

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

In the Matter of:)	
Allyson Regas)	
Former Vice President, Chief Financial Officer, and)	AA-EC-12-83
Controller)	
Western Springs National Bank & Trust)	
Western Springs, IL)	

CONSENT ORDER

WHEREAS, the Comptroller of the Currency of the United States of America (“Comptroller”) intends to initiate civil money penalty proceedings against Allyson Regas (“Respondent”) pursuant to 12 U.S.C. § 1818(i) on the basis of Respondent’s activities while serving as Vice President, Chief Financial Officer, and Controller of Western Springs National Bank & Trust, Western Springs, IL (“Bank”) until her resignation from the Bank in October 2011;

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(i);

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

Initials: AR
Date: 10/1/12

Article I

JURISDICTION

(1) The 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).

(2) Respondent is a former vice president, Chief Financial Officer, and Controller of the Bank 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)).

(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 a civil money penalty action against her pursuant to 12 U.S.C. § 1818(i).

Article II

COMPTROLLER'S FINDINGS

Pursuant to the authority vested in him by the Federal Deposit Insurance Act, as amended, 12 U.S.C. § 1818, the Comptroller finds, and Respondent neither admits nor denies, the following:

(1) Respondent served as Vice President, Chief Financial Officer, and Controller of the Bank until her resignation in October 2011.

(2) During the period 2004 through 2009, Respondent's father, the Bank's Chairman of the Board, made multiple real estate investments in her name and on her behalf. Several of the real estate investments received loans and extensions of credit from the Bank.

(3) Bank policy required Bank officers, including Respondent, to disclose any financial connection with Bank borrowers to the Bank's Board. Respondent failed to inform herself of her various real estate investments of which she should have been aware and falsely stated on her annual disclosures to the Bank that she did not have a financial relationship with any Bank borrowers.

(4) By reason of the foregoing conduct, Respondent engaged in violations of law and breached her fiduciary duty to the Bank. Her breaches were part of a pattern of misconduct.

Article III

ORDER FOR CIVIL MONEY PENALTY

Respondent consents to, and it is ORDERED that:

- (1) Respondent shall pay a civil money penalty in the amount of ten thousand dollars (\$10,000.00), which shall be paid in full upon execution of this Order.
 - (a) If a check is the selected method of payment, the check shall be made payable to the Treasurer of the United States and shall be delivered to:
Comptroller of the Currency, P.O. Box 979012, St. Louis, Missouri
63197-9000.
 - (b) If a wire transfer is the selected method of payment, it shall be sent to the Comptroller's account #2071001, ABA Routing # 021030004.
 - (c) The docket number of this case (AA-EC-12-83) shall be entered on the payment document or wire confirmation and a photo copy of the payment document or confirmation of the wire transfer shall be sent immediately, by overnight delivery, to the Director of Enforcement and Compliance, Office of the Comptroller of the Currency, 250 E Street, S.W., Washington D.C., 20219.
- (2) 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(i) and (h) (as amended).

Article IV

OTHER PROVISIONS

- (1) By consenting to the issuance of this Order, Respondent waives:
 - (a) the right to the issuance of a Notice of Civil Money Penalty Assessment under 12 U.S.C. § 1818(i);
 - (b) all rights to a hearing and a final agency decision pursuant to 12 U.S.C. § 1818 (i) 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 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 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 him to agree to consent to the issuance of this Order or to execute this Order

(3) This Order constitutes a settlement of civil money penalty proceedings arising out of the specific acts, omissions, or violations described in the Comptroller's Findings (Article II of this Order). However, the specific acts, omissions, or violations described in Article II may be used by the OCC in future enforcement actions to establish a pattern or practice of misconduct or the continuation of a pattern or practice of misconduct.

(4) This Order shall not be construed as an adjudication on the merits and, except as set forth above in paragraph (4), shall not inhibit, 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.

(5) Nothing herein shall preclude any proceedings brought by the Comptroller to enforce the terms of this Order, and 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 has hereunto set his hand.

Allyson M. Regas

10/1/12

Allyson Regas

Date

IT IS SO ORDERED.

Henry Fleming

10/11/12

Henry Fleming
Director for Special Supervision

Date

