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Comptroller of the Currency  
Midwestern District

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## **PUBLIC DISCLOSURE**

November 26, 1997

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The First National Bank and Trust Company of Miami  
Charter Number 5252

2 North Main  
Miami, Oklahoma 74354

Comptroller of the Currency  
Midwestern District  
Joplin Field Office  
1710 East 32nd Street  
Joplin, Missouri 64804

NOTE: This evaluation is not, nor should it 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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## GENERAL INFORMATION

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the Community Reinvestment Act (CRA) performance of The First National Bank and Trust Company of Miami, prepared by the Office of the Comptroller of the Currency (OCC), the institution's supervisory agency, as of November 26, 1997. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

**INSTITUTION'S CRA RATING:** This institution is rated: "**Satisfactory.**"

- ▶ Loans are reasonably distributed to borrowers of various income levels.
- ▶ A substantial majority of the bank's loans are made within its assessment area.
- ▶ The geographic distribution of loans within the assessment area is reasonable.
- ▶ The bank's loan-to-deposit ratio is reasonable.

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## **DESCRIPTION OF INSTITUTION**

The First National Bank and Trust Company of Miami (FNB&T) is a \$73 million community bank in Miami, Oklahoma. FNB&T is majority owned by First Miami Bancshares Inc., a one-bank holding company.

The bank currently serves its community with the main office at 2 North Main, a motor bank at 205 North Main, and two off-site automated teller machines (ATM). One ATM is located in a moderate-income census tract. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its assessment area. The last CRA examination of FNB&T was conducted on December 12, 1994.

The loan portfolio represents 61% of total assets. The portfolio is comprised of 23% 1-4 family residential, 21% consumer installment, and 20% agricultural loans.

## **DESCRIPTION OF THE FIRST NATIONAL BANK AND TRUST OF MIAMI'S ASSESSMENT AREA**

FNB&T's assessment area consists of Ottawa County, Oklahoma. FNB&T is one of ten financial institutions in the assessment area and is the third largest.

Miami has a population of approximately 13,000 persons. Small farming operations and small businesses are the predominant industries.

The bank's assessment area contains nine census tracts. Two of the tracts are moderate-income and seven are middle-income. The updated 1990 U.S. Census median family income for the assessment area is \$30,800. The assessment area population of 30,561 consists of 13% low-income families, 19% moderate-income families, 22% middle-income families and 46% upper-income families.

We met with two community contacts during the examination, a local business person and a city government official. The contacts indicated credit needs are being met through the local financial institutions. They also stated small business and affordable housing loans are the primary credit needs.

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## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### *Lending to Borrowers of Various Income Levels and Businesses of Different Sizes*

FNB has reasonable lending penetration among borrowers of different income levels. In part, we based our conclusion on a review of the examiner verified, residential real estate loan application register from January 1, 1995 to September 5, 1997. We also based our conclusion on a review of the bank's November 18, 1997 consumer loan listing. We used loan size as a proxy to stratify consumer loan borrowers by income level. We stratified the loans as follows:

Loans less than \$2,500	Low-income
Loans \$2500 to \$4999	Moderate-income
Loans \$5000 to \$9999	Middle-income
Loans above \$9999	High-income

1-4 family residential real estate loans represent 14% and consumer loans 21% of the total number of loans in the bank's portfolio. The following table illustrates our findings:

<b>Loan distribution by family income</b>				
	Low-Income	Moderate-Income	Middle-Income	Upper-Income
% of Families in bank's assessment area	22%	21%	24%	33%
% of Residential Real Estate and Consumer Loans	20%	25%	30%	25%

FNB&T makes loans to farms of different sizes. We based our conclusion on a review of the bank's list of agriculture production loans. We used loan size to individual borrowers as a proxy to stratify farms of different sizes. Loans to finance agriculture production are 9% by dollar volume and 5% by number of the bank's loan portfolio.

The following table illustrates our findings:

<b>Loans to Finance Agriculture Production by Dollar Size</b>					
<b>Loan size used as Proxy</b>	<b>Less than \$10,000</b>	<b>\$10,000 to \$24,999</b>	<b>\$25,000 to \$49,999</b>	<b>\$50,000 to \$99,999</b>	<b>\$100,000 &amp; Over</b>
<b>% of Loans to finance Agriculture Production</b>	38%	30%	10%	16%	6%

***Geographic Distribution of Loans***

The geographic distribution of loans in the assessment area is reasonable. We based our conclusion on a review of the examiner verified, bank loan application register from January 1, 1997 to September 30, 1997.

The following table illustrates our findings:

<b>Loan Distribution by Census Tract Income</b>				
	<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>
<b>% of families in census tract</b>	0%	17%	83%	0%
<b>% of loans in census tract</b>	0%	16%	84%	0%

***Lending in Assessment Area***

FNB&T originates a majority of its loans within the assessment area. We based this conclusion on our review of examiner verified, bank reports. Our review showed that 85% of the bank's loans were made within its assessment area.

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### ***Loan-to-Deposit Ratio***

The bank's loan-to-deposit ratio is reasonable. The ratio ranged from a low of 60% at March 31, 1995 to a high of 67% at September 30, 1997. FNB had an average loan-to-deposit ratio of 63% since the last CRA examination dated December 12, 1994. The average loan-to-deposit ratio of six other community banks that also serve the assessment area ranged from 36% to 75% for the same period.

### ***Compliance with Antidiscrimination Laws and Regulations***

We found the bank in compliance with both substantive and technical provisions of antidiscrimination laws and regulations.