



Federal Deposit Insurance Corporation
Division of Risk Management Supervision
300 South Riverside Plaza, Suite 1700, Chicago, IL 60606

Chicago Regional Office
Phone (312) 382-7500
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VIA ELECTRONIC DELIVERY

Brandon J. Zanotti
[REDACTED]
Marion, Illinois 62959
[REDACTED]

Re: Prohibition under Section 19 of the Federal Deposit Insurance Act

Dear Mr. Zanotti:

The Federal Deposit Insurance Corporation (“FDIC”) has become aware of your May 15, 2024, conviction of False Entry of Bank Records in US District Court, Southern District of Illinois that is covered by Section 19 of the Federal Deposit Insurance Act (“FDI Act”). Section 19 prohibits, except with the prior written consent of the FDIC, any person who has been convicted of any criminal offense involving dishonesty, breach of trust, or money laundering, or who has agreed to enter into a pretrial diversion or similar program in connection with a prosecution for such an offense, from becoming or continuing as an institution-affiliated party with respect to any insured depository institution; owning or controlling, directly or indirectly, any insured depository institution; or otherwise participating, directly or indirectly, in the conduct of the affairs of any insured depository institution.¹ Section 19(a) (2)(A)(i)(I) explicitly that persons such as you who have been convicted of 18 U.S.C. 1005 are subject to a Ten-Year prohibition from participating in the affairs of any insured depository institution. Moreover, because Section 19 is effective by operation of law, you are already subject to the law’s restrictions.

Your attention is directed to Section 19(b) of the FDI Act, 12 U.S.C. § 1829(b), which imposes criminal penalties of up to five years’ imprisonment and a fine of up to \$1,000,000 for each day such prohibition is violated, upon any person who knowingly violates the restrictions of Section 19. The FDIC has also issued Part 303, Subpart L of the FDIC Rules and Regulations (12 C.F.R. part 303, subpt. L) entitled, “Section 19 of the FDI Act (Consent to Service of Persons Convicted of, or Who Have Program Entries for, Certain Criminal Offenses),” which provides additional background and information.

If you have reason to believe that your May 15, 2024, conviction is not covered by Section 19 of the FDI Act, please provide a written response to this office within 30 days of your receipt of this letter. After that time period, this letter will be posted and become publicly available on the FDIC website. Should you have a question regarding this matter, please contact Senior Regional Attorney [REDACTED] at [REDACTED] or Case Manager [REDACTED] at [REDACTED].

Sincerely,

/s/ Date: 3/19/2025

[REDACTED]
Regional Director

cc [REDACTED], IDFPR

¹ Section 19 provides exceptions and exemptions for certain offenses that otherwise would be covered by the statute. Your offenses referenced above do not currently meet the exception or exemption criteria.