

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

_____	)	
In the Matter of	)	
	)	
ROBERT C. FICK	)	ORDER TO PAY
	)	
individually, and as an institution-affiliated	)	FDIC-17-0172k
party of	)	
	)	
VALLEY BANK	)	
MOLINE, ILLINOIS	)	
(In Receivership)	)	
	)	
(INSURED STATE NONMEMBER BANK)	)	
_____	)	

ROBERT C. FICK (Respondent) and a representative of the Legal Division of the Federal Deposit Insurance Corporation (FDIC) executed a Stipulation and Consent to the Issuance of an Order to Pay (CONSENT AGREEMENT) dated April 20, 2018, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any violations of law or regulation for which civil money penalties may be assessed, consented to payment of civil money penalties and the issuance of this Order to Pay (ORDER) pursuant to 12 U.S.C. § 1818(i) and the FDIC’s Rules of Practice and Procedure, 12 C.F.R. Part 308.

The FDIC considered the matter and determined it has reason to believe that:

1. At all times relevant to this proceeding, Respondent served as a Director at Valley Bank, Moline, Illinois (Bank). As such, Respondent is an institution-affiliated party of the Bank as defined in 12 U.S.C. § 1813(u).

2. Respondent violated Regulation O of the Board of Governors of the Federal Reserve (“Regulation O”), 12 C.F.R. Part 215, made applicable to state nonmember banks by 12 U.S.C. §

1828(j), concerning certain loans from the Bank to Respondent and his related interests. The Bank incurred no loss on the loans.

3. During the period beginning after July 20, 2012, Respondent violated or caused the Bank to violate 12 C.F.R. § 363.

After taking into account the CONSENT AGREEMENT, the appropriateness of the civil money penalty with respect to the good faith of Respondent, the gravity of the violations of law or regulations by Respondent, the history of previous violations by Respondent, and such other matters as justice may require, the FDIC accepts the CONSENT AGREEMENT, and issues the following:

ORDER TO PAY

IT IS HEREBY ORDERED that by reason of the violations set forth above, a civil money penalty in the amount of FIFTEEN THOUSAND DOLLARS \$15,000 is assessed against ROBERT C. FICK, and shall be paid as provided in Section 5 of the CONSENT AGREEMENT.

IT IS FURTHER ORDERED that Respondent is prohibited from seeking or accepting indemnification from any insured depository institution for any civil money penalty assessed and paid in this matter.

Nothing in the CONSENT AGREEMENT or this ORDER shall preclude any proceeding brought by the FDIC to enforce the terms of this ORDER or constitute a waiver of any right, power, or authority of the FDIC or any other Federal or state agency or department from taking any other action against Respondent, the Bank, or any of the Bank's current or former institution-affiliated parties, as that term is defined in 12 U.S.C. §1813(u).

This ORDER shall be effective upon its issuance.

Pursuant to delegated authority.

Dated this 10<sup>th</sup> day of may, 2018.

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