

**UNITED STATES OF AMERICA
DEPARTMENT OF THE TREASURY
OFFICE OF THE COMPTROLLER OF THE CURRENCY**

In the Matter of:

Claudia Russ Anderson
Former Community Bank Group Risk Officer

David Julian
Former Chief Auditor

Paul McLinko
Former Executive Audit
Director

Wells Fargo Bank, N.A.
Sioux Falls, South Dakota

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**ORDER GRANTING ENFORCEMENT COUNSEL’S MOTION TO UNSEAL
CERTAIN FILINGS RELATED TO THE STAY OF THE
ENFORCEMENT PROCEEDINGS AGAINST CARRIE TOLSTEDT**

On March 27, 2023, Enforcement Counsel filed a Motion to Unseal Certain Filings Related to the Stay of the Enforcement Proceedings against Carrie Tolstedt (“Motion to Unseal”). Respondents took no position on the motion. These documents were filed under seal pursuant to an August 20, 2020 Order finding that disclosure of Enforcement Counsel’s Motion to Stay the OCC’s administrative enforcement proceedings against Respondent Carrie Tolstedt (“Stay Motion”), its attachments, and any response submitted thereto, would be contrary to the public interest because the filings contained information relating to a criminal investigation by the Department of Justice (“DOJ”). On September 9, 2020, the Administrative Law Judge granted the Stay Motion, and subsequent filings referencing the stay were also filed under seal.

On March 15, 2023, the United States Attorney’s Office for the Central District of California filed a plea agreement for Tolstedt, in which Tolstedt agreed to plead guilty to

obstruction of a bank examination in violation of 18 U.S.C. § 1517.8. The guilty plea resolved DOJ's criminal investigation. Thereafter, on March 20, 2023, by Order of the Comptroller, the administrative enforcement proceeding against Respondent Tolstedt was terminated.

Upon consideration, and good cause appearing, and there being no objection thereto, the Motion to Unseal is GRANTED. Information related to the stay of enforcement proceedings against Carrie Tolstedt need not be filed under seal in the future. Additionally, the following filings¹ related to the stay shall be unsealed:

- Enforcement Counsel's Motion to Stay the OCC's Enforcement Proceeding Against Respondent Carrie Tolstedt (Aug. 19, 2020);
- Order Sealing Submissions Regarding Enforcement Counsel's Motion to Stay the OCC's Enforcement Proceeding Against Respondent Carrie Tolstedt at 1 (Aug. 20, 2020);
- Respondent Carrie Tolstedt's Unopposed Motion to Seal August 20, 2020 Order Sealing Submissions Regarding Enforcement Counsel's Motion to Stay Enforcement Proceeding Against Her (Sept. 1, 2020);
- Order Sealing August 20, 2020 Order Sealing Submissions Regarding Enforcement Counsel's Motion To Stay Enforcement Proceeding Against Respondent Carrie Tolstedt (Sept. 1, 2020);
- Respondents Russ Anderson, Strother, Julian, And McLinko's Response to Enforcement Counsel's Motion to Stay the OCC's Enforcement Proceeding Against Respondent Carrie Tolstedt (Sept. 3, 2020);
- Respondent Carrie Tolstedt's Opposition to Motion to Stay the Enforcement Proceeding Against Her (Sept. 3, 2020);
- Order Regarding Enforcement Counsel's Motion to Stay the OCC's Enforcement Action Against Respondent Carrie Tolstedt (Sept. 9, 2020);
- Respondents' Request for Clarification of the Order Regarding Enforcement Counsel's Motion to Stay the OCC's Enforcement Action Against Respondent Carrie Tolstedt (Sept. 18, 2020);
- Order Granting Unopposed Motion to Seal the Request for Clarification of the Order Regarding Enforcement Counsel's Motion to Stay the OCC's Enforcement Action Against Respondent Carrie Tolstedt (Sept. 18, 2020);
- Respondent Carrie Tolstedt's Motion for Interlocutory Review of the Tribunal's September 9, 2020 Order (Sept. 24, 2020);

¹ Includes any sealed appendices, exhibits, sealing motions, proposed orders, or other attachments thereto.

- Order Granting Tolstedt's Unopposed Motion to Seal Motion for Interlocutory Review (Sept. 28, 2020);
- Enforcement Counsel's Opposition to Respondents' Request for Clarification of the Order Regarding Enforcement Counsel's Motion to Stay the OCC's Enforcement Action Against Respondent Carrie Tolstedt (Oct. 5, 2020);
- Order Regarding Respondents' Request for Clarification of the Order Regarding Enforcement Counsel's Motion to Stay the OCC's Enforcement Action Against Respondent Carrie Tolstedt (Oct. 6, 2020);
- Enforcement Counsel's Opposition to Respondent Tolstedt's Request for Interlocutory Review of the Tribunal's Sept. 9, 2020 Order (Oct. 9, 2020);
- Respondent Russ Anderson, Strother, Julian, and McLinko's Response in Support of Respondent Carrie Tolstedt's Motion for Interlocutory Review of the Tribunal's September 9, 2020 Order (Oct. 9, 2020);
- Order Transmitting Respondent Tolstedt's Motion for Interlocutory Review (Oct. 20, 2020);
- Joint Stipulation and [Proposed Order] to Extend Time for Carrie Tolstedt to File a Motion to Quash or Modify (Aug. 10, 2021);
- Joint Stipulation and [Proposed] Order Regarding Carrie Tolstedt's Hearing Testimony (Nov. 19, 2021);
- Order Sealing Joint Stipulation and Order Regarding Carrie Tolstedt's Hearing Testimony (Nov. 20, 2021); and
- Joint Stipulation and Order Regarding Carrie Tolstedt's Hearing Testimony (Nov. 23, 2021).

It is **SO ORDERED**.

Date: March 31, 2023.

Michael J. Hsu
Acting Comptroller of the Currency