# UNITED STATES OF AMERICA DEPARTMENT OF THE TREASURY COMPTROLLER OF THE CURRENCY WASHINGTON, D.C.

In the Matter of	)
<b>CHRISTOPHER SANGSTER</b> , former Branch Manager	) ) ) OCC AA-EC-2019-58
South Central Bank, N.A. Chicago, Illinois	) ) )
	) _ )

#### **ASSESSMENT OF A CIVIL MONEY PENALTY**

On February 6, 2020, Michael R. Brickman, Deputy Comptroller for Special Supervision for the Office of the Comptroller of the Currency ("OCC") issued a Notice of Charges to Respondent which, *inter alia*, sought the imposition of a Civil Money Penalty against Christopher Sangster ("Respondent"), an institution affiliated party of South Central Bank, N.A., Chicago, Illinois. The Notice of Charges sought imposition of a Thirty-Five Thousand Dollar (\$35,000.00) civil money penalty against Respondent pursuant to Section 8(i)(2)(B) of the Federal Deposit Insurance Act, 12 U.S.C. § 1818(i)(2)(B).

As set forth in the Decision on Entry of Default ("Decision"), Respondent failed to submit a timely Answer to the Notice and failed to seek a hearing on assessment of the Civil Money Penalty.

Pursuant to Section 8(i) of the Federal Deposit Insurance Act, 12 U.S.C. § 1818(i): IT IS HEREBY ORDERED that Respondent, Christopher Sangster, be assessed a civil money penalty in the amount of Thirty-Five Thousand Dollars (\$35,000.00).

Remittance of the civil money penalty shall be payable to the Treasury of the United

States and delivered to the Comptroller of the Currency, Washington, D.C.

IT IS FURTHER ORDERED that 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 will become effective thirty (30) days from the date of its issuance.

The provisions of this ORDER will remain effective and in force except in the event

that, and until such time as, any provision of this ORDER shall have been modified, terminated,

suspended, or set aside by the Office of the Comptroller of the Currency.

IT IS SO ORDERED.

Date: May 17, 2021.

/s/

MICHAEL J. HSU ACTING COMPTROLLER OF THE

**CURRENCY** 

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<b>CHRISTOPHER SANGSTER</b> , former Branch Manager	) ) ) OCC AA-EC-2019-58
South Central Bank, N.A. Chicago, Illinois	) ) )
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### **ORDER OF PROHIBITION**

On February 6, 2020, Michael R. Brickman, Deputy Comptroller for Special Supervision for the Office of the Comptroller of the Currency ("OCC") issued a Notice of Charges to Christopher Sangster ("Respondent") which, *inter alia*, sought the issuance of an order permanently prohibiting Respondent from further participation in the affairs of insured depository institutions pursuant to Section 8(e) of the Federal Deposit Insurance Act ("FDIA"), 12 U.S.C. § 1818(e).

As set forth in the Decision on Entry of Default ("Decision"), the Respondent failed to submit a timely Answer to the Notice and failed to seek a hearing on assessment of the Civil Money Penalty.

For the reasons set forth in the Decision, it is hereby ordered, pursuant to Section 8(e) of the FDIA, 12 U.S.C. § 1818(e):

1. Christopher Sangster shall not participate in any manner in the conduct of the affairs of any insured depository institution, agency, or organization enumerated in Section

8(e)(7)(A) of the FDIA, 12 U.S.C. § 1818(e)(7)(A), without the prior written consent of the appropriate Federal financial institutions regulatory agency, as that term is defined in Section 8(e)(7)(D) of the FDIA, 12 U.S.C. § 1818(e)(7)(D); and

- 2. Christopher Sangster shall not 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 described in Section 8(e)(7)(A) of the FDIA, 12 U.S.C. § 1818(e)(7)(A), without the prior written consent of the appropriate Federal financial institutions regulatory agency, as that term is defined in Section 8(e)(7)(D) of the FDIA, 12 U.S.C. § 1818(e)(7)(D); and
- 3. Christopher Sangster shall not violate any voting agreement with respect to any insured depository institution, agency, or organization enumerated in Section 8(e)(7)(A) of the FDIA, 12 U.S.C. § 1818(e)(7)(A), without the prior written consent of the appropriate Federal financial institutions regulatory agency, as that term is defined in Section 8(e)(7)(D) of the FDIA, 12 U.S.C. § 1818(e)(7)(D); and
- 4. Christopher Sangster shall not vote for a director, or serve or act as an institution-affiliated party, as that term is defined in Section 3(u) of the FDIA, 12 U.S.C. § 1813(u), of any insured depository institution, agency, or organization enumerated in Section 8(e)(7)(A) of the FDIA, 12 U.S.C. § 1818(e)(7)(A), without the prior written consent of the appropriate Federal financial institutions regulatory agency, as that term is defined in Section 8(e)(7)(D) of the FDIA, 12 U.S.C. § 1818(e)(7)(D).

This ORDER will become effective thirty (30) days from the date of its issuance.

The provisions of this ORDER will remain effective and in force except in the event that, and until such time as, any provision of this ORDER shall have been modified, terminated, suspended, or set aside by the Office of the Comptroller of the Currency.

IT IS SO ORDERED.

Date: May 17, 2021.

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MICHAEL J. HSU ACTING COMPTROLLER OF THE CURRENCY

## UNITED STATES OF AMERICA DEPARTMENT OF THE TREASURY COMPTROLLER OF THE CURRENCY WASHINGTON, D.C.

In the Matter of	)	
CHRISTOPHER SANGSTER, former Branch Manager	) ) )	OCC AA-EC-2019-58
South Central Bank, N.A. Chicago, Illinois	) ) ) )	
	)	

### CEASE AND DESIST ORDER OF RESTITUTION

On February 6, 2020, Michael R. Brickman, Deputy Comptroller for Special Supervision for the Office of the Comptroller of the Currency ("OCC"), issued a Notice of Charges to Christopher Sangster ("Respondent") which, *inter alia*, sought issuance of a Cease and Desist Order requiring Respondent to make restitution for violations of law that resulted in his unjust enrichment, pursuant to Section 8(e) of the Federal Deposit Insurance Act ("FDIA"), 12 U.S.C. § 1818(b)(6).

As set forth in the Decision on Entry of Default ("Decision"), Respondent failed to submit a timely Answer to the Notice and failed to seek a hearing on assessment of the Civil Money Penalty.

For the reasons set forth in the Decision, it is hereby ordered, pursuant to Section 8(b)(6) of the FDIA, 12 U.S.C. § 1818(b)(6): that Respondent, Christopher Sangster, former branch manager at South Central Bank, N.A., Chicago, Illinois ("Bank"), pay restitution in the amount of One Hundred Forty-One Thousand Four Hundred and Seventy-One Dollars

(\$141,471) or such other amount as justice may require, representing the unjust enrichment to Respondent and the losses of the insured depository institution and Bank customer attributable to Respondent's violations of law and applicable regulations as set forth in the Decision.

The amounts of restitution are distributed as follows:

- 1. \$104,000.00 to South Central Bank, N.A., Chicago, Illinois; and
- \$37,471.00 to the Bank customer dba Rothschild Liquors, identified as
   Business A in the Notice of Charges.

This Order of Restitution shall continue to apply in favor of any successor in interest to the above-enumerated insured depository institution and Bank customer. Remittance of the restitution owed by Respondent shall be payable to the named insured depository institution, or its successor in interest, and shall be delivered to the Director, Enforcement Group ("Director of Enforcement"), OCC, 400 7th Street, SW, Washington D.C. 20219, or to any subsequent address the OCC may occupy. The docket number in this case (OCC AA-EC-2019-58) shall be included with the remittance.

Upon execution of this Order, Respondent shall notify the Director of Enforcement of his current residential address, by returning proof of such address with this Order. Until the total amount of restitution is paid in full, upon each subsequent change in residential address, if any, Respondent shall notify the Director of Enforcement of the new address within seven (7) days of such change in residential address.

The provisions of this Order will remain in effect and in force except in the event that, and until such time as, any provision of this Order shall have been modified, terminated, suspended, or set aside by the Office of the Comptroller of the Currency.

## IT IS SO ORDERED.

Date: May 17, 2021.

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MICHAEL J. HSU ACTING COMPTROLLER OF THE CURRENCY