

**UNITED STATES OF AMERICA**  
**Before The**  
**OFFICE OF THRIFT SUPERVISION**

<b>In the Matter of</b>	)	
	)	
<b>AMYE LORING,</b>	)	Re: Order No. NE-07-09
	)	
<b>A Former Employee of</b>	)	Dated: July 9, 2007
	)	
<b>SOVEREIGN BANK,</b>	)	
<b>Wyomissing, Pennsylvania</b>	)	
<b>(OTS No. 04410)</b>	)	

**STIPULATION AND CONSENT TO**  
**ISSUANCE OF AN ORDER OF PROHIBITION**

WHEREAS, the Office of Thrift Supervision ("OTS"), based upon information derived from the exercise of its regulatory responsibilities, has informed Amye Loring ("LORING"), formerly an employee of Sovereign Bank, Wyomissing, Pennsylvania (the "Bank," OTS No. 04410), that the OTS is of the opinion that grounds exist to initiate administrative prohibition proceedings against LORING pursuant to provisions of Section 8(e) of the Federal Deposit Insurance Act ("FDI Act"), 12 U.S.C. § 1818(e),<sup>1</sup> and

WHEREAS, LORING desires to cooperate with the OTS and to avoid the time and expense of such administrative proceedings; and

WHEREAS, LORING, while admitting that the OTS has jurisdiction with respect to this matter (as addressed in Paragraph 1 below), neither admits nor denies (i) that the above-mentioned grounds exist, or (ii) the OTS Findings of Fact (in Paragraph 2 below), and, is of the understanding that this settlement is subject to Rule 408 of the Federal Rules of Evidence.

NOW, THEREFORE, AMYE LORING hereby stipulates and agrees to the following:

1. Jurisdiction.

(a) Sovereign Bank is, and at all times relevant hereto has been, a "savings association" within the meaning of 12 U.S.C. §§ 1462(4) and 1813(b). Accordingly, Sovereign Bank is and has been an "insured depository institution" as that term is defined in 12 U.S.C. § 1813(c).

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<sup>1</sup> All references to the United States Code in this Stipulation and in the related Order are to the United States Code as amended.

(b) LORING, having been an employee of the Bank at all times relevant hereto, is an "institution-affiliated party" as that term is defined in 12 U.S.C. § 1813(u).

(c) Pursuant to 12 U.S.C. § 1813(q), the OTS is the "appropriate Federal banking agency" with jurisdiction to initiate and maintain administrative enforcement proceedings against institution-affiliated parties of savings associations pursuant to 12 U.S.C. § 1818.

(d) LORING, having been an employee of the Bank within six years of the date hereof, is subject to the authority of the OTS to initiate and maintain administrative prohibition proceedings against her, pursuant to 12 U.S.C. § 1818(e). See 12 U.S.C. § 1818(i)(3).

#### 2. OTS Findings of Fact.

LORING had been employed as a head teller in a Massachusetts branch of Sovereign Bank until mid-March 2007. On or about March 15, 2007, LORING misappropriated approximately \$19,630 from a cash drawer at the Sovereign Bank branch where she had been employed. Therefore, the OTS finds that, LORING engaged in one or more violations of law and unsafe or unsound practices by misusing her position and misappropriating funds from the bank's cash drawer. By reason of the violations and unsafe practices, LORING caused a financial loss or other damage to the Bank, prejudiced the interests of the Bank's depositors, and received financial gain or other benefit. Such violations and practices also involve personal dishonesty on the part of LORING and/or demonstrate willful or continuing disregard for the safety or soundness of the Bank.

#### 3. Consent.

LORING consents to the issuance by the OTS of the accompanying Order of Prohibition (the "Order"). LORING further agrees to comply with the terms of the Order upon its issuance and stipulates that the Order complies with all requirements of law.

#### 4. Finality.

The Order is issued by the OTS under the authority of 12 U.S.C. § 1818(e), and upon its issuance by the OTS (acting through its Regional Director) the Order shall be a final order, effective and fully enforceable by the OTS under the provisions of 12 U.S.C. § 1818(i).

#### 5. Waivers.

LORING waives the following:

- (i) The right to be served with a written notice of the OTS' charges against her;
- (ii) The right to an administrative hearing of the OTS' charges against her;
- (iii) The right to seek judicial review of the Order, including, without limitation, any

such right provided by 12 U.S.C. § 1818(h), or otherwise to challenge the validity of the Order; and

- (iv) Any and all claims against OTS, including its employees and agents, and any other governmental entity for the award of fees, costs, or expenses related to this OTS enforcement matter and/or the Order, whether arising under federal statutes (e.g., the Equal Access to Justice Act, 5 U.S.C. § 504, or 28 U.S.C. § 2412), under common law, or otherwise.

6. Indemnification.

LORING shall neither cause nor permit the Bank (or any successor institution, holding company, subsidiary, or service corporation thereof) to incur, directly or indirectly, any expense for any legal or other professional expenses incurred relative to the negotiation and issuance of the Order. LORING also shall not obtain any indemnification (or other reimbursement) from the Bank (or any successor institution, holding company, subsidiary, or service corporation thereof) with respect to such amounts. Any such payments received by or on behalf of LORING in connection with this action shall be returned to the Bank (or the successor institution, holding company, subsidiary, or service corporation thereof).

7. Other Government Actions Not Affected.

LORING acknowledges and agrees that her consent to the issuance of the Order is for the purpose of resolving this OTS administrative enforcement matter only, and does not release, discharge, compromise, settle, dismiss, resolve, or in any way affect any actions, charges against, or liability of LORING that arise relative to her service at Sovereign Bank or otherwise, and that may be or have been brought by any other government entity other than the OTS.

8. Miscellaneous.

(a) The construction and validity of this Stipulation and the Order shall be governed by the laws of the United States of America.

(b) All references to the OTS in this Stipulation and the Order shall also mean any of the OTS's predecessors, successors, and assigns.

(c) The section and paragraph headings in this Stipulation and in the Order are for convenience only, and such headings shall not affect the interpretation of this Stipulation or the Order.

(d) The terms of this Stipulation and of the Order represent the final written agreement of the parties with respect to the subject matters hereof, and constitute the sole agreement of the parties with respect to such subject matters.



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A Former Employee of	)	Dated: July 9, 2007
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SOVEREIGN BANK,	)	
Wyomissing, Pennsylvania	)	
(OTS No. 04410)	)	
	)	

**ORDER OF PROHIBITION**

WHEREAS, AMYE LORING (“LORING”) has executed the accompanying Stipulation and Consent to the Issuance of an Order of Prohibition (“Stipulation”); and

WHEREAS, LORING, by her execution of the Stipulation has consented and agreed to the issuance of this Order of Prohibition (“Order”) by the Office of Thrift Supervision (“OTS”), pursuant to Section 8(e) of the Federal Deposit Insurance Act (“FDI Act”), 12 U.S.C. § 1818(e).

**NOW THEREFORE, IT IS ORDERED that:**

**1. Prohibition.**

(a) LORING is prohibited from further participation, in any manner, in the conduct of the affairs of Sovereign Bank (OTS No. 04410), which is based in Wyomissing, Pennsylvania.

(b) LORING, except upon the prior written consent of the OTS (acting through its Director or an authorized representative thereof) and any other “appropriate Federal financial institutions regulatory agency,” for purposes of 12 U.S.C. § 1818(e)(7)(B)(ii), shall not hold any office in, or participate in any manner in the conduct of the affairs of, any institution or agency specified in 12 U.S.C. § 1818(e)(7)(A), including, but not limited to:

- i. Any insured depository institution, e.g., savings and loan associations, savings banks, national banks, trust companies, and other banking institutions;
- ii. Any institution treated as an insured bank under 12 U.S.C. §§ 1818(b)(3) and 1818(b)(4), or as a savings association under 12 U.S.C. § 1818(b)(9), e.g., subsidiaries and holding companies of banks or savings associations;
- iii. Any insured credit union under the Federal Credit Union Act (12 U.S.C. § 1781 et seq.);

- iv. Any institution chartered under the Farm Credit Act of 1971 (12 U.S.C. § 2001 et seq.);
  - v. Any appropriate Federal depository institution regulatory agency, within the meaning of 12 U.S.C. § 1818(e)(7)(A)(v); and
  - vi. The Federal Housing Finance Board and any Federal Home Loan Bank.
- (c) **LORING**, in view of 12 U.S.C. § 1818(e)(6), also shall not –
- i. Solicit, procure, transfer, attempt to transfer, vote, or attempt to vote any proxy, consent, or authorization with respect to any voting rights in any institution identified in 12 U.S.C. § 1818(e)(7)(A) (and also identified in Paragraph 1(a) above);
  - ii. Violate any voting agreement previously approved by the “appropriate Federal banking agency” (within the meaning of 12 U.S.C. § 1813(q)); or
  - iii. Vote for a director, or, except as otherwise provided by Paragraph 1(a) hereof, serve or act as an “institution-affiliated party”, as that term is defined at 12 U.S.C. § 1813(u), e.g., a director, officer, employee, controlling stockholder of, or agent for, an insured depository institution.

2. This Order is subject to and hereby provides notice of the provisions of Section 8(j) of the FDI Act, 12 U.S.C. § 1818(j).

3. **LORING** shall promptly respond to any request from the OTS for documents or information that the OTS reasonably requests to demonstrate compliance with this Order.

4. The Stipulation is made a part hereof and is incorporated herein by this reference.

5. This Order is and shall become effective on the date it is issued, which date is shown in the caption hereof. The Stipulation and this Order shall remain in effect until terminated, modified or suspended in writing by the OTS, acting through its Director, Regional Director, or other authorized representative.

**OFFICE OF THRIFT SUPERVISION**

*s/ Robert C. Albanese*

By: \_\_\_\_\_  
Robert C. Albanese  
Regional Director, Northeast Region