

UNITED STATES OF AMERICA
BEFORE
THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
WASHINGTON, D.C.

In the Matter of:)	Docket Nos. 11- 058 – E-I.
)	11-058-CMP-I
Bryan T. Posey,)	
a former Institution- Affiliated Party of:)	Order of Prohibition and
Security Bank,)	Assessment of Civil Money Penalty
Tulsa, Oklahoma)	Issued Upon Consent Pursuant to
)	Sections 8(e) and 8(i) of the Federal
)	Deposit Insurance Act, as Amended

WHEREAS, pursuant to sections 8(e), 8(i)(2) and 8(i)(3) of the Federal Deposit Insurance Act, as amended (the “FDI Act”), 12 U.S.C. §§ 1818(e), (i)(2) and (i)(3), the Board of Governors of the Federal Reserve System (the “Board of Governors”) issues this Order of Prohibition and Assessment of Civil Money Penalty (the “Order”) upon the consent of Bryan T. Posey (“Posey), a former employee and institution-affiliated party, as defined in section 3(u) of the FDI Act, 12 U.S.C. § 1813(u), of Security Bank, Tulsa, Oklahoma (the “Bank”), a registered state member bank.

WHEREAS, the Board of Governors, on April 21, 2011, issued a combined Notice of Intent to Prohibit and Notice of Assessment of a Civil Money Penalty against Posey (the "April 21, 2011 Notice"). The April 21, 2011 Notice alleged that Posey had engaged in violations of law and unsafe and unsound banking practices, and breached his fiduciary

duties in connection with the Bank's issuance of commercial real estate and other loans.

Posey has denied the allegations of the April 21, 2011 Notice.

WHEREAS, by affixing his signature hereunder, Posey has consented to the issuance of this Order of Prohibition and Assessment of Civil Money Penalty by the Board of Governors (the "Order") and has agreed to comply with each and every provision of this Order, and has waived any and all rights he might have pursuant to 12 U.S.C. § 1818, 12 CFR Part 263, or otherwise: (a) to a hearing for the purpose of taking evidence with respect to any matter implied or set forth in this Order; (b) to obtain judicial review of this Order or any provision hereof; and (c) to challenge or contest in any manner the basis, issuance, terms, validity, effectiveness, or enforceability of this Order or any provision hereof.

NOW THEREFORE, prior to the taking of any testimony or adjudication of or finding on any issue of fact or law implied or set forth herein, and without this Order constituting an admission by Posey of any allegation made or implied by the Board of Governors in connection with this proceeding, and solely for the purpose of settlement of this proceeding without protracted or extended hearings or testimony:

IT IS HEREBY ORDERED, pursuant to sections 8(e) and (i)(3) of the FDI Act, 12 U.S.C. §§ 1818(e) and (i)(3), that:

1. Posey, without the prior written approval of the Board of Governors and, where necessary pursuant to section 8(e)(7)(B) of the FDI Act, 12 U.S.C. § 1818(e)(7)(B), another Federal financial institutions regulatory agency, is hereby and henceforth prohibited from:

(a) participating in any manner in the conduct of the affairs of any institution or agency specified in section 8(e)(7)(A) of the FDI Act, 12 U.S.C. § 1818(e)(7)(A), including, but not limited to, any insured depository institution or any holding company of an insured depository institution, or any subsidiary of such holding company;

(b) soliciting, procuring, transferring, attempting to transfer, voting or attempting to vote any proxy, consent, or authorization with respect to any voting rights in any institution described in section 8(e)(7)(A) of the FDI Act, 12 U.S.C. § 1818(e)(7)(A);

(c) violating any voting agreement previously approved by any Federal banking agency; or

(d) voting for a director, or serving or acting as an institution-affiliated party, as defined in section 3(u) of the FDI Act, 12 U.S.C. § 1813(u), such as an officer, director or employee, in any institution described in section 8(e)(7)(A) of the FDI Act.

IT IS HEREBY FURTHER ORDERED, pursuant to section 8(i) of the FDI Act, that:

2. Posey is assessed and shall pay to the Board of Governors a civil money penalty in the amount of \$35,000.

3. The penalty assessed pursuant to this Order shall be remitted in full, at the time of Posey's execution of this Order, payable to the "Board of Governors of the Federal Reserve System" and forwarded with Posey's executed copy of this Order, to Jennifer J. Johnson, Secretary of the Board, Board of Governors of the Federal Reserve System,

Washington, DC 20551. The Board of Governors shall remit the payment to the Treasury of the United States as required by statute.

2. All communications regarding this Order shall be addressed to:

(a) Richard M. Ashton, Esq.
Deputy General Counsel
Board of Governors of the
Federal Reserve System
20th & C Sts., N.W.
Washington, DC 20551

(b) Mr. Bryan T. Posey

Tulsa, Oklahoma 74137

With a copy to:

Ken Klingenberg, Esq.
330 N.W. 13th Street
Oklahoma City, Oklahoma 78103

3. Any violation of this Order shall separately subject Posey to appropriate civil or criminal penalties, or both, under sections 8(i) and (j) of the FDI Act, 12 U.S.C §§ 1818(i) and (j).

4. The provisions of this Order shall not bar, estop, or otherwise prevent the Board of Governors, or any other Federal or state agency or department, from taking any other action affecting Posey; provided, however, that the Board of Governors shall not take any further action against Posey relating to the matters addressed by this Order based upon facts presently known by the Board of Governors.

5. Each provision of this Order shall remain fully effective and enforceable until expressly stayed, modified, terminated, or suspended in writing by the Board of Governors.

