



Federal Housing Finance Agency

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FINAL SUSPENSION ORDER

The Federal Housing Finance Agency, as safety and soundness regulator of Fannie Mae, Freddie Mac, and the twelve Federal Home Loan Banks (the “regulated entities”), is issuing this Final Order pursuant to the following legal authorities:

1. Section 1313B of the Federal Housing Enterprises Financial Safety and Soundness Act of 1992 (Safety and Soundness Act) authorizes FHFA to establish standards for the regulated entities regarding prudential management of risks. FHFA is authorized to issue orders requiring the regulated entities to take any action that will best carry out the purposes of that section. *See* 12 U.S.C. 4513b(b)(2)(B)(iii).
2. Section 1319G of the Safety and Soundness Act authorizes FHFA to issue any orders necessary to ensure that the purposes of the Safety and Soundness Act are accomplished. *See* 12 U.S.C. 4526(a).
3. Section 1313 of the Safety and Soundness Act authorizes FHFA to exercise such incidental powers as may be necessary in the supervision and regulation of each regulated entity. *See* 12 U.S.C. 4513(a)(2).

Consistent with these authorities, FHFA has determined that any business relationship between Barbara Hotchkiss and a regulated entity would present excessive risk to the safety and soundness of the regulated entity. This does not apply to the purchase or sale of any residential mortgage loan for personal or household use.

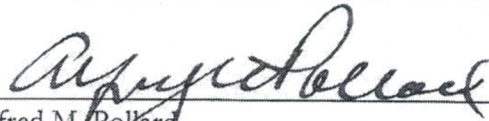
This determination is based on the following findings:

1. Barbara Hotchkiss entered into a Stipulation and Consent to the Issuance of an Order of Prohibition From Further Participation with the Federal Deposit Insurance Corporation (“FDIC Order”), whereby Ms. Hotchkiss consented to the issuance of the FDIC Order without admitting or denying any unsafe or unsound banking practices or violations of laws or regulations.
2. The FDIC Order stated that the FDIC considered the matter involving Ms. Hotchkiss and determined that it has reason to believe that Ms. Hotchkiss:

- a. Has engaged or participated in unsafe and unsound banking practices and/or violation of laws or regulations as an institution-affiliate party of the West Coast Bank, Lake Oswego, Oregon ("Bank");
 - b. By reason of such practices and/or violation of laws or regulations, the Bank has suffered or will probably suffer financial loss or other damage, the interests of the Bank's depositors have been or could be prejudiced and/or Ms. Hotchkiss received financial gain or other benefit; and
 - c. Such practices and violation of laws or regulations involve personal dishonesty on the part of Respondent or demonstrate Ms. Hotchkiss' willful and/or continuing disregard for the safety and soundness of the Bank.
3. The FDIC further determined that such practices and/or violation of laws or regulations demonstrated Ms. Hotchkiss' unfitness to serve as a director, officer, person participating in the conduct of the affairs or as an institution-affiliated party of any insured depository institution, or any other agency or organization enumerated in section 8(e)(7)(A) of 12 U.S.C. 1818(e)(7)(A).
 4. The Bank referenced in the FDIC Order is a member bank of the Federal Home Loan Bank of Seattle.

With this Final Order, FHFA is directing each regulated entity to cease any business relationship with Barbara Hotchkiss indefinitely, beginning on March 30, 2015. This does not include the purchase or sale of any residential mortgage loan for personal or household use. This suspension extends to any individual, company, partnership or other group that FHFA determines to be an affiliate of Barbara Hotchkiss.

This Final Order is a final action of the Federal Housing Finance Agency.



Alfred M. Pollard
General Counsel

2-12-2015
Date