



2. Factual Basis. The NCUAB is of the opinion that reasonable, just, and adequate grounds exist to initiate an administrative prohibition proceeding against Ms. Pelham, pursuant to Section 206(g) of the FCUA, 12 U.S.C. § 1786(g), for conduct engaged in by Ms. Pelham in her former role as the Chief Executive Officer of Everglades Federal Credit Union. Such conduct includes, but is not necessarily limited to, Ms. Pelham having (a) engaged in, and/or directed others at Everglades Federal Credit Union to engage in, improper conduct in relation to a Notice of Freeze and/or Notice of Levy in relation to the business accounts of Ms. Pelham's personal friend, who was, and whose businesses were, members of Everglades Federal Credit Union; (b) improperly permitted the same personal friend, who was not an employee and/or officer of Everglades Federal Credit Union, to make charges on Ms. Pelham's Everglades Federal Credit Union corporate credit card; and (c) created a conflict of interest between Ms. Pelham's personal financial interests (and those of one of Ms. Pelham's family members) and the interests of Everglades Federal Credit Union, and having acted under that conflict of interest in a manner that caused financial and/or other damage to Everglades Federal Credit Union.

Ms. Pelham, without admitting or denying the accuracy of the allegations, acknowledges that good and sufficient grounds exist for the NCUAB to prohibit her, pursuant to 12 U.S.C. § 1786(g). Accordingly, Ms. Pelham hereby consents to the issuance by NCUAB of an Order of Prohibition ("Order").

3. Finality. In arriving at her decision to enter into this Stipulation, Ms. Pelham has reviewed and considered all of the terms of this Stipulation and the accompanying Order, the ramifications thereof, and all other options reasonably available to her. Ms. Pelham does hereby knowingly, intelligently, and voluntarily enter into this Stipulation; and Ms. Pelham consents to the issuance of the accompanying Order. Ms. Pelham acknowledges and agrees that the

accompanying Order complies with all requirements of law, and is issued pursuant to Section 206 of the FCUA, 12 U.S.C. § 1786. Further, Ms. Pelham acknowledges and agrees that, upon its issuance, the accompanying Order shall be final, effective, and fully enforceable by the NCUAB. Moreover, Ms. Pelham acknowledges and agrees that the laws of the United States of America shall govern the construction and validity of this Stipulation and the Order.

4. Waivers. Ms. Pelham hereby knowingly, intelligently, and voluntarily waives her right to an administrative hearing provided by Section 206(g)(4) of the FCUA, 12 U.S.C. § 1786(g)(4). Additionally, Ms. Pelham hereby knowingly, intelligently, and voluntarily waives her right to seek judicial review of the Order and/or to otherwise challenge the validity, legality, finality and/or enforceability of the Order.

5. Other Actions. Pursuant to this Stipulation, Ms. Pelham hereby acknowledges and agrees that the Order is solely for the purpose of settling and resolving NCUAB's potential administrative claims against her, as provided by paragraph 2 of this Stipulation. Ms. Pelham further acknowledges and agrees that this Stipulation is solely between Ms. Pelham and NCUAB, and does not release, discharge, compromise, settle, dismiss, resolve and/or in any way affect any other or further potential claims, causes of action, and/or liabilities arising out of and/or in connection with her former or current affiliations with Everglades Federal Credit Union, and that have been and/or may be brought by any other Federal or state government agency or entity other than the NCUAB.



**WHEREFORE**, in consideration of the foregoing, Ms. Pelham and the NCUAB execute this Stipulation and Consent to the Issuance of an Order of Prohibition.

**SO STIPULATED and AGREED:**

  
LINDA S. PELHAM

December 26 2018

NATIONAL CREDIT UNION ADMINISTRATION BOARD

  
 C. KEITH MORTON  
Regional Director

January 14, 2019

**UNITED STATES OF AMERICA  
NATIONAL CREDIT UNION ADMINISTRATION  
NATIONAL CREDIT UNION ADMINISTRATION BOARD**

In the Matter of ) Linda S. Pelham, ) Former Chief Executive Officer and ) Institution-Affiliated Party of ) Everglades Federal Credit Union (Charter No. 24204) ) Clewiston, Florida )	)	Docket No. 19-0101-RS
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**ORDER OF PROHIBITION**

**WHEREAS**, Linda S. Pelham (“Ms. Pelham”) has executed a Stipulation and Consent to Issuance of an Order of Prohibition (“Stipulation”), and has agreed and consented to the issuance of this Order of Prohibition (“Order”), pursuant to Section 206(g) of the Federal Credit Union Act (“FCUA”), 12 U.S.C. § 1786(g), and Part 747 of the National Credit Union Administration Rules and Regulations (“Rules”), 12 C.F.R. § 747, *et seq.*; and

**WHEREAS**, pursuant to the FCUA and the Rules, the National Credit Union Administration Board (“NCUAB”) has authority to issue a final Order *inter alia* where an Institution-Affiliated Party (“IAP”), such as Ms. Pelham, has consented to the issuance of such an Order; and

**WHEREAS**, the NCUAB is of the opinion and finds that reasonable, just, and adequate grounds exist to initiate an administrative prohibition proceeding against Ms. Pelham, pursuant to Section 206(g) of the FCUA, 12 U.S.C. § 1786(g), for conduct engaged in by Ms. Pelham in

her role as the Chief Executive Officer of Everglades Federal Credit Union, and (b) that the final Order consented to by Ms. Pelham is reasonable, just, and proper.

**NOW THEREFORE**, the NCUAB issues this Order, effective on the date of the execution of this Order, as indicated below, prohibiting Ms. Pelham from participating in any manner in the conduct of the affairs of any federally insured credit union, and from continuing or commencing to hold any office, or participate in any manner, in the conduct of the affairs of any other institution or agency set forth in Section 206(g)(7) of the FCUA, 12 U.S.C. § 1786(g)(7).

**FURTHERMORE**, all technical words or terms used in this Order have meanings defined in the FCUA, the Rules, Title 12 of the United States Code, and any such words or terms undefined in the foregoing have meanings that accord with the best customs and usage in the credit union industry.

**FURTHERMORE**, this Order against Ms. Pelham, which is effective upon its issuance, incorporates by reference for all purposes the Stipulation executed by Ms. Pelham contemporaneously with this Order.

**NATIONAL CREDIT UNION ADMINISTRATION BOARD**

By:   
C. KEITH MORTON  
Regional Director

Dated: January 14, 2019