

FEDERAL DEPOSIT INSURANCE CORPORATION  
WASHINGTON, D.C.

In the Matter of	)	
	)	
Tracy L. Robison, an institution-affiliated party of	)	
	)	ORDER TO PAY
The Farmers Bank	)	
Carnegie, Oklahoma	)	FDIC-21-0037k
	)	
(Insured State Nonmember Bank)	)	
	)	
Respondent's NMLS UI# N/A	)	
	)	
	)	
	)	

Tracy L. Robison (Respondent) was advised of the right to receive a Notice of Assessment (Notice) detailing Respondent's violations of law or regulations, unsafe or unsound banking practices and breaches of fiduciary duties for which an Order to Pay a civil money penalty (Order to Pay) may be issued under 12 U.S.C. § 1818(i).

Respondent was further advised of the right to a hearing on the Notice under § 1818(i), and 12 C.F.R. Part 308, subparts A & B. Respondent waived certain rights under those provisions on April 4, 2022, and consented to the issuance of an Order to Pay by entering into a Stipulation and Consent to the Issuance of an Order to Pay (Consent Agreement) with a representative of the Federal Deposit Insurance Corporation's (FDIC) Legal Division.

The FDIC determined and Respondent neither admits nor denies the following:

1. Respondent between July 2017 and August 2018, as Chief Financial Officer and a director of The Farmers Bank, Carnegie, Oklahoma ("Bank"), provided critically deficient oversight of senior management's compliance with laws and regulations, insider abuse, conflicts of interest, poor internal controls, and weak credit underwriting and administration, and Respondent engaged in acts and omissions that resulted in multiple violations of law or regulation. Respondent's actions were recklessly unsafe and unsound and were part of a pattern of misconduct.

2. As described in paragraph 1, Respondent violated laws or regulations, engaged or participated in unsafe or unsound practices in connection with the Bank, and breached Respondent's fiduciary duties owed to the Bank.

3. Respondent's violations, practices, breaches were part of a pattern of misconduct.

After considering the civil money penalty (CMP) mitigating factors under 12 U.S.C. § 1818(i)(2)(G), the FDIC accepts the Consent Agreement and issues the following:

#### **ORDER TO PAY**

4. By reason of Respondent's actions listed in paragraph 1, \$2,500.00 CMP is assessed against Tracy L. Robison under 12 U.S.C. § 1818(i)(2) and is effective upon issuance. Respondent must immediately pay the CMP to the Treasury of the United States.

5. Respondent may not seek or accept indemnification from any insured depository institution for the CMP assessed in this matter.

6. The Order to Pay is enforceable under 12 U.S.C. § 1818(i), and the FDIC will take action to collect the amount due if Respondent fails to make payment.

7. The Order to Pay does not waive any right, power, or authority of the United States; federal, state, or local agencies; or the FDIC as Receiver.

Issued under delegated authority.

Dated: September 26, 2022.

/s/  
Patricia A. Colohan  
Associate Director  
Division of Risk Management Supervision