



Federal Deposit Insurance Corporation  
Dallas Regional Office

1601 Bryan Street, Dallas, Texas 75201  
(214) 754-0098 FAX (972) 761-2082

Division of Risk Management Supervision  
Memphis Area Office

6060 Primacy Parkway, Suite 300, Memphis, Tennessee 38119  
(901) 685-1603 FAX (901) 821-5308

**VIA USPS CERTIFIED MAIL # 7012 1010 0002 0487 6058**

August 25, 2016

Mr. Richard P. Geurin

[REDACTED]

[REDACTED]  
Ardmore, OK 73401-8882

Subject: Prohibition Under Section 19 of the Federal Deposit Insurance Act

Dear Mr. Geurin:

The Federal Deposit Insurance Corporation (FDIC) has become aware of your February 12, 2015 conviction in Muskogee, Oklahoma that is covered by Section 19 of the Federal Deposit Insurance Act (FDI Act). Section 19 prohibits, except with the prior written consent of the FDIC, any person who has been convicted of any criminal offense involving dishonesty, breach of trust, or money laundering, or who has entered into a pretrial diversion or similar program in connection with such an offense, from becoming or continuing as an institution-affiliated party with respect to any insured depository institution; owning or controlling, directly or indirectly, any insured depository institution; or otherwise participating, directly or indirectly, in the conduct of the affairs of any insured depository institution. Because Section 19 is effective by operation of law, you are already subject to the law's restrictions, including the prohibition on participating in the affairs of any insured depository institution.

Your attention is directed to Section 19(b) of the FDI Act, 12 U.S.C. § 1829(b), which imposes criminal penalties of up to five years imprisonment and a fine of up to \$1,000,000 upon any person who knowingly violates the restrictions of Section 19. The FDIC has also adopted a Statement of Policy for Section 19, which provides additional background and information. If you have reason to believe that your February 12, 2015 conviction or program entry is not

covered by Section 19 of the FDI Act, please provide a written response to this office within 30 days. After that time period, this letter will be posted and become publicly available on the FDIC website. Should you have a question regarding this matter, please contact [REDACTED]  
[REDACTED].

Sincerely,

/s/

Serena L. Owens  
Deputy Regional Director