FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

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| In the Matter of<br><br>PARAMOUNT BANK<br>HAZELWOOD, MISSOURI<br><br>(Insured State Nonmember Bank) | )<br>)<br>)<br>)<br>)<br>)<br>)<br>) | CONSENT ORDER AND<br>ORDER TO PAY<br><br>FDIC-26-0023b<br>FDIC-26-0015k |

The Federal Deposit Insurance Corporation (FDIC) is the appropriate Federal banking agency for Paramount Bank, Hazelwood, Missouri (Bank), under 12 U.S.C. § 1813(q).

The FDIC considered the matter and determined that the Bank violated the Home Mortgage Disclosure Act (HMDA), Truth in Lending Act (TILA), Real Estate Settlement Procedures Act (RESPA), Equal Credit Opportunity Act (ECOA), the Flood Disaster Protection Act (Flood Act), and the regulations promulgated thereunder (collectively, Consumer Protection Laws), as described in the February 18, 2025, FDIC Consumer Compliance Report of Examination (Report of Examination).

The Bank, by and through its duly elected and acting Board of Directors (Board), executed a Stipulation and Consent to the Issuance of a Consent Order and an Order to Pay (collectively, Consent Agreement), dated May 20, 2026, that is accepted by the FDIC. With the Consent Agreement, the Bank has consented, without admitting or denying any charges of violations of laws and regulations, to the issuance of this Consent Order and Order to Pay (collectively, Orders) by the FDIC, and that the Bank's compliance with the Orders will be monitored by the FDIC.

## I. DEFINITIONS

For purposes of these Orders, the following definitions shall apply to all terms not otherwise defined elsewhere in these Orders:

A. "Consumer Harm" shall mean an injury to a consumer (actual or potential, quantifiable or non-quantifiable) caused by a violation of a Consumer Protection Law (directly or through a Third-Party).

B. "Management" shall mean those officers of the Bank that are responsible for implementing and overseeing policies and procedures approved by the Board.

C. "Third-Party" shall mean any person or entity that enters into a significant relationship with the Bank, including those where the Bank has outsourced a compliance function.

## II. CONSENT ORDER

Having determined that the requirements for issuance of an order under 12 U.S.C. § 1818(b) have been satisfied, the FDIC orders the Bank to cease and desist from engaging in the violations of laws and regulations described above and take affirmative action as follows:

### A. Correction of Violations

Within 120 days of the effective date of this Order, the Bank must implement processes to ensure all violations of laws and regulations cited in the Report of Examination are fully corrected and implement processes to prevent future violations. Full corrective action should include:

i) Appropriate root cause analysis that allows Management to identify specific action(s) that caused the violations;

ii) Actions to remediate consumer harm when it occurs;

iii) Actions to prevent prospective violations and further harm; and

iv) Testing to validate that corrective actions were effective.

Corrective action must also include conducting a file search within 120 days to identify any additional harmed parties impacted by the TILA and RESPA violations since the November 28, 2022, FDIC Consumer Compliance Examination and providing restitution to consumers in instances where consumer harm has occurred.

**B. Compliance Management System**

Within 90 days from the effective date of this Order, the Board must develop and maintain a sound compliance management system (CMS) that is integrated into the overall risk management strategy of the institution. The Board must also develop and Management must implement a compliance program that is commensurate with the level of complexity of the Bank's operations.

## III. BINDING EFFECT

This Order is effective on the date of issuance, and its provisions will remain effective and enforceable unless and until it is modified, terminated, suspended, or set aside in writing by the FDIC. The FDIC will terminate this Order once the Bank has achieved substantial compliance with the provisions of this Order.

## IV. ORDER TO PAY

By reason of the Bank's violations of the HMDA, 12 U.S.C. § 2804, and Regulation C, 12 C.F.R. § 1003.6, the Bank is assessed a civil money penalty of $44,800 pursuant to section 8(i)(2) of the Act, 12 U.S.C. § 1818(i)(2), the receipt of which is acknowledged.

The Bank may not seek or accept indemnification from any third party for the civil money penalty assessed and paid in this matter.

The Order to Pay shall become effective upon issuance by the FDIC.

The Order to Pay does not waive any right, power, or authority of the United States; federal, state, or local agencies; or the FDIC as Receiver.

Issued Pursuant to Delegated Authority.

/s/ Date: 6/30/2026______________
G. Chris Finnegan
Senior Deputy Director
Division of Depositor and Consumer Protection