

**UNITED STATES OF AMERICA
NATIONAL CREDIT UNION ADMINISTRATION BOARD
ALEXANDRIA, VIRGINIA**

In the Matter of)

KENNAE RAKEEM JEFFRIES,)
Institution-Affiliated Party of)

NCUA Docket No. 07-0501-V

HONDA FEDERAL CREDIT UNION)
Torrance, California)

Final Decision and Orders

Final Decision

This case is before the National Credit Union Administration Board for a final decision, following Administrative Law Judge Ann Z. Cook's issuance of a Recommended Decision and Order to grant Enforcement Counsel's Motion for Summary Disposition to permanently prohibit Kennae Rakeem Jeffries from participating in the affairs of an insured credit union pursuant to Section 206(g) of the Federal Credit Union Act, and to impose restitution in the amount of \$61,541.75 plus interest pursuant to Section 206(e) of the Federal Credit Union Act, 12 U.S.C. §§1786(e) and (g).

I. Procedural Background

On May 21, 2007, the National Credit Union Administration (NCUA) Board issued a Notice of Charges for an Order of Prohibition and an Order to Pay Restitution against Kennae Rakeem Jeffries (Respondent), former employee of the Honda Federal Credit Union (the FCU). The Notice was issued pursuant to Section 206(e) and (g) of the Federal Credit Union Act and was submitted to the Office of Financial Institution Adjudication (OFIA). 5 C.F.R. §747.18. OFIA Administrative Law Judge (ALJ) Ann Z. Cook assumed responsibility for the case on May 22, 2007. Respondent filed his answer on June 18, 2007, several days late. Enforcement Counsel filed a motion for default judgment based on the late answer. 12 C.F.R. §747.19. On June 29, 2007, ALJ Cook denied the motion based on her preference for resolving proceedings on the merits rather than by procedural disposition as well as uncertainties associated with Respondent's receipt of the Notice. ALJ Cook also set forth a schedule for the proceeding:

dispositive motions were to be filed by August 1, 2007 and a hearing was set for November 7, 2007. Respondent's counsel entered his appearance on July 25, 2007. Enforcement Counsel moved for summary deposition on August 17, 2007; Respondent did not file a response. Neither party requested a hearing on the motion. On September 28, 2007, ALJ Cook issued her Recommended Decision that Enforcement Counsel's dispositive motion be granted. 12 C.F.R. §747.29. Further, ALJ Cook certified the case to the NCUA Board with an index to and copies of the administrative record. 12 C.F.R. §747.38. On October 2, 2007, the NCUA Board Secretary notified the parties of their right to file exceptions to the Recommended Decision. 12 C.F.R. §747.39. No exceptions were filed. On November 5, 2007, the NCUA Board determined that the record was complete. On November 7, 2007, the NCUA Board Secretary notified the parties that the proceeding was submitted to the NCUA Board for final decision. 12 C.F.R. §747.40.

II. Board Adoption of the Recommended Decision

The NCUA Board hereby adopts, and incorporates herein, the Recommended Decision issued by ALJ Cook. The Recommended Decision is incorporated herein and attached hereto as Appendix A. The discussion below in Sections III, IV, and V is based on the Recommended Decision as well as the motion for summary disposition.

III. Findings of Fact

The following is a summary of the Findings of Fact as set forth by ALJ Cook (see Appendix A) and adopted by the NCUA Board.

Respondent Kenna Rakeem Jefferies was employed by Honda Federal Credit Union from February 2002 until October 2003. In May and June, 2002, using his access to FCU account systems, Respondent opened FCU accounts and obtained FCU VISA credit cards for his grandparents, LeRoy and Joyce Douglas. Neither Respondent nor his grandparents were eligible to open such accounts. Respondent initially obtained supervisory approval to raise the credit limits on the two VISA cards, and then unilaterally increased the limits on each VISA card to \$25,000, the maximum allowed. Respondent did not have the authority to do so. Respondent charged both of the VISA credit card accounts to their \$25,000 maximum to pay his own personal expenses. Respondent caused the FCU to suffer an aggregate financial loss of \$61,541.75, consisting of an aggregate past due balance of \$48,229.06 and accrued interest of \$13,312.69. In order to avoid showing delinquencies in the two VISA card accounts, Respondent kited funds between the two VISA accounts and his own account. He also twice altered the FCU's general ledger diverting the FCU's retained earnings in order to bring the VISA card accounts current and to avoid showing a delinquency on the VISA accounts.

IV. Grounds for Prohibition

Respondent is an institution affiliated party as defined in Section 206(r)(1) of the Federal Credit Union Act. The imposition of a prohibition against him requires the establishment of three elements found in Section 206(g)(1) of the FCU Act commonly known as misconduct, effect and culpability. Misconduct includes, among other things, breach of a fiduciary duty and/or participation in any unsafe or unsound practice in connection with any insured credit union. The NCUA Board has generally defined an unsafe and unsound practice as “conduct deemed contrary to accepted standards of credit union operation which might result in abnormal risk or loss to a credit union or its members.” Gully v. NCUA, 341 F.3d 155, 165 (2d Cir. 2003). Self-dealing in particular qualifies as an unsafe or unsound practice because of the conflict it creates between the interests of the institution and those of the individual. Hoffman v. FDIC, 912 F.2d 1172, 1174 (9th Cir. 1990). The NCUA Board defines the fiduciary duty owed to a credit union as the “duty to act in the best interests of the institution, its shareholders and its depositors.” In re Majette, NCUA Docket 98-0401-11, Decision & Order issued March 18, 1999. According to Section 206(g)(1) of the FCU Act, the misconduct must have the effect of financial loss or other damage to the credit union, prejudice to the interests of the members, or financial gain to the Respondent. In order to meet the standard of culpability, the Respondent’s misconduct must involve personal dishonesty or otherwise demonstrate his unfitness to participate in the affairs of the credit union. 12 U.S.C. 1786(g)(1).

Respondent clearly abused his fiduciary duty and engaged in unsafe and unsound banking practices through self-dealing. Respondent opened the two credit card accounts for individuals who were not and could not become FCU members. He then increased the credit card account limits, appropriated the credit card extensions of credit for his personal use (self-dealing) and moved funds between those accounts and his own to create the appearance that there were sufficient funds in each account to meet the minimum required balance when there in fact were not. All this was done without the necessary authority or supervisory authorization. Respondent also twice manipulated the FCU’s general ledger account in order to avoid showing a delinquency, a further breach of fiduciary duty and an unsafe and unsound act. The credit union suffered an immediate loss of \$48,727 and more than \$13,000 in lost interest. This loss clearly meets the effects test. Respondent’s conduct exhibited both personal dishonesty and unfitness to participate in any capacity in the affairs of an insured credit union, meeting the culpability test. The requirements for an issuance of an order of prohibition pursuant to Section 206(g)(1) of the FCU Act have been clearly established.

V. Grounds for Restitution

The NCUA Board may issue an Order to Cease and Desist when it believes that an institution affiliated party has engaged in an unsafe or unsound practice in

conducting the affairs of the credit union. 12 U.S.C. 1786(e)(1). As described above, Respondent engaged in unsafe and unsound practices. A cease and desist order is not necessary in this case since Respondent is no longer working at the FCU and an order of prohibition will be issued. However, the cease and desist authority also includes the authority to order "affirmative action to correct any conditions resulting from any violation or practice with respect to which such order is issued." 12 U.S.C. 1786(e)(3). The affirmative action may include making restitution to the credit union if the offender was "unjustly enriched in connection with such violation or action." 12 U.S.C. 1786(e)(3)(A)(i). The standard is met here. As noted above, Respondent was unjustly enriched as he appropriated the funds from the VISA accounts for his own personal use. The FCU suffered a loss of \$61,541.75 as a direct result of the unsafe and unsound practices Respondent engaged in at the FCU. This entitles the FCU to restitution in that amount.¹

VI. Grounds for Summary Disposition

Summary disposition is appropriate when there is no genuine issue as to any material fact and the moving party is entitled to a decision in its favor as a matter of law. 12 C.F.R. §747.29(a). The party seeking the summary disposition bears the initial responsibility to identify those portions of the documentary evidence which it believes demonstrate the absence of a genuine issue of material fact. Summary disposition is warranted against an opponent who fails to make a showing sufficient to establish the existence of an essential element of the defense. Celotex Corp. v. Catrett, 477 U.S. 317, 322 - 323 (1986). It is noted that Respondent did not file a response to Enforcement Counsel's motion for summary disposition. As the discussion above indicates, Enforcement Counsel has met the standard for summary disposition. This determination is based on the pleadings filed including Enforcement Counsel's motion for summary disposition and, among other things, the Respondent's answer, and the sworn declarations of both the CEO of the FCU and the manager of the FCU branch at which Respondent was employed.

VIII. Issuance of Orders

Although ALJ Cook recommended that NCUA's motion for summary disposition be granted and that Respondent be prohibited from further participation in an insured credit union and that he be required to pay Honda FCU restitution in the amount of \$61, 541.75 plus interest, she did not issue recommended orders. The Board issues three orders, one granting NCUA's motion for summary disposition, one requiring prohibition and one requiring restitution. The orders contain the substantive provisions that ALJ Cook recommended.

¹ It is noted that on November 10, 2004, the Los Angeles Superior Court entered a default judgment in favor of the FCU against Respondent in the amount of \$62,132.99. According to the Compliance Officer for Honda FCU, no payments have been made as of December 14, 2007.

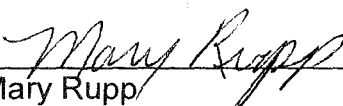
Order of Summary Disposition

Based upon the administrative record stemming from the Notice of Charges for an Order of Prohibition and an Order to Pay Restitution against Kennae Rakeem Jeffries, including the NCUA's Motion for Summary Disposition and the Recommended Decision of Administrative Law Judge Ann Z. Cook, (Recommended Decision incorporated herein as Appendix A to the Final Decision of the National Credit Union Administration Board), and

Pursuant to the authority vested in the National Credit Union Administration Board by Section 206(e) and (g) of the Federal Credit Union Act, 12 U.S.C. §1786(e) and (g), and in accordance with Part 747 of the NCUA Rules and Regulations, 12 C.F.R. Part 747,

IT IS HEREBY ORDERED that NCUA's Motion for Summary Disposition is granted.

SO ORDERED, this 24th day of January, 2008, by the National Credit Union Administration Board.



Mary Rupp
Secretary, NCUA Board

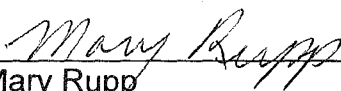
Order of Prohibition

Based upon the administrative record stemming from the Notice of Charges for an Order of Prohibition and an Order to Pay Restitution against Kennae Rakeem Jeffries, including the NCUA's Motion for Summary Disposition and the Recommended Decision of Administrative Law Judge Ann Z. Cook, (Recommended Decision incorporated herein as Appendix A to the Final Decision of the National Credit Union Administration Board, and

Pursuant to the authority vested in the National Credit Union Administration Board by Section 206(g) of the Federal Credit Union Act, 12 U.S.C. §1786(g), and in accordance with Part 747 of the NCUA Rules and Regulations, 12 C.F.R. Part 747,

IT IS HEREBY ORDERED that Kennae Rakeem Jeffries is prohibited from participating in any manner in the conduct of the affairs of any institution or agency specified in Section 206(g)(7) of the Federal Credit Union Act. Such prohibition includes prohibition from the specific activities set forth in Section 206(g)(5) of the Federal Credit Union Act. Pursuant to Section 206(g)(4) of the Federal Credit Union Act, this Order shall become effective thirty days after service upon Kennae Rakeem Jeffries.

SO ORDERED, this 24th day of January, 2008, by the National Credit Union Administration Board.



Mary Rupp
Secretary, NCUA Board

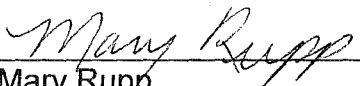
Order of Restitution

Based upon the administrative record stemming from the Notice of Charges for an Order of Prohibition and an Order to Pay Restitution against Kennae Rakeem Jeffries, including the NCUA's Motion for Summary Disposition and the Recommended Decision of Administrative Law Judge Ann Z. Cook, (Recommended Decision incorporated herein as Appendix A to the Final Decision of the National Credit Union Administration Board), and

Pursuant to the authority vested in the National Credit Union Administration Board by Section 206(e) of the Federal Credit Union Act, 12 U.S.C. §1786(e), and in accordance with Part 747 of the NCUA Rules and Regulations, 12 C.F.R. Part 747,

IT IS HEREBY ORDERED that Kennae Rakeem Jeffries shall immediately make restitution to the Honda Federal Credit Union, 19701 Hamilton Avenue, Suite 130, Torrance, CA 90509 in the amount of \$61,541.75, plus interest from the day of issuance of this order. Pursuant to Section 206(e)(2) of the Federal Credit Union Act, this Order shall become effective thirty days after service upon Kennae Rakeem Jeffries.

SO ORDERED, this 24th day of January, 2008, by the National Credit Union Administration Board.


Mary Rupp
Secretary, NCUA Board

APPENDIX A

UNITED STATES OF AMERICA
NATIONAL CREDIT UNION ADMINISTRATION
ALEXANDRIA, VIRGINIA

_____)
In The Matter of)
)
Kennae Rakeem Jeffries,) NCUA 07-0501-V
Institution-Affiliated Party of)
)
Honda Federal Credit Union)
Torrance, California)
_____)

RECOMMENDED DECISION AND ORDER

This action arises out of a Notice issued by the National Credit Union Administration on May 21, 2007 to Respondent KENNAE RAKEEM JEFFRIES also known as RAKEEM JEFFRIES. The Notice of Charges, brought pursuant to 12 U.S.C. §§ 1786 (e)(3)(A) and (g)(1), seeks an order requiring Respondent to pay restitution in the amount of \$55,790 plus interest to Honda Federal Credit Union and to prohibit Respondent from further industry participation. Respondent served his Answer on June 18, 2007.

On August 17, 2007, Enforcement Counsel for the NCUA moved for summary disposition. Respondent did not file a response within the time allowed. 12 C.F.R. § 747.29(b).

Summary disposition is appropriate when (1) there is “no genuine issue as to any material fact” and (2) the “moving party is entitled to a decision in its favor as a matter of law.” 12 C.F.R. § 747.29(a). For the reasons outlined below, I find that standard has been met and recommend that the motion for summary disposition be GRANTED.

DISCUSSION

To impose a prohibition requires establishing three elements, found at 12 U.S.C. § 1786(g)(1) and commonly summarized as misconduct, effect and culpability. Misconduct includes among other things breach of a fiduciary duty and/or participation in any unsafe or unsound practice in connection with any insured credit union or business institution. The misconduct must have the effect of financial loss or other damage to the credit union, prejudice to the interests of the credit union shareholders, or financial gain or other benefit to the respondent. Lastly, the respondent's misconduct must involve personal dishonesty or otherwise demonstrate his or her unfitness to serve as an officer or director or to participate in the affairs of the credit union.

To impose a cease and desist order requiring restitution an institution affiliated party much be shown to have engaged in an unsafe or unsound practice or violated a law, rule or regulation, and as a result have been unjustly enriched. 12 U.S.C. §§ 1786(e)(1), (e)(3).

The Notice alleges that both of these requirements are met by Respondent's actions while an employee of the credit union where he, although lacking authority and contrary to credit union policy and practice, opened credit card accounts in his grandparents' names, increased the credit limits on the accounts, and then appropriated the credit in the accounts for himself.

Enforcement Counsel's motion is supported by the sworn declarations of Steven L. Brandon, the chief operating officer of the credit union, and Beatrice Walker, manager of the credit union branch at which Respondent was employed as a member service representative. The Brandon declaration and credit union records attached thereto as exhibits detail how Respondent, using a former Honda employee's membership number, created VISA credit card accounts for his grandparents, who were neither credit union members nor eligible for membership, and then increased their credit card limits, all without authority or proper authorization. After granting himself access to these accounts, the records show that he made personal charges and withdrew funds for his own use.

Brandon's declaration also details Respondent's kiting of funds (moving the same funds among different accounts to create the appearance of a credit in each account when it is reconciled) between his grandparents' and his own accounts and twice manipulating the credit union's general ledger. When Respondent was terminated in October 2003, the records show that his grandparents' accounts had an aggregate unpaid balance of \$48,729.06 on which Brandon calculates the accrued aggregate interest was \$13,312.69 as of August 10, 2007.

Walker, in her sworn declaration attests that she did not give Respondent permission or approval to open an account for any one who was not a credit union member, nor assist him by filling in an applicant's employee identification number or mailing account application forms to anyone on his behalf. Walker further attests that she understands records indicate that she approved a request to increase the credit limit on one of Respondent's grandparents' accounts and that she would not have approved such a request had she known the person ineligible to be a credit union member, was a relative of Respondent or that Respondent opened or controlled the account.

Additionally, Enforcement Counsel submits a sworn statement dated October 29, 2003 signed by Respondent which he now asserts he was coerced into signing. Answer ¶ 17. The statement, also attached to the Notice as Exhibit A, generally acknowledges the truth of the charges set out in the Notice and admits forging on account documents the names of his grandparents, who knew nothing of the accounts.

Also attached to Enforcement Counsel's motion is a default judgment obtained against Respondent in Los Angeles County Superior Court on November 10, 2004 ordering him to pay the credit union \$55,789.69 in damages, \$5,758.55 in interest and \$584.74 in costs. Honda Federal Credit Union v. Kennae R. Jeffries, No. YC 049266 (Los Angeles County Superior Ct., Nov. 10, 2004).

Respondent's Answer admits that he added himself as an authorized user of each of the two credit card accounts (¶ 9), increased their limits from \$10,000 to \$25,000 (¶ 10), and charged both to their limit to pay his own personal expenses (¶ 12). His Answer further admits that he

accessed the credit union's computer account tracking records and authorized issuance of "convenience checks" to himself for each account and established internet access to, from and between the accounts that allowed him to transfer funds between those accounts and his own accounts (¶¶ 11, 13, 14). Respondent admits creating the VISA credit card accounts but asserts his manager approved them and increased the initial limits on them from \$5,000 to \$10,000, apparently without reviewing the Douglas's credit which would have shown their undischarged bankruptcy filing (¶¶ 6 – 8). Respondent identifies his supervisor as Bea Arthur rather than Beatrice Walker (¶¶ 5, 7).

Enforcement Counsel has established the requirements for imposition of both an order of prohibition and an order of restitution. Respondent abused his fiduciary duties to the credit union and engaged in unsafe and unsound banking practices by opening the two accounts for individuals who were not and could not become credit union members, increasing the credit card account limits, appropriating the funds in the accounts for his personal use and moving funds between those accounts and his own to create the appearance that there were sufficient funds in each account to meet the minimum required balance when there in fact were not, all without the necessary authority or supervisory authorization. In doing so, he also manipulated the credit union's books and records, a further breach of fiduciary duty and unsafe and unsound act. His conduct exhibited both personal dishonesty and unfitness to participate in any capacity in the affairs of a credit union. The credit union suffered an immediate loss of \$48,729 and thereafter more than \$13,000 in lost interest. Thus, a prohibition from further participation in the banking industry is appropriate to penalize Respondent's indefensible self-dealing and to keep him from similar misconduct in the future. 12 U.S.C. § 1786(g)(1).

Respondent's breach of fiduciary duties he owed the credit union and his participation in unsafe and unsound banking practices caused a substantial financial loss to the credit union and a corresponding, unjustified financial gain for himself. An order requiring him to reimburse the credit union for its loss together with interest thereon is fully warranted. 12 U.S.C. § 1786(e)(3).

FACTUAL FINDINGS AND CONCLUSIONS OF LAW

1. From February 2002 until October 29, 2003 Respondent was an employee of Honda Federal Credit Union, a federally-insured credit union, and was an institution-affiliated party as that term is defined in 12 U.S.C. § 1786(r)(1). NCUA therefore has jurisdiction to bring this enforcement proceeding. Answer ¶¶ 1, 3; Brandon Dec. ¶ 3

2. On May 22, 2002, Respondent circumvented normal credit union procedures and without authorization created a credit union member account in the name of LeRoy Douglas, his grandfather, using the credit union member number of a former Honda employee to falsely establish eligibility. Answer ¶¶ 6, 8; Brandon Dec. ¶¶ 8, 9; Walker Dec. ¶¶ 3, 5.

3. On the same day, Respondent applied for and approved a VISA credit card account for LeRoy Douglas, thereafter accessed the credit union account tracking records to add himself as an authorized user and to order checks on the account in the names of LeRoy Douglas and himself. Answer ¶ 9; Brandon Dec. ¶¶ 12 -14; Walker Dec. ¶ 4.

3. On June 3 and 4, 2002, Respondent using generally the same procedures created a credit union account in the name of Joyce Douglas, his grandmother, applied for and obtained approval for a VISA credit card for her, added himself as an authorized user, and ordered checks on the account in the names of Joyce Douglas and himself. Answer ¶ 9; Brandon Dec. ¶¶ 10, 11, 15-17.

4. Until June 10, 2002, Respondent was a temporary employee of the credit union and as such was not eligible to apply for and obtain a VISA credit card account for himself or a family member. Respondent's opening of the accounts in his grandparents' names was both unauthorized and violated credit union policies and practice. Brandon Dec. ¶¶ 2, 3; Walker Dec. ¶¶ 2 - 6.

5. Without revealing his relationship to the account holders or that they had filed for bankruptcy, he obtained supervisory approval to increase the credit limit on one VISA credit card account from \$5,000 to \$10,000. Thereafter Respondent accessed the credit union account tracking records several times to unilaterally increase the limits on both VISA credit card accounts until each reached \$25,000, the maximum allowed. Brandon Dec. ¶¶ 18, 19, Ex. A lines 11, 22, 28, 36, 52, 54; Walker Dec. ¶ 7.

6. On June 21 and 24, 2002 Respondent accessed the credit union account tracking system and established internet access that permitted him to make transfers to, from and between

the Douglas' accounts and his own account. Answer ¶ 13; Brandon Dec. ¶¶ 20, 21, Ex. A lines 26, 33, 37, 42.

7. Respondent charged both of the VISA credit card accounts to their \$25,000 maximum of each to pay his own personal expenses. Answer ¶ 12. By October 19, 2003, the end of the billing period before Respondent was terminated, the LeRoy and Joyce Douglas VISA credit card accounts had accumulated respectively \$24,271.61 and \$23,957.45 in debt. Brandon Dec. ¶¶ 22 – 24, Ex. C lines 220-222, Ex. D lines 270-273.

8. To and including August 15, 2007, Respondent caused the credit union to suffer an aggregate financial loss of \$61,541.75, consisting of an aggregate past due balance of \$48,229.06 and accrued interest of \$13,312.69. Brandon Dec. ¶¶ 34-36, Ex. E.

9. To avoid showing a delinquency in the Douglas VISA credit card accounts, Respondent on six occasions shifted funds among those accounts and his own to show a credit in each VISA credit card Douglas's account at the end of the statement period. Answer ¶ 14; Brandon Dec. ¶¶ 25-31.

10. Additionally, Respondent twice altered the credit union's general ledger to divert retained earnings of the credit union to the Douglas VISA credit card accounts to bring them current and avoid showing a delinquency. Brandon Dec. ¶¶ 32-33, Ex. C line 185, Ex. E line 254.

11. Respondent's above-described misconduct manifestly breached his fiduciary duty to the credit union and constituted participation in unsafe and unsound banking practices.

12. Respondent's above-described misconduct had the effect of causing financial loss and other damage to the credit union and unjustified financial gain to himself.

13. Respondent's conduct involved personal dishonesty and also demonstrated his unfitness to serve as a director or officer of, or to otherwise participate in the conduct of the affairs of, an insured credit union

14. An order permanently prohibiting Respondent from participation in the affairs on an insured credit union is appropriate. 12 U.S.C. § 1786(g)

15. An order to cease and desist directing Respondent to pay restitution to the credit union in the amount of \$61,541.75 plus interest accruing from today through the date of payment is appropriate. 12 U.S.C. § 1786(e)(3)(A)(i).

CONCLUSION AND RECOMMENDATION

There are no genuine issues as to any material fact and the NCUA is entitled to a decision in its favor as a matter of law. It is recommended that an order prohibiting Respondent from further participating in the affairs of an insured credit union and requiring him to pay restitution to Honda Federal Credit Union in the amount of \$61,541.75 plus interest be issued.



Ann Z. Cook
Administrative Law Judge

Dated: September 28, 2007

CERTIFICATE OF SERVICE

The undersigned certifies that on September 28, 2007, the foregoing Recommended Decision and Order, as well as a Certified Index of the Administrative Record, and the complete record of the proceeding was served by electronic mail upon the following persons:

Secretary of the Board
National Credit Union Administration
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Alexandria, VA 22314
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bobf@ncua.gov
ogcmail@ncua.gov
allanm@ncua.gov

And a copy of the Recommended Decision and Order, and Certified Index of the Administrative Record was served by electronic mail upon:

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widerman@ncua.gov

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