

UNITED STATES OF AMERICA
BEFORE THE
BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
WASHINGTON, D.C.

In the Matter of

YOULEI TANG, A.K.A. ALEX TANG

A Former Institution-Affiliated Party of

GOLDMAN SACHS & CO.

New York, New York

Docket Nos. 19-010-B-I

Order to Cease and Desist Issued
Upon Consent Pursuant to Section
8(b) of the Federal Deposit
Insurance Act, as Amended

WHEREAS, the Board of Governors of the Federal Reserve System (the “Board of Governors”), pursuant to section 8(b) of the Federal Deposit Insurance Act, as amended (the “FDI Act”), 12 U.S.C. §§ 1818(b), issues this Order to Cease and Desist (this “Order”) upon the consent of Youlei Tang, a.k.a Alex Tang (“Tang”), a former employee and institution-affiliated party, as defined in sections 3(u) and 8(b)(3) of the FDI Act, 12 U.S.C. §§ 1813(u) and 1818(b)(3), of Goldman Sachs & Co. (“Goldman Sachs”), a non-bank subsidiary of the Goldman Sachs Group, Inc., a bank holding company;

WHEREAS, in 2018, while employed as a Vice President for Goldman Sachs, Tang, without authorization and contrary to Goldman Sachs’s policies, removed from the office documents containing Confidential Supervisory Information (“CSI”) and proprietary information belonging to Goldman Sachs, including by sending these documents to his personal e-mail addresses, and kept copies of these documents at his residence;

WHEREAS, Goldman Sachs has recovered the documents Tang inappropriately removed from the office;

WHEREAS, Tang was terminated by Goldman Sachs on August 17, 2018;

WHEREAS, Tang's misconduct described above constituted an unsafe or unsound practice and a violation of Board of Governors' regulations, including 12 C.F.R. § 261.20(g); and

WHEREAS, by affixing his signature hereunder, Tang has consented to the issuance of this Order by the Board of Governors and has agreed to comply with each and every provision of this Order, and has waived any and all rights he might have pursuant to 12 U.S.C. § 1818, 12 CFR Part 263, or otherwise: (a) to contest the issuance of a cease-and-desist order on any matter implied or set forth in this Order; (b) to request a hearing for the purpose of taking evidence with respect to any matter implied or set forth in this Order; (c) to obtain judicial review of this Order or any provision hereof; and (d) to challenge or contest in any manner the basis, issuance, terms, validity, effectiveness, or enforceability of this Order or any provision hereof.

NOW THEREFORE, before the filing of any notices, or the taking of any testimony or adjudication of or finding on any issue of fact or law herein, and without Tang admitting or denying any allegation made or implied by the Board of Governors in connection herewith, and solely for the purpose of settlement of this matter without a formal proceeding being filed and without the necessity for protracted litigation or extended hearings,

IT IS HEREBY ORDERED THAT:

Cease and Desist

1. Pursuant to section 8(b) of the FDI Act, 12 U.S.C. § 1818(b), that prior to accepting any position that would cause Tang to become an institution-affiliated party, or upon execution of this Order if Tang is currently an institution-affiliated party, as defined in sections 3(u) and 8(b)(3) of the FDI Act, 12 U.S.C. §§ 1813(u) and 1818(b)(3), of any institution or agency described in section 8(e)(7)(A) of the FDI Act, 12 U.S.C. § 1818(e)(7)(A), including, but not limited to, any insured depository institution or any holding company of an insured depository institution, or any subsidiary of such holding company, or any foreign bank or company to which subsection (a) of 12 U.S.C. § 3106 applies and any subsidiary of such foreign bank or company, Tang shall:

(a) provide the Managing Director/Senior Vice President or equivalent level in the reporting line of the institution with notice and a copy of this Order;

(b) fully familiarize himself with the policies and procedures of the institution that pertain to his duties and responsibilities, including, but not limited to, the policies and procedures concerning the restrictions on making personal copies of CSI and/or removing CSI from the institution's premises; and

(c) within ten (10) days after his acceptance of any position, or execution of this Order, as described in this paragraph, provide written notice to the Board of Governors, along with a written certification of his compliance with each provision of this paragraph.

2. In connection with Tang's status as an institution-affiliated party, as defined in sections 3(u) and 8(b)(3) of the FDI Act, 12 U.S.C. §§ 1813(u) and 1818(b)(3), Tang shall:

- (a) fully comply with all applicable laws, rules, regulations, policies, and procedures;
- (b) not engage in any unsafe or unsound practice; and
- (c) fully observe his fiduciary duties.

Notices

3. All communications regarding this Order shall be addressed to:

- (a) Richard M. Ashton, Esq.
Deputy General Counsel
Patrick M. Bryan, Esq.
Assistant General Counsel
Board of Governors of
the Federal Reserve System
20th & C Streets NW
Washington, DC 20551

- (b) Youlei Tang

with copy to:

Daniel P. Stipano, Esq.
Buckley LLP
2001 M Street NW, Suite 500
Washington, DC 20036

Miscellaneous

4. Any violation of this Order shall separately subject Tang to appropriate civil penalties under section 8(i) of the FDI Act, 12 U.S.C § 1818(i).

5. The provisions of this Order shall not bar, estop, or otherwise prevent the Board of Governors, or any other Federal or state agency or department, from taking any other action affecting Tang; provided, however, that the Board of Governors shall not take any further action against Tang on any matters concerning or arising from the matters addressed by this Order based upon facts presently known by the Board of Governors. This release and discharge shall

not preclude or affect (i) any right of the Board of Governors to determine and ensure compliance with this Order, or (ii) any proceedings brought by the Board of Governors to enforce the terms of this Order.

6. Each provision of this Order shall remain fully effective and enforceable until expressly stayed, modified, terminated, or suspended in writing by the Board of Governors.

By order of the Board of Governors of the Federal Reserve System, effective this 4th day
of June, 2019.

BOARD OF GOVERNORS OF THE
FEDERAL RESERVE SYSTEM

_____/s/
Youlei Tang

By: _____/s/
Ann E. Misback
Secretary of the Board