FEDERAL DEPOSIT INSURANCE CORPORATION
WASHINGTON, D.C.

AND

STATE OF MICHIGAN
OFFICE OF FINANCIAL AND INSURANCE REGULATION

In the Matter of CLARKSTON STATE BANK Clarkston, Michigan (INSURED STATE NONMEMBER BANK)	ORDER TO CEASE AND DESIST FDIC-08-056b

Clarkston State Bank, Clarkston, Michigan ("Bank"), having been advised of its right to a NOTICE OF CHARGES AND OF HEARING detailing the unsafe or unsound banking practices and violations of law, rule, or regulation alleged to have been committed by the Bank, and of its right to a hearing on the charges under section 8(b) of the Federal Deposit Insurance Act ("Act"), 12 U.S.C. § 1818(b), and under section 2304 of the Banking Code of 1999, Mich. Comp. Laws § 487.12304, regarding hearings before the Office of Financial and Insurance Regulation for the State of Michigan ("OFIR"), and having waived those rights, entered into a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO CEASE AND DESIST ("CONSENT AGREEMENT") with representatives of the Federal Deposit Insurance Corporation (“FDIC”) and OFIR, dated May 22, 2008, whereby, solely for the purpose of this proceeding and without admitting or denying the charges of unsafe or unsound banking practices and violations of law, rule, or regulation, the Bank consented to the issuance of an ORDER TO CEASE AND DESIST (“ORDER”) by the FDIC and OFIR.

The FDIC and OFIR considered the matter and determined that they had reason to believe that the Bank had engaged in unsafe or unsound banking practices and had violated laws, rules, or regulations. The FDIC and OFIR, therefore, accepted the CONSENT AGREEMENT and issued the following:

IT IS HEREBY ORDERED, that the Bank, its institution-affiliated parties, as that term is defined in section 3(u) of the Act, 12 U.S.C. § 1813(u), and its successors and assigns, cease and desist from the following unsafe or unsound banking practices and violation of law, rule, or regulation:

A) Engaging in unsatisfactory lending and collection practices, including, but not limited to: extending credit with inadequate diversification of risk; and, extending an excessive concentration of its loan portfolio to borrowers with subprime characteristics, as described on page 4 of the Report of Examination dated October 29, 2007 (“Report of Examination”);

B) Operating with an excessive level of adversely classified loans;

C) Operating with an inadequate level of capital protection for the kind and quality of assets held;

D) Operating in such a manner as to produce low earnings;

E) Operating with an inadequate allowance for loan and leases losses for the volume, kind and quality of loans and leases held;

F) Operating with an inadequate plan for addressing liquidity;

G) Operating with inadequate loan rating system;

H) Operating with inadequate policies or procedures to ensure proper tax payment and allocation between the Bank and its holding company;

I) Operating in violation of law, rule, or regulation as described on pages 21 and 22 of the Report of Examination;

J) Operating with management whose policies and practices are detrimental to the Bank and jeopardize the safety of its deposits; and

K) Operating with a board of directors which has failed to provide adequate supervision over and direction to the active management of the Bank.

IT IS FURTHER ORDERED, that the Bank, its institution-affiliated parties, and its successors and assigns, take affirmative action as follows:

1. (a) During the life of this ORDER, the Bank shall have and thereafter retain qualified management. Each member of management shall have the qualifications and experience commensurate with his or her duties and responsibilities at the Bank. Each member of management shall be provided appropriate written authority from the Bank’s board of directors to implement the provisions of this ORDER.

(b) The qualifications of management shall be assessed on its ability to:

(i) comply with the requirements of this ORDER;

(ii) operate the Bank in a safe and sound manner;

(iii) comply with applicable laws and regulations; and

(iv) restore all aspects of the Bank to a safe and sound condition, including asset quality, capital adequacy, earnings, management effectiveness, liquidity, and sensitivity to market risk.

(c) During the life of this ORDER, the Bank shall notify the Regional Director of the Chicago Regional Office of the FDIC (“Regional Director”) and the Acting Chief Deputy Commissioner of the OFIR (“Commissioner”) in writing of any changes in any of the Bank’s directors or senior executive officers. For purposes of this ORDER, “senior executive officer” is defined as in section 32 of the Act (“section 32”), 12 U.S.C. § 1831(i), and section 303.101(b) of the FDIC Rules and Regulations, 12 C.F.R. § 303.101(b), and includes any person identified by the FDIC and the OFIR, whether or not hired as an employee, with significant influence over, or who participates in, major policymaking decisions of the Bank.

(d) Prior to the addition of any individual to the board of directors or the employment of any individual as a senior executive officer, the Bank shall comply with the requirements of section 32 and Subpart F of Part 303 of the FDIC Rules and Regulations, 12 C.F.R. §§ 303.100-

303.104. Further, the Bank shall request and obtain the Commissioner’s written approval prior to the addition of any individual to the board of directors and the employment of any individual as a senior executive officer.

2. (a) Within ninety (90) days from the effective date of this ORDER, the Bank shall develop a written analysis and assessment of the Bank’s management needs (“Management Study”) for the purpose of providing qualified management for the Bank.

(b) The Management Study shall be developed within 90 days from the effective date of this ORDER. For purposes of this subparagraph (b), the term “Bank officer” shall be defined to include: all individuals with the title, responsibilities or duties of Assistant Vice President or Department Head; all individuals supervising, managing or overseeing individuals serving as an Assistant Vice President or Department Head; and any employees of any affiliate serving as an Assistant Vice President or Department Head or supervising, managing or overseeing an Assistant Vice President or Department Head. The Management Study shall include, at a minimum:

(i) Identification of both the type and number of officer positions needed to properly manage and supervise the affairs of the Bank;

(ii) Identification and establishment of such Bank committees as are needed to provide guidance and oversight to active management;

(iii) Evaluation of all Bank officers to determine whether these individuals possess the ability, experience and other qualifications required to perform present and anticipated duties, including adherence to the Bank's established policies and practices, and restoration and maintenance of the Bank in a safe and sound condition;

(iv) Evaluation of all Bank officers' compensation, including salaries, director fees, and other benefits;

(v) A plan to recruit and hire any additional or replacement personnel with the requisite ability, experience and other qualifications to fill those officer positions identified by this paragraph of this ORDER;

(vi) A plan to ensure the Bank has personnel available to competently perform temporarily in key management positions.

(c) The Management Study shall be submitted to the Regional Director and Commissioner for review and comment upon its completion. Within thirty (30) days from the receipt of any comments from the Regional Director and Commissioner and after the adoption of any recommended changes, the Bank shall approve the Management Study, and record such approval in the minutes of the board of directors’ meeting. Thereafter, the Bank shall implement and follow the Management Study.

3. From the effective date of this ORDER, the board of directors shall increase its participation in the affairs of the Bank, assuming full responsibility for the approval of sound policies and objectives and for the supervision of all of the Bank's activities, consistent with the role and expertise commonly expected for directors of Banks of comparable size. This participation shall include meetings to be held no less frequently than monthly at which, at a minimum, the following areas shall be

reviewed and approved: reports of income and expenses; new, overdue, renewal, insider, charged-off, and recovered loans; investment activity; operating policies; and individual committee actions. Board minutes shall document these reviews and approvals, including the names of any dissenting directors.

4. (a) As of September 30, 2008, the Bank’s Tier 1 capital as a percentage of its total assets (“capital ratio”) shall be at least 8 percent. As of December 31, 2008, the Bank’s Tier 1 capital ratio shall be at least 9 percent. For purposes of this ORDER, Tier 1 capital and total assets shall be calculated in accordance with Part 325 of the FDIC Rules and Regulations (“Part 325”), 12 C.F.R. Part 325.

(b) Within 30 days from the last day of each calendar quarter following the effective date of this ORDER and commencing with the calendar quarter ending March 31, 2009, the Bank shall determine from its Report of Condition and Income its level of Tier 1 capital as a percentage of its total assets (“capital ratio”) for that calendar quarter. If the capital ratio is less than 9 percent, the Bank shall, within 60 days of the date of the required determination, increase its capital ratio to not less than

9 percent calculated as of the end of that preceding quarterly period.

(c) Any such increase in Tier 1 capital may be accomplished by the following:

(i) The sale of common stock and noncumulative perpetual preferred stock constituting Tier 1 capital under Part 325; or

(ii) The elimination of all or part of the assets classified “Loss” in the Report of Examination, without loss or liability to the Bank, provided any such collection on a partially charged-off asset shall first be applied to that portion of the asset which was not charged off pursuant to this ORDER; or

(iii) The collection in cash of assets previously charged off; or

(iv) The direct contribution of cash by the directors and/or the shareholders of the Bank; or

(v) Any other means acceptable to the Regional Director and the Commissioner; or

(vi) Any combination of the above means.

(d) If all or part of any increase in capital required by this paragraph is to be accomplished by the sale of new securities, the board of directors of the Bank shall adopt and implement a plan for the sale of such additional securities, including the voting of any shares owned or proxies held by or controlled by them in favor of said plan. Should the implementation of the plan involve public distribution of Bank securities, including a distribution limited only to the Bank’s existing shareholders, the Bank shall prepare detailed offering materials fully describing the securities being offered, including an accurate description of the financial condition of the Bank and the circumstances giving rise to the offering, and other material disclosures necessary to comply with Federal securities laws. Prior to the implementation of the plan and, in any event, not less than 20 days prior to the dissemination of such materials, the materials used in the sale of the securities shall be submitted to the FDIC Registration and Disclosure Section, 550 17th Street, N.W., Washington, D.C. 20429 and to the

Commissioner, Office of Financial and Insurance Regulation, 611 West Ottawa Street, Lansing, Michigan 48933, for their review. Any changes requested to be made in the materials by the FDIC or OFIR shall be made prior to their dissemination.

(e) In complying with the provisions of this paragraph, the Bank shall provide to any subscriber and/or purchaser of Bank securities written notice of any planned or existing development or other changes which are materially different from the information reflected in any offering materials used in connection with the sale of Bank securities. The written notice required by this paragraph shall be furnished within 10 calendar days of the date any material development or change was planned or occurred, whichever is earlier, and shall be furnished to every purchaser and/or subscriber of the Bank's original offering materials.

(f) The capital ratio analysis required by this paragraph shall not negate the responsibility of the Bank and its board of directors for maintaining throughout the year an adequate level of capital protection for the kind, quality and degree of market depreciation of assets held by the Bank.

5. (a) Within sixty (60) days from the effective date of this ORDER, the Bank shall develop, adopt and implement a written plan to reduce the Bank's risk position in each asset in excess of $100,000 which is classified "Substandard" in the Report of Examination. In developing such plan, the Bank shall, at a minimum:

(i) Review the financial position of each such borrower, including source of repayment, repayment ability, and alternative repayment sources; and

(ii) Evaluate the available collateral for each such credit, including possible actions to improve the Bank's collateral position.

(b) Such plan shall include, but not be limited to:

(iii) Dollar levels to which the Bank shall reduce each asset within six months and twelve months from the effective date of this ORDER; and

(iv) Provisions for the submission of monthly written progress reports to the Bank's board of directors for review and notation in minutes of the meetings of the board of directors.

(c) As used in this paragraph, “reduce” means to: (1) collect; (2) charge-off; or (3) improve the quality of such assets so as to warrant removal of any adverse classification by the FDIC or OFIR.

(d) The plan shall be in a form and manner acceptable to the Regional Director and Commissioner as determined at subsequent examinations and/or visitations.

6. Within ten (10) days from the effective date of this ORDER, the Bank shall eliminate from its books, by charge-off or collection, all assets or portions of assets classified “Loss” in the Report of Examination that have not been previously collected or charged-off. Elimination or reduction of these assets with the proceeds of other Bank extensions of credit is not considered collection for the purpose of this paragraph.

7. (a) As of the effective date of this ORDER, the Bank shall not extend, directly or indirectly, any additional credit to, or for the benefit of, any borrower who is already obligated in any manner to the Bank on any extensions of credit (including any portion thereof) that has been charged off the books of the Bank or classified “Loss” so long as such credit remains uncollected.

(b) As of the effective date of this ORDER, the Bank shall not extend, directly or indirectly, any additional credit to, or for the benefit of, any borrower whose loan or other credit has been classified "Substandard" and is uncollected unless the Bank's board of directors has adopted, prior to such extension of credit, a detailed written statement giving the reasons why such extension of credit is in the best interest of the Bank. A copy of the statement shall be placed in the appropriate loan file and shall be incorporated in the minutes of the applicable board of directors' meeting.

8. Within 60 days from the effective date of this ORDER, the Bank shall adopt and implement a written plan for the reduction and collection of delinquent loans. The plan shall include, but not be limited to, provisions which:

(i) prohibit the extension of credit for the payment of interest;

(ii) establish acceptable guidelines for the collection of delinquent credits;

(iii) establish dollar levels to which the Bank shall reduce delinquencies within six and twelve months from the effective date of this ORDER; and

(iv) provide for the submission of monthly written progress reports to the Bank's board of directors for review and notation in minutes of the meetings of the board of directors. As used in this paragraph, "reduce" means to collect, charge-off or improve the quality of such assets so they would no longer be considered delinquent by the FDIC or OFIR.

9. (a) Within 60 days from the effective date of this ORDER, the Bank shall formulate and submit to the Regional Director and Commissioner a written plan to reduce the commercial real estate loan concentration identified in the Report of Examination as a percentage of the Bank's total Tier 1 capital. Such plan shall prohibit any additional advances that would increase the concentrations or create new concentrations and shall include, but not be limited to:

(i) Dollar levels to which the Bank shall reduce the commercial real estate concentration within six and twelve months from the effective date of this ORDER; and

(ii) Provisions for the submission of monthly written progress reports to the Bank’s board of directors for review and notation in minutes of the meetings of the board of directors. As used in this paragraph, “reduce” means to: (1) collect; (2) charge-off; or (3) improve the quality of such assets so as to warrant removal of any adverse classification by the FDIC or OFIR.

(b) Within 30 days from receipt of any comment from the Regional Director and Commissioner, and after the adoption of any recommended changes, the Bank shall approve the plan, which approval shall be recorded in the minutes of a board of directors’ meeting. Thereafter, the Bank shall implement and follow the plan.

10. Within 60 days from the effective date of this ORDER, the Bank shall formulate and submit to the Regional Director and Commissioner for review and comment a written plan to reduce the Bank’s level of loans to borrowers with subprime characteristics (as described on page 4 of the Report of Examination) to not more than 25 percent of the Bank’s total Tier 1 capital. A copy of the written plan

shall be submitted to the Regional Director and Commissioner upon its completion. Such plan shall prohibit any additional advances that would increase the levels of loans to borrowers with subprime characteristics and shall include, but not be limited to:

(a) Dollar levels to which the Bank shall reduce the level of loans to borrowers with subprime characteristics within six and twelve months from the effective date of this ORDER; and

(b) Provisions for the submission of monthly written progress reports to the Bank's board of directors for review and notation in minutes of the meetings of the board of directors. As used in this paragraph, "reduce" means to: (1) collect; (2) charge-off; or (3) sell or otherwise remove the loans from the Bank's books.

11. (a) Within ninety (90) days from the effective date of this ORDER, the Bank shall provide monthly reports to the board stratifying loans by credit score and other underwriting fundamentals appropriate to each type of portfolio.

(b) For the part of the stratification that include loans to borrowers with subprime characteristics (as described on page 4 of the Report of Examination), the report shall include a list of the borrower's ratios for debt-to-income and, when appropriate, loan-to-value in order to support the degree to which the low credit score may be mitigated by other strengths in the credit decision.

12. (a) Within ninety (90) days from the effective date of this ORDER, the Bank shall revise its internal loan procedures to periodically review the Bank’s loan portfolios and identify and categorize problem credits and to assess the overall quality of the Bank’s loan portfolio. The loan review procedures shall, at a minimum:

(i) Establish procedures to confirm the accuracy of all risk grades assigned by the Bank's loan officers;

(ii) Establish procedures to address concentrations of credit and diversification of risk, including goals for portfolio mix, establishment of limits within loan and other asset categories, and development of a tracking and monitoring system for the economic and financial condition of specific geographic locations, industries, and groups of borrowers;

(iii) Establish procedures to identify deteriorating loans which ensure the timely placement of credits on the watch list;

(iv) Require for each loan identified as a watch list loan, a written statement maintained in the appropriate credit files of the reason(s) why such loan merits special attention;

(v) Require compliance with requirements found in the FFIEC Instructions for the Reports of Condition and Income for charge off of collateral dependent loans;

(vi) Require monthly written reports to the Board of the status of each watch list loan and the action(s) taken by Bank management to improve the Bank's position on each watch list loan; and

(vii) Establish procedures for charging off loans which, at a minimum, comply with the standards set forth in the FDIC’s Uniform Retail Credit

Classification and Account Management Policy.

(b) A copy of the reports submitted to the board, as well as documentation of the action taken by the Bank to collect or strengthen assets identified as problem credits, shall be kept with the minutes of the board of directors.

13. (a) Prior to submission or publication of all Reports of Condition and Income required by the FDIC after the effective date of this ORDER, the board of directors of the Bank shall review the adequacy of the Bank’s allowance for loan and lease losses (“ALLL”), provide for an adequate ALLL, and accurately report the same. The minutes of the board meeting at which such review is undertaken shall indicate the findings of the review, the amount of increase in the ALLL recommended, if any, and the basis for determination of the amount of ALLL provided. In making these determinations, the board of directors shall consider the FFIEC Instructions for the Reports of Condition and Income and any analysis of the Bank’s ALLL provided by the FDIC or OFIR.

(b) Throughout the duration of this ORDER, the Bank shall maintain an ALLL in accordance with the

Interagency Policy Statement on the Allowance for Loan and Lease Losses.

(c) ALLL entries required by this paragraph shall be made prior to any Tier 1 capital determinations required by this ORDER.

14. (a) Within sixty (60) days from the effective date of this ORDER, the Bank shall formulate, adopt and implement a written profit plan and a realistic, comprehensive budget for all categories of income and expense for calendar year 2008. Thereafter, for every calendar year during the life of this ORDER, and beginning with calendar year 2009, the Bank shall prepare a written profit plan and a realistic, comprehensive budget for all categories of income and expense and shall complete each plan and budget at least 30 days prior to the beginning of the applicable calendar year. The plans required by this paragraph shall contain formal goals and strategies, consistent with sound banking practices, to reduce discretionary expenses and to improve the Bank's overall earnings, and shall contain a description of the operating assumptions that form the basis for major projected income and expense components. A copy of each such plan and budget shall be submitted to the Regional Director and Commissioner upon its completion.

(b) The written profit plan shall address, at a minimum:

(i) Realistic growth and margin assumptions;

(ii) Realistic core deposit growth projections and strategies associated therewith;

(iii) Maintenance of an adequate Allowance for Loan and Lease Losses (“ALLL”); and

(iv) Clear assignment of responsibilities for implementing the written profit plan.

(c) Within thirty (30) days from the end of each calendar quarter following completion of the profit plans and budgets required by this paragraph, the Bank’s board of directors shall evaluate the Bank’s actual performance in relation to the plan, record the results of the evaluation, and note any actions taken by the Bank in the minutes of the board of directors’ meeting at which such evaluation is undertaken.

(d) The plan shall be in a form and manner acceptable to the Regional Director and Commissioner as determined at subsequent examinations and/or visitations.

15. (a) Within 90 days from the effective date of this ORDER, the Bank shall formulate and adopt a realistic, comprehensive strategic plan. The plan required by this paragraph shall contain an assessment of the Bank's current financial condition and market area, and a description of the operating assumptions that form the basis for major projected income and expense components.

(b) The written strategic plan shall address, at a minimum:

(i) An assessment of the Bank's current financial condition;

(ii) Strategies for pricing policies and asset/liability management; and

(iii) Financial goals, including pro forma statements for asset growth, capital adequacy, and earnings.

(c) The Bank will submit the strategic plan to the Regional Director and Commissioner for review and comment. After consideration of all such comments, the Bank shall approve the plan, which approval shall be recorded in the minutes of a board of directors' meeting.

(d) Within 30 days from the end of each calendar quarter following the effective date of this ORDER, the Bank's board of directors shall evaluate the Bank's actual performance in relation to the strategic plan required by this paragraph and record the results of the evaluation, and any actions taken by the Bank, in the minutes of the board of directors’ meeting at which such evaluation is undertaken.

(e) The strategic plan required by this ORDER shall be revised and submitted to the Regional Director and Commissioner for review and comment 30 days prior to the end of each calendar year for which this ORDER is in effect. Within 30 days of receipt of all such comments from the Regional Director and Commissioner, and after consideration of all such comments, the Bank shall approve the revised plan, which approval shall be recorded in the minutes of a board of directors’ meeting. Thereafter, the Bank shall implement the revised plan.

16. (a) Within sixty (60) days from the effective date of this ORDER, the Bank shall develop, adopt and implement a written plan addressing liquidity, the Bank’s relationship of volatile liabilities to temporary investments, rate sensitivity objectives, and overall asset/liability management. Annually thereafter during the life of this ORDER, the Bank shall review this plan for adequacy and, based upon such review, shall make appropriate revisions to the plan that are necessary to

strengthen funds management procedures and maintain adequate provisions to meet the Bank’s liquidity needs. The initial plan shall include, at a minimum, provisions:

(i) Establishing contingency plans by identifying alternative courses of action designed to meet the Bank’s liquidity needs;

(ii) Requiring review of interest rate risk measurement and management reports by the board of directors on a quarterly basis;

(iii) Establish an adequate model for managing and monitoring the Bank's interest rate risk utilizing reasonable documented assumptions;

(iv) Requiring independent testing of the interest rate risk measurement and monitoring system on an annual basis;

(v) Establishing reasonable policy limits for changes in interest rate risk exposures as estimated by the Bank’s interest rate risk measurement system;

(vi) Establishing procedures for managing the Bank’s sensitivity to interest rate risk that comply with the Joint Agency Statement of Policy on Interest Rate Risk (June 26, 1996), and the Joint Supervisory Statement on Investment Securities and End-user Derivative Activities (April 23, 1998); and

(vii) Requiring revising and approving investment and funds management policies at least annually.

(b) The plan shall be in a form and manner acceptable to the Regional Director and Commissioner as determined at subsequent examinations and/or visitations.

17. (a) Within sixty (60) days from the effective date of this ORDER, the Bank shall review all of the Bank’s tax accounts and maintain supporting documentation for each account as well as the Bank’s carryback and carryforward position, on a stand-alone basis.

(b) Within 60 days from the effective date of this ORDER, the Bank shall develop, adopt and implement a written policy satisfactory to the Regional Director and the Commissioner, which policy shall govern the relationship between the Bank and its holding company, and shall include a tax allocation provision consistent with the Interagency Policy Statement on Income Tax Allocation in a Holding Company Structure dated November 5, 1998 (63 Fed. Reg. 64757.)

18. As of the effective date of this ORDER, the Bank shall not declare or pay any cash dividend without the prior written consent of the Regional Director and Commissioner.

19. (a) Within thirty (30) days from the effective date of this ORDER, the Bank shall eliminate and/or correct all violations of laws, rules, and regulations listed in the Report of Examination.

(b) Within 60 days from the effective date of this ORDER, the Bank shall implement procedures to ensure future compliance with all applicable laws, rules, and regulations.

20. (a) Within 30 days from the end of each calendar quarter following the effective date of this ORDER, the Bank shall furnish to the Regional Director and Commissioner written progress reports signed by each member of the Bank's board of directors, detailing the actions taken to secure compliance with the ORDER and the results thereof.

(b) Such reports may be discontinued when the corrections required by this ORDER have been accomplished and the Regional Director and Commissioner have, in writing, released the Bank from making further reports.

21. Following the effective date of this ORDER, the Bank shall send to its shareholders a copy or description of this ORDER: (1) in conjunction with the Bank’s next shareholder communication; and (2) in conjunction with its notice or proxy statement preceding the Bank’s next shareholder meeting. The description shall fully describe this ORDER in all material respects. The description and any accompanying communication, notice or statement shall be sent to the FDIC Registration and Disclosure Section, 550 17th Street, N.W., Washington, D.C. 20429 and to the OFIR, 611 West Ottawa Street, Lansing, Michigan 48933, for review at least 20 days prior to dissemination to shareholders. Any changes requested to be made by the FDIC and the OFIR shall be made prior to dissemination of the description, communication, notice or statement.

The effective date of this ORDER shall be 10 calendar days after its issuance by the FDIC and OFIR.

The provisions of this ORDER shall be binding upon the Bank, its institution-affiliated parties, and any successors and assigns thereof.

The provisions of this ORDER shall remain effective and enforceable except to the extent that, and until such time as, any provision has been modified, terminated, suspended, or set aside by the FDIC and OFIR.

Pursuant to delegated authority.

Dated: June 16, 2008.

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Sylvia H. Plunkett Regional Director Chicago Regional Office Federal Deposit Insurance Corporation	Peggy L. Bryson Acting Chief Deputy Commissioner Office of Financial and Insurance Regulation for the State of Michigan