

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMERICAN BANK OF OKLAHOMA,

Defendant.

Civil No. 23-cv-00371-CDL

**Joint Motion for Approval and Entry of Proposed
Consent Order and Memorandum in Support**

Plaintiff United States of America and Defendant American Bank of Oklahoma (the “Parties”) have agreed upon and jointly move this Court to approve and enter the attached Consent Order as the judgment of the Court. The Parties hereby agree and stipulate to the Court’s entry of this Consent Order in resolution of this litigation. In support of their joint motion, the Parties state as follows:

1. The United States of America filed a Complaint alleging that American Bank of Oklahoma (the “Bank”) engaged in a pattern or practice of unlawful redlining in violation of the Fair Housing Act (“FHA”), 42 U.S.C. §§ 3601–3619, and the Equal Credit Opportunity Act (“ECOA”), 15 U.S.C. §§ 1691–1691f. The Bank neither admits nor denies any of the allegations in the Complaint except that, for the purposes of this Consent Order, the Bank admits facts necessary to establish this Court’s jurisdiction over it and over the subject matter of this action.

2. The Parties have resolved the claims raised in the Complaint and seek entry of the proposed Consent Order.

3. The Court has jurisdiction over the parties and subject matter of this action.

There have been no factual findings or adjudication in this case.

4. The Parties agreed to the terms stated in their proposed Consent Order to voluntarily resolve all claims arising from the conduct alleged in the Complaint.

5. Entry of this Consent Order is in the public interest.

6. Accordingly, the Parties respectfully request that this Court approve and enter the proposed Consent Order.

Respectfully submitted,

For the United States of America:

Dated: August 28, 2023

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For American Bank of Oklahoma:

Dated: August 28, 2023

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