

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

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In the Matter of	)	)	
	)	)	
SUSAN L. YEDLICKA, in the	)	)	ORDER GRANTING PERMISSION
Application for Waiver and Consent	)	)	TO FILE APPLICATION AND
to Participate in the Conduct of	)	)	APPROVING APPLICATION FOR
the Affairs of Any Insured	)	)	CONSENT TO PARTICIPATE IN
Depository Institution	)	)	THE AFFAIRS OF ANY
	)	)	INSURED DEPOSITORY
	)	)	INSTITUTION
	)	)	
	)	)	
	)	)	FDIC-09-494L
	)	)	
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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 Susan L. Yedlicka ("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 October 9, 1979, Applicant, twenty years old, was convicted of petty theft (shop lifting) in violation of Section 484 of the California Penal Code. Applicant was fined \$70.00 and sentenced to 15 days in jail, with 14 days suspended and 1 day credited for time served. The conviction was set aside and dismissed 1 year later.

(2) Since her conviction 30 years ago, Applicant has had no other arrests or convictions. Applicant has also had a successful employment history. Applicant worked for the Monterey Peninsula Airport District from 1980 to 1989. Applicant worked for Morgan Stanley from 1997 to 2006 and Merrill Lynch from 2006 to 2007. Applicant holds FINRA Series 7 and 63 licenses, which enable her to serve as a general securities representative and solicit securities orders. Applicant was hired by Wells Fargo Bank ("WFB") as an executive assistant in 2009 after disclosing her conviction on her job application and to her manager, but was asked to resign by WFB's Human Resources Department a month later due to her conviction. WFB is willing to rehire Applicant but has declined to sponsor her Section 19 Application.

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

(4) The FDIC notes that over 30 years have elapsed since the conviction (which was subsequently set aside), Applicant has demonstrated a successful employment history, and Applicant has no other arrests or convictions.

(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 other 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 Susan L. Yedlicka, 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 8<sup>th</sup> day of December, 2009.

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