

**FEDERAL DEPOSIT INSURANCE CORPORATION**

**WASHINGTON, D.C.**

**In the Matter of**

**ORDER TO PAY**

**LIBERTY BANK OF NEW YORK  
NEW YORK, NEW YORK**

**FDIC-06-083k**

**(Insured State Nonmember Bank)**

Liberty Bank of New York, New York, New York ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY ("CONSENT AGREEMENT") dated May 18, 2006, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying the violations of law and regulations, violations of a final order issued pursuant to section 8(b) of the Federal Deposit Insurance Act ("Act"), 12 U.S.C. § 1818(b), and unsafe and unsound banking practices for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasurer of the United States and the New York State Banking Department.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the conduct by Respondent, the history of previous conduct by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

**ORDER TO PAY**

IT IS HEREBY ORDERED, that by reason of the pattern of the violations of law and regulations, violations of the final order issued pursuant to section 8(b) of the Act, and reckless unsafe and unsound practices set forth in paragraph 3 of the CONSENT AGREEMENT, a penalty in the amount of \$600,000 be, and hereby is, assessed against Liberty Bank of New York, New York, New York. The assessment shall be concurrent with the assessment of a civil money penalty in the amount of \$600,000 by the Financial Crimes Enforcement Network, United States Department of the Treasury ("FinCEN") and the New York State Banking Department and shall be satisfied by one payment in the amount of \$300,000 to the Treasurer of the United States on behalf of the FDIC and FinCEN and one payment in the amount of \$300,000 to the New York State Banking Department.

This Order to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 18 day of May, 2006.

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John H. Corston  
Associate Director  
Division of Supervision and Consumer Protection

**FEDERAL DEPOSIT INSURANCE CORPORATION**

**WASHINGTON, D.C.**

**In the Matter of**

**Mi-JA TONG, individually, and as an  
institution-affiliated party of**

**LIBERTY BANK OF NEW YORK  
NEW YORK, NEW YORK**

**ORDER TO PAY**

**FDIC-03-074k**

**(INSURED STATE NONMEMBER BANK)**

Mi-Ja Tong ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY ("CONSENT AGREEMENT") dated February 6, 2006, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any unsafe or unsound banking practice and/or breach of fiduciary duty for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasurer of the United States.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the conduct by Respondent, the history of previous conduct by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

**ORDER TO PAY**

IT IS HEREBY ORDERED, that by reason of the unsafe or unsound banking practices and/or breaches of fiduciary duty set forth in paragraph 3 of the CONSENT AGREEMENT, a penalty of ONE THOUSAND DOLLARS (\$1,000) be, and hereby is, assessed against Mi-Ja Tong. The Respondent shall pay the civil money penalty to the Treasurer of the United States.

IT IS FURTHER ORDERED that the 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 to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 30th day of March, 2006.

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Lisa K. Roy  
Associate Director  
Division of Supervision and Consumer Protection

**FEDERAL DEPOSIT INSURANCE CORPORATION**

**WASHINGTON, D.C.**

**In the Matter of**

**SANG YOUNG WOO, individually, and as an  
institution-affiliated party of**

**LIBERTY BANK OF NEW YORK  
NEW YORK, NEW YORK**

**ORDER TO PAY**

**FDIC-03-068k**

**(INSURED STATE NONMEMBER BANK)**

SANG YOUNG WOO ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY ("CONSENT AGREEMENT") dated January 5, 2006, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any violation of law or regulation, unsafe or unsound banking practice and/or breach of fiduciary duty for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasurer of the United States.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the conduct by Respondent, the history of previous conduct by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

**ORDER TO PAY**

IT IS HEREBY ORDERED, that by reason of the unsafe or unsound banking practices and/or breaches of fiduciary duty set forth in paragraph 3 of the CONSENT AGREEMENT, a penalty of ONE THOUSAND DOLLARS (\$1,000) be, and hereby is, assessed against SANG YOUNG WOO. The Respondent shall pay the civil money penalty to the Treasurer of the United States.

IT IS FURTHER ORDERED that the 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 to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 30th day of March, 2006.

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Lisa K. Roy  
Associate Director  
Division of Supervision and Consumer Protection

**FEDERAL DEPOSIT INSURANCE CORPORATION**

**WASHINGTON, D.C.**

**In the Matter of**

**KI YOUNG LEE, individually, and as an  
institution-affiliated party of**

**LIBERTY BANK OF NEW YORK  
NEW YORK, NEW YORK**

**ORDER TO PAY**

**FDIC-03-067k**

**(INSURED STATE NONMEMBER BANK)**

Ki Young Lee ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY ("CONSENT AGREEMENT") dated January 18, 2006, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any violation of law or regulation, unsafe or unsound banking practice and/or breach of fiduciary duty for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasurer of the United States.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the conduct by Respondent, the history of previous conduct by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

**ORDER TO PAY**

IT IS HEREBY ORDERED, that by reason of the unsafe or unsound banking practices and/or breaches of fiduciary duty set forth in paragraph 3 of the CONSENT AGREEMENT, a penalty of SEVENTEEN THOUSAND FIVE HUNDRED DOLLARS (\$17,500) be, and hereby is, assessed against Ki Young Lee. The Respondent shall pay the civil money penalty to the Treasurer of the United States.

IT IS FURTHER ORDERED that the 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 to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 30th day of March, 2006.

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Lisa K. Roy  
Associate Director  
Division of Supervision and Consumer Protection

**FEDERAL DEPOSIT INSURANCE CORPORATION**

**WASHINGTON, D.C.**

**In the Matter of**

**HIDONG KIM, individually, and as an  
institution-affiliated party of**

**LIBERTY BANK OF NEW YORK  
NEW YORK, NEW YORK**

**ORDER TO PAY**

**FDIC-03-065k**

**(INSURED STATE NONMEMBER BANK)**

Hidong Kim ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY ("CONSENT AGREEMENT") dated January 12, 2006, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any unsafe or unsound banking practice and/or breach of fiduciary duty for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasurer of the United States.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the conduct by Respondent, the history of previous conduct by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

**ORDER TO PAY**

IT IS HEREBY ORDERED, that by reason of the unsafe or unsound banking practices and/or breaches of fiduciary duty set forth in paragraph 3 of the CONSENT AGREEMENT, a penalty of ONE THOUSAND DOLLARS (\$1,000) be, and hereby is, assessed against Hidong Kim. The Respondent shall pay the civil money penalty to the Treasurer of the United States.

IT IS FURTHER ORDERED that the 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 to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 30th day of March, 2006.

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Lisa K. Roy  
Associate Director  
Division of Supervision and Consumer Protection

**FEDERAL DEPOSIT INSURANCE CORPORATION**

**WASHINGTON, D.C.**

**In the Matter of**

**CHAN KIM, individually, and as an  
institution-affiliated party of**

**LIBERTY BANK OF NEW YORK  
NEW YORK, NEW YORK**

**(INSURED STATE NONMEMBER BANK)**

**ORDER TO PAY**

**FDIC-03-064k**

Chan Kim ("Respondent") and a representative of the Legal Division of the Federal Deposit Insurance Corporation ("FDIC") executed a STIPULATION AND CONSENT TO THE ISSUANCE OF AN ORDER TO PAY ("CONSENT AGREEMENT") dated January 31, 2006, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any unsafe or unsound banking practice and/or breach of fiduciary duty for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasurer of the United States.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the conduct by Respondent, the history of previous conduct by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT and issues the following:

**ORDER TO PAY**

IT IS HEREBY ORDERED, that by reason of the unsafe or unsound banking practices and/or breaches of fiduciary duty set forth in paragraph 3 of the CONSENT AGREEMENT, a penalty of ONE THOUSAND DOLLARS (\$1,000) be, and hereby is, assessed against Chan Kim. The Respondent shall pay the civil money penalty to the Treasurer of the United States.

IT IS FURTHER ORDERED that the 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 to Pay shall be effective upon issuance.

Pursuant to delegated authority.

Dated at Washington, D.C., this 30th day of March, 2006.

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Lisa K. Roy  
Associate Director  
Division of Supervision and Consumer Protection