

UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
COMPTROLLER OF THE CURRENCY

In the Matter of: Julie K. Wright Former Officer Park National Bank Newark, Ohio))))))	AA-EC-06-02
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CONSENT ORDER

WHEREAS, the Comptroller of the Currency of the United States of America (“Comptroller”) intends to initiate an action for a personal cease and desist order against Julie K. Wright (“Respondent”) pursuant to 12 U.S.C. § 1818(b) (as amended) for unsafe and unsound banking practices and violations of law relating to unauthorized credit transactions, incomplete disclosures on applications and forms of Park National Bank, Newark, Ohio and failure to abide by the terms of a plan of disciplinary action imposed by that bank ; and

WHEREAS, in the interest of cooperation and to avoid the costs associated with future administrative and judicial proceedings with respect to the above matter, Respondent, without admitting or denying any wrongdoing, desires to enter into this Consent Order (“Order”) issued pursuant to 12 U.S.C. § 1818(b);

NOW, THEREFORE, in consideration of the above premises, it is stipulated by and between the Comptroller, through his duly authorized representative, and Respondent that:

JURISDICTION

Park National Bank, Newark, Ohio (“Bank”) is a national banking association, chartered and examined by the Comptroller, pursuant to the National Bank Act of 1864, as amended, 12 U.S.C. § 1 et seq. Accordingly, the Bank is an “insured depository institution” as that term is defined in 12 U.S.C. § 1813(c)(2).

Respondent was an officer of the Bank in charge of the Bank Card Department and is an “institution-affiliated party” of the Bank as that term is defined in 12 U.S.C. § 1813(u), having served in such capacity within six (6) years from the date hereof (see 12 U.S.C. § 1818(i)(3)).

Pursuant to 12 U.S.C. § 1813(q), the Comptroller is the “appropriate Federal banking agency” to maintain an enforcement proceeding against institution-affiliated parties. Therefore, Respondent is subject to the authority of the Comptroller to initiate and maintain this cease and desist proceeding against her pursuant to 12 U.S.C. § 1818(b).

Article II

PRIOR NOTICE

Pursuant to the authority vested in him by the Federal Deposit Insurance Act, as amended, 12 U.S.C. § 1818, the Comptroller hereby orders that,

(1) Prior to accepting any position that causes her to become an “institution-affiliated party” (as defined in 12 U.S.C. § 1813(u)) of any institution or agency specified in 12 U.S.C. § 1818(e)(7)(A), Respondent shall provide the chief executive officer and

Initials __ JW
Date- 2 -_1/11/06

the board of directors of the institution or agency considering hiring her with a copy of this Order.

(2) Within ten (10) days from and after her acceptance of any position described in paragraph (1), Respondent shall provide written notice of such acceptance to the Director of the Enforcement and Compliance Division, OCC, 250 E Street, S.W., Washington, D.C. 20219, along with a written certification of her compliance with paragraph (1).

Article III

Duties and Responsibilities

It is further ordered that in the event Respondent becomes an “institution-affiliated party” as defined in 12 U.S.C. § 1813(u), she shall comply with the following provisions:

- (1) Respondent shall comply with applicable laws and regulations.
- (2) Respondent shall avoid engaging in any unsafe or unsound practices (as that term is used in 12 U.S.C. § 1818).
- (3) Respondent shall adhere to the written policies and procedures of any insured depository institution or agency with which she may become affiliated, or seek and receive written permission from appropriate authorized individuals to do otherwise.
- (4) Respondent shall not breach her duties of loyalty or care owed to any insured depository institution or agency with which she may become affiliated and shall, at all times, avoid placing her own interests above those of the institution.

Initials __ JW
Date- 3 -_1/11/06

(5) If Respondent is uncertain whether a situation implicates paragraphs 1 through 4 of this Article, or if Respondent is uncertain about her duties arising from these or any other requirements under this Order, she shall obtain, at her own expense, and abide by the written advice of counsel regarding her duties and responsibilities with respect to the matter. To comply with this paragraph, Respondent shall engage counsel who is in no way affiliated with the institution or agency and who has never been subject to any sanctions by any Federal banking agency, either by agency order or consent.

This Order shall be enforceable to the same extent and in the same manner as an effective and outstanding order that has been issued and has become final pursuant to 12 U.S.C. § 1818(b).

Article IV

WAIVERS

- (1) By executing this Order, Respondent waives:
- (a) the right to the issuance of Notice(s) under 12 U.S.C. § 1818(b);
 - (b) all rights to a hearing and a final agency decision pursuant to 12 U.S.C. § 1818(b) and 12 C.F.R. Part 19;
 - (c) all rights to seek judicial review of this Order;
 - (d) all rights in any way to contest the validity of this Order; and
 - (e) any and all claims for fees, costs or expenses against the Comptroller, or any of his agents or employees, related in any way to this enforcement

Initials __ JW
Date- 4 -_1/11/06

matter or this Order, whether arising under common law or under the terms of any statute, including, but not limited to, the Equal Access to Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412.

(2) Respondent shall not cause, participate in or authorize the Bank (or any subsidiary or affiliate thereof) to incur, directly or indirectly, any legal (or other professional) expense relative to the negotiation and issuance of this Order except as permitted by 12 C.F.R. § 7.2014 and Part 359; and Respondent shall not, directly or indirectly, obtain or accept any indemnification (or other reimbursement) from the Bank (or any subsidiary or affiliate thereof) with respect to such amounts except as permitted by 12 C.F.R. § 7.2014 and Part 359.

(3) Respondent acknowledges that she has read and understands the premises and obligations of this Order and declares that no separate promise or inducement of any kind has been made by the Comptroller, his agents or employees to cause or induce Respondent to agree to consent to the issuance of this Order and/or to execute this Order.

(4) It is hereby agreed that the provisions of this Order constitute a settlement of the cease and desist proceedings pursuant to 12 U.S.C. 1818(b) contemplated by the Comptroller. The Comptroller agrees not to institute proceedings for the specific acts, omissions, or violations referenced in the first whereas clause, hereof, unless such acts, omissions, or violations reoccur.

(5) It is further agreed that the provisions of this Order shall not be construed as an adjudication on the merits and, except as set forth above in paragraph 4, shall not inhibit,

Initials __ JW
Date- 5 -_1/11/06

estop, bar, or otherwise prevent the Comptroller from taking any action affecting Respondent if, at any time, he deems it appropriate to do so to fulfill the responsibilities placed upon him by the several laws of the United States of America.

(6) Respondent understands that nothing herein shall preclude any proceedings brought by the Comptroller to enforce the terms of this Order, and that nothing herein constitutes, nor shall Respondent contend that it constitutes, a waiver of any right, power, or authority of any other representatives of the United States or agencies thereof, including the Department of Justice, to bring other actions deemed appropriate.

IN TESTIMONY WHEREOF, the undersigned have hereunto set their hands.

/s/

Ronald G. Schneck
Director
Special Supervision Division

1/26/06

Date

/s/

Julie K. Wright

1/11/06

Date

Initials __ JW
Date- 6 -_1/11/06