

FEDERAL DEPOSIT INSURANCE CORPORATION

WASHINGTON, D.C.

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| _____ |) | |
| In the Matter of |) | |
| |) | |
| TRAE D. DOROUGH, |) | |
| as an institution-affiliated party of |) | ORDER TO PAY |
| |) | |
| MONTGOMERY BANK & TRUST |) | FDIC-15-0094k |
| AILEY, GEORGIA |) | |
| |) | |
| (INSURED STATE NONMEMBER BANK) |) | |
| |) | |
| RESPONDENT'S NMLS UI # N/A |) | |
| _____ |) | |

Trae D. Dorough (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 March 12, 2018, whereby Respondent, solely for the purpose of this proceeding and without admitting or denying any violation(s) of law for which civil money penalties may be assessed, consented and agreed to pay civil money penalties in the amount specified below to the Treasury of the United States.

The FDIC has determined, and Respondent neither admits nor denies, that, as an institution affiliated party of Montgomery Bank & Trust, Ailey, Georgia (Bank), Respondent on or about April 30, 2012, caused the Bank to understate its allowance for loan and lease losses in the Bank's Report of Condition and Income (CALL Report) as of March 31, 2012, and therefore caused or permitted the Bank to violate 12 U.S.C. § 1817(a)(1), which prohibits insured State nonmember banks from submitting or publishing false or misleading CALL Reports.

After taking into account the CONSENT AGREEMENT, the appropriateness of the penalty with respect to the financial resources and good faith of Respondent, the gravity of the

