



FEDERAL RESERVE BANK *of* KANSAS CITY

March 7, 2024

Mr. John J. Sanders

REDACTED

Gahanna, OH 43230

(via FedEx and secure email to REDACTED )

Re: Pretrial Diversion or Similar Program & Criminal Conviction – Prohibition from  
Banking Industry

Dear Mr. Sanders:

This letter replaces and supersedes the original letter to you dated January 19, 2022. The Federal Reserve Bank of Kansas City has become aware that you agreed to enter into a pretrial diversion or similar program in connection with a prosecution for *Theft - \$5,000-20,000* (Colo. Rev. Stat. § 18-4-401(1) & (2)(g)), and were adjudicated guilty of *Theft - \$750-2,000* (Colo. Rev. Stat. § 18-4-401(1) & (2)(e)) in connection with your employment at NBH Bank, Greenwood Village, Colorado. A copy of the court docket information detailing your crime and sentencing is attached. Because you agreed to enter into a pretrial diversion or similar program in connection with a prosecution for a crime involving dishonesty or breach of trust and were 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, 12 U.S.C. § 1829 (“Section 19”), for financial 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 financial organizations described below. That 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 traditional, 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) 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 Act 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 and savings and loan holding companies and Edge Act and Agreement



corporations. The National Credit Union Administration Board may grant consent for 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, or 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.

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 public 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 Wendell Thomas in writing at this Reserve Bank.

Sincerely,

**REDACTED**

Ryan L. Harwell  
Vice President

Attachment

cc: Legal-Section19Letters@frb.gov  
Ms. Sonya Ramsey, Case Manager, Special Activities  
Federal Deposit Insurance Corporation  
Mr. Ken Boldt, State Bank Commissioner  
Colorado Division of Banking

Docket, dated November 14, 2023, concerning *State of Colorado v. John Joseph Sanders*, Case No. 2018-CR-2670, in the Arapahoe County District Court on file.