



PUBLIC DISCLOSURE

April 20, 2015

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, 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.

INSTITUTION'S 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 75 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 levels, is satisfactory.
- 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.

Scope of Examination

A Data Integrity review commenced on March 9, 2015, to evaluate the bank's system of internal controls for collecting, verifying, and submitting data reported on the Home Mortgage Disclosure Act Loan Application Register (HMDA LAR).

HMDA loans originating in 2013 and 2014 were reviewed. The review indicated that the data the bank is required to collect and report to regulatory agencies under the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA) is materially accurate. Internal controls over the system to collect and report HMDA data are effective.

This Performance Evaluation is based on 2010 US Census demographic information. Conclusions regarding the Lending Test are based on the origination of home mortgage loans from January 1, 2013, through December 31, 2014, and a sample of small business loans originated from January 1, 2013, through March 31, 2015. Conclusions regarding the Community Development Test are based on community development activities from July 30, 2012, through April 20, 2015.

To assess FNBT's performance under the CRA regulations, we analyze the bank's activities in and around its designated AA. We divided FNBT's AA into two distinct areas. The 13 census tracts in the Oklahoma City Metropolitan Statistical Area (MSA) received a full-scope review. The limited-scope AA included two non-MSA census tracts in Caddo County. In 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 95 percent of the bank's loans and 99 percent of the bank's deposits. The full-scope review of the Oklahoma City MSA included a review of the major loan products for the bank. Lending performance in the limited-scope AAs was not evaluated.

Description of Institution

FNBT is a \$488 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 9 full service branches and 1 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 seventeen ATMs. Since the previous CRA evaluation, FNBT has not opened or closed any branch locations. The tables below provide information on FNBT's branch and Automated Teller Machine (ATM) locations.

FNBT's Branch Locations		
Location:	Address:	City:
Main Bank	302 Chickasha Ave.	Chickasha, OK
Grand Avenue	602 Grand Ave.	Chickasha, OK
Eagle	6 th & Choctaw Ave.	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 rd 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 th	Oklahoma City, OK

FNBT's ATM Locations		
Location:	Address:	City:
Blanchard	1100 N. Council Rd.	Blanchard, OK
Minco	524 SW 3 rd St	Minco, OK
Tuttle	5311 East Highway 37	Tuttle, OK
Newcastle	1308 N. Main St.	Newcastle, OK
Walkers	2 SW 4 th St.	Tuttle, OK
Drive-In	122 N. Sixth St.	Chickasha, OK
Main Bank	302 Chickasha	Chickasha, OK

FNBT's ATM Locations - continued		
Location:	Address:	City:
Grand	602 Grand Ave.	Chickasha, OK
Spencer's IGA	208 S. 5 th St.	Chickasha, OK
Campus Corner	1601 W. Grand Ave.	Chickasha, OK
Riley's	123 N. Main Street	Pocasset, OK
Rush Springs	222 W. Blakely	Rush Springs, OK
Alex	102 S. Main St.	Alex, OK
Bridgescreek	1063 S. Sarah Rd.	Blanchard, OK
Cyril	201 W. Main St.	Cyril, OK
SWOKC	8504 SW 59 th St.	Oklahoma City, OK
Wash Town	120 E. Veterans Memorial	Blanchard, 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, Automated Clearing House (ACH), 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 into 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, 2014, FNBT's assets totaled \$488 million, of which \$311 million, or 64 percent, were comprised of various types of loans to individuals and commercial businesses. The bank's loan portfolio segmentation is detailed below.

Loan Portfolio Composition as of December 31, 2014		
	\$ (000)	%
Residential Real Estate	\$64,624	21%
Commercial Real Estate	\$108,558	35%
Commercial and Industrial	\$95,682	31%
Farm Loans	\$11,771	4%
Individual Loans	\$28,396	9%
Other	\$1,832	<1%
Total	\$310,863	100%

Source: December 31, 2014 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.

Description of Assessment Area(S)

The AA adopted by FNBT consists of whole geographies, does not reflect illegal discrimination, and does 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 Chickasha/Oklahoma City (OKC) Partial MSA AA and the Chickasha Non-MSA AA.

The Chickasha/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. Total population of the full-scope AA is 70,524. Of the 28,280 total housing units, 20,116, or 71 percent, are owner occupied. Households below the poverty level total 3,628, or 13 percent, and households that receive public assistance total 899, or 4 percent, of the total number of households. 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. The following table describes major demographic and economic characteristics of the Chickasha/OKC Partial MSA AA, based on 2010 US Census data.

Demographic And Economic Characteristics of the Chickasha/OKC Partial MSA AA	
<i>Population</i>	
Number of Families	19,504
Number of Households	25,377
<i>Geographies</i>	
Number of Census Tracts	13
% Low-Income Census Tracts	0.00%
% Moderate-Income Census Tracts	30.77%
% Middle-Income Census Tracts	61.54%
% Upper-Income Census Tracts	7.69%
% N/A	0.00%
<i>Median Family Income (MFI)</i>	
2010 MFI for AA	\$58,775
2007 HUD-Adjusted MFI	\$60,000
<i>Economic Indicators</i>	
Unemployment Rate	3.32%
2010 Median Housing Value	\$109,309
% of Households Below Poverty Level	12.88%

Source: 2010 Census data and 2013 HUD updated income data

The economy in Chickasha is considered stable and has shown improvement with a lower unemployment rate than the Oklahoma City MSA average. Major employers in the AA are Grady Memorial Hospital, Gabriel Ride Control, Chickasha Public Schools, and University of Arts and Science of Oklahoma. Manufacturing represents 14 percent of the business sector, followed by retail services, health, and social assistance at 13 percent each.

The community credit needs and business opportunities are also served by several other financial institutions, as well as branches of those institutions located in the AA.

Several community contacts were conducted during this review to help ascertain the credit needs of the AA. The contacts indicated that there is a need for affordable housing, financial literacy training, and venture capital for small businesses.

The limited-scope AA is defined as the census tracts outside the OKC MSA, in which the bank has a branch. It consists of two census tracts in Caddo County, representing the trade territory for the Cyril branch. Both Caddo County tracts are designated as distressed non-metropolitan middle-income geographies. Less than 1 percent of the bank's deposits and less than 5 percent of loans reside in this limited-scope area. Due to the limited market share of this area, in-depth demographic data is not provided.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the Lending Test is rated "*Satisfactory*". This Performance Evaluation assesses FNBT's performance focusing primarily on five performance criteria: the loan-to-deposit ratio; lending in the AA; 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, the major loan products offered by the bank were evaluated. All HMDA residential real estate loans originated in 2013 and 2014 were reviewed and analyzed. A random sample of 27 small business loans that originated from January 1, 2012, through March 31, 2015, was selected. Based on the analysis and consistent with available resources and capabilities, FNBT is meeting the credit needs of the AA in an outstanding manner.

Loan-to-Deposit Ratio

FNBT's LTD ratio is reasonable and meets the standard for satisfactory performance. The bank's LTD ratio at December 31, 2014, was 73 percent. The bank's average quarterly LTD ratio from September 30, 2012, through December 31, 2014, was 75 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 \$150 million and \$500 million, for the same time period. FNBT's average LTD ratio is slightly higher than the average of the four comparable banks of 71 percent. These average LTD ratios are detailed in the following table.

Loan-To-Deposit Ratios		
Institution	Total Assets \$000's (As of 12/31/14)	Average Loan – to-Deposit Ratio
Sooner State Bank, Tuttle, OK	\$180,711	64.35%
<i>First National Bank & Trust, Chickasha, OK</i>	<i>\$487,507</i>	<i>75.49%</i>
First Bank & Trust Co., Duncan, OK	\$615,675	71.52%
Liberty National Bank, Lawton, OK	\$454,015	67.42%
Legacy Bank	\$462,787	82.54%

Source: Institution Reports of Condition from September 30, 2012, to December 31, 2014

Lending in Assessment Area

FNBT's lending in its AA meets the standard for satisfactory performance. A majority of the number and dollar amount of home mortgage and small business loans originated within the bank's AAs. As depicted in the following table, 73 percent of the number and 70 percent of the dollar amount of loans originated in FNBT's AA.

Table 1 – Lending in AAs										
Loan Type	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	141	67.79	67	32.21	208	\$14,857	64.72	\$8,098	35.28	\$22,955
Home Improvement	52	82.54	11	17.46	63	\$2,637	80.96	\$620	19.04	\$3,252
Refinance	149	75.25	49	24.75	198	\$12,360	77.36	\$3,618	22.64	\$15,978
Small Business	22	81.4	5	18.25	27	\$1,133	59.36	\$775	40.64	\$1,908
Totals	364	73.39	132	26.61	496	\$30,987	70.27	\$13,111	29.73	\$44,098

Source: Data reported for 2013 and 2014 HMDA Loans and 2013, 2014, and YTD 3/31/15 Small Business Loan Sample

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

FNBT's distribution of home mortgage and small business loans to individuals of different income levels and to businesses of different sizes reflects a reasonable penetration and meets the standard for satisfactory performance.

The bank's borrower distribution of loans to small businesses indicates reasonable penetration as 77 percent of the number of business loans sampled and 52 percent of the dollar volume of business loans sampled were to businesses with revenues of less than \$1 million. Note that 23 percent of the business in the AA did not report revenues

Table 2A - Borrower Distribution of Loans to Businesses in the MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	73.92%	3.48%	22.60%	100.00%
% of Bank Loans in AA by #	77.27%	22.73%	0.00%	100.00%
% of Bank Loans in AA by \$	51.65%	48.35%	0.00%	100.00%

Overall, the bank's distribution of home mortgage loans indicates reasonable penetration. The percentage of home mortgage loans to low-income borrowers is less than the corresponding percentages to LMI families in the AA. However, this performance is not unreasonable when considering low-income families may not be able to meet conventional mortgage underwriting guidelines. The distribution of home mortgage products to moderate-income families is reasonable, and for refinance loans, exceeds the percentage of moderate-income families in the AA. Management states that the lower penetration to low-income families may be due to more conservative underwriting. Also, the demand for home mortgage products from low-income wage employees may have decreased due to the robust energy industry in 2013 and 2014.

Table 2 - Borrower Distribution of Residential Real Estate Loans in the MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	22.28	12.38	19.28	15.24	21.05	14.29	37.39	58.10
Home Improvement	22.28	11.90	19.28	19.05	21.05	28.57	37.39	40.48
Refinance	22.28	14.29	19.28	28.57	21.05	17.46	37.39	39.68

Source: Data reported for 2013 and 2014 HMDA Loans; 2010 U.S. Census data

Geographic Distribution of Loans

FNBT’s geographic dispersion of home mortgage and small businesses loans in FNBT’s AA is excellent and exceeds the standard for satisfactory performance. The bank’s AA contains no low-income census tracts.

The geographic dispersion of business loans to moderate-income tracts significantly exceeds the demographic comparators, with 50 percent of the number of bank loans to business located in moderate-income tracts compared to only 24 percent of the AA businesses located in moderate-income tracts. The bank’s mortgage lending in moderate-income tracts significantly exceeds the percentage of owner occupied housing in moderate-income tracts for all three mortgage products,

Table 3A - Geographic Distribution of Loans to Businesses in the MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Small Business	0.00	0.00	24.13	50.00	62.46	45.45	13.41	4.55

Source: 2013, 2014, and YTD 3/31/15 Small Business Loan Sample; Dunn and Bradstreet data.

Table 3 - Geographic Distribution of Residential Real Estate Loans in the MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.00	0.00	20.57	28.99	69.50	67.39	9.93	3.62
Home Improvement	0.00	0.00	20.57	41.18	69.50	52.94	9.93	5.88
Refinance	0.00	0.00	20.57	51.05	69.50	46.85	9.93	2.10

Source: Data reported for 2013 and 2014 HMDA Loans; 2010 U.S. Census data.

Responses to Complaints

There have been no consumer complaints regarding the bank’s Community Reinvestment Act performance 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 Oklahoma City branch location, a majority of the AA is comprised of non-metropolitan, low-density areas.

FNBT is active in the communities they serve and has demonstrated a strong commitment to local economic and community development projects. This is evidenced by the bank’s financial commitment to local health care facilities, downtown revitalization projects, and loans to small businesses that create or retain jobs for LMI individuals. FNBT has facilitated small business lending through loans made to an economic development entity that in turn provides CD loans to businesses throughout Oklahoma. Bank officers are active in the communities they serve through their leadership roles on various civic and non-profit organizations that provide services to LMI individuals.

A Business/Community Development Officer position was established in 2006. Business Development Officer Paul Lewis has been instrumental in bringing new industry to Chickasha, facilitating creation of numerous LMI jobs. His work to help create affordable housing has brought in two new hotels, the conversion of a historic downtown building to affordable housing, and three RV parks. The Chickasha Economic Development Council has approved the development of a new housing addition.

Mr. Lewis continues to serve in a leadership position for several non-profit organizations. Most prominently, his role as Chairman of Leadership Chickasha sponsored by the Chickasha

Chamber of Commerce, has assisted in developing young executives for leadership roles within the community. Work is in progress to establish a Young Professionals Civic Organization dedicated to promoting involvement and awareness for other non-profit groups targeted to LMI individuals. As a result of his ongoing leadership and dedication to the Chickasha community, Mr. Lewis was named Citizen of the Year in February 2015.

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 has an excellent level of CD lending activities. The bank has originated or renewed 20 CD loans totaling \$35 million during the evaluation period. Two loans totaling \$470,000 provided affordable housing. Five loans totaling \$11.8 million were originated to provide social services, such as construction of a new middle school and emergency medical facilities. FNBT originated 13 loans totaling \$22.7 million for economic development, such as construction and improvements to the County Fairgrounds and multiple restaurants. Below are details on some of the CD loans originated by the bank during the evaluation period.

FNBT has been active in supporting affordable housing for senior citizens. In April 2013, the bank renewed a \$350,000 loan for renovation expenses on a historic downtown Chickasha hotel, which has been converted into affordable senior citizen housing. During the prior evaluation period, FNBT extended a \$6.2 million loan to purchase the hotel and a \$650,000 loan for renovation expenses. The project qualified for CD grant money and historical and affordable tax credits during this evaluation period of approximately \$7.7 million. The bank has also originated a \$120,000 loan in March 2013 to purchase a building located in a moderate-income census tract. The building will be used as a senior citizens center that, among other services, will provide meals to LMI senior citizens. The loan proceeds will also fund renovation expenses for six affordable rental units for LMI senior citizens.

FNBT participated in two loans that provide health care services. FNBT was a \$2.3 million participant in a \$21.8 million project to construct a two story emergency medical office building in Mustang, OK. FNBT was also a \$2.8 million participant in a \$25.8 million project to construct an emergency medical office building in north Oklahoma City. Both buildings will be leased by St. Anthony's Hospital, a 501c-3 entity that provides health care services to LMI individuals. The St. Anthony Hospital network serves four counties in the Oklahoma City MSA, a service area that includes the bank's south Oklahoma City branch.

FNBT participated in three loans that benefit local schools within the AA. The bank made a \$6 million loan to the Independent School District of Grady County (Ninnekah Public Schools). Proceeds will provide funding for the construction of a new middle school in Ninnekah, OK. The middle school will be located in a moderate-income census tract. The Junior High School in Ninnekah reports that 81 percent of the students are eligible for the free or reduced lunch program. In June 2013, the bank made a \$300,000 loan to Alex Public Schools to provide the school system an operating line of credit. In June 2014, the loan was renewed at \$400,000 providing an additional \$100,000 under the line of credit. Alex schools are located in a

moderate-income census tract. Students eligible for the free or reduced lunch program exceeds 80 percent.

FNBT has taken a leadership role in supporting and funding economic development projects. During the evaluation period, the bank committed \$13 million to fund improvements to the Grady County Fairgrounds located in Chickasha, OK. Improvements include the construction of a new 50,000 square foot multi-purpose, climate controlled arena, along with a new outdoor arena and new multi-purpose expo center. The \$13 million commitment includes a phase I loan for \$10 million that originated in October 2014 and a phase II note for \$3 million that originated February 2015. These loans were participated among five other local financial institutions with FNBT acting as the lead bank. This project created approximately 127 LMI jobs and is projected to contribute over \$9 million in revenues to Grady County. The fairgrounds are located in a moderate-income census tract.

Additional economic development loans originated during the evaluation period include eight loans for \$7.7 million related to the construction and/or renovation of four restaurants. All four restaurants will provide LMI jobs. Three of the five restaurant loans are also located within the Chickasha Main Street Association's Downtown Revitalization Program. FNBT originated two loans for \$962,000 to small businesses to construct or renovate their businesses that created LMI jobs. The bank originated a \$1 million loan to a non-profit Community Development Financial Investment company that invests in small businesses that employ mostly low-income people, buys low-income home loans and co-lends with banks to make unbankable loans bankable.

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 regulation.

The level of qualified investments and donations, totaling \$10.9 million during the evaluation period, indicates FNBT's excellent responsiveness to the CD needs in the bank's AAs. The bank made 63 qualified donations during the period totaling \$177,000. 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.

The bank also purchased numerous school bonds within their AA. During the evaluation period, FNBT purchased \$2.9 million in school bonds benefiting Title 1 schools (large low-income student population) where a majority of the student's parents have incomes less than 80 percent of the area's medium income and are eligible for the free and/or reduced lunch program. These bonds financed the construction of and repairs to school buildings, provided buses and equipment, and provided classroom and technology upgrades.

In addition, FNBT took a leadership role in the rehabilitation of the historic downtown Chickasha Hotel, which created 38 units of affordable housing. The two-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 (LIHTCs), FNBT, through

its holding company, First Independent Bancorp, funded and completed this historic preservation and low-income housing project. Total tax credits of \$7.7 million, which are qualified CD investments, were received by FNBT through developing this project. The project not only created a large block of affordable housing units to serve primarily low-income senior citizens of Chickasha, it restored some of the historic beauty of the downtown business district and is expected to stimulate other capital improvements.

Extent to Which the Bank Provides Community Development Services

The level of qualified CD services is excellent. 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. The bank's Business Development Officer, Paul Lewis, serves as a Frontline Team Member on the Southwest Oklahoma Impact Coalition. The Southwest Oklahoma Impact Coalition covers a 12-county region, including Grady and Caddo counties, which is dedicated to regional economic development. These organizations are all active with regard to economic development, the retention and recruitment of new businesses, and job creation within their respective area.
- ***Chickasha Main Street Association***
A bank officer has served as board member and another bank officer has served as a board member and Treasurer of this association, providing financial and banking advice. The organization is dedicated to the revitalization of 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.

- ***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 Memorial Hospital accepts patients on Medicaid and provides health care services to LMI families.
- ***Court Appointed Special Advocates (CASA)***
A bank officer serves as Treasurer for this non-profit organization. Every year millions of children are abused, neglected, or abandoned in the United States. CASA provides court appointed advocacy for LMI children so they can thrive in safe, permanent homes.
- ***The Salvation Army***
A bank officer has served as Chairperson since 2008 and another bank officer sits 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.
- ***Mustang Pregnancy Center***
A bank officer served as Chairperson of this non-profit organization during the 2013-2014 term. This group furnishes young girls and women, including LMI females, with resources and support during and after pregnancy.
- ***Chickasha YMCA***
Bank officers have served in various capacities with the local YMCA. The focus is youth development, healthy living, and social responsibility.
- ***Rotary Clubs, Lions Clubs, Kiwanis Clubs***
The bank supports the Rotary Clubs, Lions Clubs, and Kiwanis 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.

RETAIL DELIVERY SYSTEMS

FNBT has appropriate systems for delivering retail banking services. In addition to the main bank location, the bank operates a full service branch with a drive-thru ATM at Grand Avenue in Chickasha and at its locations in Alex, Blanchard, Cyril, Minco, Newcastle, Rush Springs, Tuttle, and Southwest Oklahoma City. The bank also has two drive-thru ATMs at the Eagle Branch location in Chickasha, along with stand-alone or walk-up ATMs at the Campus Corner convenience store and Spencer's IGA grocery store in Chickasha, Riley's Short Stop convenience store in Pocasset, Walker's 66 convenience store in Tuttle, Sara Road in Bridge Creek, and Wash Town Carwash in Blanchard. The Cyril branch is located in a distressed

middle-income CT. The offices and retail services are reasonably accessible to geographies and individuals of different income levels in the AA.

Traditional banking services are offered at the full service offices. The bank offers 24-hour access via mobile banking options, including mobile deposits. Internet banking allows viewing of loan and depository account information, transfers between accounts, the ability to make loan payments, and email alert notifications. The bank offers telephone banking, a free All Green checking account, free checking to seniors over 60, a health savings account, remote deposit capture, bill pay, and prepaid Visa cards. Alternative delivery systems provide easy access to banking services by all sections of the bank's AA, to include LMI individuals and geographies.

Responsiveness to Community Development Needs

Overall, FNBT has demonstrated excellent responsiveness to the identified needs and opportunities throughout their AAs. FNBT has taken a leadership role in the major economic development projects in their community in terms of time, personal resources, and the financing commitments they have made to these projects. Examples during this evaluation period include the historic downtown hotel and the fairgrounds. Both projects will meet a community need, provide affordable housing and generate significant revenues for the City of Chickasha. The level of CD activities is outstanding with \$35 million in CD loans and \$3.1 million in qualified investments. Bank officers have taken leadership roles in the community with their involvement in organizations that provide services to LMI persons, create affordable housing, or promote economic development.

Fair Lending 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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.”