

UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
OFFICE OF THE COMPTROLLER OF THE CURRENCY

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| In the Matter of: |) | |
| |) | AA-EC-2019-68 |
| Resolute Bank |) | |
| Maumee, Ohio |) | |

PROMPT CORRECTIVE ACTION DIRECTIVE

WHEREAS, the Office of the Comptroller of the Currency (“OCC”) has supervisory authority over Resolute Bank, Maumee, Ohio (“Bank”);

WHEREAS, the Bank is critically undercapitalized pursuant to 12 U.S.C. § 1831o and 12 C.F.R. Part 6; and

WHEREAS, the OCC is authorized, pursuant to 12 U.S.C. § 1831o and 12 C.F.R. Part 6, to take certain supervisory actions against significantly undercapitalized banks; and

WHEREAS, on September 10, 2019, the OCC issued a Notice of Intent to Issue a Prompt Corrective Action Decision (“Notice”) to the Bank pursuant to 12 C.F.R. § 6.21;

WHEREAS, on September 17, 2019 the Bank submitted a written response to the Notice pursuant to 12 C.F.R. § 6.22;

WHEREAS, the OCC has considered the Bank’s response to the Notice;

WHEREAS, the OCC finds it necessary in order to carry out the purpose of 12 U.S.C. § 1831o and 12 C.F.R. Part 6 to issue this Prompt Corrective Action Directive (“Directive”), requiring the Bank to immediately follow proscriptions and take actions; and

NOW THEREFORE, pursuant to the authority vested in the OCC by 12 U.S.C. § 1831o and 12 C.F.R. Part 6, the OCC, through the duly authorized representative of the Comptroller of the Currency (“Comptroller”), hereby issues this Directive.

ARTICLE I

JURISDICTION

(1) The Bank is an “insured depository institution” as that term is defined in 12 U.S.C. § 1813(c)(2) and within the meaning of 12 U.S.C. § 1831*o*.

(2) The Bank is a “federal savings association” as that term is defined in 12 U.S.C. § 1813(b), and is supervised and examined by the OCC pursuant to 12 U.S.C. § 5412(b).

(3) The OCC is “the appropriate Federal banking agency” as that term is defined in 12 U.S.C. § 1813(q) and is therefore authorized to initiate and maintain this action against the Bank pursuant to 12 U.S.C. § 1831*o*.

ARTICLE II

COMPLIANCE COMMITTEE

(1) Effective immediately upon the issuance of this Directive, the Bank’s Compliance Committee appointed and maintained pursuant to Article I of the Consent Order issued by the OCC on September 5, 2018 (“2018 Order”), shall be responsible for monitoring and overseeing the Bank’s compliance with the provisions of this Directive. The Compliance Committee shall meet at least monthly and maintain minutes of its meetings.

(2) Within ten (10) days of the issuance of this Directive and thereafter along with any written progress report submitted to the Bank’s Board of Directors (“Board”) pursuant to Article I, Paragraph (3) of the 2018 Order, or within such other period as the Director for Special Supervision (“Director”) requires in writing, the Compliance Committee shall submit a written progress report to the Board setting forth in detail a description of the:

- (a) Bank’s proposed actions to comply with each Article of this Directive;

- (b) Bank personnel responsible for implementing the corrective actions and the time frames for completion; and
- (c) the results and status of actions taken to comply with each Article of this Directive.

(3) The Board shall forward a copy of the reports required by Paragraph (2) of this Article, with any additional comments by the Board, to the Director within ten (10) days of receiving such reports.

ARTICLE III

CAPITAL RESTORATION PLAN

(1) Effective immediately upon the issuance of this Directive, the Bank is obligated to submit an acceptable capital restoration plan pursuant to, and that complies with all the requirements of, 12 U.S.C. § 1831o(e)(2) and 12 C.F.R. §§ 6.5 and 6.6.

ARTICLE IV

INSIDER LENDING AND CONFLICTS OF INTEREST

(1) Within thirty (30) days of the issuance of this Directive, the Board shall adopt, implement, and thereafter ensure Bank adherence to a written, comprehensive conflict of interest program (including revised policies and procedures) applicable to the Bank's directors, principal shareholders, executive officers, affiliates, and employees ("Insiders") and related interests of such Insiders, as defined by 12 C.F.R. § 215.3(n). The program, in addition to defining a conflict of interest, shall address:

- (a) avoidance of conflicts of interest and breaches of fiduciary duty, and the

- appearance of conflicts of interest;
- (b) involvement in the loan approval process of Insiders who may benefit directly or indirectly from the decision to grant credit;
 - (c) disclosure of actual and potential conflicts of interest to the Board, including interests in the business of a borrower, loan applicant or other customer of the bank, and periodic disclosure of related interests as defined by 12 C.F.R. § 215.3(n);
 - (d) requirements for arms-length dealing in any transactions by Insiders, or their related interests, as defined by 12 C.F.R. § 215.3(n) involving the Bank's sale, purchase, or rental of property and services;
 - (e) procedures to ensure compliance with 12 C.F.R. Part 215 (Regulation O), including but not limited to, 12 C.F.R. §§ 215.4 and 215.5;
 - (f) documentation and recordkeeping requirements to memorialize Board approvals and evidence of each Board member's vote.
 - (g) restrictions on, and disclosure of receipt of anything of value by Insiders, directly or indirectly, from borrowers, loan applicants, other customers, or suppliers of the Bank.

(2) Within (30) thirty days of the issuance of this Directive, the Board shall correct the violations of the lending limits and Regulation O including any and all renewals or modifications made thereto to such loans.

ARTICLE V

COMPLIANCE WITH GENERALLY ACCEPTED ACCOUNTING PRINCIPLES

(1) Effective immediately upon the issuance of this Directive, the Bank, subject to Board oversight, shall ensure the Bank's books and records are maintained in compliance with Generally Accepted Accounting Principles ("GAAP") and are consistent with safe and sound banking practices, including but not limited to ensuring all assets are accounted for in accordance with GAAP and appropriate adjustments are made, including on an ongoing basis, as required by any written communication from the OCC.

(2) Effective immediately upon the issuance of this Directive, the Bank shall submit a copy of all accounting policies and procedures in effect at the Bank to the Director.

(3) Effective immediately upon the issuance of this Directive, the Bank shall not make any change in accounting methods, policies, or procedures without the prior written approval of the Board and the Director's prior written determination of no supervisory objection. Any new accounting method, policy, or procedure or any change or other revision to an existing method, policy, or procedure shall be submitted to the Director for a prior written determination of no supervisory objection at least thirty (30) days prior to the effective date of such new, changed, or revised method, policy, or procedure.

(4) Upon written request by the Director, the Bank shall make appropriate modifications to its accounting methods, policies, and procedures to address any Matters Requiring Attention or citations of violation of law or regulation concerning accounting matters that the OCC may issue to the Bank following the issuance of this Directive.

ARTICLE VI

MAINTENANCE AND PRESERVATION OF ACCURATE BOOKS AND RECORDS

(1) Effective immediately upon the issuance of this Directive, the Bank, subject to Board oversight, shall ensure that all of the Bank's documents, books, and records are accurately maintained and preserved on the premises of the Bank and shall ensure that no Bank documents, books, or records are destroyed, altered, or removed from the Bank's premises until further written notice from the Director. However, such documents, books, and records may be altered and amended in the course of ordinary Bank business to accurately and timely record routine banking transactions, including but not limited to: the taking and withdrawal of deposits; the making of loans including credit presentations, loan approvals and loan histories; the receipt of loan payments; and loan payment histories.

(2) For purposes of this Article, "documents, books, and records" shall have the broadest possible meaning reasonably imaginable and shall include, without limitation, paper and electronic records of all kinds, reports, notes, calendars, phone logs, electronic mail, voice mail, financial instruments, and tapes.

(3) The Bank shall provide OCC personnel with prompt and unrestricted access to the documents, books, records, Board members, officers, and staff of the Bank. All Bank agents and representatives shall also provide OCC personnel with prompt and complete access to the documents, books, and records of the Bank.

(4) The Bank shall provide full and complete details, including but not limited to any relevant documentation, of the structure and purpose of the transactions by and between the Bank and any of its customers, transactions by and between the Bank and any of its actual or potential investors, and transactions by and between the Bank and any of its Board members,

officers, and staff to OCC personnel upon inquiry. For all such transactions, the Bank shall also disclose any current or former affiliations as well as any potential or actual conflicts of interest between the Bank's Board members, officers, and staff and the entity or person with which the Bank engaged in the transaction.

(5) Effective immediately upon the issuance of this Directive, the Bank, subject to Board oversight, shall take the necessary steps to ensure that the Bank timely files complete and accurate Consolidated Reports of Condition and Income ("Call Reports") in accordance with the Federal Financial Institutions Examination Council's "Instructions for Preparation of Consolidated Reports of Condition and Income." These steps shall include, at a minimum:

- (a) the designation of an officer with the knowledge, skills, and abilities necessary to ensure the Bank timely and accurately files its Call Reports;
- (b) training of appropriate Bank personnel in Call Report preparation;
- (c) procedures to ensure the Bank retains documentation providing an appropriate audit trail for all Call Report schedules; and
- (d) the performance of an independent review and verification of the accuracy of all Call Report schedules in advance of each Call Report filing.

(6) Effective immediately upon the issuance of this Directive, the Bank shall submit a copy of all adjustments to Call Reports to the Director upon filing or re-filing the Call Report.

ARTICLE VII

COMPENSATION, SEVERANCE PAYMENTS, AND INDEMNIFICATION PAYMENTS

(1) Effective immediately upon the issuance of this Directive, the Bank shall cease paying excessive compensation to, or on behalf of, any Bank officer.

(2) Effective immediately upon the issuance of this Directive, the Bank may not:

- (a) pay any bonus to any senior executive officer; or
- (b) provide compensation to any senior executive officer exceeding that officer's average rate of compensation (excluding bonuses, stock options, and profit sharing) during the 12 calendar months preceding the calendar month in which the Bank's PCA capital category became undercapitalized.

(3) The Bank may not make any payment described in paragraphs (1) or (2) without prior written Board approval and the Director's prior written determination of no supervisory objection.

(4) Effective immediately upon the issuance of this Directive, the Bank shall not make or agree to make any indemnification payment without the prior written approval of the Board and the Director's prior written determination of no supervisory objection. Any request for the Director's written determination of no supervisory objection shall set forth the basis under which such indemnification payment fully complies with the requirements of 12 U.S.C. § 1828(k) and 12 C.F.R. Part 359.

(5) Effective immediately upon the issuance of this Directive, the Bank shall not make or agree to make any severance payment without the prior written approval of the Board and the Director's prior written determination of no supervisory objection. Any request for the Director's written determination of no supervisory objection shall set forth the basis under which such severance payment fully complies with the requirements of 12 U.S.C. § 1828(k) and 12 C.F.R. Part 359.

ARTICLE VIII

ALLOWANCE FOR LOAN AND LEASE LOSSES METHODOLOGY

(1) Within thirty (30) days of the issuance of this Directive, the Board shall adopt written policies and procedures for maintaining an adequate allowance for loan and lease losses (“ALLL”) in accordance with GAAP. Refer to OCC Bulletin 2006-47 and OCC Bulletin 2001-37 for guidance. The ALLL policies and procedures shall at a minimum include:

- (a) procedures for determining whether a loan is impaired and measuring the amount of impairment, consistent with GAAP (including FASB ASC 310-10, Receivables - Overall - Subsequent Measurement - Impairment);
- (b) procedures for segmenting the loan portfolio and estimating loss on groups of loans that are consistent with GAAP (including FASB ASC 450-20, Loss Contingencies). These procedures shall require the Bank to document its estimation of credit losses and its analysis of the nine qualitative factors set forth in the Interagency Statement;
- (c) procedures for validating the ALLL methodology;
- (d) support for each of the qualitative factor adjustments and impairment analysis calculations included in the written analysis;
- (e) a process for summarizing and documenting, for the Board’s prior review and approval, the amount to be reported in the Call Reports for the ALLL; and
- (f) a description of the individuals responsible and methodology used to determine the ALLL.

(2) Within thirty (30) days of the issuance of this Directive, the Board shall adopt written policies and procedures to ensure that all official and regulatory reports filed by the Bank accurately reflect an adequate ALLL balance as of the date that such reports are submitted. Any difference between the ALLL balance as determined by the analysis required by this Article the Bank's actual ALLL balance shall be remedied through appropriate account adjustments in the quarter it is discovered, prior to the filing of the Call Reports.

(3) Upon adoption, the Board shall submit a copy of the policies and procedures required by this Article, or any subsequent amendments or changes to those policies and procedures, to the Director for a written determination of no supervisory objection. Upon receiving a written determination of no supervisory objection from the Director, the Board shall implement and thereafter ensure adherence to the policies and procedures.

ARTICLE IX

RISK RATING AND NONACCRUAL RECOGNITION

(1) Effective immediately upon the issuance of this Directive, the Board shall ensure that the risk associated with the Bank's loans and other assets is properly reflected and accounted for in the Bank's books and records and that the Bank properly recognizes income.

(2) Within thirty (30) days of the issuance of this Directive, the Board shall implement and adhere to a written program, which at a minimum shall:

- (a) employ a risk grading system that ensures the timely and accurate classification of credits; for guidance, see OCC Bulletin 2000-20 and the "Rating Credit Risk" Booklet of the Comptroller's Handbook;

- (b) incorporate a process to ensure that risk ratings are timely accurately assigned by lending officers at loan origination and on a sustained basis thereafter, and that such risk ratings are based on the receipt, analysis, and stress testing of current and satisfactory financial information;
- (c) incorporate a process to ensure that risk ratings are supported by accurate collateral valuation and analysis at origination and on an on-going basis thereafter;
- (d) incorporate a process to ensure the Bank's loans and other assets are timely placed on nonaccrual where appropriate in accordance with the Instructions for Call Report;
- (e) incorporate processes to ensure that risk ratings of unsecured loans and non-followed lines of credit are based on current and satisfactory information about the borrower's financial condition and credit worthiness;
- (f) require that appropriate analysis and documentation is maintained in the credit files to support the current and previous risk rating and accrual determination for each credit relationship; and
- (g) incorporate management information systems that provide feedback to the Board about the effectiveness of the program from senior management and the individual lending officers at least quarterly.

(3) Upon adoption, the Board shall forward a copy of the written program adopted

pursuant to this Article to the Director.

ARTICLE X
LOAN REVIEW

(1) Within thirty (30) days of the issuance of this Directive, the Board shall adopt, and the Bank, subject to Board review and ongoing monitoring, shall implement and thereafter ensure adherence to an effective and ongoing independent loan review program to review, at least quarterly, the Bank's loan and lease portfolios to assure the timely identification and categorization of problem credits. The program shall provide for a written report to be filed with the Board or committee thereof promptly after each review. Such written reports shall include, at a minimum, conclusions regarding the following:

- (a) the loan review scope and coverage parameters;
- (b) the overall quality of the loan and lease portfolios;
- (c) the overall underwriting and approval process;
- (d) the overall credit administration process;
- (e) the volume and types of concentrations of credit and corresponding internal risk management;
- (f) the identification, type, rating, and amount of problem loans and leases;
- (g) the identification and amount of delinquent and nonaccrual loans and leases;
- (h) loans and leases to the directors, executive officers, and principal shareholders of the Bank and to their related interests;
- (i) credit underwriting, collateral documentation, and lien perfection;
- (j) credit analysis and documentation of such analysis;
- (k) accuracy of internal risk ratings;

- (l) completeness and effectiveness of problem loan workout plans;
- (m) the independence and appropriateness of the collateral valuation process;
- (n) the accuracy of the Bank's recognition of troubled debt restructurings;
- (o) the identity of the loan officer(s) of each of the loans reported in accordance with subparagraphs (b) through (h);
- (p) the identification and status of credit-related violations of law, rule, or regulation;
- (q) adequacy of the Bank's ALLL; and
- (r) loans and leases and other extensions of credit in nonconformance with the Bank's lending and leasing policies, and exceptions to the Bank's lending and leasing policies.

(2) The Board shall evaluate the loan and lease review report(s), upon receipt, and shall ensure that the Bank takes immediate, adequate, and continuing remedial action, as appropriate, upon all findings noted in the report(s). At least quarterly, the Bank shall provide written reports to the Board on the remedial actions taken by the Bank regarding findings noted in the loan review report(s). The Board shall also ensure that the Bank preserves documentation of any actions taken by the Bank to collect or strengthen assets identified as problem credits.

ARTICLE XI

CREDIT ADMINISTRATION

(1) Within thirty (30) days of the issuance of this Directive, and every thirty (30) days thereafter, Bank management shall provide the Board with a written report that includes:

- (a) disclosure of actual and potential conflicts of interest, and of related interests as defined in 12 C.F.R. Part 215;
- (b) disclosure of any Bank officer's or director's material interest in the business of or relationship to a borrower, an applicant, or other customer of the Bank;
- (c) a list of each loan or borrowing relationship that is due for annual review pursuant to internal policy requirements including the due date for the review, and the status of the review;
- (d) a list of loans where the security interest in the collateral has not been perfected.

(2) The Board shall ensure proper credit administration and that management takes corrective action to remedy any conflicts, deficiencies, or noncompliance with internal policy requirements based on the reported information. Specifically, the Board must at a minimum ensure:

- (a) adequate oversight and timely corrective action for loans to one borrower that violate general legal lending limits;
- (b) timely and complete annual reviews of credits or credit relationships that require such reviews based on internal policy standards;
- (c) timely perfection of security interest in collateral for loans, and analysis of the loan portfolio to identify and correct any transactions where security interest in the collateral is not properly perfected.

ARTICLE XII

THIRD-PARTY CONTRACTS

(1) Effective immediately upon the issuance of this Directive, the Bank shall not enter into any new contracts with or engage any vendor, contractor, or other third party (collectively, “third party”) for any services without the Director’s prior written determination of no supervisory objection. This includes, but is not limited to, any contract with a third party to assist in the sale, merger, or recapitalization of the Bank that requires the payment of anything other than the third party’s reasonable expenses prior to such sale, merger, or recapitalization or that requires the Bank to pay, directly or indirectly, the cost of performing due diligence, or other services related to the transaction.

(2) Any request for the Director’s written determination of no supervisory objection shall be in writing and shall include:

- (a) a description of the services to be performed by the third party, including a copy of the proposed contract or engagement;
- (b) a description of the Bank’s due diligence process for agreeing to the services to be performed; and
- (c) a determination by the Board that:
 - (i) the activities to be performed by the third party are fair and reasonable to the Bank;
 - (ii) the parties are able to perform under the contract or commitment;
 - (iii) the fees the Bank is required to pay to the third party are reasonable for the services provided; and
 - (iv) the contract is in the best interests of the Bank.

(3) Following any written determination of no supervisory objection by the Director, the Bank, subject to Board oversight, shall regularly monitor the third party's performance to ensure that the third party is complying with the written contract or engagement. The Board shall immediately take appropriate action if the third party is not complying with the written contract or engagement and shall maintain documentation of any such actions.

ARTICLE XIII

OTHER ACTIONS REQUIRED

(1) Effective immediately upon issuance of this Directive, the Bank shall not take any of the following actions without the prior written approval of the Board and the Director's prior written determination of no supervisory objection:

- (a) enter into any new product or service, or undertake a significant expansion of any existing product or service;
- (b) enter into any material transaction, including but not limited to any investment, expansion, acquisition, or other similar action;
- (c) engage in the sale or transfer of any Bank asset;
- (d) amend the Bank's charter or bylaws, except to the extent necessary to carry out any other requirement of law, regulation, or order;
- (e) transfer any asset to a current or former institution-affiliated party of the Bank (collectively, "IAP"), as that term is defined in 12 U.S.C. § 1813(u), an IAP's related interests including but not limited to any family member, an affiliate, as defined by 12 U.S.C. § 371c, or to the Bank's holding company or other affiliated party or person; and

(f) engage in any transaction for the transfer of funds, the extension of credit, the acceptance or transference of risk, and/or the conferring of another type of benefit, directly or indirectly, involving any Bank affiliates, as that term is defined in 12 U.S.C. § 371c, or current or former Board members, shareholders, senior executive officers, or their respective family members.

(2) The Bank shall cooperate fully with the efforts of the Federal Deposit Insurance Corporation (“FDIC”) to avoid a loss or otherwise minimize exposure to the Deposit Insurance Fund. Such cooperation includes, but is not limited to, timely responding to requests for information, providing full access to personnel, agents, and third parties, accommodating on-site visits, and permitting the FDIC to provide otherwise confidential information to third parties to facilitate the liquidation or other resolution of the Bank in anticipation of the possible appointment of the FDIC as conservator, receiver, or other legal custodian.

ARTICLE XIV

GENERAL BOARD RESPONSIBILITIES

(1) The Board shall ensure that the Bank has timely adopted and implemented all corrective actions required by this Directive, and shall verify that the Bank adheres to the corrective actions and they are effective in addressing the Bank’s deficiencies that resulted in this Directive.

(2) In each instance in which this Directive imposes responsibilities upon the Board, including but not limited to oversight, it is intended to mean that the Board shall:

- (a) authorize, direct, and adopt corrective actions on behalf of the Bank as may be necessary to perform the obligations and undertakings imposed on the Board by this Directive;
- (b) ensure the Bank has sufficient processes, management, personnel, control systems, and corporate and risk governance to implement and adhere to all provisions of this Directive;
- (c) require that Bank management and personnel have sufficient training and authority to execute their duties and responsibilities pertaining to or resulting from this Directive;
- (d) hold Bank management and personnel accountable for executing their duties and responsibilities pertaining to or resulting from this Directive;
- (e) require appropriate, adequate, and timely reporting to the Board by Bank management of corrective actions directed by the Board to be taken under the terms of this Directive; and
- (f) address any noncompliance with corrective actions in a timely and appropriate manner.

ARTICLE XV

CLOSING

- (1) This Directive constitutes a final order under 12 U.S.C. § 1831*o* and is enforceable under 12 U.S.C. § 1818(i).
- (2) The provisions of this Directive supplement, and do not replace or supersede, the requirements of the 2018 Order. Notwithstanding this Directive, the Bank remains under a

continuing obligation to comply with the 2018 Order, comply with applicable laws and regulations, including but not limited to the requirement that the Bank submit an acceptable capital restoration plan, and operate safely and soundly.

(3) It is expressly and clearly understood that if, at any time, the OCC deems it appropriate to undertake any action affecting the Bank or any IAP, nothing in this Directive shall in any way inhibit, estop, bar, or otherwise prevent the OCC from so doing.

(4) Nothing in this Directive is a release, discharge, compromise, settlement, dismissal, or resolution of any actions, or in any way affects any actions that may be or have been brought by any other representative of the United States or an agency thereof, including, without limitation, the United States Department of Justice.

(5) This Directive is effective upon its issuance by the OCC, through the Comptroller's duly authorized representative. Except as otherwise expressly provided herein, all references to "days" in this Directive shall mean calendar days and the computation of any period of time imposed by this Directive shall not include the date of the act or event that commences the period of time. The provisions of this Directive shall remain effective except to the extent that, and until such time as, such provisions are amended, suspended, waived, or terminated in writing by the OCC, through the Comptroller's duly authorized representative. The Bank may, upon a change in circumstances, submit a request for modification or rescission of this Directive, including a request for an extension, amendment, suspension, waiver, or termination of any provision of this Directive or within any plan or program submitted pursuant to this Directive, to the OCC pursuant to 12 C.F.R. § 6.24. Any such request shall be submitted in writing to the Director, shall include a statement setting forth in detail the change in circumstances, and shall be accompanied by relevant supporting documentation. The OCC's

decision concerning a request submitted pursuant to this paragraph, which will be communicated to the Board in writing, is final and not subject to further review. During the review of any such request, this Directive shall remain in effect.

(6) The Bank will not be deemed to be in compliance with this Directive until it has adopted, implemented, and adhered to all of the corrective actions set forth in each Article of this Directive; the corrective actions are effective in addressing the Bank's deficiencies; and the OCC has verified and validated the corrective actions. An assessment of the effectiveness of the corrective actions requires sufficient passage of time for the Bank to demonstrate the sustained effectiveness of the corrective actions.

(7) This Directive is not a contract binding on the United States, the United States Treasury Department, the OCC, or any officer, employee, or agent of the OCC and neither the Bank nor the OCC intends this Directive to be a contract.

(8) Each citation, guidance, or issuance referenced in this Directive includes any subsequent citation, guidance, or issuance that replaces, supersedes, amends, or revises the referenced cited citation, guidance, or issuance.

(9) The terms of this Directive, including this paragraph, are not subject to amendment or modification by any extraneous expression, prior agreements, or prior arrangements between the parties, whether oral or written.

(10) All reports, plans, or programs submitted to the Director pursuant to this Directive shall be forwarded via electronic mail to the Director.

IT IS SO ORDERED, this 18th day of September, 2019.

//s// Digitally Signed, Date: 2019.09.18

Julie A. Thieman

Director for Special Supervision