

STATE OF MAINE
BUREAU OF FINANCIAL INSTITUTIONS
OFFICE OF THE CONSERVATOR OF QUADS TRUST COMPANY

ORDER RESIGNING AS CUSTODIAN OF CERTAIN ACCOUNTS AND
PLANS AND APPOINTING A SUCCESSOR CUSTODIAN OF
THOSE ACCOUNTS AND PLANS

WHEREAS, effective at 5:00 p.m. on January 31, 2007, the Superintendent of the Maine Bureau of Financial Institutions appointed Deputy Superintendent Donald W. Groves as Conservator of QUADS Trust Company ("QTC"), a Maine non-depository trust company having its principal place of business at 12 West Church Street, Frederick, Maryland (a/k/a the Firehouse Financial Center); and

WHEREAS, the Conservator has an obligation to conduct the business of QTC for the benefit of depositors, sponsors and beneficiaries of accounts or plans for which QTC is custodian; and

WHEREAS, QTC is custodian for Individual Retirement Accounts with non-traditional assets ("NTIRA's"); and

WHEREAS, the Conservator has determined that it is in the best interest of the accountholders of NTIRA's for which QTC is custodian to transfer their account to a custodian with greater financial and managerial resources or to receive a distribution of their account; and

WHEREAS, the Conservator has worked with NTIRA accountholders since April 4, 2007 to transfer or distribute their accounts; and

WHEREAS, most of QTC's NTIRA's have been transferred or distributed; and

WHEREAS, the Conservator has recently discovered approximately 20 NTIRA's that were miscoded on QTC's trust accounting system (remaining NTIRA's) and have not been previously contacted; and

WHEREAS, because the conditions that caused the Superintendent of the Maine Bureau of Financial Institutions placed QTC into conservatorship continue to exist, the Conservator has determined that it is in the best interest of the accountholders of the remaining NTIRA's to transfer to another IRA custodian as soon as possible; and

WHEREAS, Millennium Trust Company of Oak Brook, Illinois ("MTC") has demonstrated that it has the managerial and financial resources to accept appointment as successor custodian of NTIRA's in QTC's custody; and

WHEREAS, MTC has signed an agreement, effective July 31, 2007, with QTC accepting appointment as successor custodian for approximately 20 of QTC's NTIRA's that were miscoded on QTC's trust accounting system; and

WHEREAS, pursuant to 9-B M.R.S.A. § 363-A(1)(B), the Conservator has all rights, powers, privileges and authority possessed by the officers, governing body, corporators, members and investors of the financial institution; and

WHEREAS, pursuant to 9-B M.R.S.A. § 363-A(1)(B)(2), the Conservator has authority to execute, acknowledge and deliver all deeds, assignments, releases and other instruments necessary and proper to effectuate any sale of real or personal property or any compromise approved by the Superintendent; and

WHEREAS, pursuant to 9-B M.R.S.A. § 363-A(1)(B)(2), the Maine Superintendent of Financial Institutions has approved the aforementioned agreement between QTC and MTC;

THEREFORE, pursuant to the aforementioned agreement between QTC and MTC and effective 5:00 p.m. on July 31, 2007, QUADS Trust Company simultaneously:

1. Resigns as custodian of the NTIRA's identified in the agreement between QTC and MTC; and
1. Appoints Millennium Trust Company as its successor custodian of the NTIRA's identified in the agreement between QTC and MTC.

By Order of the Conservator of QUADS Trust Company this 30th day of July 2007 at Gardiner, Maine

/s/ Donald W. Groves
Deputy Superintendent
Maine Bureau of Financial Institutions
Conservator of QUADS Trust Company

Appellate Rights

Pursuant to 9-B M.R.S.A. §363-A(10), any person aggrieved by the foregoing Order may bring an action challenging it in the superior Court of Kennebec County at Augusta, Maine within ten (10) business days after receiving notice of the order by any of those means prescribed by 9-B M.R.S.A. §363-A(10)(B).