

STATE OF NEW JERSEY  
DEPARTMENT OF BANKING AND INSURANCE

In the Matter of	)	
	)	
	)	AMENDED AND RESTATED
	)	CONSENT ORDER
UNION COUNTY SAVINGS BANK	)	
ELIZABETH, NEW JERSEY	)	
	)	
	)	
	)	

WHEREAS, the Commissioner of Banking and Insurance of the State of New Jersey (“Commissioner”) is charged with the responsibility of administering and enforcing the New Jersey Banking Act of 1948, N.J.S.A. 17:9A-1 to -467 (“the Act”); and

The Commissioner issued a Consent Order against Union County Savings Bank (“Bank”) on November 30, 2022 (“2022 Consent Order”). The Commissioner issued a subsequent Consent Order against the Bank on May 29, 2024 (“2024 Consent Order”). This Amended and Restated Consent Order consolidates, amends and restates the 2022 and 2024 Consent Orders; and

WHEREAS, the Bank is a financial institution chartered by the Commissioner pursuant to the Act; and

WHEREAS, pursuant to N.J.S.A. 17:9A-267, the Commissioner may order a state-chartered financial institution to cease any unsafe or unsound practices; and

WHEREAS, the Commissioner and the Bank, by and through its duly elected and acting board of trustees (“Board”), having agreed to enter into this Amended and Restated Consent Order pursuant to N.J.S.A. 17:9A-267, and the Bank, without admitting or denying any charges of unsafe or unsound banking practices and violations of law or regulation, hereby consent to the following provisions;

NOW THEREFORE, it is on this 17 day of February 2026, ORDERED AND AGREED that:

## 1. BOARD REQUIREMENTS

The Board must ensure its supervision and direction of Bank management and its oversight of the Bank's activities and performance are commensurate with the size of the Bank and the nature, scope, and risk of the Bank's activities. The Board must, at a minimum, ensure its receipt and review of any updated, revised, or reformulated plans required by this Order; its adoption of such plans; and the monitoring of the Bank's implementation and adherence to such plans.

## 2. FUNDS MANAGEMENT PLAN

The Board must ensure that the Bank has a liquidity and funds management policy with a contingency funding plan (**Funds Management Plan**) commensurate with the size and complexity of the Bank, and the nature, scope, and the risk of the Bank's liquidity and funding profile. The Board must, at a minimum, ensure the Bank:

A. Funds Management Plan Update. Updates the Funds Management Plan to address the liquidity and contingency funding deficiencies and weaknesses identified in the June 30, 2025 Report of Examination issued jointly by the FDIC and the New Jersey Department of Banking and Insurance (**2025 ROE**);

B. Implementation and Adherence. Fully and completely implements and adheres to the updated Funds Management Plan; and

C. Notification of Deviation. Promptly, but in no instance more than 5 business days from awareness of such event, advises the Commissioner in writing of any breach of a limit established in Appendix A and/or a limit or target established in Appendix B of the Funds Management Plan and the action, along with a timeline for implementation, it will take to address such breach.

### **3. STRATEGIC PLAN**

The Board must ensure that the Bank has a strategic plan commensurate with the size and complexity of the Bank, and the nature, scope, and the risk of the Bank's activities. The Board must, at a minimum, ensure the Bank:

- A. **Strategic Plan Update.** Revises and submits the Strategic Plan, as defined in the 2022 Consent Order and non-objected to by the Commissioner, to the Board for its approval within 30 days after the end of each fiscal year to address any changes in the Bank's financial condition and market area and adjusts, as appropriate, the operating assumptions forming the basis for major projected income and expense components, and the means by which the Bank will reduce interest rate risk exposure and improve profitability; and
- B. **Implementation and Adherence.** Fully and completely implements and adheres to the Board-approved Strategic Plan.

### **4. PROFIT AND BUDGET PLAN**

The Board must ensure that the Bank has a profit and budget plan commensurate with the size and complexity of the Bank, and the nature, scope, and the risk of the Bank's activities. The Board must, at a minimum, ensure the Bank:

- A. **Implementation and Adherence.** Fully and completely implements and adheres to the Board-approved Profit Plan;
- B. **Evaluation of Performance.** Evaluates the Bank's actual performance in relation to the Profit Plan, as defined in the 2022 Consent Order and non-objected to by the Commissioner, records the results of the evaluation, submits such results to the Board along with any recommended action on not less than a monthly basis, and submits an appropriately reformulated Profit Plan to the Board for its approval within 30 days after the end of each fiscal year to address any changes in the Bank's

financial goals and strategies, material projected revenue and expense components, including staffing levels, compensation, technology and facilities;

## 5. CAPITAL PLAN

The Board must ensure that the Bank has a capital plan commensurate with the size and complexity of the Bank, and the nature, scope, and the risk of the Bank's activities. The Board must, at a minimum, ensure the Bank:

A. Capital Plan Update. Revises the Capital Plan, as defined in the 2022 Consent Order and non-objected to by the Commissioner, to address the deficiencies and weaknesses related to the Bank's capital monitoring triggers and early warning indicators and timelines identified in the 2025 ROE;

B. Implementation and Adherence. Fully and completely implements and adheres to the Board-approved Capital Plan;

C. Monitoring. Monitors the Bank's capital projections on, at a minimum, a quarterly basis, documents monitoring results identifying any early warning indicator or trigger breaches, identifies any capital target ratio variations, and submits the results along with any recommended action to the Board; and

## 6. COMPLIANCE COMMITTEE

A. Compliance Committee Composition. The Board must maintain its Compliance Committee, as defined in the 2022 Consent Order and non-objected to by the Commissioner. Any proposed change to the composition of the Compliance Committee must be submitted to the Commissioner for non-objection. Nothing herein diminishes the responsibility of the entire Board to ensure compliance with the provisions of this Order in a timely manner.

B. Compliance Committee Oversight. The Compliance Committee must monitor

compliance with this Order and submit a written report detailing the status of all actions required in connection with this Order to the Board for consideration at each regularly scheduled Board meeting occurring after the effective date of this Order. The Compliance Committee Report and any discussion related to it or this Order must be included in the minutes of the corresponding Board meeting. Compliance Committee Reports must be submitted to the Commissioner as part of the progress reports required by Paragraph 7 of this Order, noting any action taken by the Board based on them.

#### **7. PROGRESS REPORTS**

Within 45 days of the end of each calendar quarter, the Board must ensure the Bank furnishes written progress reports detailing the form, manner, and results of any actions taken to secure compliance with this Order to the Commissioner. All progress reports and any other written responses made in connection with this Order must be reviewed and approved by the Board and be made a part of the Board minutes.

#### **8. MISCELLANEOUS**

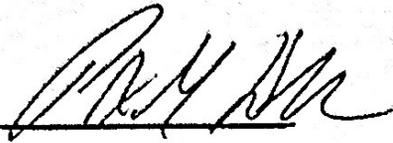
The provisions of this Order do not bar, estop, or otherwise prevent the Commissioner any other federal or state agency or department from taking any other action against the Bank, any of the Bank's current or former institution-affiliated parties.

The provisions of this Order are binding on the Bank, its institution-affiliated parties, and any successors and assigns thereof.

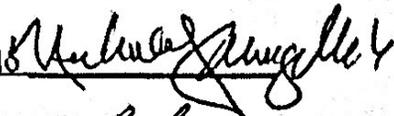
This Order is effective on the date of issuance, and its provisions will remain effective and enforceable unless and until it is modified, terminated, suspended, or set aside in writing by the Commissioner.

 2/17/2026  
\_\_\_\_\_  
Susan Ochs  
Acting Commissioner

CONSENTED AS TO FORM, CONTENT, AND ENTRY:

Peter G. DeMarin 

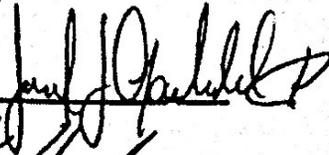
Date: 2/17/2026

Nicholas A. Frungillo 

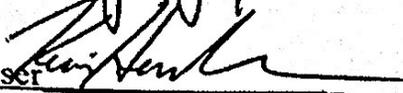
Date: 2/17/2026

Salvador J. Garcia 

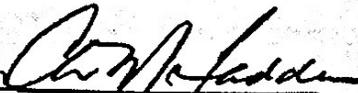
Date: 2/17/2026

Joseph J. Garibaldi, IV 

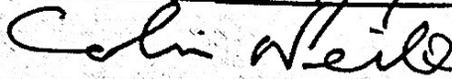
Date: 2/17/2026

Kevin Hemhauser 

Date: 2/17/2026

Chris McFadden 

Date: 2/17/2026

Colin Neill 

Stiney Colin Neill

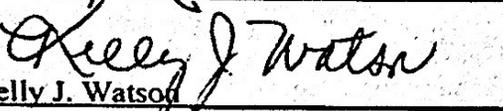
Date: 2/17/2026

Thomas Ramos 

Date: 2/17/2026

Teresa Soto Vega 

Date: 2/17/2026

Kelly J. Watson 

Date: 2/17/2026