



Federal Reserve Bank of Kansas City

March 20, 2020

Via Federal Express/Direct Signature Required

Ms. Erica L. File
REDACTED

Valley, Nebraska 68064

Re: Criminal Conviction - Prohibition from Banking Industry

Dear Ms. File:

The Federal Reserve Bank of Kansas City (Reserve Bank) has become aware that you were convicted upon a guilty plea of *Theft By Employee and Aid/Abet*, in connection with your employment at First Nebraska Bank, Valley, Nebraska. A copy of your judgment of conviction is attached. 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, 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. 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, either 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, 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 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 Federal Reserve System may grant such consent with respect to bank and savings and loan holding companies and Edge Act and Agreement corporations, and the National Credit Union Administration Board may grant such consent with

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www.KansasCityFed.org



Ms. File

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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.

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 the Reserve Bank.

Sincerely,

REDACTED

Porcia B. Block
Vice President

Attachment

cc: Ms. Nicole L. Cavanaugh, Attorney at Law
Legal-Section19Letters@frb.gov
Mr. Ashley Schrag, Case Manager (Special Activities)
Federal Deposit Insurance Corporation
Mr. Mark Quandahl, Director
Nebraska Department of Banking and Finance

Plea Agreement, dated August 12, 2019, and Judgment in a Criminal Case, dated November 25, 2019, concerning *United States v. Erica L. File*, Case No. 8:19-cr-00020-LSC-MDN, in the United States District Court for the District of Nebraska on file.