

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

In the Matter of)

MICHAEL DOHERTY,)
individually, and as an)
institution-affiliated party)
of)

ORDER TO PAY

FDIC-13-327k

NORTHWESTERN BANK)
TRAVERSE CITY, MICHIGAN)

(STATE NONMEMBER BANK))

Michael Doherty ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a Stipulation to the Issuance of an Order to Pay ("STIPULATION"), dated July 17, 2013, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any violation of law, rule, or regulation or breach of fiduciary duty for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasury of the United States.

After taking into account the STIPULATION, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the conduct by Respondent, and such other matters as justice may require, the FDIC accepts the STIPULATION and issues the following:

ORDER TO PAY

IT IS HEREBY ORDERED, that by reason of the violation set forth in paragraph 2 of the STIPULATION, a penalty of \$20,000.00 be, and hereby is, assessed against Michael Doherty. The Respondent shall pay the civil money penalty to the Treasury of the United States.

IT IS FURTHER ORDERED that the Respondent is prohibited from seeking or accepting indemnification from any insured depository institution for the civil money penalty assessed and paid in this matter.

This Order to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 30th day of December, 2013.

/s/

Christopher J. Newbury
Associate Director
Division of Risk Management Supervision