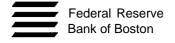
December 19, 2018



Ross McLellan REDACTED

Hingham, MA 02043

Re: Criminal Conviction - Prohibition from Banking Industry

Dear Mr. McLellan:

The Federal Reserve Bank of Boston has become aware that you were convicted after trial of wire fraud, securities fraud and conspiracy to commit wire fraud and securities fraud in connection with your employment at State Street Corporation. A copy of your judgment 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, 12 U.S.C. § 1829 ("Section 19"), for financial organizations and in Section 205 of the National Credit Union Act, 12 U.S.C. § 1785(d) ("Section 205(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 financial organizations described below. That 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 Act 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 Act and Agreement corporations. The National Credit Union Administration Board may grant consent for insured credit unions. The automatic prohibition does not cover affiliation with a subsidiary of a bank holding company that is not itself a bank holding company, or a subsidiary of a savings and loan holding company that is not itself a savings and loan holding company, 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.

Ross McLellan December 19, 2018 Page 2 of 3

This letter will be posted on the public 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 the undersigned in writing at this Reserve Bank.

Sincerely, REDAGTED

Laura Rogers Assistant Vice President Supervision, Regulation & Credit Department

cc: Martin G. Weinberg Martin G. Weinberg, PC 20 Park Plaza Suite 1000 Boston, MA 02116

> Robert M. Goldstein 20 Park Plaza, Suite 1000 Boston, MA 02116

Maksim Nemtsev 20 Park Plaza, Suite 1000 Boston, MA 02116

Michael Pabian Michael Pabian Law Office, LLC 20 Park Plaza, Suite 1000 Boston, MA 02116

Stephen E. Frank United States Attorney's Office MA Suite 9200 1 Courthouse Way Boston, MA 02210

William Johnston U.S. Department of Justice, Criminal Division, Fraud Section 1400 New York Ave NW Washington, DC 20005 Ross McLellan December 19,2018 Page 3 of 3

Legal-Section19Letters@frb.gov

Special Activities Section, Division of Supervision Federal Deposit Insurance Corporation 550 17th Street N.W. Washington, D.C. 20249

Commissioner of Banks Commonwealth of Massachusetts Division of Banks 1000 Washington Street, 10th Floor Boston, MA 02118

Director Department of Supervision National Credit Union Administration 1900 Duke Street, Suite 300 Alexandria, VA 22314

Joseph Hooley, Chairman and Chief Executive Officer State Street Corporation 1 Lincoln St Boston, MA 02111 Judgment in a Criminal Case, dated October 16, 2018, concerning *United States* v. *Ross McLellan*, Case No. 16-cr-10094-LTS, in the United States District Court for the District of Massachusetts on file.