

From: Taylor, Richele
To: Neil Rashley <nrashley@scbankers.org>
CC: Schimsa, Rebecca <RebeccaSchimsa@gov.sc.gov>
Date: 10/25/2016 10:43:13 AM
Subject: RE: Banks - Hurricane Matthew

Neil –

Give me a call if the below doesn't make sense or we need to talk through further. I thought initially from our exchange that the bank did not want an order closing the banks and the State of Emergency/Evacuation Orders were what you needed. That is why I answered that we did not put a stop date in the Order we issued as the State of Emergency runs for 15 days. However, I am thinking you did not need an Order real time, but you do want a final Order to cover the days banks closed. I know not all of the counties had issues, but would it be best to provide a statewide legal holiday for banks? I am assuming that banks can then decide whether or not to take the holiday as needed.

Also, I am thinking we would limit the holidays to Oct 5, 6, 7, 11 and 12. Oct 8 and 9 are weekend days – I think a few banks are open minimally on Saturday (Oct 8). And then Oct 10th was a federal holiday.

Would this cover the need?

Richele

Richele K. Taylor
Chief Legal Counsel
Office of the Governor
O: 803-734-8465
C: 803-231-9763
It's a great day in South Carolina

Safe Place SC – www.safeplaceSC.sc.gov

From: Neil Rashley [<mailto:nrashley@scbankers.org>]
Sent: Tuesday, October 25, 2016 10:14 AM
To: Taylor, Richele
Cc: Schimsa, Rebecca
Subject: RE: Banks - Hurricane Matthew

Richele and Rebecca,

I'm just checking to see if the order is ready on the banks. We like to send it out to them once it's done.

Thanks again for all your help.

Neil

From: Taylor, Richele [<mailto:RicheleTaylor@gov.sc.gov>]
Sent: Friday, October 14, 2016 11:35 AM
To: Neil Rashley
Cc: Schimsa, Rebecca

Subject: RE: Banks - Hurricane Matthew

Thanks Neil. We did not put a stop date in the Order so it goes for 15 days unless we issue a new Order. We are letting the State of Emergency Order stand for the full 15 days at this time, and it is still good today, so the banks should be fine. I appreciate you keeping us up-to-date and in the loop.

Richele

From: Neil Rashley [<mailto:nrashley@scbankers.org>]
Sent: Friday, October 14, 2016 11:10 AM
To: Taylor, Richele
Cc: Schimsa, Rebecca
Subject: RE: Banks - Hurricane Matthew

Richele and Rebecca,

Just to tie up the loose ends on this now that things are subsiding - we feel good that the order for the banks can have an end date of October 12, 2016. There may have been a few branches out here and there but for the banks themselves, they were open by then. I assume the start date should be October 5, 2016 – the beginning of the state of emergency and evacuation orders.

Let me know if I've missed something.

Thanks,
Neil

From: Taylor, Richele [<mailto:RicheleTaylor@gov.sc.gov>]
Sent: Thursday, October 06, 2016 9:00 AM
To: Neil Rashley
Cc: Schimsa, Rebecca
Subject: Re: Banks - Hurricane Matthew

That does! Thank you Neil.

Richele K Taylor
Chief Legal Counsel
Office of the Governor
South Carolina
Direct 803-734-8465

Sent from my iPhone

On Oct 6, 2016, at 8:49 AM, Neil Rashley <nrashley@scbankers.org> wrote:

Richele,

The way we followed this before is that banks close as any other business that is subject to the Governor's evacuation order. So we've felt that specifically closing banks by order wasn't really needed. Plus people may need access to banking as they leave – just like they might need a gas station or grocery store. Still we advise our banks that they are subject to the Governor's order if they are in affected counties and that safety of customers and employees come first. Some have already let us know of when they are closing.

As for Monday, we've advised them that although Monday is a federal holiday and a legal banking holiday there is no law says they must be closed. They're simply allowed to do so as a legal holiday. If they are allowed to return per the Governor's order and they wish to open to accommodate customers,

they can do so.

It looks like from the projected course of the storm that Oct. 5th through 9th will be the affected days for the purposes of the order we typically do with your office. The 10th will need no order as it is already a legal banking holiday. Looking at the order that was done for the October flood we included Sunday. I don't see any problem doing that this time.

Does this help? I know y'all very busy but I am available if you'd like to talk. Otherwise e-mail is fine.

Neil

From: Taylor, Richele [<mailto:RicheleTaylor@gov.sc.gov>]
Sent: Thursday, October 06, 2016 8:38 AM
To: Neil Rashley
Cc: Schimsa, Rebecca
Subject: Re: Banks - Hurricane Matthew

Neil -

With the evacuation of various counties, do we have a need to close the banks? I know they are closed Monday and I'm not sure if this further impacts any decisions?

Richele K Taylor
Chief Legal Counsel
Office of the Governor
South Carolina
Direct 803-734-8465

Sent from my iPhone

On Oct 4, 2016, at 11:40 AM, Neil Rashley <nrashley@scbankers.org> wrote:

Thanks Rebecca.

Richele you can reach me by this e-mail, my office number below as well as my cell 803-467-2210 if you need to. I will monitor things from the banks end. Hopefully this thing will blow back out to sea. I'm sure you all are very busy right now.

Neil

From: Schimsa, Rebecca [<mailto:RebeccaSchimsa@gov.sc.gov>]
Sent: Tuesday, October 04, 2016 11:35 AM
To: Neil Rashley
Cc: Taylor, Richele
Subject: Re: Banks - Hurricane Matthew

Neil,

Yes, Richele Taylor, Governor's Chief Legal Counsel, and I will be handling these types of requests. Please send your requests to declare state holidays for banks to both of us at the appropriate time so we can prepare draft executive orders.

Thank you,

Rebecca

Sent from my iPhone

On Oct 4, 2016, at 11:21 AM, Neil Rashley <nrashley@scbankers.org> wrote:

Rebecca,

I hope you're well.

As you're aware this storm keeps inching closer to the SC coast. I just want to confirm you are still my contact in the governor's office in case we need an order concerning banks that have to close.

Thanks,

Neil Rashley
Senior Vice President and Counsel
South Carolina Bankers Association
2009 Park Street
P.O. Box 1483
Columbia, SC 29202
(803) 779-0850
(803) 779-0890 (fax)
nrashley@scbankers.org
www.scbankers.org