

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

### Part I Reporting Issuer

<b>1</b> Issuer's name		<b>2</b> Issuer's employer identification number (EIN)	
First Resource Bank		20-2139081	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
Lauren Ranalli	610-363-9400	LRanalli@firstresourcebank.com	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact		<b>7</b> City, town, or post office, state, and Zip code of contact	
101 Marchwood Road		Exton, PA 19341	
<b>8</b> Date of action		<b>9</b> Classification and description	
5/11/2012		Common stock dividend	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
336177100		OTCBB: FRSB	

### Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

**14** Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ First Resource Bank declared a 5% stock dividend on First Resource Bank common stock, payable May 11, 2012 to shareholders of record at the close of business on May 4, 2012. As a result, for every five shares of First Resource Bank common stock held by a shareholder on May 4, 2012, the shareholder received one additional share of First Resource Bank common stock on May 11, 2012.

**15** Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ The stock dividend was non-taxable under Section 305 of the Internal Revenue Code of 1986, as amended (the "Code"). As a result of the stock dividend, each First Resource Bank shareholder was required to allocate their tax basis in the shares they owned prior to the stock dividend over the shares they own after the stock dividend. Any cash received in lieu of fractional shares will be treated as a distribution taxable as a dividend under section 301 of the Code.

**16** Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ A First Resource Bank shareholder will divide their tax basis in each share held before the stock dividend by 1.05 to determine their tax basis in each share held immediately after the stock dividend, and will multiply the total number of shares owned prior to the stock dividend by 1.05 to determine the number of shares of First Resource Bank common stock owned after the stock dividend.

**Example:**

Before the stock split: 100 shares with a tax basis of \$10.00 per share: \$1,000 aggregate tax basis

After the stock split: 100 shares x 1.05 = 105 shares owned after the stock dividend

\$10.00 tax basis per share / 1.05 = \$9.52 (rounded) tax basis per share after the stock dividend

105 shares x \$9.52 per share tax basis = \$1,000 (rounded) aggregate tax basis

**Part II** Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ \_\_\_\_\_

Section 305(a)

Section 307(a)

18 Can any resulting loss be recognized? ▶ not applicable

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ 2012

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

**Sign Here**

Signature ▶ Signature redacted Date ▶ \_\_\_\_\_

Print your name ▶ Lauren C. Ranalli Title ▶ EVP & CFO

**Paid Preparer Use Only**

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name ▶			Firm's EIN ▶	
Firm's address ▶			Phone no.	