



The FDIC considered the matter and determined that the Bank has engaged in a pattern or practice of violating section 102(e) of the FDPA, 42 U.S.C. § 4012a(e), and Section 339.7(a) of the FDIC Rules and Regulations, 12 C.F.R. § 339.7(a), as follows: failing to follow force placement flood insurance notification procedures in five (5) instances; and failing to purchase flood insurance on a borrower's behalf upon the borrower's failure to obtain flood insurance in five (5) instances.

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 and regulations set forth herein, pursuant to section 102(f) of the FDPA, 42 U.S.C. § 4012a(f), a civil money penalty of \$3,750 is assessed against the Bank. The Bank shall pay such amount to the Treasury of the United States.

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 Federal Deposit Insurance Act, 12 U.S.C. § 1813(u).

Pursuant to delegated authority.

Dated: June 16, 2025

/s/ \_\_\_\_\_  
Kara L. Ritchie  
Acting Deputy Regional Director  
New York Region