

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

---

In the Matter of:	)	
	)	
Oday Sessi, an institution-affiliated party of	)	PERSONAL CONSENT ORDER
	)	
BANK OF ENGLAND	)	FDIC-23-0089b
ENGLAND, ARKANSAS	)	
	)	
(INSURED STATE NONMEMBER BANK)	)	
	)	
Respondent's NMLS UI# 1799001	)	
	)	
	)	

---

Oday Sessi (Respondent) and Respondent's counsel were advised of the Respondent's right to receive a Notice of Intention to Seek a Cease and Desist Order (Notice) detailing Respondent's violations of laws for which an Order To Cease and Desist (Personal Consent Order) may be issued under 12 U.S.C. § 1818(b).

Respondent was further advised of the right to a hearing on the Notice under 12 U.S.C. § 1818(b) and 12 C.F.R. Part 308, subparts A & B. Respondent waived certain rights under those provisions on October 4, 2023, and consented to the issuance of the Personal Consent Order by entering into a Stipulation to The Issuance of a Personal Consent Order (Consent Agreement) with a representative of the FDIC's Legal Division.

The FDIC determined and Respondent neither admits nor denies the following:

1. The FDIC determined, and Respondent neither admits nor denies, that from approximately October 2018 to December 2019, Respondent engaged in violations of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45(a) (Section 5), by misrepresenting his and the Bank's affiliation with the Department of Veterans Affairs ("VA") in the course of taking

applications for originating VA mortgage loans. These representations were false and misleading in violation of Section 5.

2. As described in paragraph 1, Respondent engaged or participated in violations of law.

The FDIC accepts the Consent Agreement and issues the following:

**PERSONAL CONSENT ORDER**

Respondent must cease and desist from, and take affirmative action, as follows:

3. Prior to accepting any position that would cause Respondent to become an institution-affiliated party (IAP) of an insured depository institution specified in 12 U.S.C. § 1818(e)(7)(A), Respondent shall complete at least 24 hours of training through an outside third-party provider that is deemed acceptable by the Regional Director of the FDIC's Dallas Regional Office. The training must cover the topics of ethics and compliance with mortgage-related laws and regulations. Respondent must submit documentation to demonstrate successful completion of this training requirement no later than 15 days after completion of at least 24 hours of training to the FDIC's Dallas Regional Office at: David E. Wright, Deputy Regional Director, Federal Deposit Insurance Corporation, 600 North Pearl Street, Suite 700, Dallas, Texas 75201.

4. Respondent must not violate Section 5 of the Federal Trade Commission Act.

5. When Respondent is employed by an insured depository institution (IDI) or otherwise becomes an IAP under 12 U.S.C. § 1813(u), Respondent must follow the written policies and procedures of that IDI. If Respondent is affiliated with an IDI whose written policies and procedures are more stringent than the provisions of this Personal Consent Order, Respondent must adhere to the IDI's written policies and procedures.

6. Within 10 calendar days of the date of this Personal Consent Order, Respondent must provide a copy of this Personal Consent Order to the Chairman of the Board of Directors of any IDI of which Respondent is an IAP.

7. Before accepting any position causing Respondent to become an IAP, Respondent must provide a copy of this Personal Consent Order to: (i) the Chairman of the Board of Directors of the IDI, or (ii) a senior executive manager of the IDI, provided that the official was approved in writing by the Regional Director, FDIC Dallas Regional Office, for this purpose.

8. Within 10 calendar days of satisfying the requirements of paragraphs 6 and 7, Respondent must provide a written certification of Respondent's compliance to the Regional Director, FDIC Dallas Regional Office.

9. If Respondent believes that the Personal Consent Order provisions are fulfilled, Respondent may request termination of the Personal Consent Order by submitting a letter with supporting materials to the Regional Director, FDIC Dallas Regional Office. The FDIC may request additional information to review the termination request. The decision to deny the request and retain this Personal Consent Order as is, modify it, or terminate it, is at the FDIC's discretion.

10. This Personal Consent Order is enforceable and effective under 12 U.S.C. § 1818(i) for 5 years from the date of this Personal Consent Order, except to the extent that any provision is modified, terminated, suspended, or set aside by the FDIC.

11. This Personal Consent Order does not waive any right, power, or authority of the United States; federal, state, or local agencies; or the FDIC as Receiver.

Issued under delegated authority.

Dated: January 12, 2024.

/s/  
\_\_\_\_\_  
G. Chris Finnegan,  
Senior Deputy Director  
Division of Depositor and Consumer Protection