



**PUBLIC DISCLOSURE**

November 30, 2021

**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  
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

**Institution’s CRA Rating:** This institution is rated Outstanding  
**The Lending Test is rated:** Satisfactory  
**The Community Development test is rated:** Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on two full-scope assessment areas (AAs), both in the state of Oklahoma.
- The First National Bank and Trust Company’s (FNBT’s) loan-to-deposit (LTD) ratio is reasonable and averaged 68 percent during the evaluation period.
- A majority of the bank’s loans were originated within the bank’s declared AAs.
- FNBT’s distribution of loans to small businesses and home mortgage borrowers of low- and moderate-income levels reflects reasonable distribution.
- FNBT’s distribution of loans to small business and home mortgage borrowers in low- and moderate-income geographies reflects excellent distribution.
- The Community Development (CD) Test rating is based on the two full-scope AAs in the state of Oklahoma.
- CD loans, investments, and services reflect excellent responsiveness to the needs of the AAs.

**Loan-to-Deposit Ratio**

The bank’s LTD ratio is reasonable and meets the standard for satisfactory performance considering the bank’s size, financial condition, and the credit needs of the AAs. As of December 31, 2020, FNBT’s LTD ratio is 64.55 percent. FNBT’s quarterly average LTD ratio from March 31, 2018 to December 31, 2020 is 68.19 percent. We compared FNBT’s LTD ratio to four similar banks in the same market area. The comparative banks aggregate average LTD over the same time frame averaged 82.23 percent and ranged from a high of 94.77 percent and a low of 75.46 percent.

<b>BANK NAME</b>	<b>TOTAL ASSETS (000s)</b>	<b>Avg. LTD Ratio</b>
The First National Bank and Trust Co.	777,821	<b>68.19</b>
Liberty National Bank	737,968	75.46
Quail Creek Bank, National Association	766,740	78.06
Kirkpatrick Bank	923,011	80.63
Great Plains National Bank	945,007	94.77

**Lending in Assessment Area**

A majority of the bank’s loans are inside its AAs.

The bank originated and purchased 52.5 percent of its total loans inside the bank's AAs during the evaluation period. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	<b>\$(000s)</b>
Home Mortgage	264	52.8	236	47.2	500	26,237	30.0	61,125	70.0	87,362
Small Business	90	51.7	84	48.3	174	22,414	30.2	51,878	69.9	74,292
<b>Total</b>	<b>354</b>	<b>52.5</b>	<b>320</b>	<b>47.5</b>	<b>674</b>	<b>48,651</b>	<b>30.1</b>	<b>113,003</b>	<b>69.9</b>	<b>161,654</b>
<i>Source: Bank Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

The bank's primary products based on loan originations and purchases are home mortgage and small business loans in both AAs.

#### Description of Institution

FNBT is a \$778 million institution headquartered in Chickasha, Okla. 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, Okla. 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 15 ATMs. Since the previous CRA evaluation, FNBT has not opened or closed any branch locations. A new LPO was opened in Oklahoma City during the evaluation period.

FNBT's primary focus is to serve 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, 2020, FNBT's assets totaled \$778 million, of which \$453 million, or 58 percent, were composed of

various types of loans to individuals and commercial businesses. The bank's loan portfolio segmentation is detailed below.

<b>Loan Portfolio Composition as of December 31, 2020</b>		
	<b>\$(000)</b>	<b>%</b>
Commercial Real Estate	\$215,559	47.61%
Commercial and Industrial	\$94,466	20.87%
Residential Real Estate	\$69,584	15.37%
Farm Loans	\$38,709	8.55%
Individual Loans	\$6,307	1.39%
Other	\$28,119	6.21%
<b>Total</b>	<b>\$452,744</b>	<b>100.00%</b>

*Source: December 31, 2020 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 October 29, 2018 CRA PE.

#### Scope of the Evaluation

#### **Evaluation Period/Products Evaluated**

We completed a full-scope review of FNBT's CRA activities in its AAs under the Intermediate Small Bank CRA procedures which include a lending test and a CD test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AAs through qualified CD lending, investments, donations, and services.

Conclusions regarding the lending test are based on samples of business and residential real estate loans originated in 2018, 2019, and 2020. Conclusions regarding the CD test are based on the bank's CD activities during the same period.

#### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

FNBT has two rating areas and a separate rating area for the State of Oklahoma. The bank's overall rating is based on the full scope reviews of these AAs. The Oklahoma Non-MSA AA accounts for approximately 3.65 percent of the bank's deposits and 3.58 percent of the number of loans in the bank's portfolio. The Oklahoma Partial MSA AA accounts for approximately 96.35 percent of the bank's deposits and 96.42 percent of the number of loans in the bank's portfolio. We gave more weight to FNBT's performance in the Oklahoma Partial MSA AA.

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

Pursuant to 12 CFR 25.28(c), in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA 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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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.

State Rating

## **State of Oklahoma**

**CRA rating for the State of Oklahoma<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- FNBT's distribution of loans to small businesses and home mortgage borrowers of low- and moderate-income levels reflects reasonable distribution.
- FNBT's distribution of loans to small business and home mortgage borrowers in low- and moderate-income geographies reflects excellent distribution.
- CD loans, investments, and services reflect excellent responsiveness to the needs of the AAs.

## **Description of Institution's Operations in Oklahoma**

The bank operates 11 branches and 15 ATMs in the two AAs in the State of Oklahoma. The bank's primary focus overall is commercial lending addition to the traditional suite of loan and deposit products to meet the needs of their community. Primary loan products in both AAs were similar so we chose the same products for analysis in both AAs.

## **Oklahoma Non-MSA AA**

The Oklahoma Non-MSA AA consists of two contiguous census tracts (CTs) in Caddo County. Both CTs in this AA are middle-income. One branch and one ATM are located in this AA in Cyril, Okla.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNBT Co AA 2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	5,280	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	2,619	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	1,542	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	571	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	506	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	213	0.0	0.0	100.0	0.0	0.0
Farms by Geography	29	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	1,409	19.1	19.7	21.1	40.2	0.0
Household Distribution by Income Level	2,113	23.8	17.5	18.6	40.2	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$80,491
			Median Gross Rent			\$535
			Families Below Poverty Level			11.4%
<i>Source: 2015 ACS and 2020 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>						

Competition in the Oklahoma Non-MSA AA is low with two other financial institutions in the area with a physical branch. Based on the FDIC Deposit Market Share data as of June 30, 2020, FNBT holds 30.71 percent of the market share of deposits and is ranked second among financial institutions in the AA. The Oklahoma Non-MSA AA accounts for approximately 3.65 percent of the bank's deposits and 3.58 percent of the bank's number of loans.

We consulted with a community contact with operations in the AA to gain a better understanding of the general community credit and developmental needs, as well as economic conditions. The community contact primarily has a community support purpose through Head Start programs, affordable housing, and transportation services. The organization contacted is located in Chickasha, Okla. with a focus on Caddo and Grady Counties. The contact indicated that economic opportunity in Caddo County is limited due to population decline. However, local banks are active in supporting community needs.



## Oklahoma Partial MSA AA

The Oklahoma Partial MSA AA consists of 13 CTs, including all 10 CTs in Grady County, two CTs in McClain County, and one CT in Oklahoma County. The CTs in McClain and Oklahoma counties are CTs where FNBT has at least one branch or deposit taking ATM. In this AA, there are one low-income CT, two moderate-income CTs, seven middle-income CTs, and three upper-income CTs. Ten branches and 14 ATMs are located in this AA. The downtown Chickasha branch (the bank's main branch) is located in a moderate-income CT. Five other branches are located in middle-income CTs and three branches are located in upper-income CTs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNBT Co MSA 2020						
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	5,803	1.9	13.1	51.1	33.9	0.0
Farms by Geography	422	2.4	3.8	71.3	22.5	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 MSA - 36420 Oklahoma City, Okla MSA		\$64,058	Median Housing Value			\$120,596
			Median Gross Rent			\$693
			Families Below Poverty Level			8.3%

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

Competition in the Oklahoma Partial MSA AA is moderate with 11 other financial institutions in the AA with physical operations. Based on the FDIC Deposit Market Share data as of June 30, 2020, FNBT holds 41.11 percent of the market share of deposits and is ranked first among financial institutions in the AA. The Oklahoma Partial MSA AA accounts for approximately 96.35 percent of the bank's deposits and 96.42 percent of the number of loans in the bank's portfolio.

We consulted with a community contact with operations in the AA to gain a better understanding of the general community credit and developmental needs, as well as economic conditions. The community contact primarily has a community development purpose through economic development, attracting employers of all sizes, entrepreneurs, and attracting more residents to the area. The organization contacted is located in Chickasha, Okla. with a focus on the City of Chickasha. The contact indicated that economic opportunity in Chickasha and Grady County is abundant. The contact indicated that the needs in the community are revitalization of downtown Chickasha, affordable housing, and local school assistance. The contact stated that financial institutions are involved in their development efforts, but none more so than FNBT. The contact was especially complementary of FNBT and their involvement in municipal fundraising efforts, participation in local community groups, participation in an affordable housing development, and the bank's overall readiness to support or sponsor local community development efforts through both financial support and bank employees volunteering their time.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA**

### **LENDING TEST**

The bank's performance under the Lending Test in Oklahoma is rated Satisfactory.

Based on a full-scope review, the bank's lending performance in the State of Oklahoma is reasonable.

#### Oklahoma Partial MSA AA

#### **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the Oklahoma Partial MSA AA.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in the Oklahoma City MSA AA reflects excellent distribution among LMI geographies and exceeds the standard for satisfactory performance. For the time period of 2018-2020, the distribution to low-income CTs is higher than both the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA. The distribution to moderate-income tracts is also higher than both the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA.

#### ***Small Loans to Businesses***

Refer to Table Q in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses in the Oklahoma Partial MSA AA reflects reasonable distribution in the LMI geographies and meets the standard for satisfactory performance. For the time period of 2018-2020, the distribution to low-income tracts exceeds both the percentages of businesses located in the geography and the aggregate lending level. The distribution to moderate-income tracts is somewhat lower than the percentage of businesses located in the geography and is near to the aggregate lending level.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans in the Oklahoma Partial MSA AA reflects reasonable distribution among LMI borrowers. Home mortgage lending in the Oklahoma City MSA AA reflects reasonable penetration among LMI borrowers and meets the standard for satisfactory performance. For the time period of 2018-2020, the penetration to low-income borrowers was lower than the percentage of low-income families, but the bank's percentage of loans exceeded the aggregate percentage of lending. Only one of the CTs in the Oklahoma Partial MSA AA is low-income. Furthermore, only 2 percent of housing units in the AA are in the low-income CT and only 1 percent of owner-occupied housing in the AA is in the low-income CT. In the AA, the average home price is \$120,596 while the average income for low-income families is \$32,029. Additionally, the average gross rent is \$693, which is 25 percent of the average income for low-income families. Lending to moderate-income borrowers was good. The penetration to moderate-income borrowers was near to the percentage of moderate-income families in the AA and the aggregate percentage of lending.

### ***Small Loans to Businesses***

Refer to Table R in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of business loans in the Partial MSA AA reflects reasonable distribution. Lending to small businesses, those with less than \$1 million, in the Oklahoma Partial MSA AA reflects reasonable penetration. For the time period of 2018-2020, the penetration to small businesses was near to the percentage of businesses identified as having revenues of less than or equal to \$1 million and exceeded the aggregate lending for these businesses.

### **Oklahoma Non-MSA AA**

## **Distribution of Loans by Income Level of the Geography**

A geographic analysis in the Oklahoma Non-MSA AA was not conducted as it would not yield any measurable results for the purpose of this examination.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits excellent distribution of loans to borrowers of different income levels.

### ***Home Mortgage Loans***

Refer to Table P in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans in the Oklahoma Non-MSA AA reflects excellent distribution among LMI borrowers. Home mortgage lending in the Oklahoma Non-MSA AA reflects excellent penetration among LMI borrowers and exceeds the standard for satisfactory performance. For the time period of 2018-2020, the penetration to low-income borrowers was higher than both the percentage of low-income borrowers and aggregate percentage of lending. Lending to moderate-income borrowers was excellent, the bank exceeded both the percentage of moderate-income families and the aggregate percentage of lending in the AA.

### ***Small Loans to Businesses***

An analysis of lending to small businesses in the Oklahoma Non-MSA AA was not conducted as there were not enough loans originated in the AA to meet the minimum statistical requirements for the purpose of this examination.

### **Responses to Complaints**

There were no CRA related complaints during the assessment period.

### **Community Development Test**

The bank's performance under the Community Development Test in the State of Oklahoma is rated Outstanding.

### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

### **Number and Amount of Community Development Loans**

The Community Development Loans Table, shown on the following page, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Okla. Partial MSA	35	85.4	25,784	88.9
Okla. Non-MSA	6	14.6	3,227	11.1

The bank's level of CD lending demonstrates excellent responsiveness, considering the bank's capacity and the need and availability of such opportunities for CD lending in the bank's AA.

#### Oklahoma Partial MSA AA

During the evaluation period, the bank originated or renewed 35 CD loans totaling \$25.8 million in the Oklahoma Partial MSA AA. These loans include nine loans totaling \$4.8 million for community services, 20 loans totaling \$16.5 million for economic development, and six loans totaling \$4.5 million to revitalize and stabilize designated areas within the AA.

Significant loans include two loans totaling \$5.9 million to build and furnish a new hotel in Chickasha that will create LMI jobs and two loans totaling \$3.5 million to a local cable company who is bringing high speed internet to LMI individuals and families in rural areas of the AA and the surrounding areas.

While not included in table above, FNBT was also very active in the Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the Coronavirus (COVID-19) crisis. FNBT's participation resulted in the origination of 357 qualifying PPP loans totaling \$29.7 million that revitalized or stabilized the AA, including LMI areas. An additional 131 PPP loans totaling \$8.4 million were originated for persons outside the AAs but in Oklahoma and 13 PPP loans totaling \$2.1 million were originated for out of state residents. Management reports that many of the loans to borrowers outside the AAs had businesses in the AA or the immediate surrounding areas.

#### Oklahoma Non-MSA AA

During the evaluation period, the bank originated or renewed six CD loans totaling \$3.2 million in the Oklahoma Non-MSA AA. These loans include five loans totaling \$3.2 million for economic development and one loan totaling \$9 thousand to revitalize and stabilize a designated area within the AA.

Significant loans include three loans totaling \$3 million to purchase radio stations, which includes stations that will help to maintain LMI jobs in the area.

FNBT was also very active in the Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce

during the COVID-19 crisis. FNBT's participation resulted in the origination of 27 qualifying PPP loans totaling \$524 thousand that revitalized or stabilized the AA, including LMI areas.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
OKC Partial MSA	5	810	47	6,853	52	92.9	7,663	77.2		
Non-MSA	1	667	3	1,600	4	7.1	2,267	22.8		

The bank's level of investments and donations demonstrates excellent responsiveness to the needs of its AAs given performance context.

#### Oklahoma Partial MSA AA

The level of qualified CD investments is excellent in the Oklahoma Partial MSA AA. During the evaluation period FNBT invested in 17 qualified municipal investment securities totaling \$6 million. The investments in four school systems in Grady County will finance various construction, renovation, and repair activities of school buildings, and equipment and furnishings for classrooms. More than 50 percent of the student populations in the area schools qualify for the free and reduced-price lunch program.

The bank made 26 donations totaling \$103 thousand to qualified organizations in the Oklahoma Partial MSA AA during the evaluation period. Donations were made to local non-profit organizations that provide social services, youth programs, homeless assistance, food assistance and various training programs that target LMI individuals. The bank's holding company, First Independent BanCorp (FIBI), provided one donation of \$100 thousand to Chickasha Public Schools to fund the science, technology, engineering, and mathematics (STEM) programs. Eighty percent of the Chickasha Public School students qualify for the free and reduced lunch program.

The bank and holding company have been instrumental over the years in funding the Grady Memorial Hospital surgical facilities expansion project after its closing and loss of jobs. The surgical wing was nearing completion and the holding company made a \$50 thousand donation towards the purchase of a high-tech machine for the hospital. The hospital is in a moderate-income census tract, is the only hospital in Grady County and the hospital has helped maintain and create LMI jobs.

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system

During this evaluation period, FIBI and another party were instrumental in creating the new entity Chickasha Today. Chickasha Today was created August 2018 to purchase and renovate buildings in the 100 block of Chickasha Avenue for retail use. All the buildings are in a moderate-income census tract in Grady County that has been slated for revitalization by the Chickasha Economic Development Council. FIBI made two qualified contributions totaling \$600 thousand for real estate acquisitions and development of properties for Chickasha Today. They have purchased six properties and three are renovated and rented.

In a prior 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 that qualifies as a CD investment. Tax credits of \$600 thousand are allocated annually, with a portion used each year to amortize the investment in renovation costs.

### Oklahoma Non-MSA AA

The level of qualified CD investments is excellent in the Oklahoma Non-MSA AA. FNBT did not make any donations during the evaluation period but, made three qualified investments totaling \$1.6 million. The proceeds from two investments totaling \$1.4 million were used to refund outstanding bonds that financed the costs of construction and equipping a new detention center for use by Caddo County and expanding, renovating, and equipping the existing County Courthouse. These facilities will benefit the whole County where seven of the nine census tracts are distressed middle-income tracts. The courthouse and jail also employ 196 people from across the county. The third qualified investment, totaled \$230 thousand. The investment in Cement school in Caddo County will finance construction, equipment and furnishing new facilities. More than 50 percent of the student populations in the area schools qualify for the free and reduced-price lunch program.

Management reported that there are few qualified CD donation opportunities available in this rural area due to needs being met by the local tribes.

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

The level of qualified CD services reflects excellent responsiveness within the AAs.

As a result of the pandemic, bank management was active in both AAs in assisting new and existing customers with obtaining PPP loans and grants from the Oklahoma Business Relief Program (OBRP). OBRP offered funds to businesses that had suffered revenue loss due to the pandemic. FNBT bankers notified business customers that the Governor had designated funds for OBRP and when they were available. Grant applications were available on the bank's website. Bank managers assisted 51 customers with the application documents and submitted applications on the customer's behalf totaling \$809 thousand. There was no charge to customers for the assistance; it was a donation of banker time to assist the small business customers that were impacted by the pandemic.



Oklahoma Partial MSA AA

The level of qualified CD services reflects excellent responsiveness in the Oklahoma 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 and the Chickasha Economic Development Council, 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, Tuttle, and Rush Springs Chambers of Commerce. Bank officers provide technical expertise through involvement with planning, budgeting, and financing, among other activities.

• ***Financial Literacy/Career Fairs***

The bank is dedicated to promoting financial literacy in its communities. Bank staff provided credit-related training to high school students in LMI areas. Bank staff provided training to high school seniors on how to manage and balance a checking account. The bank participates in the “*National Teach Children to Save*” program. The bank provided *Finance for Freshman* at a few schools that qualify in LMI areas. The bank also did presentations about banking positions and careers at various high school Career Fairs.

• ***The Salvation Army***

A bank officer has served as Chairperson since 2008. 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.

In addition to supporting local organizations, the Chairman of the Board was instrumental in creating a program to revitalize and stabilize downtown Chickasha. He worked with the Economic Development Council and the city to create a public/private partnership to make leases in the downtown area (between Kansas and Choctaw Avenues) affordable. A \$3 investment by the occupant results in a \$1 reimbursement to encourage upgrades to and renovations in the focus area.

Approved by city council December 2018, there was \$2.5 million in funds earmarked for downtown redevelopment from the now expired sales tax increase. These funds are being used through the redevelopment grant program in an effort to revitalize the downtown district and increase sales tax revenue for the City of Chickasha.

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 LMI jobs. Although the officer retired in 2020, the bank still maintains many of the same types of efforts through various other officers and their involvement in community organizations. The officer spent his final year mentoring and sharing his knowledge with other bank employees.

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. The position has been used to develop relationships to bring in new business. Although held by different persons during the evaluation period, they have worked to bring businesses to the Tri-City area.

#### Oklahoma Non-MSA AA

The level of qualified CD services reflects adequate responsiveness in the Oklahoma Non-MSA AA. The bank is dedicated to promoting financial literacy in its communities. Bank staff provided credit related training to students in Cyril High School, which included LMI students. They provided "*Finance for Grads*" training, which teaches high school seniors how to manage and balance a checking account.

## Appendix A: Scope of Examination

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 MSA(s) and non-MSA(s) 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>	01/01/2018 to 12/31/2020	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Oklahoma</b>		
Okla. Partial MSA AA	Full-Scope	All CTs in Grady County, two CTs in McClain County, one CT in Oklahoma County
Okla. Non-MSA AA	Full-Scope	Two CTs in Caddo County

Appendix B: Summary of MMSA and State Ratings

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RATINGS for FIRST NATIONAL BANK AND TRUST COMPANY			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank and Trust Company	Satisfactory	Outstanding	Outstanding
State:			
Oklahoma	Satisfactory	Outstanding	Outstanding

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** 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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope 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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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-Scope 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:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.

**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.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 1 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.



Appendix D: 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 statistical areas, if applicable, 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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. 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 MMSA/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 that were 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) in those geographies. Because aggregate 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 (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2018-2020</b>		
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			
FNBT Non-MSA AA	14	537	5.3	94	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0			
FNBT Partial MSA	250	25,700	94.7	4,154	1.0	1.2	0.0	7.6	15.2	2.7	63.1	70.4	49.2	28.3	13.2	48.1	0.0	0.0	0.0			
<b>Total</b>	<b>264</b>	<b>26,237</b>	<b>100.0</b>	<b>4,248</b>	<b>0.9</b>	<b>1.1</b>	<b>0.0</b>	<b>7.1</b>	<b>14.4</b>	<b>2.7</b>	<b>65.6</b>	<b>72.0</b>	<b>50.3</b>	<b>26.3</b>	<b>12.5</b>	<b>47.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>			

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2018-2020</b>		
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			
FNBT Non-MSA AA	14	537	6.5	94	19.1	28.6	2.1	19.7	36.4	21.3	21.1	20.0	18.1	40.2	42.9	35.1	0.0	--	23.4			
FNBT Partial MSA	250	25,700	94.7	4,154	19.4	9.6	3.5	17.5	16.4	14.6	22.3	23.2	20.1	40.9	32.8	34.8	0.0	18.0	26.9			
<b>Total</b>	<b>264</b>	<b>26,237</b>	<b>100.0</b>	<b>4,248</b>	<b>19.4</b>	<b>9.8</b>	<b>3.5</b>	<b>17.6</b>	<b>17.0</b>	<b>14.8</b>	<b>22.2</b>	<b>22.7</b>	<b>20.1</b>	<b>40.8</b>	<b>33.3</b>	<b>34.8</b>	<b>0.0</b>	<b>17.0</b>	<b>26.8</b>			

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2018-2020</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
FNBT Non-MSA AA	--	--	--	34	0.0	--	0.0	0.0	--	0.0	100.0	--	100.0	0.0	--	0.0	0.0	--	0.0			
FNBT Partial MSA	174	74,292	13.8	1,258	1.9	5.6	1.6	13.1	8.9	10.3	51.1	66.7	50.1	33.9	18.9	38.0	0.0	0.0	0.0			
<b>Total</b>	<b>174</b>	<b>74,292</b>	<b>13.8</b>	<b>1,292</b>	<b>1.9</b>	<b>5.6</b>	<b>1.5</b>	<b>12.6</b>	<b>8.9</b>	<b>10.1</b>	<b>52.9</b>	<b>66.7</b>	<b>51.4</b>	<b>32.7</b>	<b>18.9</b>	<b>37.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>			

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2018-2020</b>	
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		
FNBT Non-MSA AA	--	--	--	34	75.6	--	41.2	4.7	--	19.7	--		
FNBT Partial MSA	174	74,292	13.8	1,258	88.1	76.7	43.5	3.6	20.0	8.3	3.3		
<b>Total</b>	<b>174</b>	<b>74,292</b>	<b>13.8</b>	<b>1,258</b>	<b>88.1</b>	<b>76.7</b>	<b>43.4</b>	<b>3.6</b>	<b>20.0</b>	<b>8.7</b>	<b>3.3</b>		

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*