

to the issuance of this ORDER TO PAY CIVIL MONEY PENALTY (“ORDER”) by the FDIC.

The FDIC considered the matter and determined that the Bank has engaged in a pattern or practice of committing violations of the FDPA and section 339.3(a) of the FDIC’s Rules and Regulations, 12 C.F.R. § 339.3(a), in 10 instances by making, increasing, extending, and/or renewing designated loans secured by personal property not covered by flood insurance for the term of the loan. The Bank failed to require borrowers to obtain flood insurance covering contents pledged as security for the loan when contents are owned by a guarantor who is not the borrower.

The FDIC accepts the CONSENT AGREEMENT and issues the following:

ORDER TO PAY CIVIL MONEY PENALTY

IT IS HEREBY ORDERED that, by reason of the violations of law set forth herein, pursuant to section 102(f) of the FDPA, 42 U.S.C. § 4012a(f), a penalty of \$10,000 is assessed against the Bank. The Bank shall pay such amount to the Treasury of the United States, and such amount will be applied to the National Flood Mitigation Fund.

IT IS FURTHER ORDERED that the Bank is prohibited from seeking or accepting indemnification from any third party for the civil money penalty assessed and paid in this matter.

This ORDER shall become effective upon its issuance by the FDIC.

The provisions of this ORDER shall not bar, estop, or otherwise prevent the FDIC or any other federal or state agency or department from taking any other action against the Bank or any of the Bank's current or former institution-affiliated parties, as that term is defined in Section 3(u) of the Act, 12 U.S.C. § 1813(u).

Pursuant to delegated authority.

Dated at New York, New York this 20th day of November, 2024.

/s/

Scott D. Strockoz
Deputy Regional Director