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Comptroller of the Currency  
Administrator of National Banks

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Central District Office  
One Financial Place, Suite 2700  
440 South LaSalle Street  
Chicago, Illinois 60605

February 7, 1997

**Conditional Approval #232**  
**March 1997**

Mr. Robert W. Constien  
Executive Vice President  
The State Bank & Trust Company  
401 South Clinton Street  
Defiance, Ohio 43512

*RE: Application by The State Bank and Trust Company, Defiance, Ohio for a new national trust bank charter*

Dear Mr. Constien:  
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OCC Control No: 97-CE-01-

The Office of the Comptroller of the Currency has reviewed your application to establish a new national trust bank with the title of "**Reliance Financial Services, National Association**", Defiance, Ohio. On February 7, 1997, after a thorough evaluation of your application and other data available to the OCC, we found that your proposal met the requirements for preliminary conditional approval.

We have also made our decision with the understanding that the proposed national trust bank will become a member of the Federal Reserve System. Major deviations from the operating plan or changes in the composition of the board of directors, ownership, or chief executive officer that the OCC has not approved may result in withdrawal of this preliminary approval.

This approval is subject to the enclosed standard conditions. It is the responsibility of management to ensure that the applicable policies and procedures are established and adopted by the Board of Directors before the trust bank commences business. Applicable standard conditions must be met before the bank will be allowed to commence business.

This approval also is subject to the following two special conditions which shall be deemed to be "conditions imposed in writing by the agency in connection with the granting of any application or other request" within the meaning of 12 U.S.C. §1818(b)(1).



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1. Reliance Financial Services, National Association (*hereinafter RFS*), shall assure that the operations of the bank are limited to that of a trust bank and that deposits other than trust funds are not accepted, loans are not made and checks are not paid.
2. The limitations of RFS's activities must be fully enumerated in the bank's articles of association. Specifically, the articles must clearly state:
  - The business of the association will be limited to that of a national trust bank;
  - The bank must obtain the prior written approval of the OCC before amending its articles of association to expand the scope of its activities and services; and

You may now form a body corporate and begin organizing Reliance Financial Services, National Association as soon as you adopt and forward the organization certificate to this Office, at the address noted at the top of this page. As a body corporate, you may begin to take those steps necessary for obtaining final approval.

The Comptroller's Manual for National Banks, the Comptroller's Manual for Corporate Activities, the Comptroller's Handbook for National Bank Examiners, the Comptroller's Handbook for Fiduciary Activities, the Comptroller's Handbook for Compliance, An Examiner's Guide to Consumer Examination, a set Call Report forms and instructions, and a set of current OCC issuances will be sent to you under separate cover.

Any questions concerning this preliminary conditional approval should be directed to Brian J. Paul, National Bank Examiner at (312) 360-8858.

Sincerely,

/s/

Thomas M. Fitzgerald  
District Administrator  
Central District

Enclosures:

- Documents - OCC Standard Conditions, New Bank Charters
- Documents - Applicant, Organization Checklist (Parts A & B), New Bank Charters
- Documents - OCC, Minimum Policies and Procedures, New Bank Charters
- Documents - OCC, Organization - Instructions, New Bank Charters