SQUIRE PATTON BOGGS

Steve Conigliaro

Partner

Phoenix **Los Angeles**
T +1 602 528 4009

steven.conigliaro@squirepb.com



About Steve

Steve Conigliaro brings over two decades of experience counseling consumer and retail banking clients on partnership agreements, joint ventures and regulatory compliance matters.

He has been a trusted advisor to the world's largest national banks, auto captive finance companies, fintechs and payment card networks, as well as processors, issuers and acquirers.

Throughout his career, Steve has led many strategic transactions and partnership negotiations including auto finance private label agreements with auto original equipment manufacturers (OEMs), whole loan purchase agreements with major point-of-sale personal loan originators, banking as a service platform agreements and transformational bank partnership agreements with financial services technology providers.

Steve also has a strong track record of successfully defending financial institutions on supervisory and enforcement matters with the Office of the Comptroller of the Currency, the Federal Reserve Board, the Federal Deposit Insurance Corporation and the Consumer Financial Protection Bureau related to all major consumer banking businesses, including auto finance, credit card, unsecured lending, home lending and digital and branch banking.

Before joining the firm, he held leadership roles in the legal departments at some of the largest national banks in the US. Steve began his legal career at a leading global law firm and was a founding member of its Financial Services Practice Group, where he specialized in representing payment card networks, banks and other financial institutions.

Experience

- Served as lead counsel for a national bank on a US$4 billion annual whole loan purchase agreement with a major point-of-sale personal loan originator.
- Negotiated several sophisticated auto lease and loan side-by-side agreements (including for indirect and direct auto lending) for a money center bank with an electric vehicle (EV) auto OEM.
- Negotiated an Master Service Agreement (MSA) and Statements of Work (SOWs) for a point-of-sale merchant seeking to implement a credit card surcharge program to offset interchange and other payment card processing costs associated with its payment card acceptance.
- Counseled a fintech company on issuing prepaid gift cards and prepaid mobile airtime top up in compliance with FinCEN's Bank Secrecy Act (BSA) Anti-Money Laundering (AML) regulations and state Money Service Business (MSB) licensing standards.
- Represented a national fuel retailer on the negotiation of a commercial card agreement with a payment processor to offer branded MasterCard payment cards to the retailer's fleet and commercial customers
- Counseled a buy-now pay-later fintech company on developing a compliance management system to establish preventative and detective controls to comply with Reg Z, Reg E and Unfair, Deceptive or Abusive Acts or Practices (UDAAP).

Credentials

Education

- Cornell Law School, J.D., *cum laude*, 2002
- Bucknell University, B.A., 1999

Admissions

- California, 2004
- New York, 2004
- Arizona, 2024

Expertise

Services

- Financial Services

About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.