## FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

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In the Matter of

PAULA D. LAWRENCE, in the Application for Consent to Participate in the Conduct of the Affairs of Any Insured Depository Institution ORDER GRANTING PERMISSION TO FILE APPLICATION AND APPROVING APPLICATION FOR CONSENT TO PARTICIPATE IN THE AFFAIRS OF ANY INSURED DEPOSITORY INSTITUTION

FDIC-09-336L

(INSURED STATE NONMEMBER BANK)

The Federal Deposit Insurance Corporation ("FDIC"), having fully considered all the facts and information relating to the application filed pursuant to section 19 of the Federal Deposit Insurance Act, 12 U.S.C. § 1829 ("section 19"), by Paula D. Lawrence ("Applicant"), individually, for a waiver of the FDIC policy requirement that an insured depository institution file a section 19 application on her behalf, and for consent to participate directly or indirectly in the affairs of any insured depository institution, has determined that Applicant's request for a waiver should be granted and that Applicant's section 19 application to participate in the affairs of any insured depository institution, should be approved, based upon the following: (1) On November 9, 1976, Applicant, nineteen years old, was charged with passing a worthless check in Dallas, Texas, in the amount of \$30. Applicant pled guilty to the charge and promptly paid the amount of the check and \$52 in court fees and fines.

(2) Applicant requests that the FDIC waive its policy requiring that a sponsoring insured depository institution submit a Section 19 application on her behalf.

(3) Applicant has been employed over the last fifteen years at a mortgage company as a collections associate and at Brinks Home Security and Westinghouse Home Security, both of which required a security clearance issued by the State of Texas Board of Private Investigators.

(4) The FDIC notes that more than thirty-three years have elapsed since the offense, and Applicant has no additional convictions or pre-trial diversions.

(5) Based on the above, the FDIC has determined that Applicant has demonstrated satisfactory evidence of rehabilitation.

(6) The FDIC believes that Applicant's participation directly or indirectly, in the conduct of the affairs of any insured depository institution, in any position, does not appear to constitute a threat to the safety and soundness of any insured depository institution, or to the interests of depositors, and that such participation would not threaten to impair public confidence in any insured institution.

The FDIC has determined that there is substantial good cause to waive the FDIC policy requirement that an insured depository institution file a section 19 application on Applicant's behalf and that the Applicant be granted permission to file a Section 19 application on her own behalf.

NOW, THEREFORE, IT IS HEREBY ORDERED that Paula D. Lawrence, as an individual, shall be permitted to file the section 19 application on her own behalf; and

IT IS FURTHER ORDERED, that the Applicant's section 19 application for consent to participate directly or indirectly in the conduct of the affairs of any insured depository institution is hereby APPROVED, provided that prior to serving in any position, Applicant disclose to any such insured depository institution the FDIC's approval of Applicant's section 19 application by providing the insured depository institution with a copy of the ORDER GRANTING PERMISSION TO FILE APPLICATION AND APPROVING APPLICATION FOR CONSENT TO PARTICIPATE IN THE AFFAIRS OF ANY INSURED DEPOSITORY INSTITUTION and that Applicant be covered by a fidelity bond to the same extent as others in similar positions at the subject insured depository institution. IT IS FURTHER ORDERED, that the permission and approval granted by the ORDER shall apply only to the offense described in paragraph 1, above.

Dated this  $9^{th}$  day of November, 2009.

\_\_\_\_\_/s/\_\_\_\_ Serena L. Owens Associate Director Division of Supervision and Consumer Protection