FEDERAL RESERVE BANK of ATLANTA

CHAPELLE D. DAVIS
Assistant Vice President

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February 19, 2015

Re. Criminal Conviction – Prohibition from Banking Industry

Stephen Michael Little Inmate Register # 17910-021 Bastrop Federal Correctional Institution Post Office Box 1010 Bastrop, Texas 78602

Dear Mr. Little:

The Federal Reserve Bank of Atlanta has become aware that you were convicted upon a plea of guilty on two counts of Bank Fraud in connection with your employment by the former First National Bank of Savannah, Savannah, Georgia. A copy of your judgment of conviction is attached. Because you have been convicted of crimes involving dishonesty or breach of trust, you are automatically subject to the prohibitions set forth in Section 19 of the Federal Deposit Insurance Act, as amended ("Section 19")(12 U.S.C. § 1829) for banking organizations and in Section 205 of the National Credit Union Act, as amended ("Section 205(d)") (12 U.S.C. § 1785(d)) for insured credit unions.

Section 19 and Section 205(d) prohibit you from becoming or continuing as an institution-affiliated party with respect to any of the banking organizations or credit unions described below. This means that you may not, among other things, act as an employee, officer, director, or agent of these banking organizations or credit unions. Nor may you otherwise participate, directly or indirectly, in the conduct of the affairs of any of these organizations. You are also prohibited from directly or indirectly owning or controlling any insured depository institution or holding company. These statutes do not prohibit you from being a normal, armslength customer of a banking organization or credit union, such as having a loan, checking or savings account.

The prohibitions of Section 19 and Section 205(d) cover all insured depository institutions, including, but not limited to, any bank, savings association or credit union, and their holding companies, as well as Edge corporations and Agreement corporations. The Federal Deposit Insurance Corporation may grant written consent for you to engage in otherwise prohibited conduct with respect to insured depository institutions, and the Federal Reserve may grant written consent with respect to bank and savings and loan holding companies and Edge and Agreement corporations. The National Credit Union Administration Board may grant consent for insured credit unions. The automatic prohibition does not cover non-bank subsidiaries of bank holding companies or uninsured branches or agencies of foreign banks, unless the appropriate federal banking agency takes further action against you.

Should you engage in prohibited conduct without obtaining the required consent from the appropriate agency, you could be subject to daily criminal fines of up to \$1,000,000 or up to five years imprisonment.

This letter will be posted on the website of the Board of Governors of the Federal Reserve System. If you believe that the prohibitions of Section 19 and Section 205(d) do not apply to you, because, for example, your conviction has been reversed on appeal, or for any other reason, please contact me in writing at this Reserve Bank.

Sincerely,
Signed by Chapelle D. Davis

Cc: **Brad Fleetwood** Senior Counsel **Board of Governors** Legal Division – Mail Stop 13 Washington, D.C. 20551

> Director, Department of Supervision National Credit Union Administration 700 Central Parkway **Suite 1600** Atlanta, Georgia 30328

James D. Durham Assistant U.S. Attorney U.S. Attorney's Office Post Office Box 8970 Savannah, Georgia 31412

Chan White, Director of Examinations Federal Reserve Bank of Atlanta

**Special Activities Section** Division of Supervision Federal Deposit Insurance Corporation 550 17<sup>th</sup> Street N.W. Washington, D.C. 20429

Kevin B. Hagler, Commissioner Georgia Department of Banking and Finance 2990 Brandywine Road, Suite 200 Atlanta, Georgia 30341-5565

R. Joseph Burby, IV Bryan Cave, LLP One Atlantic Center 1201 West Peachtree Street, N.W. 14<sup>th</sup> Floor Atlanta, Georgia 30309-3488

Robin Ratliff, Public Affairs Federal Reserve Bank of Atlanta Judgment and Disposition, dated June 18, 2014, concerning *United States of America v. Stephen Michael Little*, Case No. 4:13CR00003-2, in the United District Court for the Southern District of Georgia Savannah Division on file.