



**ROBERT MAHALIK**  
EXAMINING OFFICER  
Applications and Enforcement

FEDERAL RESERVE BANK  
OF DALLAS

2200 N. PEARL ST.  
DALLAS, TX 75201

July 27, 2017

Mr. Steven Michael

**REDACTED**

San Antonio, Texas 78247

Re: Criminal Conviction – Prohibition from Banking Industry

Dear Mr. Michael:

The Federal Reserve Bank of Dallas has become aware that you were convicted upon a plea of guilty of fraudulent participation, sharing in, and receipt of money through transactions of a federally insured bank in connection with your employment at Frost Bank, San Antonio, Texas. 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. 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 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 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 me in writing at this Reserve Bank.

Sincerely,

**REDACTED**

cc:

Mr. Shawn C. Brown  
Law Office of Shawn C. Brown, P.C.  
540 South St. Mary's Street  
San Antonio, Texas 78205

Mr. Thomas Joseph McHugh  
Law Offices of Thomas J. McHugh  
106 South St. Mary's Street  
Suite 260  
San Antonio, Texas 78205

Ms. Kristie K. Elmquist  
Regional Director  
Federal Deposit Insurance Corporation  
1601 Bryan Street  
Dallas, Texas 75201

Mr. Charles G. Cooper  
Commissioner  
Texas Department of Banking  
2601 North Lamar  
Austin, Texas 78705

Mr. Michael R. Brickman  
Assistant Deputy Comptroller  
Comptroller of the Currency  
Southern District  
500 North Akard, Suite 1600  
Dallas, Texas 75201-3394

Mr. Keith Morton  
Director, Region 4  
National Credit Union Administration  
4807 Spicewood Springs Road  
Suite 5200  
Austin, Texas 78759-8490

Board of Governors  
(via email)

Judgment in a Criminal Case, dated June 1, 2017, concerning *United States v. Steven Lee Michael*, Case No. 5:16-cr-00862-XR, in the United States District Court for the Western District of Texas, San Antonio Division on file.