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{{06-30-06 p.12574.1}}

[¶12,573] In the Matter of Per-Odd Keul, Asia-Europe-Americas Bank, Seattle, Washington, now known as Bay Bank, a division of The Cowlitz Bank, Longview, Washington, Docket No. 04-283k (4-21-06).

Respondent agrees to pay civil money penalty assessed by the FDIC in the amount of \$20,000.

**In the Matter of
PER-ODD KEUL, individually and as an institution-affiliated party of
ASIA-EUROPE-AMERICAS BANK
SEATTLE, WASHINGTON
now known as
BAY BANK, a division of THE COWLITZ BANK,
LONGVIEW, WASHINGTON
(Insured State Nonmember Bank)
ORDER TO PAY**

FDIC-04-283k

Per-Odd Keul ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY ("CONSENT AGREEMENT") dated February 9, 2006, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any violation of law or regulation or breach of fiduciary duty for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasury of the United States.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the violation by Respondent, the history of previous violations by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

ORDER TO PAY

IT IS HEREBY ORDERED, that by reason of the breach of fiduciary duty set forth in paragraph 3 of the CONSENT AGREEMENT, a penalty of \$20,000 be, and hereby is, assessed against Per-Odd Keul. The Respondent shall pay the civil money penalty to the Treasury of the United States.

IT IS FURTHER ORDERED, that the Respondent is prohibited from seeking or accepting indemnification from any insured depository institution for the civil money penalty assessed and paid in this matter.

This Order to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 21th day of April, 2006.

Last
Updated legal@fdic.gov
8/11/2006