Certified Mail

Re: Criminal Conviction – Prohibition from Banking Industry

August 31, 2009

Mr. Keith Hurd

Pearland, Texas 77584

Dear Mr. Hurd:

The Federal Reserve Bank of St. Louis has become aware that you pleaded guilty to a Third Degree Felony of Theft in connection with your employment by First Bank, Hazelwood, Missouri. The court further issued an order of deferred adjudication and placed you on community supervision for a period of five years, pursuant to Texas Code of Crim. Proc. art. 42.12 § 5(a), in connection with your plea of guilty. A copy of the court's judgment is attached. Because you agreed to enter into a pretrial diversion or similar program in connection with a prosecution for 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.
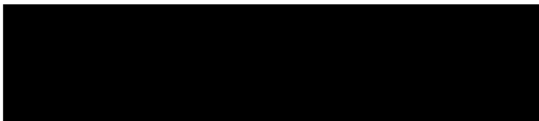
The prohibitions of Section 19 and Section 205(d) cover all insured depository institutions, including, but not limited to, any bank, savings association or credit union, and their holding companies, as well as Edge corporations and Agreement corporations. The Federal Deposit Insurance Corporation may 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 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 me in writing at this Reserve Bank.

Sincerely,

Timothy A. Bosch
Vice President

cc: Mr. Stephen H. Meyer
       Assistant General Counsel
       Board of Governors of the Federal Reserve System
       20th & Constitution Streets, NW
       Washington, D.C. 20551

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

Order of Deferred Adjudication and Placement on Community Supervision, dated May 19, 2009, concerning *The State of Texas v. Keith Hurd*, Cause No. 58774, in the District Court of Brazoria County, Texas, 23rd Judicial District on file.