

October 10, 2008

Mr. Victor A. Ulman

Denver, Colorado 80231

Re: Criminal Conviction – Prohibition from Banking Industry

Dear Mr. Ulman:

The Federal Reserve Bank of Kansas City has become aware that you were convicted upon a plea of guilty of felony theft in connection with your employment by Guaranty Bank and Trust Company, Denver, Colorado. 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, as amended ("Section 19")(12 U.S.C. § 1829) for banking organizations, and in Section 205 of the National Credit Union Act, as amended ("Section 205(d)") (12 U.S.C. § 1785(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 banking organizations or credit unions described below. This 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, armslength 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 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 holding companies and Edge and Agreement corporations. The Office of Thrift Supervision may grant consent with respect to savings and loan association holding companies. The National Credit Union Administration Board may grant consent for insured credit unions. The automatic prohibition does not cover non-bank subsidiaries of bank holding companies or uninsured branches or agencies of foreign banks, unless the appropriate federal banking agency takes further action against you.



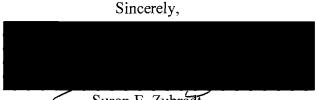
Mr. Ulman

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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.

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This letter will be posted on the 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 Ms. Haley Gibson, Enforcement Examiner, in writing at this Reserve Bank.



Susan E. Zubradt Vice President

cc: Mr. Gregory Robinson, Esquire 1407 Larimer Street, Suite 206 Denver, Colorado 80202

> Mr. Stephen H. Meyer Assistant General Counsel Legal Division Board of Governors of the Federal Reserve System

Mr. Richard Gross Case Manager, Special Activities Federal Deposit Insurance Corporation

Mr. Richard Fulkerson Commissioner, Colorado Division of Banking

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DISTRICT COURT, DE	ENVER COUNTY, COLORADO)		
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Phone Number: 720	-865-8301			
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The People of Colorad	lo			
VS ULMAN, VICTOR		: :	Division:	10
	SENTENC	E ORDER		
Defendant: ULMAN, V		Date of Birth:		
Count	Theft \$20,000 or more) - Theft \$500-\$1000	Class F3	Plea Plea of Guilty	Finding Dfrd Sentence
Z 18-4-401(1),(Z)(0.5)) - Inert \$500-\$1000	M 1	Plea of Guilty	Guilty
ASSESSED FINES & COS		M1	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1	TS	M1	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victim Compensation Fun	TS	\$163.00	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victim Compensation Fun Victims Assistance Fund	TS	\$163.00 \$163.00	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victims Compensation Fun Victims Assistance Fund Court Costs	TS Irs Id	\$163.00 \$163.00 \$35.00	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victim Compensation Fun Victims Assistance Fund Court Costs Court Security Cash Fund	TS Irs Id	\$163.00 \$163.00 \$35.00 \$5.00	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victim Compensation Fund Victims Assistance Fund Court Costs Court Security Cash Fund Request for Time to Pay	TS Irs Id	\$163.00 \$163.00 \$35.00 \$5.00 \$25.00	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victim Compensation Fund Victims Assistance Fund Court Costs Court Security Cash Fund Request for Time to Pay Drug Standardized Assess Probation Supervision Fee	TS Irs Id	\$163.00 \$163.00 \$35.00 \$5.00 \$25.00 \$75.00 \$2,400.00	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victim Compensation Fun Victims Assistance Fund Court Costs Court Security Cash Fund Request for Time to Pay Drug Standardized Assess Probation Supervision Fee Restitution	TS Irs Id	\$163.00 \$163.00 \$35.00 \$5.00 \$25.00 \$75.00	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victims Compensation Fun Victims Assistance Fund Court Costs Court Security Cash Fund Request for Time to Pay Drug Standardized Assess Probation Supervision Fee Restitution Count # 2	TS Irs Id	\$163.00 \$163.00 \$35.00 \$5.00 \$25.00 \$75.00 \$2,400.00	Plea of Guilty	Guilty
ASSESSED FINES & COS Count # 1 Deferred Sentence: 4 Yea Victim Compensation Fun Victims Assistance Fund Court Costs Court Security Cash Fund Request for Time to Pay Drug Standardized Assess Probation Supervision Fee Restitution	TS Irs Id	\$163.00 \$163.00 \$35.00 \$5.00 \$25.00 \$75.00 \$2,400.00	Plea of Guilty	Guilty
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Following this hearing you are to present this form to the Clerk's Office for payment. Payment is due by the end of business on your Court Date. Failure to pay when due will result in additional costs pursuant to HB1198.