

UNITED STATES OF AMERICA  
Before The  
OFFICE OF THRIFT SUPERVISION

In the Matter of )  
 )  
 )  
Bennie G. Snider, an )  
Officer and Director )  
of North Texas )  
Savings and Loan )  
Association, )  
Denton, Texas )

Re: Resolution No. DAL-91-15

Dated: March 19, 1991

STIPULATION AND CONSENT TO ISSUANCE OF  
ORDER OF CIVIL MONEY PENALTY ASSESSMENT

The Office of Thrift Supervision ("OTS"), by and through the District Director for the Dallas District, and Bennie G. Snider stipulate and agree as follows:

1. Consideration.

The OTS, based upon information reported to it, is of the opinion that grounds exist to initiate an administrative civil money penalty assessment proceeding against Bennie G. Snider pursuant to Section 8(i)(2) of the Federal Deposit Insurance Act ("FDIA"), as amended by Section 907(a)(2)(A) of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 ("FIRREA"), Pub. L. No. 101-73, 103 Stat. 183 (to be codified at 12 U.S.C. § 1818(i)(2)). Bennie G. Snider desires to cooperate with OTS and to avoid the time and expense of such administrative litigation and, without admitting or denying that such grounds exist, hereby stipulates and agrees to the following terms in consideration of the forbearance by the OTS from initiating such administrative civil money penalty assessment proceeding against Bennie G. Snider with respect to the following matters:

Snider Development, Inc. (also referred to as Snider Development Corporation or Snider Development Co., and hereinafter identified as

"SDI"), at all times relevant hereto, was jointly owned by Benny G. Snider, his wife, his son, and his daughter-in-law. Therefore, Snider Development, Inc. is an affiliated person, as defined at 12 C.F.R. § 561.5. On December 29, 1989, North Texas Savings and Loan Association (the "Association") granted a loan to Richard A. Harris, III, on the security of real property purchased from SDI, through Stewart Craig Snider, in violation of 12 C.F.R. § 563.43(c)(1). Bennie G. Snider approved the loan, which resulted in pecuniary gain to him through his interest in SDI. The approval of the loan and the transfer of lot transaction violated the Association's Standards of Responsibility and Conduct.

2. Jurisdiction.

(a) North Texas Savings and Loan Association, Denton, Texas, is a "savings association" within the meaning of Section 3 of the FDIA and Section 2 of the Home Owners' Loan Act of 1933, as amended by FIRREA. Accordingly it is an "insured depository institution" as that term is defined in Section 3(c) of the FDIA, as amended by FIRREA (to be codified at 12 U.S.C. § 1813 (c)).

(b) Bennie G. Snider is an institution-affiliated party within the meaning of Section 3(u) of the FDIA, as amended by FIRREA (to be codified at 12 U.S.C. § 1813(u)).

(c) Pursuant to Section 3 of the FDIA, as amended by FIRREA, OTS is the "appropriate Federal banking agency" to maintain civil money penalty assessment proceedings against such an institution-affiliated party. Therefore, Bennie G. Snider is subject to the authority of OTS to initiate and maintain the assessment of a civil money penalty pursuant to Section 8(i)(2) of the FDIA, as amended by FIRREA (to be codified at 12 U.S.C. § 1818(i)(2)).

3. Consent.

Bennie G. Snider consents to the issuance by OTS of the accompanying Order and further agrees to comply with its terms upon issuance and stipulates that the Order complies with all requirements of law.

4. Finality.

The Order is issued under Section 8(i)(2) of the FDIA, as amended by FIRREA (to be codified at 12 U.S.C § 1818(i)(2)). Upon its issuance by the District Director for the Dallas District, it shall be a final order, effective and fully enforceable by OTS under the provisions of Section 8(i)(2) of the FDIA, as amended by FIRREA (to be codified at 12 U.S.C. §1818(i)(2)).

5. Waivers

Bennie G. Snider waives the right to a Notice of Assessment of Civil Money Penalty provided by Section 8(i)(2) of the FDIA, as amended by FIRREA (to be codified at 12 U.S.C. § 1818(i)(2)), and the administrative hearing provided by Section 8(i)(2)(H) of the FDIA, as amended by FIRREA (to be codified at 12 U.S.C. § 1818(i)(2)(H)), and further waives his right to seek judicial review of the Order, including any such right provided by Section 8(h) of the FDIA, as amended by FIRREA (to be codified at 12 U.S.C. § 1818(h)) or to otherwise challenge the validity of the Order.

WHEREFORE, in consideration of the foregoing, the District Director for the Dallas District on behalf of OTS, and Bennie G. Snider execute this Stipulation and Consent to Issuance of Order of Civil Money Penalty Assessment.

OFFICE OF THRIFT SUPERVISION

By:

/S/

Billy C. Wood  
District Director  
Dallas  
District Office

/S/

Bennie G. Snider

UNITES STATES OF AMERICA  
BEFORE THE  
OFFICE OF THRIFT SUPERVISION

IN THE MATTER OF:

BENNIE G. SNIDER, AN OFFICER  
AND DIRECTOR OF NORTH TEXAS  
SAVINGS AND LOAN ASSOCIATION,  
DENTON, TEXAS

RESOLUTION NO. DAL-91-15

DATED: March 19, 1991

ORDER OF CIVIL MONEY PENALTY ASSESSMENT

WHEREAS, Bennie G. Snider has executed a Stipulation and Consent to Issuance of Order of Civil Money Penalty Assessment, which is incorporated herein by reference ("Stipulation") and is accepted and approved by the Office of Thrift supervision ("OTS") acting through the Regional Director for the Midwest Regional Office, Dallas, Texas; and,

WHEREAS, Bennie G. Snider, in the Stipulation, has consented to the issuance of this Order of Civil Money Penalty Assessment pursuant to Section 8(1)(2) of the Federal Deposit Insurance Act ("FDIA"), as amended by Section 907(a)(2)(A) of the Financial Institutions Reform, Recovery and Enforcement Act of 1989 ("FIRREA"), Pub. L. No. 101-73, 103 Stat. 183 (to be codified at 12 U.S.C. § 1818(1)(2));

NOW THEREFORE, IT IS ORDERED that Bennie G. Snider shall pay to OTS a sum of \$10,000 as follows: (1) by tendering a check to OTS made payable to the Treasurer of the United States in the amount of \$2,000 by February 22, 1991, and (2) by tendering a check to the OTS made payable to the Treasurer of the United States in the amount of \$8,000 by May 31, 1991.

OFFICE OF THRIFT SUPERVISION

BY: /S/  
BILLY C. WOOD  
REGIONAL DIRECTOR  
MIDWEST REGIONAL OFFICE  
DALLAS, TEXAS