

SULLIVAN & CROMWELL LLP

Lawyers



Camille L. Orme

Partner

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PRACTICES & CAPABILITIES

General Practice

Financial Services

Bank Regulatory

Commodities, Futures & Derivatives

Investment Management

Camille Orme is a partner in the Firm's Financial Services Group. Ms. Orme advises U.S. and non-U.S. financial institutions on a wide range of U.S. banking laws and regulations. Recent areas of focus include restructuring global businesses in light of shifting regulatory requirements and standards, bank corporate governance matters, the Volcker Rule, the FDIC's brokered deposits regulations, bank ownership and control matters, national bank preemption, and permissibility of bank activities. Ms. Orme's regulatory practice also includes the affiliate transaction rules, restrictions on insider transactions, restrictions on depository institution management interlocks, and broker-dealer push-out. She also advises banks on supervisory matters, regulatory investigations and enforcement actions.

EDUCATION

2000, The University of Chicago Law School, J.D.

1996, University of Georgia, A.B.

BAR ADMISSIONS

New York

SELECTED REPRESENTATIONS

Recent representations include:

- Bank Policy Institute on numerous matters related to laws, regulations, and legislation relevant to the banking industry, and interactions with federal and state agencies
- Raymond James in its \$1.1 billion acquisition of TriState Capital Holdings
- First Horizon in its merger of equals with IBERIABANK
- CIT Group in its merger of equals with First Citizens, creating the 19th largest bank in the United States based on assets; and in connection with CIT Bank's \$1 billion acquisition of Mutual of Omaha Bank
- State Street in its \$2.6 billion acquisition of Charles River Systems
- CIT Group and IMB Holdco, as joint regulatory counsel, in CIT Group's \$3.4 billion merger with IMB Holdco
- Evercore on its acquisition of the operating businesses of ISI International Strategy & Investment
- A global investment management organization in all aspects of debanking and deregistering as a bank holding company, including conversion of two depository institutions to trust-only institutions,

regulatory and transactional structuring, divestitures, bank regulatory applications, public company disclosure, and representation before multiple bank regulatory agencies

- A major non-U.S. financial institution in the preparation of its IHC implementation plan required by the Federal Reserve's enhanced prudential standards for foreign banking organizations
- A major non-U.S. banking organization regarding the U.S. regulatory aspects of creation of a new top-tier holding company
- A global bank in analyzing existing governance and risk management structures and practices under the OCC's heightened standards
- Multiple financial institutions after their conversions to bank holding companies during the financial crisis, including analysis of permissibility of activities, conformance efforts, and advice regarding financial holding company status
- Financial institutions in connection with a variety of bank regulatory enforcement actions
- Distressed depository institutions and their holding companies on a range of regulatory, corporate and disclosure issues
- On corporate governance issues, including development of The Clearing House's The Role of the Board of Directors in Promoting Effective Governance and Safety and Soundness for Large U.S. Banking Organizations and The Clearing House Guiding Principles for Compensation Practices for Risk-Management and Control Function Personnel at Banking Organizations

In addition, Ms. Orme has advised on numerous transactional and corporate and disclosure matters. She also has experience with derivatives regulation and the formation and designation of electronic exchanges.

Ms. Orme has spoken on U.S. regulatory reform and other bank regulatory issues, including at conferences and programs hosted by the American Bar Association, the Institute of International Bankers, Practising Law Institute, the Washington, D.C., Bar Association and the Association of the Bar of the City of New York. She is a Co-Chair of the ABA Banking Law Committee Systemically Important Financial Institutions Subcommittee, past Co-Chair of the ABA Banking Law Committee International Banking Subcommittee, a past member of the Banking Law Committee of the Association of the Bar of the City of New York, and a past member of the Association of the Bar of the City of New York Committee on Futures Regulation.

Ms. Orme is co-head of the Firm's Bank Regulatory practice and serves as an Associate Development Partner for the Firm's Financial Services Group. She has been recognized for her work by *Chambers USA* (Financial Services Regulation: Banking Compliance) and *IFLR1000* (Financial Services Regulatory). Camille was named a *Law360* MVP for Compliance in 2022. She was also awarded the Best in Financial Regulation award at *Euromoney Legal Media Group's* Americas Women in Business Law Awards in 2016 and 2018.

