



**PUBLIC DISCLOSURE**

October 29, 2018

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

The First National Bank and Trust Co.  
Charter Number 5547

302 Chickasha Avenue  
Chickasha, OK 73023-1130

Office of the Comptroller of the Currency  
Oklahoma City Field Office  
The Harvey Parkway Building  
301 NW 63rd Street, Suite 490  
Oklahoma City, OK 73116-7908

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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**Overall CRA Rating: This Institution is rated: Outstanding**

**The Lending Test is rated: Satisfactory.**

**The Community Development Test is rated: Outstanding.**

Assigned ratings are based on the following conclusions:

- The First National Bank and Trust Company's (FNBT's) loan-to-deposit (LTD) ratio is reasonable and averaged 71 percent during the evaluation period.
- A majority of the bank's loans originated within the bank's designated assessment areas (AAs).
- FNBT's distribution of loans to businesses and individuals of different income, including low- and-moderate income (LMI) levels, is reasonable and meets the standard for satisfactory performance.
- The geographic distribution of loans reflects an excellent dispersion throughout the AA, particularly in moderate-income geographies.
- FNBT's community development (CD) performance demonstrates excellent responsiveness to the CD needs of the AAs.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

FNBT is a \$581 million institution that is headquartered in Chickasha, Oklahoma, located in Central Oklahoma. The bank is a wholly owned subsidiary of First Independent Bancorp, Incorporated, a one-bank holding company.

The main bank is located at 302 Chickasha Avenue in Chickasha, Oklahoma. FNBT has 10 full service branches and one walk-up branch, all located in Oklahoma and within the AA. Each of the branch locations have drive-in facilities that provide extended hours of operation, as well as Saturday hours. The bank has 22 ATMs. Since the previous CRA evaluation, FNBT has not opened or closed any branch locations. A new LPO was opened in Yukon, Oklahoma, during the evaluation period. The table below provides information on FNBT's branch locations.

FNBT's Branch Locations		
Location:	Address:	City:
Main Bank	302 Chickasha Ave.	Chickasha, OK
Grand Avenue	602 Grand Ave.	Chickasha, OK
Eagle	122 N. 6 <sup>th</sup>	Chickasha, OK
Alex	102 S. Main St.	Alex, OK
Blanchard	1100 N. Council Rd.	Blanchard, OK
Cyril	201 W. Main St.	Cyril, OK
Minco	524 SW 3 <sup>rd</sup> St.	Minco, OK
Newcastle	1308 N. Main St.	Newcastle, OK
Rush Springs	222 W. Blakely	Rush Springs, OK
Tuttle	5311 East Highway 37	Tuttle, OK
SWOKC	8504 SW 59 <sup>th</sup>	Oklahoma City, OK

FNBT's primary focus is to serve the commercial, consumer, and agricultural customers in the AA and surrounding communities. FNBT meets these needs by providing various types of loan and deposit products and services, as well as, Internet banking with bill-pay, Mobile Banking, Automated Clearing House, Trust, and Cash Management services. Traditional loan products are offered, such as consumer, home purchase, refinance and home improvement, business, agricultural, and commercial loans. FNBT originates home purchase loans to be sold in the secondary market, as well as to be retained in the loan portfolio. Home mortgage loans retained by the bank provide more flexible terms making them more accessible to LMI people than conventional loans. For example, down-payments can be in cash or in the form of other collateral. Credit scores less than 620 are considered and fees are held to a minimum. Also offered are traditional checking and savings accounts, in addition to CDs and IRAs.

As of December 31, 2017, FNBT's assets totaled \$581 million, of which \$339 million, or 58 percent, were comprised of various types of loans to individuals and commercial businesses. The bank's loan portfolio segmentation is detailed on the following page.



<b>Loan Portfolio Composition as of December 31, 2017</b>		
	<b>\$ (000)</b>	<b>%</b>
Commercial Real Estate	\$130,084	38%
Commercial and Industrial	\$99,536	29%
Residential Real Estate	\$42,355	13%
Farm Loans	\$34,804	10%
Individual Loans	\$10,310	3%
Other	\$22,552	7%
<b>Total</b>	<b>\$339,641</b>	<b>100%</b>

*Source: December 31, 2017 Report of Condition and Income*

There are no known legal, financial, or other factors impeding management's ability to help meet the credit needs of the designated AA. The bank earned a rating of "Outstanding" in its April 20, 2015 CRA PE.

### **Scope of the Evaluation**

A Data Integrity review commenced on May 1, 2018, to evaluate the bank's system of internal controls for collecting, verifying, and submitting data reported on the HMDA Loan Application Register (HMDA LAR).

We reviewed HMDA loans originated in 2015, 2016, and 2017. The review indicated that the data the bank is required to collect and report to regulatory agencies under the CRA and the HMDA is materially accurate. Internal controls over the system to collect and report HMDA data are effective.

This Performance Evaluation is based on 2010 U.S. Census and the updated 2015 American Community Survey (ACS) demographic information. Conclusions regarding the Lending Test are based on the origination of home mortgage loans from January 1, 2015 through December 31, 2016 with a separate assessment based on home mortgage loans originated in 2017. Our review also included a sample of small business loans originated from January 1, 2015 through December 31, 2016 with a separate assessment based on small business loans originated in 2017. The 2015 and 2016 home mortgage and small business samples are compared to 2010 Census Data information, whereas the 2017 home mortgage and small business sample is based on updated information from the 2015 ACS U.S. Census. Conclusions regarding the Community Development Test are based on community development activities from April 21, 2015 through December 31, 2017.

To assess FNBT's performance under the CRA regulations, we analyzed the bank's activities in and around its designated AAs. We divided FNBT's AA into two distinct areas. The 13 census tracts in the Oklahoma City (OKC) Partial Metropolitan Statistical Area (MSA) received a full-scope review. The Non-MSA AA consists of only two census tracts in Caddo County, which holds the Cyril branch. This AA contains only 2 percent of the bank's loans and 4 percent of the deposits. A limited-scope review of this AA for the

Lending Test could not be performed as there were no loan types with sufficient originations to render a meaningful sample. A limited-scope assessment was performed under the Community Development Test. In the full-scope reviews, the data used to evaluate performance under each test is analyzed considering complete performance context information, quantitative factors (e.g., lending volume, distribution of branches, geographical and borrower distribution) and qualitative factors (e.g., innovation and complexity of products offered). Full-scope reviews are conducted in AAs where the bank has a substantial share of its deposit and loan business. The full-scope AA contains 98 percent of the bank's loans and 96 percent of the bank's deposits. The full-scope review of the OKC Partial MSA included a review of the major loan products for the bank.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), "Effect of evidence of discriminatory or other illegal credit practices", respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### The Lending Test is rated: Satisfactory

This Performance Evaluation assessed FNBT's performance focusing primarily on five performance criteria: the LTD ratio; lending in the AAs; lending to borrowers of different incomes and to businesses of different sizes; geographic distribution of loans; and responses to CRA related complaints.

To evaluate FNBT's lending performance, all HMDA loans originated in 2015, 2016, and 2017 were reviewed. In addition, we reviewed a random sample of 60 small business loans originated in 2015, 2016, and 2017. Small business and home mortgage loans serve as FNBT's primary loan products. Each loan product was given equal weight in evaluating performance. Based on this analysis and consistent with available resources and capabilities, FNBT is meeting the credit needs of the AAs in a satisfactory manner. The bank's LTD is reasonable and meets the standard for satisfactory performance. The distribution of loans to businesses and individuals of different incomes is satisfactory. The geographic distribution of loans reflects an excellent dispersion of loans to LMI geographies and reflects outstanding performance.

#### Loan-to-Deposit Ratio

FNBT's LTD ratio is reasonable and meets the standard for satisfactory performance. The bank's LTD ratio at December 30, 2017 was 68 percent. The bank's average quarterly LTD ratio from March 31, 2015 through December 31, 2017 was 71 percent. This average was compared to the average of four similar banks located in FNBT's AA or the surrounding counties, with total assets between \$200 million and \$600 million, for the same time period. FNBT's average LTD ratio of 71 percent is slightly lower than the average of the four comparable banks of 78 percent. These average LTD ratios are detailed in the following table.

Loan-To-Deposit Ratios		
Institution	Total Assets \$000's (As of 12/31/17)	Average Loan to Deposit Ratio
<i>First National Bank and Trust Co., Chickasha, OK</i>	<i>\$581,151</i>	<i>71.01%</i>
Sooner State Bank, Tuttle, OK	\$202,202	72.26%
First Bank and Trust Co., Duncan, OK	\$593,709	74.51%
Liberty National Bank, Lawton, OK	\$466,461	79.59%
Legacy Bank, Hinton, OK	\$457,324	86.62%

Source: Institution Reports of Condition from March 31, 2015 to December 31, 2017.

## Lending in Assessment Area

FNBT's lending in their AA meets the standard for satisfactory performance. A majority of the number and dollar amount of home mortgage and small business loans were originated in the bank's AAs. As depicted in the following table, 66 percent of the number and 60 percent of the dollar amount of loans originated in FNBT's AAs.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	315	66	162	34	477	33,893	60	22,995	40	56,888
Small Business	42	70	18	30	60	5,348	67	2,680	33	8,028
<b>Total</b>	<b>357</b>	<b>66</b>	<b>180</b>	<b>34</b>	<b>537</b>	<b>39,241</b>	<b>60</b>	<b>25,675</b>	<b>40</b>	<b>64,916</b>

Source: 1/1/2015-12/31/2017 Bank Data

## Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

### OKC Partial MSA AA

FNBT's overall distribution of business and home mortgage loans reflects reasonable penetration and meets the standard for satisfactory performance.

When assessing the penetration of home mortgage lending to low-income families, consideration is given to the fact that LMI families have difficulty qualifying for conventional home mortgage products without flexible terms or reduced closing costs. In FNBT's OKC Partial MSA AA, a low-income person earns less than \$33,300 annually, based on the 2017 median family income (MFI), while the average median housing cost in the bank's AA is \$120,596. Consequently, many LMI families choose to rent rather than purchase homes. According to the 2015 ACS Census data, approximately 51 percent of households in the AA are on fixed income from social security or retirement; and 22 percent of the housing units in the AA are rental property. Fourteen percent of the population in the bank's AA are below the poverty level or on public assistance.

The borrower distribution of home mortgage loans to low-income families based on 2015-2016 originations reflects a reasonable penetration to low-income families and an excellent penetration compared to aggregate peer data. The distribution of home mortgage loans to moderate-income families reflects a reasonable penetration to moderate-income families and an excellent penetration compared to aggregate peer data. The borrower distribution of home mortgage loans based on 2017 originations reflects a poor penetration to low-income families and excellent penetration when compared to aggregate peer data. The distribution of home mortgage loans to moderate-income

families reflects a reasonable penetration to moderate-income families and an excellent penetration compared to aggregate peer data.

The borrower distribution of loans to small businesses based on a sample of 2015-2016 originations reflects a reasonable penetration of loans to businesses with revenues of less than \$1.0 million and an excellent penetration compared to aggregate peer data. The borrower distribution of loans to small businesses based on a sample of 2017 originations reflects a reasonable penetration of loans to businesses with revenues of less than \$1.0 million and an excellent penetration compared to aggregate peer data.

Refer to Tables P and R in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

### **Geographic Distribution of Loans**

FNBT's overall geographic distributions of small business and home mortgage loans reflects an excellent dispersion among LMI geographies and exceeds the standard for satisfactory performance.

FNBT's geographic distribution of home mortgage loans is excellent. Note that the bank's AA had no low-income tracts in 2015-2106 and only one low-income census tract in 2017 based on the updated ACS Census Data. The one low-income tract for 2017 was not evaluated as there was only 1 percent owner occupancy in that tract, resulting in insufficient data for meaningful analysis. FNBT's geographic distribution of 2015-2106 originated home loans to moderate-income tracts is excellent exceeding both the percent of home ownership in moderate-income tracts and aggregate peer data. FNBT's distribution of 2017 originated home mortgage loans to moderate-income tracts is excellent exceeding both the percent of home ownership in moderate-income tracts and aggregate peer data.

FNBT's geographic distribution of business loans is excellent. The geographic distribution of 2015, 2016, and 2017 sampled business loans exceeded both the percentage of businesses in moderate-income tracts and aggregate peer data.

Refer to Tables O and Q in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

### **Responses to Complaints**

There have been no consumer complaints regarding FNBT's Community Reinvestment Act during the evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test is rated "**Outstanding.**" FNBT's CD performance demonstrates excellent responsiveness to the CD needs of its AAs.

Opportunities for qualified CD loans and investments are limited in the bank's AA. With the exception of the South OKC branch location, a majority of the AA is comprised of non-metropolitan, low-density areas.

FNBT is active in the communities they serve. This is evidenced by their leadership roles in various civic and non-profit organizations that provide services to LMI individuals. The bank is also involved with, invests in, or lends to individuals or organizations whose focus is on affordable housing, community services, or economic development.

### Number and Amount of Community Development Loans

Qualifying CD loans are those that meet the definition of CD, as defined in the CRA regulation. FNBT's level of CD loans indicates excellent responsiveness to the needs of the bank's AAs.

#### OKC Partial MSA AA

The level of qualified CD loans in the OKC Partial MSA AA reflects excellent responsiveness. The bank has originated or renewed 25 CD loans totaling \$34.7 million during the evaluation period.

FNBT originated or renewed eight loans totaling approximately \$25.6 million that provided funding for community services. A loan for \$3.3 million was extended to the YMCA to construct a facility in South OKC and to provide funds for renovations to other facilities. The most significant and impactful lending was the five loans totaling \$22.2 million extended to Grady Memorial Hospital, which is located in a moderate-income tract in Chickasha, OK. In March of 2016, FNBT purchased a \$425 thousand participation in an \$850 thousand loan to fund pre-construction costs associated with the construction of a new surgery center. In April 2016, the bank originated a \$13.2 million loan for the construction of new surgical and x-ray facilities. In March 2017, the bank originated a \$1.2 million loan to cover additional construction funding. A loan for \$6.4 million was extended in September of 2017 to purchase equipment for the surgical and x-ray facilities. Also in September 2017, the bank renewed a \$942 thousand loan for operating expenses. These loans financed the construction of a surgical center and an x-ray facility creating an estimated 90 LMI jobs. The hospital's viability is reliant on the construction of these new facilities. Meeting the credit needs of the Grady Memorial Hospital is critical in order to provide the essential health care needs of Grady County and contiguous counties. Grady Memorial Hospital treats all patients regardless of their ability to pay. Many of the rural population served would not otherwise receive health care due to the lack of income or the inability to drive the distances required to receive services.

Eleven loans totaling \$8.1 million were extended for the purpose of economic development through creating and retaining permanent LMI jobs in the bank's AA. The largest and most impactful loan was FNBT's \$3.5 million participation in a \$7.1 million loan for the development of 40 acres into eight commercial lots to be used for retail space and restaurants. It is estimated that this project will create 150 new LMI retail and service industry jobs. Part of the development is located in a moderate-income tract in Chickasha, OK. The other 10 economic development loans were to local small businesses that created or retained LMI jobs through the financing provided.

FNBT originated three loans totaling \$626 thousand to promote affordable housing. One loan for \$25.3 thousand was to fund repairs to a six-unit apartment complex with monthly rents of \$425. The complex is located in a moderate-income census tract. Another loan for \$201 thousand was extended to a local non-profit faith based homeless shelter. The funds will be used for remodeling and to provide temporary living quarters. A third loan was extended to a church that will use the funds to provide temporary housing and teach various life skills to LMI individuals in order to rebuild their lives.

Three loans totaling \$404 thousand were originated to promote revitalization or stabilization of a LMI area. A loan for \$251 thousand was extended to provide tenant improvements to a downtown historic building that was recently renovated for affordable senior citizen housing and office space. A \$67 thousand loan was extended to a restaurant for improvements. The restaurant is located in a moderate-income tract in Chickasha, OK. The bank originated an \$86 thousand loan to remodel a commercial building in downtown Chickasha, OK in an area designated by the Chickasha Economic Development Council as a revitalization zone.

### **Non-MSA AA**

The level of qualified CD loans in the limited-scope Non-MSA AA reflects adequate responsiveness. The bank originated six loans totaling \$361 thousand. Four loans totaling \$354 thousand were considered economic development by creating or retaining LMI jobs. A \$59.2 thousand loan was originated to a restaurant for improvements, a \$65 thousand loan was originated to purchase a convenience store, and a \$28.9 thousand loan was extended to a convenience store for operational expenses. All four loans were extended to businesses located in distressed/underserved middle-income census tracts. Twenty-five permanent LMI jobs are estimated to have been created or retained by the above financing.

Two loans totaling \$7.0 thousand were made to a senior citizen center to fund a nutrition program. The senior citizens center is located in a distressed/underserved middle-income census tract.

## **Number and Amount of Qualified Investments**

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose CD, as defined in the CRA regulations. FNBT's level of CD investments reflects excellent responsiveness to the needs of the bank's AAs.

### **OKC Partial MSA AA**

The level of qualified investments and donations, totaling \$8.8 million during the evaluation period, reflects excellent responsiveness to the CD needs in the bank's AAs. The bank made 33 qualified donations during the period totaling \$229 thousand. These donations and contributions were to local schools and non-profit organizations that provide social services, including youth programs, homeless centers, soup kitchens, and health care facilities that target LMI individuals. In 2017, the bank's holding company, First Independent BanCorp, Incorporated (FIBI), provided a \$100 thousand donation to fund the science, technology, engineering and mathematics (STEM) program for the Chickasha schools. The majority of the students in Chickasha schools are LMI students.

The bank also purchased numerous school bonds within their AA. During the evaluation period, FNBT purchased 32 school bonds for \$8.2 million. These bonds financed the construction of and repairs to school buildings, provided buses and equipment, and provided classroom and technology upgrades. Investment in the local school systems is a critical need. Eighty percent of the children attending Chickasha schools qualify for the free or reduced lunch program according to the Oklahoma State Department of Education's Low Income Report for 2017-2018.

In the previous evaluation period, FNBT took a leadership role in the rehabilitation of the historic downtown Chickasha Hotel, which created 38 units of affordable housing for senior citizens. The four-story structure was built in 1902 prior to statehood and had fallen into disrepair. Through the innovative use of Federal and State Historic Tax Credits, and Low Income Housing Tax Credits, FNBT, through its holding company, FIBI funded and completed this historic preservation and low-income housing project. Tax credits remaining from the hotel restoration project total \$415 thousand and are qualified CD investments.

### **Non-MSA AA**

The level of qualified investments and donations, totaling \$1.6 million during the evaluation period, reflects FNBT's excellent responsiveness to the CD needs in the bank's AAs. The bank made a qualified donation during the period totaling \$3,000 to the local school. The bank also purchased school bonds within their AA. During the evaluation period, FNBT purchased five school bonds for \$1.6 million. These bonds financed the construction of and repairs to school buildings, tornado shelters, and provided equipment. Investment in the local school systems is a critical need. Sixty-nine percent of the children attending the Cyril School District qualify for the free or reduced lunch program according to the Oklahoma State Department of Education's Low Income Report for 2017-2018.



## **Extent to Which the Bank Provides Community Development Services**

FNBT's level of CD services reflects excellent responsiveness to the needs of the bank's AAs.

### **OKC Partial MSA AA**

The level of qualified CD services is excellent in the full-scope OKC Partial MSA AA. Bank officers serve in leadership positions in organizations involved in economic and small business development activities. Bank officers serve in leadership positions in organizations that provide community services to LMI families and that provide technical expertise and financial assistance to these organizations. Examples of qualifying CD services include the following:

- ***Chambers of Commerce and Economic Development Organizations***  
Bank officers are active in taking leadership positions with the Chickasha Chamber of Commerce, the Chickasha Economic Development Council, and Chickasha Industrial Authority, along with the Blanchard Chamber of Commerce and the Blanchard Economic Trust Authority. Bank officers currently serve as board members or officers or on committees with Minco, Mustang, Newcastle, and Tuttle Chambers of Commerce. Bank officers provide technical expertise through involvement with planning, budgeting, and financing, among other activities.
- ***Chickasha Main Street Association***  
A bank officer has served as board member and Treasurer and another bank officer is serving as a board member and Secretary of this association, providing financial and banking advice. The organization is dedicated to the revitalization of the Chickasha Main Street District through retention and attraction of new business to the downtown area. Chickasha continues to make the central business district economically viable for independently-owned businesses.
- ***Financial Literacy***  
The bank is dedicated to promoting financial literacy in its communities. Bank staff provided credit-related training to high school students in LMI areas and at the Canadian Valley Technology Center. Bank staff provided training to high school seniors on how to manage and balance a checking account. The bank also participates in the "*National Teach Children to Save*" program. A three part series on financial literacy was also taught at Life Skills, a branch of the local homeless shelter. The topics focused on budgeting, saving, and debt.
- ***Grady Memorial Hospital Foundation***  
A bank officer serves on the Board of Directors of this non-profit organization. The foundation supports the medical services and programs of Grady Memorial Hospital and provides cost-effective health care services to its community. Grady County Memorial Hospital accepts patients on Medicaid and provides health care services to LMI families.

- ***Friends of the Grady Memorial Hospital***

Bank employees committed over a 150 hours campaigning for a ¼ percent sales tax increase to build a new surgery and x-ray facilities at Grady Memorial Hospital (GMH). The GMH surgery facilities were shut down for health code violations in 2015. The hospital is the only hospital in Grady County and one of the larger employers in the County. Without the surgery facility, residents would be required to travel much further for medical procedures, retention of doctors would be in jeopardy, and there would be a loss of jobs.

A bank officer served on the Friends of GMH Committee and another served as Treasurer. This Committee's primary purpose was to educate the public about the sales tax needed to fund the new surgery and x-ray facilities at GMH. Another bank officer was in charge of marketing for the social media portion of the campaign and produced more than 20 videos depicting the issues as seen by the doctors, community leaders, and business professionals. One employee represented the bank at community meetings and answered questions.

- ***The Salvation Army***

A bank officer has served as Chairperson since 2008 and another bank officer serves on the Advisory Board. The Salvation Army is a non-profit organization that provides basic necessities of life – food, shelter, and warmth. This group provides hunger relief to children and families, housing to the homeless, emergency disaster relief services, assistance to veterans, elderly services, adult rehabilitation, among many other services that assist LMI individuals.

- ***Chickasha YMCA***

Bank officers have served and continue to serve in various capacities with the local YMCA. The focus is youth development, healthy living, and social responsibility.

- ***Rotary Clubs, Lions Clubs***

The bank supports the Rotary Clubs and Lions Clubs in its communities. These organizations help meet community needs through volunteer activities and are dedicated to raising funds to sponsor assorted programs that serve to improve the lives of LMI children and the community at large. Community services, such as providing eye exams and glasses for LMI individuals, is just one example of the types of services provided.

The bank established a Business/Community Development Officer position in 2006. This Officer has been instrumental in bringing new industry to Chickasha resulting in the creation of numerous LMI jobs. His efforts contributed to the construction of four new hotels and finding tenants to occupy two vacant properties, and currently is in process of recruiting an additional grocery store to Chickasha. This Officer continues to serve in a leadership position for several non-profit organizations. Most prominently, his role as Chairman of Leadership Chickasha Committee, sponsored by the Chickasha Chamber of Commerce, has assisted in developing young executives for leadership roles within the community. The Leadership Chickasha Committee is working on and has prepared a

proposal for additional revitalization of several blocks in downtown Chickasha, a LMI area and part of a city designated revitalization zone.

The Retail Business Development Officer position for the bank's northern locations (Blanchard, Minco, Newcastle, Oklahoma City, and Tuttle) has been in place since 2012. He has assisted in developing a relationship that has brought in a new hotel and larger convenience store in Newcastle. He serves in leadership positions for several non-profit organizations dedicated to community growth and assistance. He currently serves as Chairman of Frontline Family Services, which provides counseling and assistance to LMI families dealing with substance abuse, domestic violence, and parenting.

### **Non-MSA AA**

The level of qualified CD services is adequate in this limited-scope AA. The bank is dedicated to promoting financial literacy in its communities. Bank staff provided credit-related training to students in LMI areas. They provided "*Finance for Grads*" training, which teaches high school seniors how to manage and balance a checking account. They also provided the "*Finance for Freshman*" and "*National Teach Children to Save*" courses to LMI students in the Cyril school district.

### **Responsiveness to Community Development Needs**

Overall, FNBT has demonstrated excellent responsiveness to the identified needs and opportunities throughout their AAs. The level of CD activities is excellent with \$34.7 million in CD loans, \$8.8 million in qualified investments and donations, and a strong involvement by bank officers to assume leadership roles within the community. CD lending is considered to be responsive to critical needs within the AAs by supporting many businesses, including the local hospital. The bank provided funding to support the construction of the new surgery facility at the local hospital. Many of the rural population served would not otherwise receive adequate health care due to the lack of income or the distance required to drive to receive services at another hospital. Several rural Oklahoma hospitals have closed in recent years. CD investments were very responsive by meeting the capital expenditure needs of the local school systems, which are primarily located in poor rural areas and have a very high level of students eligible for the free/reduced lunch program. CD service activities also reflect excellent responsiveness as bank employees have taken leadership roles in non-profit, economic development, and small business advocacy organizations. The bank's most impactful service was management's time and effort spent to educate and to encourage the local community to back a sales tax to support the local hospital.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (1/1/15 to 12/31/17) Investment and Service Tests and CD Loans: (4/21/15 to 12/31/17)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
The First National Bank and Trust (FNBT), Chickasha, Ok	Home Mortgage Loans Small Business Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
(Name of Affiliate (Abbreviation))	N/A	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
OKC Partial MSA Non-MSA	Full-Scope Limited-Scope	

## Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: OKC Partial MSA AA, 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	30.8	61.5	7.7	0.0
Population by Geography	70,524	0.0	22.6	67.9	9.5	0.0
Housing Units by Geography	28,280	0.0	26.5	64.8	8.7	0.0
Owner-Occupied Units by Geography	20,116	0.0	20.6	69.5	9.9	0.0
Occupied Rental Units by Geography	5,261	0.0	37.2	57.2	5.6	0.0
Vacant Units by Geography	2,903	0.0	47.9	46.3	5.8	0.0
Businesses by Geography	4,047	0.0	24.9	61.3	13.9	0.0
Farms by Geography	334	0.0	22.2	68.0	9.9	0.0
Family Distribution by Income Level	19,504	22.3	19.3	21.0	37.4	0.0
Household Distribution by Income Level	25,377	23.3	15.7	18.2	42.8	0.0
Median Family Income Non-MSAs - OK		\$58,775	Median Housing Value			\$109,309
			Median Gross Rent			\$599
			Families Below Poverty Level			10.3%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: OKC Partial MSA AA, 2015 ACS						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	7.7	15.4	53.8	23.1	0.0
Population by Geography	73,992	1.7	10.2	60.7	27.4	0.0
Housing Units by Geography	30,168	2.0	11.2	62.3	24.5	0.0
Owner-Occupied Units by Geography	20,664	1.0	7.6	63.1	28.3	0.0
Occupied Rental Units by Geography	6,052	3.5	19.6	59.7	17.2	0.0
Vacant Units by Geography	3,452	5.6	17.9	62.1	14.4	0.0
Businesses by Geography	4,176	2.2	16.0	50.9	31.0	0.0
Farms by Geography	313	1.9	4.5	76.4	17.3	0.0
Family Distribution by Income Level	19,809	19.4	17.5	22.3	40.9	0.0
Household Distribution by Income Level	26,716	21.3	15.9	18.4	44.3	0.0
Median Family Income Non-MSAs - OK		\$64,058	Median Housing Value			\$120,596
			Median Gross Rent			\$693
			Families Below Poverty Level			8.3%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AAs adopted by FNBT consist of whole geographies, do not reflect illegal discrimination, and do not arbitrarily exclude LMI geographies. It meets the requirements of the CRA regulation. Two AAs were considered in evaluating FNBT's CRA performance. These AAs are defined as the OKC Partial MSA AA and the Non-MSA AA.

The OKC Partial MSA is considered the full-scope AA and consists of 13 census tracts in the OKC MSA. The AA includes all 10 census tracts in Grady County, two census tracts in McClain County, and one census tract in Oklahoma County. Based on 2010 Census data, there are no low-income census tracts, four moderate-income census tracts, eight middle-income census tracts, and one upper-income census tract. The moderate-income census tracts are located in the north and western sections of the City of Chickasha and around the Alex and Rush Springs branches. The main bank, the Alex branch, and the Rush Springs branch are located in moderate-income census tracts. The Grand Avenue branch, the Minco branch, the Tuttle branch, the SWOKC branch, and the Cyril branch are located in middle-income census tracts. The other two branches are located in the upper-income census tract.

Based on the updated ACS Census Data, the number of census tracts remained unchanged but the tract incomes changed as follows: one low-income tract, two moderate-income tracts, seven middle-income tracts, and three upper-income tracts. The main bank and the Eagle Branch in Chickasha, OK, are located in moderate-income tracts. Five branches are located in middle-income tracts and four branches are located in upper-income tracts. Based on the ACS Census Data, total population of the full-scope AA is 73,992. Of the 30,168 total housing units, 20,664, or 69 percent, are owner occupied. Households below the poverty level total 3,041, or 11 percent, and households that receive public assistance total 733, or 3 percent, of the total number of households. The tables on the previous page describe major demographic and economic characteristics of the OKC Partial MSA AA, based on 2010 US Census Data and the updated ASC Census Data.

Local banking competition within the AA is aggressive and includes several community, regional, and national banks and branches of these financial institutions. Major employers include Grady Memorial Hospital, Chickasha Public Schools, Gabriel Ride Control, and Ross Health Care.

In conducting the assessment of the bank's performance, two community contacts were made within FNBT's AAs. The contacts indicated that the needs in the community are affordable housing, assistance for the area schools, and more recently it was retaining full services at the hospital. The contacts indicated that the local financial institutions are involved in the local community activities and are meeting the credit needs of the community. The contacts were especially complimentary of FNBT and their efforts to educate voters on the sales tax increase needed to support building a new surgery and x-ray center at the local hospital, after it was shut down in 2015.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan

size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.



Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-2016		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
OKC Partial MSA	228	25,470	100	2,797	22.3	11.8	5.1	19.3	16.2	13.1	21.0	15.8	21.8	37.4	38.6	39.1	0.0	17.5	20.9		
<b>Total</b>	<b>228</b>	<b>25,470</b>	<b>100</b>	<b>2,797</b>	<b>22.3</b>	<b>11.8</b>	<b>5.1</b>	<b>19.3</b>	<b>16.2</b>	<b>13.1</b>	<b>21.0</b>	<b>15.8</b>	<b>21.8</b>	<b>37.4</b>	<b>38.6</b>	<b>39.1</b>	<b>0.0</b>	<b>17.5</b>	<b>20.9</b>		

*Source: 2010 Census; 01/01/2015 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data. "--" data not available. Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
OKC Partial MSA	87	8,423	100	2,834	19.4	9.2	4.6	17.5	16.1	14.7	22.3	14.9	22.5	40.9	39.1	38.4	0.0	20.7	19.8		
<b>Total</b>	<b>87</b>	<b>8,423</b>	<b>100</b>	<b>2,834</b>	<b>19.4</b>	<b>9.2</b>	<b>4.6</b>	<b>17.5</b>	<b>16.1</b>	<b>14.7</b>	<b>22.3</b>	<b>14.9</b>	<b>22.5</b>	<b>40.9</b>	<b>39.1</b>	<b>38.4</b>	<b>0.0</b>	<b>20.7</b>	<b>19.8</b>		

*Source: 2015 ASC Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data. "--" data not available. Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-2106	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
OKC Partial MSA	20	2,797	100	995	83.1	55.0	48.1	4.5	45.0	12.4	0.0	
<b>Total</b>	20	2,797	100	995	83.1	55.0	48.1	4.5	45.0	12.4	0.0	

Source: 2010 Census; 01/01/2015 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
OKC Partial MSA	22	2,551	100	995	84.7	72.7	48.1	5.1	27.3	2.9	0.0	
<b>Total</b>	22	2,551	100	995	84.7	72.7	48.1	5.1	27.3	2.9	0.0	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015 – 2016		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
OKC Partial MSA	228	25,470	100	2,797	0.0	0.0	0.0	20.6	39.5	8.9	69.5	53.9	77.6	9.9	6.6	13.5	0.0	0.0	0.0		
<b>Total</b>	<b>228</b>	<b>25,470</b>	<b>100</b>	<b>2,797</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>20.6</b>	<b>39.5</b>	<b>8.9</b>	<b>69.5</b>	<b>53.9</b>	<b>77.6</b>	<b>9.9</b>	<b>6.6</b>	<b>13.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2010 Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
OKC Partial MSA	87	8,423	100	2,834	1.0	01.1	0.2	7.6	19.5	4.8	63.1	59.8	51.7	28.3	19.5	43.3	0.0	0.0	0.0		
<b>Total</b>	<b>87</b>	<b>8,423</b>	<b>100</b>	<b>2,834</b>	<b>1.0</b>	<b>1.1</b>	<b>0.2</b>	<b>7.6</b>	<b>19.5</b>	<b>4.8</b>	<b>63.1</b>	<b>59.8</b>	<b>51.7</b>	<b>28.3</b>	<b>19.5</b>	<b>43.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2015-2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015 - 2016		
Assessment Area:	Total Loans to Small Businesses (Bus)				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Aggregate	% Bus	% Bank Loans	Aggregate	% Bus	% Bank Loans	Aggregate	% Bus	% Bank Loans	Aggregate	% Bus	% Bank Loans	Aggregate		
OKC Partial MSA	20	2,797	100	995	0.0	0.0	0.0	24.9	30.0	19.5	61.4	65.0	65.5	13.7	5.0	15.0	0.0	0.0	0.0		
<b>Total</b>	<b>20</b>	<b>2,797</b>	<b>100</b>	<b>995</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>24.9</b>	<b>30.0</b>	<b>19.5</b>	<b>61.4</b>	<b>65.0</b>	<b>65.5</b>	<b>13.7</b>	<b>5.0</b>	<b>15.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2010 Census; 01/01/2015 - 12/31/2017 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017		
Assessment Area:	Total Loans to Small Businesses (Bus)				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Bus	% Bank Loans	Aggregate	% Bus	% Bank Loans	Aggregate	% Bus	% Bank Loans	Aggregate	% Bus	% Bank Loans	Aggregate	% Bus	% Bank Loans	Aggregate		
OKC Partial MSA	22	2,551	100	995	2.2	4.6	2.8	16.0	22.7	8.9	50.8	50.0	55.4	31.0	22.7	32.9	0.0	0.0	0.0		
<b>Total</b>	<b>22</b>	<b>2,551</b>	<b>100</b>	<b>995</b>	<b>2.2</b>	<b>4.6</b>	<b>2.8</b>	<b>16.0</b>	<b>22.7</b>	<b>8.9</b>	<b>50.8</b>	<b>50.0</b>	<b>55.4</b>	<b>31.0</b>	<b>22.7</b>	<b>32.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 20X17 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*