



**FEDERAL  
RESERVE  
BANK**  
*of ATLANTA*

**SUZANNA J. COSTELLO**  
*Vice President*

1000 Peachtree Street, N.E.  
Atlanta, Georgia 30309-4470  
404.498.7159 Phone  
404.498.7302 Fax  
suzanna.costello@atl.frb.org  
frbatlanta.org

May 7, 2018

Antonette Grau Carrillo  
**REDACTED**  
Milpitas, California 95035-5908

Re: Pretrial Diversion – Prohibition from Banking Industry

Dear Ms. Carrillo:

The Federal Reserve Bank of Atlanta has become aware that you entered into a pretrial diversion or similar program in connection with the resolution of an indictment that charged you with grand theft in connection with your employment at Compass Bank, Sunnyvale, California. A copy of the court document reflecting your entry into the program is attached. Because you have agreed to enter into a pretrial diversion or similar program in connection with the prosecution 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

Suzanna J. Costello

cc: Special Activities Section  
Division of Supervision  
Federal Deposit Insurance Corporation  
550 17th Street N.W.  
Washington, D.C. 20429

Gary Lee Goodman  
Office of Public Defenders  
231 Grant Avenue  
Palo Alto, California 94306-1907

William Lee Byrd  
Corporate Security Officer  
Compass Bank  
15 South 20th Street  
Suite 1402  
Birmingham, Alabama 35233

State of California  
Department of Business Oversight  
Division of Financial Institutions  
45 Fremont Street, Suite 1700  
San Francisco, California 94105-2219

District Attorney's Palo Alto Branch Office  
Steven Dal Porto, Supervising Deputy DA  
270 Grant Avenue  
Palo Alto, California 94306- 1911

Plea documents, dated February 22, 2011 and Probation and Sentencing document, dated May 5, 2011, concerning *State of California v. Antonette Grau Carrillo*, Case No. CA04307048, in the Superior Court of Santa Clara County on file.