



FEDERAL RESERVE BANK *of* KANSAS CITY

April 30, 2021

**Via FedEx#773598505768**

Mr. Joel Braun

**REDACTED**

Kansas City, Missouri 64106

Re: Pretrial Diversion – Prohibition from Banking Industry

Dear Mr. Braun:

The Federal Reserve Bank of Kansas City (Reserve Bank) has become aware that you entered into a pretrial diversion or similar program in connection with the resolution of an indictment that charged you with *Stealing* in connection with your employment at Commerce Bank, Kansas City, Missouri. A copy of the court document reflecting your entry into the program is attached. Because you have agreed to enter into a pretrial diversion or similar program in connection with the prosecution 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 banking 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 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 entities. 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 its holding company(ies). These statutes do not prohibit you from being a conventional, 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) apply to all insured depository institutions, including, but not limited to, any bank, savings association, or credit union, and their respective 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, the Board of Governors of the Federal Reserve System may grant written consent with respect to bank and savings and loan holding companies and Edge and Agreement corporations, and the National Credit Union Administration Board may grant consent with respect to 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, 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.



Mr. Braun

April 30, 2021

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.

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 Senior Examiner Tara Cisney-Decker in writing at the Reserve Bank.

Sincerely,  
**REDACTED**

Porcia B. Block  
Vice President

cc: Mr. Michael Crawford  
Legal-Section19Letters@frb.gov  
Mr. Ashley Schrag, Case Manager, Special Activities  
Federal Deposit Insurance Corporation  
Mr. Robert Barrett, Commissioner  
Missouri Division of Finance

Docket, dated April 13, 2021, Sentence-Judgment-Conviction, dated June 25, 2020, and First Amended Information, dated June 11, 2020, concerning *State of Missouri v. Joel M. Braun*, Case No. 20CY-CR00044-02, in the Circuit Court of Clay County, Seventh Judicial District, on file.