

STATE OF FLORIDA

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OFFICE OF THE GENERAL COUNSEL
HAROLD A. MCLEAN
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

July 3, 2002

Michael Jack Haney, Senior Attorney
Federal Deposit Insurance Corporation
1910 Pacific Avenue, 4th Floor
Dallas, Texas 73201

Re: Docket No. 020403-SU, Application for transfer of wastewater facilities of Country Run Wastewater Utility Company in Orange County to Orange County Utilities, and request for cancellation of Certificate No. 490-S.

Dear Mr. Haney:

Thank you for taking time last Friday to discuss the above referenced docket with Ms. Patricia Brady of Commission staff. As Ms. Brady indicated, the above-referenced application was filed by Mr. James E. Guildi on May 8, 2002. Unfortunately, Mr. Guildi does not hold the utility's certificate of authorization. Certificate No. 490-S was issued to the Federal Deposit Insurance Corporation (FDIC) by Order No. PSC-94-0225-FOF-SU, issued March 2, 1994, in Docket No. 930683. A copy of the order is enclosed.

By means of the enclosed Quitclaim Bill of Sale and Special Warranty Deed, both dated August 7, 1998, Mr. Guildi verified that he acquired the utility facilities and land from the FDIC in a 1998 Florida Auction. Pursuant to Section 367.071(1), Florida Statutes, no utility shall sell, assign, or transfer its certificate of authorization without determination and approval by the Commission that the proposed sale, assignment, or transfer is in the public interest.

Since the transfer to Mr. Guildi occurred without Commission approval, there will be an automatic show cause issue in staff's recommendation on the transfer to Orange County. The show cause issue will address the apparent violation of Section 367.071(1), Florida Statutes. Accordingly, staff will need an explanation from the FDIC of the mitigating circumstances as to why the transfer took place without first obtaining Commission approval, as required by the statute. For that explanation, the following information may be useful.

06890-02
7/3/02

It appears that the FDIC relied on a series of operating companies to run the utility until the property could be liquidated. As indicated in Order No. PSC-94-0225-FOF-SU, the operating company at the time of certification was Hydrologic Florida, Inc., which operated the utility through the end of 1995. Calligan Operating Services operated the utility from the beginning of 1996 through October 11, 1997, when Integra Real Estate Services, Inc. (Integra) took over operation: Integra continued to operate the utility until sold to Mr. Guildi in 1998. At the time of the 1998 Florida Auction, the address and phone number for Integra were: c/o J. Peter Vescovo, Executive Vice President, 3442 Asbury, Suite 100, Dallas Texas 75205, (214) 219-3900.

In addition to the show cause issue, I believe Ms. Brady also explained that Commission records show the FDIC owes penalties and interest (P&I) for late-filed regulatory assessment fees (RAFs) for the years 1994, 1995 and 1996. By statute, the Commission assesses each utility 4.5% of its gross annual revenues to cover the costs of regulation. Pursuant to Section 350.113, Florida Statutes, penalties and interest shall be assessed against any utility that fails to pay its RAFs by March 31st of each year.

After reviewing the available information, staff has determined the total amount of outstanding P&I for late filed 1994, 1995, and 1996 RAFs is \$1,271.94, broken down as follows:

<u>YEAR</u>	<u>PENALTY</u>	<u>INTEREST</u>	<u>TOTAL</u>
1994	\$367.13	\$73.43	\$440.56
1995	\$534.02	\$170.88	\$704.90
1996	\$105.40	\$21.08	\$126.48
		TOTAL DUE	\$1,271.94

In summary, to file a recommendation on the transfer of utility facilities to Orange County, staff must provide the Commission with an explanation why the utility was transferred in 1998 without authorization and must account for any unpaid P&I. While staff recognizes the difficulties inherent in liquidating utility properties, it would be extremely helpful if the FDIC would provide its own explanation of the mitigating circumstances, as well as remit the outstanding P&I for the late-filed 1994, 1995 and 1996 RAFs.

Due to the case management schedule, staff would appreciate the filing of the statement and the payment of P&I by July 19, 2002. Both should be filed directly with the:

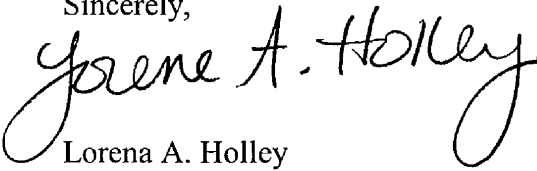
Director, Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Michael Jack Haney, Senior Attorney
July 3, 2002
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Should you have any questions or concerns regarding the contents of this letter, please do not hesitate to contact me at (850) 413-6185, lholley@psc.state.fl.us If you have any questions on the pending application, please contact Ms. Brady at (850) 413-6686, pbrady@psc.state.fl.us. If you need any further documentation on the amount of penalties and interest owed, please contact Mr. Matthew Brinkley at (850) 413-6838, mbrinkle@psc.state.fl.us.

Thank you in advance for your cooperation with this matter.

Sincerely,



Lorena A. Holley
Senior Attorney

LAH/dm

Enclosures (3)

cc: Division of the Commission Clerk and Administrative Services
Division of Economic Regulation (Brady, Brinkley)

~~Country Run was acquired~~ by FDIC in 1992 through foreclosure. Upon becoming aware of the utility's existence, FDIC was advised that it must apply for a certificate from this Commission to provide wastewater service. As stated previously, ~~FDIC filed the application on July 13, 1993.~~

According to information provided, FDIC did not file for a certificate because it believed that it was exempt from Commission regulation pursuant to Section 367.022(2), Florida Statutes, which applies to systems owned, operated, managed or controlled by governmental authorities. However, in Order No. PSC-92-0699-FOF-WS the Commission found that the Resolution Trust Company, which is a similar entity, is not exempt from Commission regulation pursuant to Section 367.022(2), Florida Statutes. Because of the confusion and because FDIC has been responsive and cooperative since becoming aware that it is subject to Commission regulation, we will not institute show cause proceedings against FDIC.

Application

Except as discussed previously, the application is in compliance with Section 367.045, Florida Statutes, and other pertinent statutes and administrative rules. In particular, the application contains a filing fee in the amount of \$150, pursuant to Rule 25-30.020, Florida Administrative Code.

Rule 25-30.034(1)(e), Florida Administrative Code, requires that a warranty deed be provided in the name of the utility as evidence that it owns the land upon which its facilities are located. The deed provided is in the name of FDIC instead of Country Run. Therefore, FDIC shall provide a copy of a recorded warranty deed in the name of Country Run within 60 days of the date of this Order.

Adequate service territory and system maps and a territory description have been provided as prescribed by Rule 25-30.034(1)(h), (i) and (j), Florida Administrative Code. The territory which Country Run will serve is described on Attachment A of this Order, which by reference is incorporated herein.

FDIC provided proof of compliance with the noticing provisions of Rule 25-30.030, Florida Administrative Code, including notice to the customers in the proposed territory. No objections to the application have been received and the time for filing such has expired.

FdIC has hired Hydrologic Florida, Inc. (Hydrologic) to manage Country Run. Hydrologic has 15 offices in eight states, including five in Florida. Hydrologic employs 38 licensed wastewater operators, 23 licensed water operators and three licensed collection system operators. Mr. Charles C. Sossamon, who is licensed in both water and wastewater, has been the operator of Country Run since 1992. Therefore, we find that FDIC and Hydrologic has demonstrated the technical ability to continue to provide service to the requested territory. Also, according to the agreement between FDIC and Hydrologic, FDIC will continue to provide Hydrologic with the financial resources necessary to continue to operate the utility. In addition, according to the Department of Environmental Protection, there are no outstanding notices of violation against the utility.

Based on the foregoing, we find that it is in the public interest to grant Certificate No. 490-S to Country Run. The territory which Country Run is authorized to serve is described on Attachment A of this Order.

Rates and Charges

Country Run currently charges each residential customer a flat monthly rate of \$28.00 for wastewater service. We find this rate to be reasonable and it is approved.

Country Run does not collect customer deposits or miscellaneous service charges. However, the utility has requested to charge a \$56.00 customer deposit, which is approximately the amount of a customer's bill for two billing periods. This is consistent with Rule 25-30.311(7), Florida Administrative Code, and it will be approved administratively when the utility's tariff is approved.

The utility does not have any service availability charges because its service area is currently built-out. Since no future growth is anticipated, it is not necessary to establish service availability charges.

Country Run shall continue to charge the rates and charges approved herein until authorized to change by this Commission in a subsequent proceeding. The utility has filed a tariff reflecting these rates and charges. The tariff shall be effective on or after stamped approval date stamped on the tariff sheets.

Regulatory Assessment Fees and Annual Report for 1993

According to Rules 25-30.110(3) and 25-30.120(2), Florida Administrative Code, utilities subject to this Commission's jurisdiction must file annual reports and pay regulatory assessment fees regardless of whether or not a certificate has been granted. Country Run has been subject to this Commission's jurisdiction since it was constructed in 1990.

Country Run was made aware that it is subject to this Commission's jurisdiction on October 7, 1992. At that time, the utility was also advised of its responsibility to apply for a certificate. Therefore, we find it appropriate to require Country Run to pay regulatory assessment fees for 1993 and to file a 1993 annual report. Regulatory assessment fees and the annual report are due by March 31, 1994.

It is, therefore,

ORDERED by the Florida Public Service Commission that Country Run Wastewater Utility Company, c/o Hydrologic Florida, Inc., 5776 Hoffner Road, Orlando, Florida 32822, is hereby granted Certificate No. 490-S to provide service to the territory described on Attachment A of this Order. It is further

ORDERED that Country Run Wastewater Utility Company shall file a copy of a recorded warranty deed in the name of the utility with this Commission within 60 days of the date of this Order as evidence that it owns the land upon which its facilities are located. It is further

ORDERED that Country Run Wastewater Utility Company shall charge the rates and charges approved in the body of this Order until authorized to change by this Commission. It is further

ORDERED that Country Run Wastewater Utility Company's tariff shall be effective on or after the stamped approval date on the tariff sheets. It is further

ORDERED that Country Run Wastewater Utility Company shall pay regulatory assessment fees for 1993 by March 31, 1994. It is further

ORDERED that Country Run Wastewater Utility Company shall file a 1993 annual report by March 31, 1994. It is further

ORDERED that the provisions of this Order setting rates and charges, issued as proposed agency action, shall become final and effective unless an appropriate petition, in the form provided by Rule 25-22.036, Florida Administrative Code, is received by the

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Director, Division of Records and Reporting, 101 East Gaines Street, Tallahassee, Florida 32399-0870, by the close of business on the date set forth in the "Notice of Further Proceedings or Judicial Review" attached hereto. It is further

ORDERED that in the event this Order becomes final, this Docket shall be closed.

By ORDER of the Florida Public Service Commission, this 2nd day of March, 1994.

STEVE TRIBBLE, Director
Division of Records and Reporting

(S E A L)

ALC

by: _____
Chief, Bureau of Records

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

As identified in the body of this order, our action setting rates and charges is preliminary in nature and will not become

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effective or final, except as provided by Rule 25-22.029, Florida Administrative Code. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, as provided by Rule 25-22.029(4), Florida Administrative Code, in the form provided by Rule 25-22.036(7)(a) and (f), Florida Administrative Code. This petition must be received by the Director, Division of Records and Reporting at his office at 101 East Gaines Street, Tallahassee, Florida 32399-0870, by the close of business on March 23, 1994. In the absence of such a petition, this order shall become effective on the date subsequent to the above date as provided by Rule 25-22.029(6), Florida Administrative Code.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

If the relevant portion of this order becomes final and effective on the date described above, any party adversely affected may request judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or by the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Director, Division of Records and Reporting and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days of the effective date of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

Any party adversely affected by the Commission's final action in this matter may request: (1) reconsideration of the decision by filing a motion for reconsideration with the Director, Division of Records and Reporting within fifteen (15) days of the issuance of this order in the form prescribed by Rule 25-22.060, Florida Administrative Code; or (2) judicial review by the Florida Supreme Court in the case of an electric, gas or telephone utility or the First District Court of Appeal in the case of a water or wastewater utility by filing a notice of appeal with the Director, Division of Records and Reporting and filing a copy of the notice of appeal and the filing fee with the appropriate court. This filing must be completed within thirty (30) days after the issuance of this order, pursuant to Rule 9.110, Florida Rules of Appellate Procedure. The notice of appeal must be in the form specified in Rule 9.900(a), Florida Rules of Appellate Procedure.

AMENDMENT A

COUNTRY RUN WASTEWATER UTILITY COMPANY

Territory Description

The following described lands located in portions of Sections 2, 3, and 10, Township 22 South, Range 28 East, Orange County, Florida:

Section 2

The South 1/2 of the South 1/2 of the Northwest 1/4 of the Southwest 1/4 and the North 1/2 of the North 1/2 of the Southwest 1/4 of the Southwest 1/4 and the West 490 feet of the South 1/2 of the Northwest 1/4 of the Southwest 1/4 of the Southwest 1/4 and the West 490 feet of the Southwest 1/4 of the Southwest 1/4 of the Southwest 1/4.

Section 3

The Southeast 1/4 of the Southeast 1/4.

Section 10

The North 155 feet of the West 450 feet of the Northwest 1/4 of the Northeast 1/4 of the Northeast 1/4.

QUITCLAIM BILL OF SALE

KNOW ALL MEN BY THESE PRESENTS:

THAT FEDERAL DEPOSIT INSURANCE CORPORATION, in the following capacity:

- as Manager of the FSLIC Resolution Fund
- As Manager of the FSLIC Resolution Fund, as Receiver for _____
- As Receiver for _____, which pursuant to 12 U.S.C. § 1441a(m)(1) succeeded the Resolution Trust Corporation as Receiver for said Institution
- As Receiver for Numerica Savings Bank
- in its corporate capacity regarding the liquidation of _____

("Seller"), for and in consideration of the sum of Ten and No/100 Dollars (\$10.00) in lawful money and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, to it paid by James E. Guild, whose mailing address is P.O. Box 182061, Casselberry, Florida 32718-2061 ("Buyer"), hereby remises, releases and quitclaims to Buyer, without recourse, warranty or representation of any kind, all of Seller's right, title and interest in and to the furniture, fixtures, machinery, equipment, furnishings and other tangible personal property ("Transferred Property"), which is located on that certain parcel of real property located in Orange County, Florida, more particularly described in attached Exhibit A.

TO HAVE AND TO HOLD the Transferred Property unto Buyer, its heirs, successors and assigns, forever.

SELLER HEREBY TRANSFERS THE TRANSFERRED PROPERTY TO BUYER IN ITS "AS IS" CONDITION "WITH ALL FAULTS". IT IS EXPRESSLY AGREED AND UNDERSTOOD THAT SELLER HAS MADE NO REPRESENTATION OR WARRANTY OF ANY KIND OR NATURE, EXPRESS OR IMPLIED, BY LAW, STATUTE, DECISION, OR OTHERWISE, AS TO THE CONDITION OF ANY OF THE TRANSFERRED PROPERTY, ITS SUITABILITY OR USEFULNESS FOR ANY PARTICULAR PURPOSE, OR ITS COMPLIANCE WITH ANY FEDERAL, STATE OR LOCAL STATUTE, ORDINANCE, RULE, REGULATION OR ORDER.

IN WITNESS WHEREOF, this Quitclaim Bill of Sale has been executed by Seller's duly authorized representative on the 14 day of August 1998.

WITNESSES:

FEDERAL DEPOSIT INSURANCE CORPORATION, in the capacity stated above

Tamara S. Pittore
Print Name: Tamara S. Pittore

Mary L. Ellis
Print Name: Mary L. Ellis

By: [Signature]
Its Authorized Agent and Attorney-in-Fact
Print Name: DOUGLAS E. WOODWARD
Title: ATTORNEY-IN-FACT

Address: 1910 Pacific Avenue Suite 1300
Dallas, TX 75201

STATE OF TEXAS

COUNTY OF DALLAS

The foregoing instrument was acknowledged before me this 7 day of August, 1998, by DOUGLAS E. GOODWARD (name), as attorney-in-fact (title) of Federal Deposit Insurance Corporation, in the capacity herein above set forth on behalf of said entity. He/She (please check as applicable) He is personally known to me, or has produced _____ / his/her _____ (state driver's license, or / his/her _____ type of identification) as identification.

Lamargo Brown
 (Signature)

Lamargo BROWN
 (Printed Name)

NOTARY PUBLIC, STATE OF TEXAS

(AFFIX NOTARIAL SEAL)



 (Commission Expiration Date)

 (Serial Number, if Any)

Recording requested by
and when recorded return to:
Carroll Ball, Legal Assistant
Carlton Fields
P.O. Box 3239
Tampa, FL 33601

Lamis No. 440800435864

Tax Folio No.: 03-22-28-1818-00-002
Grantee's Taxpayer I.D. No.: _____

space above this line for Recorder's use

SPECIAL WARRANTY DEED

The undersigned, the FEDERAL DEPOSIT INSURANCE CORPORATION, in the following capacity:

- as Manager of the FSLIC Resolution Fund
- as Manager of the FSLIC Resolution Fund, as Receiver for _____
- as Receiver for _____, which pursuant to 12 U.S.C. § 1441a(m)(1) succeeded the Resolution Trust Corporation as Receiver for said institution
- as Receiver for Numerica Savings Bank
- in its corporate capacity regarding the liquidation of _____

(herein called "Grantor"), whose mailing address is 1910 Pacific Avenue, Suite 1200, City and County of Dallas, Texas 75201, for and in consideration of the sum of Ten AND NO/100 DOLLARS (\$10.00) to said Grantor paid by Grantee named herein, the receipt of which is hereby acknowledged, has GRANTED, SOLD and CONVEYED and by these presents does GRANT, SELL and CONVEY unto Jones E. Goldi {an individual} _____ (herein called "Grantee"), whose mailing address is P.O. Box 182061, Casselberry, Florida 32718-2061, the real property situated in Orange County, Florida, described on Exhibit "A" attached hereto and made a part hereof for all purposes, together with all and singular the rights and appurtenances pertaining thereto (the "Subject Property"), subject however to all exceptions, easements, rights-of-way, covenants, conditions, restrictions, reservations, encroachments, encumbrances, access limitations, and any

and all other matters or conditions affecting the Subject Property, as well as standby fees, real estate taxes, and assessments on the Subject Property and subsequent taxes and assessments due to change in land usage or ownership (all of the foregoing being collectively referred to as the "Permitted Encumbrances"). Grantee, by acceptance of delivery of this Deed, assumes and agrees to perform all of Grantor's obligations under the Permitted Encumbrances.

FURTHER, GRANTEE, BY ACCEPTANCE OF DELIVERY OF THIS DEED, ACKNOWLEDGES THAT (i) EXCEPT FOR THE SPECIAL WARRANTY OF TITLE CONTAINED HEREIN, GRANTOR HAS NOT MADE, DOES NOT MAKE, AND SPECIFICALLY NEGATES AND DISCLAIMS ANY REPRESENTATIONS, WARRANTIES, PROMISES, COVENANTS, AGREEMENTS, OR GUARANTIES OF ANY KIND OR CHARACTER WHATSOEVER, WHETHER EXPRESS OR IMPLIED, ORAL OR WRITTEN, PAST, PRESENT, OR FUTURE, OF, AS TO, CONCERNING, OR WITH RESPECT TO (A) THE VALUE, NATURE, QUALITY, OR CONDITION OF THE SUBJECT PROPERTY, INCLUDING, WITHOUT LIMITATION, THE WATER, SOIL, AND GEOLOGY, (B) THE INCOME TO BE DERIVED FROM THE SUBJECT PROPERTY, (C) THE SUITABILITY OF THE SUBJECT PROPERTY FOR ANY AND ALL ACTIVITIES AND USES WHICH GRANTEE MAY CONDUCT THEREON, (D) THE COMPLIANCE OF OR BY THE SUBJECT PROPERTY OR ITS OPERATION WITH ANY LAWS, RULES, ORDINANCES, OR REGULATIONS OF ANY APPLICABLE GOVERNMENTAL AUTHORITY OR BODY, (E) THE HABITABILITY, MERCHANTABILITY, MARKETABILITY, PROFITABILITY, OR FITNESS FOR A PARTICULAR PURPOSE OF THE SUBJECT PROPERTY, (F) THE MANNER OR QUALITY OF THE CONSTRUCTION OR MATERIALS, IF ANY, INCORPORATED INTO THE SUBJECT PROPERTY, (G) THE MANNER, QUALITY, STATE OF REPAIR, OR LACK OF REPAIR OF THE SUBJECT PROPERTY OR ANY PORTION THEREOF OR ANY IMPROVEMENTS THERETO, (H) THE EXISTENCE, QUALITY, NATURE, ADEQUACY, OR PHYSICAL CONDITION OF ANY UTILITIES SERVING THE SUBJECT PROPERTY, OR (I) ANY OTHER MATTER WITH RESPECT TO THE SUBJECT PROPERTY, AND SPECIFICALLY, THAT GRANTOR HAS NOT MADE, DOES NOT MAKE, AND SPECIFICALLY DISCLAIMS ANY REPRESENTATIONS REGARDING COMPLIANCE WITH ANY ENVIRONMENTAL PROTECTION, POLLUTION, OR LAND USE LAWS, RULES, REGULATIONS, ORDERS, OR REQUIREMENTS, INCLUDING, WITHOUT LIMITATION, THE DISPOSAL OR EXISTENCE, IN OR ON THE SUBJECT PROPERTY, OF ANY HAZARDOUS MATERIALS; (ii) GRANTEE HAS FULLY INSPECTED THE SUBJECT PROPERTY AND THAT THE CONVEYANCE AND DELIVERY HEREUNDER OF THE SUBJECT PROPERTY IS "AS IS" AND "WITH ALL FAULTS"; AND (iii) NO WARRANTY HAS ARISEN THROUGH TRADE, CUSTOM, OR COURSE OF DEALING WITH GRANTOR.

Further, by acceptance of delivery of this Deed, Grantee or anyone claiming by, through, or under Grantee, hereby fully releases Grantor, its employees, officers, directors, representatives, and agents from any and all claims, costs, losses, liabilities, damages, expenses, demands, actions, or causes of action that it may now have or hereafter acquire, whether direct

or indirect, known or unknown, suspected or unsuspected, liquidated or contingent, arising from or related to the Subject Property in any manner whatsoever. This covenant releasing Grantor shall be a covenant running with the Subject Property and shall be binding upon Grantee, its successors and assigns.

TO HAVE AND TO HOLD the Subject Property together with all and singular the rights and appurtenances thereon or in any wise belonging, unto Grantee, its heirs, personal representatives, successors and assigns forever, and Grantor does hereby bind itself, its successors and assigns, to WARRANT AND FOREVER DEFEND all and singular the Subject Property unto Grantee, its heirs, personal representatives, successors and assigns, against every person whomsoever lawfully claims or to claim the same or any part thereof, by, through, or under Grantor, but not otherwise, subject, however, to the Permitted Encumbrances set forth above.

All ad valorem taxes and assessments for the Subject Property for the year in which this Deed is executed have been prorated by the parties hereto as of the date of this Deed and Grantee hereby expressly assumes liability for the payment thereof and for subsequent years.

EXECUTED as of the 7th day of August, 1998.

FEDERAL DEPOSIT INSURANCE CORPORATION,
in the capacity set forth hereinabove

[Signature]
Witness
Print Name: Fanni S. Pinter

By: [Signature]

Name: Douglas E. Woodward

[Signature]
Witness
Print Name: Mary L. Ellis

Title: Attorney in Fact

ACKNOWLEDGMENT

STATE OF TEXAS §
 §
COUNTY OF DALLAS §

This instrument was acknowledged before me on the 7th day of August, 1998, by Douglas E. Woodward, Attorney in Fact of the Federal Deposit Insurance Corporation, in the capacity hereinabove set forth, on behalf of said entity.

[Signature]
Notary Public, State Of Texas

Prepared by:

Michael Jack Haney, Senior Attorney
Federal Deposit Insurance Corporation
1910 Pacific Avenue, Suite 1300 4th Floor
Dallas, Texas 75201



(972) 761-8150