



ROBERT MAHALIK
EXAMINING OFFICER
Applications and Enforcement

**FEDERAL RESERVE BANK
OF DALLAS**

2200 N. PEARL ST.
DALLAS, TX 75201

March 30, 2016

Ms. Brenda Paul – Register #50980-039
FCI Hazelton
Federal Correctional Institution
Attn: Warehouse
1640 Sky View Drive
Bruceton Mills, West Virginia 26525

Re: Criminal Conviction – Prohibition from Banking Industry

Dear Ms. Paul:

The Federal Reserve Bank of Dallas has become aware that you were convicted upon a plea of guilty of embezzlement from a financial institution in connection with your employment by Comerica Bank, Dallas, 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, as amended (“Section 19”)(12 U.S.C. § 1829) for banking organizations and in Section 205 of the National Credit Union Act, as amended (“Section 205(d)”) (12 U.S.C. § 1785(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 banking organizations or credit unions 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, 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 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 and Agreement corporations. The National Credit Union Administration Board may grant consent for insured credit unions. The automatic prohibition does not cover non-bank subsidiaries of bank holding companies 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 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. James R. Gerometta
Federal Defender Office
613 Abbott
5th floor
Detroit, Michigan 48226

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

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

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

Mr. Gilbert D. Barker
Deputy Comptroller
Comptroller of the Currency
Southern District
500 North Akard, Suite 1600
Dallas, Texas 75201-3394

Ms. Kirsten Daeubler
Board of Governors

Judgment in a Criminal Case, dated December 2, 2015, concerning *United States v. Brenda Paul*, Case No. 14-CR-20747-1, in the United States District Court for the Eastern District of Michigan on file.