

the interests of the depositors of Home prior to the completion of the proceedings against Home conducted pursuant to section 8(b) of the Federal Deposit Insurance Act (Act), 12 U.S.C. §1818(b);

Therefore, the OTS hereby issues this TEMPORARY ORDER TO CEASE AND DESIST (TEMPORARY ORDER) and hereby gives notice pursuant to sections 8(c)(1) and (3) of the Act, 12 U.S.C. §§1818(c)(1) and (3), that Home and its institution-affiliated parties, successors and assigns, be and hereby are ORDERED TO CEASE AND DESIST FROM AND TAKE AFFIRMATIVE ACTION, as follows:

1. Within ten (10) calendar days of the effective date of this TEMPORARY ORDER Home shall hire an independent, qualified accounting firm, which is acceptable to the Regional Director of the Central Region of OTS, to reconcile Home's books and records as of September 30, 2007. If an acceptable accounting firm has not been hired within ten (10) calendar days from the effective date of this TEMPORARY ORDER then OTS shall provide a list of three independent, qualified accounting firms and Home shall contract with one of them within three (3) business days. For purposes of this paragraph, any accounting firm that has previously been engaged by Home to perform accounting services shall not be considered to be independent with respect to the Home.

2. Home shall require, as part of its written agreement with the accounting firm retained to perform the reconciliation, that the accounting firm complete the reconciliation within forty-five (45) calendar days of the effective date of this TEMPORARY ORDER. All of the accounting firm's reports, whether in draft or final form, shall be submitted directly to the Regional Director of the Central Region at the same time the report is submitted to Home.

3. Within fifty (50) calendar days of the effective date of this TEMPORARY ORDER Home shall have complete and accurate books and records. Thereafter, Home shall maintain complete and accurate books and records. All written documentation of the correction or reconciliation of any of Home's books or records shall be retained for future regulatory review. All account differences or unsupported accounts in Home's books or records that are unresolved within fifty (50) calendar days of the effective date of this TEMPORARY ORDER shall immediately be charged off of Home's books.

4. Within seven (7) calendar days of the effective date of this TEMPORARY ORDER, Home shall establish a compliance committee comprised of at least four directors who are not officers of Home. The committee shall meet weekly, maintain detailed written minutes of the committee's meetings, and monitor Home's compliance with this TEMPORARY ORDER. Within three (3) business days following each weekly meeting, the committee shall submit a written report to the Regional Director of the Central Region on Home's compliance with this TEMPORARY ORDER.

This TEMPORARY ORDER shall be effective immediately upon service to Home and shall remain in full force and effect, pending the completion of the administrative proceedings instituted pursuant to the foregoing NOTICE.

Dated at Washington, D.C., this ___ day of October, 2007.

/s/
Scott M. Polakoff
Senior Deputy Director
Office of Thrift Supervision