



**San Francisco Regional Office**  
**25 Jessie Street at Ecker Square, Suite 2300, San Francisco, CA 94105-2780**

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April 27, 2023

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Gabriellah Santos

[REDACTED]  
Ewa Beach, Hawaii [REDACTED]

Subject            Prohibition Under Section 19 of the Federal Deposit Insurance Act

Dear Ms. Santos:

The Federal Deposit Insurance Corporation (FDIC) has become aware of your September 7, 2022 conviction or program entry in the Circuit Court of the First Circuit of the State of Hawaii 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 a 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.<sup>1</sup> Because Section 19 is effective by operation of law, you are already subject to the law's restrictions, including the prohibition on participating in the affairs of any insured depository institution.

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 September 7, 2022 conviction or program entry is not covered by Section 19, please provide a written response to this office within 30 days of your receipt of this letter by

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

Gabriellah Santos

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certified mail. After that time period, this letter will be posted and become publicly available on the FDIC website and will remain on the FDIC website until the criminal offense referenced above is no longer covered under Section 19. Should you have a question regarding this matter, please contact Counsel [REDACTED] at [REDACTED] or at 25 Jessie Street, Suite 1400, San Francisco, California 94105.

Sincerely,

[REDACTED]  
Deputy Regional Director