FEDERAL RESERVE BANK of ATLANTA

MARIA SMITH
Assistant Vice President

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June 18, 2008

Mayra Rivera

Glendale, Arizona 85301

Re: Criminal Conviction – Prohibition from Banking Industry

Dear Ms. Rivera:

The Federal Reserve Bank of Atlanta has become aware that you were convicted upon a plea of guilty of theft in connection with your employment by Compass Bank. A copy of your judgment of conviction is attached. Because you have been convicted of a crime 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 holding companies and Edge and Agreement corporations. The Office of Thrift Supervision may grant consent with respect to savings and loan association holding companies. 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 Assistant Vice President John Atkinson in writing at this Reserve Bank.

Sincerely,

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## Maria Smith

cc: Stephen Meyer
Assistant General 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

Todd Veleber Regional Security Manager Compass Bank 15 South 20<sup>th</sup> Street Birmingham, Alabama 35233

Tricia Squillante Compass Bank Central Point of Contact 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

Superintendent of Financial Institutions State Banking Department 2910 North 44<sup>th</sup> St., Suite 310 Phoenix, Arizona, 85018

Larry Turoff, Attorney Criminal Division Maricopa County Attorney's Office 301 West Jefferson, Suite 800 Phoenix, Arizona 85003

Elizabeth Mullins, Attorney Maricopa County Public Defender's Office 620 West Jackson Street, Suite 4015 Phoenix, Arizona 85003 Judgment in a Criminal Case, dated November 15, 2007, concerning *State of Arizona v. Mayra Rivera*, Case No. CR2007-008125-001 DT, in the Superior Court of Maricopa County on file.