

UNITED STATES OF AMERICA

BEFORE THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM,  
WASHINGTON, D.C.

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In the Matter of )  
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CHARLES A. DRUMMOND, ) Docket No. 99-030-CMP-I3  
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 )  
a former ) Order of Assessment  
 ) of a Civil Money  
Institution-Affiliated ) Penalty Issued Upon  
Party of ) Consent Pursuant to  
THE PROFESSIONAL BANK, ) the Federal Deposit Insurance  
Denver, Colorado ) Act, as Amended, and the Federal  
 ) Reserve Act, as Amended  
 )  

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WHEREAS, pursuant to sections 8(i)(2) and (3) of the Federal Deposit Insurance Act, as amended (the "FDI Act"), 12 U.S.C. §§ 1818(i)(2) and (3), and section 29 of the Federal Reserve Act, as amended (the "Federal Reserve Act"), 12 U.S.C. § 504, the Board of Governors of the Federal Reserve System (the "Board of Governors") issues this Order of Assessment of a Civil Money Penalty (the "Order") against Charles A. Drummond ("Drummond"), the former president, chief executive officer and director and an institution-affiliated party, as that term is defined in section 3(u) of the FDI Act, 12 U.S.C. § 1813(u), of the Professional Bank, Denver, Colorado (the "Bank"), a former state member bank, for his alleged violations of sections 23A,

23B and 22(h) of the Federal Reserve Act, 12 U.S.C. §§ 371c, 371c-1 and 375b, and Regulation O, 12 C.F.R. Part 215, in connection with insider and affiliate transactions at the Bank;

WHEREAS, by affixing his signature hereunder, Drummond has consented to the issuance of this Order by the Board of Governors and has consented to comply with each and every provision of this Order, and has waived any and all rights he might otherwise have pursuant to 12 U.S.C. §§ 504 and 1818 or 12 C.F.R. Part 263, or otherwise to: (i) the issuance of a notice of assessment of civil money penalties; (ii) a hearing for the purpose of taking evidence with respect to any matter implied or set forth in this Order; (iii) to obtain judicial review of this Order or any provision hereof; and (iv) to challenge or contest in any manner the basis, issuance, validity, terms, effectiveness, collectability or enforceability of this Order or any provision hereof;

NOW, THEREFORE, prior to the taking of any testimony or adjudication of or finding on any issue of fact or law set forth herein, and without this Order constituting an admission of any allegation made or implied by the Board of Governors in connection with this proceeding, and solely for the purpose of settlement of this proceeding without protracted or extended hearings or testimony:

IT IS HEREBY ORDERED, pursuant to sections 8(i)(2) and 8(i)(3) of the FDI Act, 12 U.S.C. §§ 1818(i)(2) and (i)(3), and section 29 of the Federal Reserve Act, 12 U.S.C. § 504, that:

1. Drummond shall forfeit and pay as hereinafter provided a civil money penalty in the sum of \$10,000.

2. The civil money penalty assessed in this Order shall be remitted in full at the time of Drummond's execution of this Order by bank certified check or cashiers check made payable to the "Board of Governors of the Federal Reserve System" and forwarded with an executed copy of this Order to Jennifer J. Johnson, Secretary of the Board, Board of Governors of the Federal Reserve System, Washington, D.C., 20551, or, alternatively, by wire transfer of immediately available funds to the Federal Reserve Bank of Richmond, ABA No. 05 1000033, to the order of the Board General Fund, account number 220 400 010, which penalty the Board of Governors, or the Federal Reserve Bank of Richmond on its behalf, shall remit to the United States Treasury as required by statute.

3. This Order, and each and every provision hereof, is and shall remain fully effective and enforceable until expressly stayed, modified, terminated or suspended in writing by the Board of Governors.

4. The provisions of this Order shall not bar, estop, or otherwise prevent the Board of Governors or any federal or

state agency or department from taking any other action affecting Bank or any former institution-affiliated party of Bank, provided, however, that the Board of Governors shall not take any further action against Drummond based upon any information presently known to the Board of Governors concerning the matters addressed in this Order.

5. All communications regarding this Order shall be addressed to:

- (a) Mr. Richard M. Ashton  
Associate General Counsel  
Board of Governors of the  
Federal Reserve System  
20th and C Streets, N.W.  
Washington, D.C. 20551
- (b) Ms. Maryann F. Hunter  
Vice President, Federal Reserve Bank  
of Kansas City, Denver Branch  
1020 16<sup>th</sup> Street  
Denver, CO 80202
- (c) James C. Ruh, Esq.  
Ireland, Stapleton, Pryor & Pascol, P.C.  
1675 Broadway, Suite 2600  
Denver, CO 80202

By order of the Board of Governors of the Federal Reserve System, effective this 18<sup>th</sup> day of January, 2000

BOARD OF GOVERNORS OF THE  
FEDERAL RESERVE SYSTEM

  
Charles A. Drummond

By:   
Jennifer J. Johnson  
Secretary of the Board