



Federal Deposit Insurance Corporation
Division of Risk Management Supervision
300 South Riverside Plaza, Suite 1700, Chicago, IL 60606

Chicago Regional Office
Phone (312) 382-7500
Fax (312) 382-6901

October 24, 2018

VIA OVERNIGHT DELIVERY

Mr. Travis Smith

[REDACTED]
Columbus, Ohio 43235

Re: Section 19 Waiver Request and Application

Dear Mr. Smith:

This is to advise you that you are not subject to Section 19 of the Federal Deposit Insurance Act ("Section 19"), 12 U.S.C. § 1829, based on the records provided to the FDIC on October 17, 2018.

The records you provided indicate that on March 1, 2016, you plead guilty to, and were sentenced for, one count of Possession of a Counterfeit Controlled Substance, a misdemeanor in the first degree. Pursuant to the FDIC's Statement of Policy issued August 3, 2018, a Section 19 Application is required where there is a conviction for a covered offense, which is a criminal offense involving dishonesty, breach of trust, or money laundering. The FDIC interprets "covered offense" to include convictions concerning the illegal manufacture, sale, distribution of, or trafficking in controlled substances. However, that interpretation does not cover mere possession of a controlled substance absent the illegal manufacture, sale, distribution of, or trafficking of that substance.

Therefore, you are not required to submit a Section 19 Waiver Request and Application for your conviction of possession of a counterfeit controlled substance, and are free to seek employment with an insured depository institution. If you have any questions relating to this matter, you may contact Senior Regional Attorney [REDACTED] at (312) 382-7550.

Sincerely,

[REDACTED]
Christopher J. Newbury
Deputy Regional Director