

CHAPELLE D. DAVIS  
Assistant Vice President



FEDERAL  
RESERVE  
BANK  
of ATLANTA

1000 Peachtree Street, N.E.  
Atlanta, Georgia 30309-4470  
404.498.7278  
fax 404.498.7217  
chappelle.davis@atl.frb.org

January 12, 2015

David Saenz-Decalahorra

Redacted

Miami, FL 33182

Re: Criminal Conviction – Prohibition from Banking Industry

Dear Mr. Decalahorra:

The Federal Reserve Bank of Atlanta has become aware that you entered into a pretrial diversion or similar program in connection with the resolution of an indictment that charged you with Grand Theft and Fraudulent Use/Possession of Personal Identification relating to your employment by Regions Bank. A copy of the court document reflecting your entry into the program is attached.

Because you have agreed to enter into a pretrial diversion or similar program in connection with the prosecution 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, arms-length 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,

Redacted

Chapelle D. Davis

cc: John L. Kuray  
Attorney  
Board of Governors  
Legal Division-Mail Stop 13  
Washington, D.C. 20551

Joe Gagliano  
Corporate Security  
Regions Bank  
417 North 20<sup>th</sup> Street  
Birmingham, Alabama 35203

Maria Perez  
145 Madeira Avenue  
Coral Gables, FL 33134

Mike Chriszt  
Public Affairs  
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

Ramon Crego  
State Attorney's Office  
1350 NW 12<sup>th</sup> Avenue  
Miami, FL 33136

Princeton Rose  
Assistant Vice President  
Federal Reserve Bank of Atlanta

Judgment and Order of Supervision, dated October 24, 2011, concerning *State of Florida v. Saenz, David*, Case No. 1109922, in the Eleventh Judicial Circuit Court in and for Miami-Dade County on file.