

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

In the Matter of:

UNIBANK FOR SAVINGS
WHITINSVILLE, MASSACHUSETTS

(INSURED STATE NONMEMBER BANK)

ORDER TO PAY CIVIL MONEY PENALTY

FDIC-15-0203K

UNIBANK FOR SAVINGS, WHITINSVILLE, MASSACHUSETTS ("Bank"), has been advised of its right to receive a NOTICE OF ASSESSMENT OF CIVIL MONEY PENALTY, FINDINGS OF FACT AND CONCLUSIONS OF LAW, ORDER TO PAY AND NOTICE OF HEARING issued by the Federal Deposit Insurance Corporation ("FDIC") detailing the violations of law and regulation for which a civil money penalty may be assessed against the Bank pursuant to section 102(f)(1) of the Flood Disaster Protection Act of 1973, as amended ("FDPA"), 42 U.S.C. § 4012a(f)(1), and has been further advised of the right to a hearing with respect to the foregoing under section 102(f)(4) of the FDPA, 42 U.S.C. § 4012a(f)(4), and the FDIC Rules of Practice and Procedure, 12 C.F.R. Part 308. The Bank, having waived those rights, entered into a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY CIVIL MONEY PENALTY ("CONSENT AGREEMENT") with counsel for the FDIC dated August 6, 2015, whereby, solely for the purpose of this proceeding and without admitting or denying the violations of law and regulation, the Bank consented 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 Part 339 of the FDIC's Rules and Regulations, 12 C.F.R. Part 339 ("Part 339"). Specifically, the FDIC has reason to believe that the Bank has violated the FDPA and Part 339 in that the Bank made, increased, extended, or renewed loans secured by a building or mobile home located or to be located in a special flood hazard area without requiring that the collateral be covered by sufficient flood insurance coverage for the term of the loan as required by Part 339.3(a), and in that the Bank failed to either properly notify the borrower that the borrower should obtain flood insurance in the proper amount or, if the borrower failed to obtain proper insurance within 45 days of such notice, force place insurance on the borrower's behalf as required by Part 339.7. These violations constituted a pattern or practice, as that term is used in the FDPA. This determination is based on the fact that there were multiple violations of the same type and the violations are attributed to management's inadequate oversight, ineffective monitoring, policies, or procedures, and inadequate training.

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 regulation set forth herein, pursuant to section 102(f) of the FDPA, 42 U.S.C. § 4012a(f), a penalty of \$6,250.00 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 of 1950, 12 U.S.C. § 1813(u).

Pursuant to delegated authority.

Dated at 1:00 PM this 18th day of August, 2015.

/s/ Scott D. Strockoz
Regional Director