



## **PUBLIC DISCLOSURE**

August 19, 2019

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

First National Bank and Trust Company  
Charter Number 18430

130 East Macarthur Street  
Shawnee, OK 74804

Office of the Comptroller of the Currency  
301 NW 63rd Street, Suite 490  
Oklahoma City, OK 73116

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 **Satisfactory**.

The major factors that support this rating include:

- A majority of the bank's loans were originated within the bank's assessment areas (AAs).
- The bank's distribution of loans indicates reasonable penetration to borrowers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects a reasonable dispersion throughout the AAs.
- The bank's average loan-to-deposit ratio is reasonable given the bank's performance context.
- The bank has received no complaints with respect to the bank's Community Reinvestment Act performance.
- Community development (CD) activities were reviewed on request by management and indicate adequate responsiveness to the bank's AAs.

## Description of Institution

First National Bank and Trust Company (FNB&T) is a \$248 million institution headquartered in Shawnee, OK. FNB&T is 99 percent owned by the Citizen Potawatomi Nation, a Native American Tribe of Oklahoma. The main bank is located in Shawnee, OK. FNB&T has two branches in Lawton, OK and branches in the towns of Holdenville, Mangum, and Granite, OK. One branch located in Shawnee has closed since the previous evaluation. The branch was not located in a low- or moderate-income (LMI) area and was closed due to low branch activity. No new branches have been opened. Drive-in facilities and Automated Teller Machines (ATMs) are located at all branch locations. See the tables below for complete branch and ATM information.

<b>FNB&amp;T's Branch Locations</b>		
<b>Location</b>	<b>Address</b>	<b>City</b>
Shawnee Main Office	130 E. MacArthur St.	Shawnee, OK
Lawton – Quanah Parker Branch	6702 Quanah Parker Trailway	Lawton, OK
Lawton-Sheridan Road Branch	702 NW Sheridan Rd.	Lawton, OK
Holdenville Branch	821 E. Highway	Holdenville, OK
Mangum Branch	204 N. Oklahoma Ave.	Mangum, OK
Granite Branch	104 E. First St.	Granite, OK

<b>FNB&amp;T's ATM Locations</b>		
<b>Location</b>	<b>Address</b>	<b>City</b>
Shawnee Main Office	130 E. MacArthur St.	Shawnee, OK
Firelake Branch	1545 S. Gordon Cooper Dr.	Shawnee, OK
Holdenville Branch	821 E. Highway	Holdenville, OK
Lawton – Quanah Parker Branch	6702 Quanah Parker Trailway	Lawton, OK
Lawton-Sheridan Road Branch	702 NW Sheridan Rd.	Lawton, OK
Mangum Branch	204 N. Oklahoma Ave.	Mangum, OK
Granite Branch	104 E. First St.	Granite, OK

The bank's primary focus is to serve its customers by providing commercial, real estate, and consumer loans. FNB&T offers a wide variety of loan and deposit products, as well as 24-hour Internet and telephone banking services. Banking hours run from 9:00 am or earlier to at least 4:30 pm at all locations Monday through Friday. Some branches also operate limited hours on Saturdays. Internet banking services are offered through FNB&T's website and phone app. Features allow customers to perform basic banking functions such as viewing balances or online bill payment at their convenience even outside of normal banking hours.

Residential real estate loan products consist primarily of conforming loans intended for sale on the secondary market. Products offered are consistent across the bank's branches. In addition to traditional home lending, the bank continues to offer loans through the Indian Home Loan Guarantee Program (HUD Section 184 Loans). The Section 184 Indian Home Loan Guarantee Program is a mortgage product specifically for Native Americans designed to improve homeownership opportunities for the historically underserved demographic.

As of December 31, 2018, FNB&T's total assets were \$248 million, of which \$96 million, or 38 percent, were loans. Specifically, the bank's loan portfolio consists of the following:

<b>Loan Portfolio Composition as of December 31, 2018</b>		
	<b>\$ (000)</b>	<b>%</b>
Commercial/Business Loans	\$69,577	72.71%
Residential Real Estate Loans	\$14,332	14.98%
Agricultural Loans	\$ 9,416	9.84%
Consumer Loans	\$ 2,283	2.39%
Other Loans	\$ 89	0.09%
<b>Total</b>	<b>\$95,697</b>	<b>100.00%</b>

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AAs. An "Outstanding" rating was assigned to FNB&T at the last CRA performance evaluation performed as of April 9, 2014.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We completed a full-scope review of FNB&T's CRA activities in its AAs under Small Bank CRA procedures, which consists of the Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. This Performance Evaluation is based on 2010 U.S. Census data and the updated 2015 American Community Survey (ACS) demographic information. Conclusions regarding the Lending Test are based home mortgage loans originated in 2016 with a separate assessment based on home mortgage loans originated in 2017 and 2018. Our review also included a sample of small business loans originated in 2016 with a separate assessment based on small business loans originated in 2017 and 2018. The 2016 home mortgage and small business samples are compared to 2010 Census Data information, whereas the 2017 and 2018 home mortgage and small business sample is based on updated information from the 2015 ACS U.S. Census. Conclusions regarding the bank's CD performance are based on CD activities from April 9, 2014 through December 31, 2018. Under Small Bank CRA procedures, a bank may request that their community development activity be reviewed in order to achieve a better rating.

### Data Integrity

We conducted a data integrity review on February 25, 2019. The scope of this review included Home Mortgage Disclosure Act (HMDA) data and the bank's system of internal controls for collecting, verifying, and submitting HMDA data. We reviewed a sample of HMDA loans originated in 2016, 2017, and 2018. The review indicated that the data the bank is required to collect and report to regulatory agencies under the CRA and the HMDA is materially accurate. Internal controls over the system to collect and report HMDA data are effective.

### Selection of Areas for Full-Scope Review

The AAs adopted by FNB&T consist of whole geographies, do not reflect illegal discrimination, and do not arbitrarily exclude LMI geographies. We selected two AAs for full-scope review: Lawton Partial MSA (Comanche County) and several non-MSA counties that were combined into a single AA. The Lawton Partial MSA AA consists of the entirety of Comanche County, which includes three (3) low-income tracts, 10 moderate-income tracts, 11 middle-income tracts, and seven (7) upper-income tracts. The Non-MSA AA includes the following counties: Pottawatomie, Seminole, Hughes, Greer, Jackson, and Kiowa. This AA contains one (1) low income-tract, 10 moderate-income tracts, 26 middle-income tracts, and six (6) upper-income tracts.

### Ratings

The rating is based on the bank's lending performance within their AAs with consideration given to the bank's CD activities. The bank's primary lending focus is commercial lending, which makes up approximately 73 percent of the bank's total loan portfolio. We weighted small business lending more heavily in the lending test than home mortgage lending, which only accounted for 15 percent of the bank's loan portfolio. We gave more weight to the bank's Non-MSA AA as the bank has significantly more deposit and lending activity from this AA. As of the examination date, the bank's Lawton branches accounted for only \$15 million (6.4 percent) of the bank's total deposits. Lending activity is similarly low. Only 13 percent of loans originated during the assessment period were originated within the Lawton Partial MSA AA.

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

Pursuant to 12 CFR 25.28(c), in determining a national 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 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.

## Performance Test Conclusions

### Lending Test

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

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is reasonable.

FNB&T's average LTD ratio over the evaluation period was 43 percent and well below the average ratios of other banks. However, FNB&T's ratio is negatively impacted by large deposits from the Pottawatomie Nation and Comanche Nation. The Pottawatomie Nation kept an average of \$84 million in deposits between March 31, 2016 and December 31, 2018, while the Comanche Nation historically maintained deposits around \$30 million. The Comanche Nation has since removed their deposits; however, these deposits were in the bank for the majority of the evaluation period. Neither tribe required much lending from FNB&T due to their liquidity. Recalculating the ratio as of December 31, 2018 without the tribal deposits results in a much higher ratio of 89 percent. Given these factors, FNB&T's ratio meets the standard for satisfactory performance. Refer to the table below for average ratios of peer banks. Peer banks were selected based on their lending products, branch structure, asset size, and proximity to FNB&T's AAs. No banks operating in Shawnee were selected due to the lack of comparable competitors.

<b>Loan-To-Deposit Ratios</b>		
<b>Institution</b>	<b>Total Assets as of 12/31/18 (000's)</b>	<b>Average LTD Ratio</b>
<i>First National Bank and Trust</i>	<i>\$247,889</i>	<i>43.21%</i>
Frazer Bank	\$319,594	62.31%
The City National Bank and Trust Company of Lawton	\$361,431	64.90%
Sooner State Bank	\$217,476	71.85%

### Lending in Assessment Area

FNB&T's lending in their AAs meets the standard for satisfactory performance. A majority of the number and dollar amount of home mortgage and small business loans were originated in the bank's AAs. The bank originated or purchased 74 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	162	71.7	64	28.3	226	13,753	56.3	10,667	43.7	24,420
Small Business	68	79.1	18	20.9	86	6,965	69.7	3,030	30.3	9,995
Total	230	73.7	82	26.3	312	20,718	60.20	13,697	39.80	34,415

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

The bank exhibits reasonable geographic distribution of loans in the bank's AA.

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

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

#### **Lawton Partial MSA AA**

The bank's lending represented reasonable distribution and meets the standard for satisfactory performance. In 2016, home mortgage loans made in LMI geographies exceeded both the percentage of home ownership and aggregate bank lending. In 2017 and 2018, mortgage loans made in LMI geographies fell below the percentage of home ownership, but was overall in line with aggregate lending in the AA. The bank had no loans in low-income tracts in 2017 and 2018; however, aggregate market data for the AA showed other institutions only had 1.6 percent of their lending in low-income tracts. Additionally, the AA only contained three (3) low-income tracts during the assessment period. Distribution to moderate-income tracts was more reasonable and in line with aggregate lending for 2017 and 2018.

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

The bank's lending represented reasonable dispersion and meets the standard for satisfactory performance. In 2016, bank loans made in LMI geographies were near the percentage of home ownership and in line with the aggregate lending in the AA. In 2017 and 2018, lending to LMI geographies exceeded the percentage of home ownership and aggregate lending in the AA. While no loans were made in low-income tracts, the bank's lending in moderate-income tracts significantly exceeded the percentage of owner occupied units and aggregate bank lending. Opportunities for lending in low-income tracts in the AA is very limited as there is only one (1) low-income tract in the AA. Aggregate lending in low-income tracts for 2017 and 2016 was virtually nonexistent at 0.4 percent of loans originated.

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

Refer to Table Q in 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.

#### **Lawton Partial MSA AA**

Lending to businesses in LMI census tracts reflects reasonable distribution and meets the standard for satisfactory performance. The number of small business loans originated in 2016 was insufficient to provide a meaningful analysis of the geographic distribution of loans in LMI tracts. FNBT's geographic distribution of 2017 and 2018 small business loans in the Lawton MSA is excellent.



Although none of the business loans in the sample were located in the low-income tracts, the geographic distribution of business loans in the moderate-income tracts exceeded both the percentage of businesses in moderate-income tracts and aggregate peer data.

#### Oklahoma Non-MSA AA

Lending to businesses in LMI census tracts reflects reasonable dispersion and meets the standard for satisfactory performance. The geographic distribution of 2016 small business loans in the Non-MSA AAs is reasonable. The percentage of business loans in the low-income tracts is in line with the percentage of businesses located in those tracts and exceeds aggregate peer data. The dispersion of 2016 business loans in moderate-income tracts is poor compared to the percentage of businesses in those tracts and aggregate peer data. The geographic distribution of 2017-2018 small business loans in the Non-MSA AA is reasonable. The percentage of business loans located in low-income tracts is in line with the percentage of businesses in those tracts and aggregate peer data. The distribution of business loans in moderate-income tracts is poor compared to the percentage of businesses in those tracts.

Poor distribution of business loans in moderate income tracts is more reasonable given the locations and composition of these tracts. Moderate-income tracts in Shawnee are primarily residential and include schools and an airport, which reduces the opportunity for commercial lending. Moderate-income tracts in Wewoka and Wetumka have very little business development. While the area had seen a boom in the 90s, more businesses have been closing in recent years. Moderate-income tracts in the Altus area are harder for FNB&T to lend in due to the lack of a branch location there. The nearest branch is over 30 minutes away from Altus, and there are eight (8) financial institutions located within Altus.

#### **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 Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### Lawton Partial MSA AA

Home mortgage lending in the AA reflects poor penetration among LMI families and does not meet the standard for satisfactory performance. In 2016, lending to LMI borrowers was below the percentage of LMI families in the AA and aggregate lending to LMI borrowers in the AA. For 2017-2018, the bank's lending remained far below the percentage of LMI families in the AA. The bank's lending to low-income borrowers was slightly above aggregate lending, while lending to moderate-income borrowers was slightly lower than aggregate lending.

The Lawton area is considered a somewhat difficult market for home loans given the presence of Ft. Sill. Many LMI persons in the area are new recruits temporarily stationed at Ft. Sill for basic training. Recruits generally receive free housing or financial assistance from the military and have less of a need for home loan products. Additionally, the bank has high level of competition for these loans given the saturation of financial institutions in the Lawton area. The poor penetration of LMI borrowers in the Lawton MSA is understandable given these market conditions.

Oklahoma Non-MSA AA

Home mortgage lending in the AA reflects reasonable penetration among LMI families and meets the standard for satisfactory performance. In 2016, lending to LMI borrowers was below the percentage of LMI families in the AA, but within reason. The bank significantly exceeded aggregate lending to low-income borrowers and was near aggregate lending to moderate-income borrowers. For 2017-2018, the bank's lending to low-income borrowers was well below the percentage of low-income families in the AA but exceeded aggregate lending. Lending to moderate-income borrowers was excellent with bank loans significantly exceeding the percentage of moderate-income families and aggregate lending.

***Small Loans to Businesses***

Refer to Table R in 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.

Lawton Partial MSA AA

Lending to businesses in the AA reflects excellent penetration of businesses with annual revenues of less than \$1.0 million and exceeds the standard for satisfactory performance. The number of small business loans originated in 2016 was insufficient to provide a meaningful analysis of borrower distribution with revenues of less than \$1.0 million. The borrower distribution of loans to small businesses based on a sample of 2017-2018 originations reflects an excellent penetration of loans to businesses with revenues of less than \$1.0 million and an excellent penetration compared to aggregate peer data.

Oklahoma Non-MSA AA

Lending to businesses in the AA reflects excellent penetration of businesses with annual revenues of less than \$1.0 million and exceeds the standard for satisfactory performance. The borrower distribution of loans to small businesses based on a sample of 2016 originations reflects an excellent penetration of loans to businesses with revenues of less than \$1.0 million and an excellent penetration compared to aggregate peer data. The borrower distribution of loans to small businesses based on a sample of 2017-2018 originations reflects an excellent penetration of loans to businesses with revenues of less than \$1.0 million and an excellent penetration compared to aggregate peer data.

**Responses to Complaints**

FNB&T has not received any complaints about its performance in helping to meet the credit needs of its AAs during this evaluation period.

**COMMUNITY DEVELOPMENT ANALYSIS****Community Development Loans**

CD lending in the bank's AA reflects adequate responsiveness. During the evaluation period, FNB&T originated or participated in four qualified CD loans totaling \$1.1 million. Loans made helped create and retain jobs for LMI persons, facilitate services to LMI persons, and provide for affordable housing. Loans promoted economic development by funding a shell building for a local economic development entity and providing funding to a local business that retained an estimated 350 jobs in the Shawnee area. The bank

refinanced a loan to a non-profit housing developer that helps provide affordable housing in Creek, Pawnee, Hughs, Lincoln, Pottawatomie, and Okfuskee counties. FNB&T participated in a loan to a non-profit organization in Shawnee, which provided childcare to LMI youths, provided 1,146 individuals access to facilities through financial assistance, and collaborates with local entities to provide other services to LMI persons.

### **Community Development Investments**

The bank has an adequate level of community development investments. Qualified investments include five (5) investments within the bank's AAs totaling \$920,000, a \$500,000 donation to the Citizen Potawatomie Community Development Corporation (CPCDC), a \$100,000 prior period equity investment in the Oklahoma MetaFund CDC (Small Business Investment Corporation), and multiple smaller donations to non-profit organizations serving the bank's AAs.

Qualified investments in the bank's AAs include bonds to construct and renovate facilities in school districts with a majority LMI students and a prior period investment in an economic development entity operating in Seminole, OK. Much of the area around Seminole is considered a distressed or underserved geography. FNB&T also purchased \$510,000 in bonds Oklahoma Development Finance Authority, which engages in economic development activities throughout the state, including the bank's AAs.

Donations totaled over \$600,000 and included a \$500,000 donation to the CPCDC and a \$100,000 donation to the Oklahoma MetaFund CDC. The CPCDC's mission is to finance, promote, educate and inspire entrepreneurial growth, economic opportunity, and financial well-being of the Citizen Potawatomie Nation Tribal Community and other under-served native populations in Oklahoma. The CPCDC offers financial education, access to capital, and other economic development services. The Oklahoma MetaFund CDC is a certified Community Development Financial Institution (CDFI). The Oklahoma MetaFund CDC works to invest in projects and businesses that create quality jobs, affordable housing, and other benefits to disadvantaged individuals and distressed geographic areas. In addition to these donations, various smaller dollar donations were made to non-profit entities providing affordable housing or social services to LMI individuals throughout the assessment period.

### **Community Development Services**

The level of CD services provided by bank employees and officers within the bank's AAs indicate excellent responsiveness to the needs of the community.

FNB&T bank officers have served in leadership positions with organizations that provide health services, youth programs, economic development, and financial literacy education. The following are examples of qualifying CD services.

#### ***Shawnee, Tecumseh, Mangum Chambers of Commerce***

Bank officers serve in leadership positions of the above Chambers of Commerce. These groups are primarily involved in small business and economic development activities that benefit their cities and the surrounding area.

#### ***Shawnee Economic Development Foundation & Greer County Economic Development Authority***

Bank officers serve in leadership positions of the above economic develop entities. These organizations work to attract new businesses and retain existing businesses in Greer County and the greater Shawnee area. The Shawnee Economic Development Foundation also constructed a shell building during the

assessment period, which could be used by manufacturing, distribution, or other types of businesses wishing to relocate to the area.

***Citizen Potawatomi Community Development Corporation***

President Larry Briggs serves on the Board of Directors of the CPCDC. The CPCDC provides both financing and counseling to Native American owned businesses. Many of these businesses would not have qualified for credit without this assistance and the CPCDC as a funding source. In addition to lending opportunities, the CPCDC provides workshops, networking activities, and training.

***Lions Club, Rotary Club, and Kiwanis Club***

Several bank officers are active in local civic organizations that provide services to LMI families. Membership is concentrated in the Shawnee area; however, some are active in Granite as well. The Lions Club is partnered with local eye care professionals to provide free eye exams and glasses to qualifying persons. The group also organizes and participates in various local events that benefit the community. Kiwanis provides various services to local youth. The majority of students in Shawnee school districts are eligible for free or reduced lunch. The Rotary Club is involved fundraisers supporting local charities and projects benefiting the community.

***Project Safe & Salvation Army***

Several bank officers and employees are active in Project Safe and the Salvation Army in Shawnee. Project Safe is a non-profit organization that provides emergency shelter and trauma informed services to victims of domestic violence, sexual assault, and stalking. The Shawnee Salvation Army provides a variety of services targeted towards LMI persons including emergency shelter.

## Appendix A: Scope of Examination

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The following table identifies the period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs 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>	01/01/2016 – 12/31/2018	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans Small Business Loans Community Development Loans, Investments, and Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not Applicable	Not Applicable
<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>		
Lawton Partial MSA	Full-Scope	The AA consists of the 32 tracts comprising Comanche County. AA is located in south-western Oklahoma and includes the cities of Lawton, Cache
Oklahoma Non-MSA	Full-Scope	This AA consists of two non-MSA areas in eastern and southwestern Oklahoma. The eastern non-MSA includes all of Pottawatomie County (16 tracts) and Hughes County (5 census tracts). The southwestern area includes Greer County (2 tracts), Jackson County (8 tracts), and Kiowa County (3 tracts).

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNBTC Non-MSA 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	2.3	14.0	72.1	11.6	0.0
Population by Geography	151,058	2.2	13.8	70.6	13.4	0.0
Housing Units by Geography	66,651	2.6	13.8	70.8	12.8	0.0
Owner-Occupied Units by Geography	39,519	1.4	11.8	71.8	15.0	0.0
Occupied Rental Units by Geography	16,253	5.5	16.7	66.9	10.8	0.0
Vacant Units by Geography	10,879	2.8	16.9	72.6	7.7	0.0
Businesses by Geography	7,339	5.3	14.9	65.8	14.1	0.0
Farms by Geography	699	0.3	14.6	73.5	11.6	0.0
Family Distribution by Income Level	38,820	22.3	17.1	20.6	39.9	0.0
Household Distribution by Income Level	55,772	24.8	16.1	17.5	41.6	0.0
Median Family Income Non-MSAs - OK		\$47,749	Median Housing Value			\$77,779
			Median Gross Rent			\$575
			Families Below Poverty Level			15.0%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: FNBTC Non-MSA 2017</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)	43	2.3	23.3	60.5	14.0	0.0
Population by Geography	151,877	2.1	22.1	59.4	16.3	0.0
Housing Units by Geography	67,505	2.3	22.6	59.4	15.7	0.0
Owner-Occupied Units by Geography	38,093	0.9	16.1	61.9	21.1	0.0
Occupied Rental Units by Geography	17,904	5.2	32.1	53.9	8.9	0.0
Vacant Units by Geography	11,508	2.6	29.1	59.7	8.6	0.0
Businesses by Geography	7,094	5.0	21.4	56.0	17.6	0.0
Farms by Geography	557	0.2	10.4	63.7	25.7	0.0
Family Distribution by Income Level	37,932	21.3	18.5	20.8	39.4	0.0
Household Distribution by Income Level	55,997	24.4	16.4	17.7	41.4	0.0
Median Family Income Non-MSAs - OK		\$51,698	Median Housing Value			\$87,918
			Median Gross Rent			\$635
			Families Below Poverty Level			13.9%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA adopted by FNB&T consists of whole geographies, does not reflect illegal discrimination, and does not arbitrarily exclude LMI geographies. It meets the requirements of the CRA regulation.

FNB&T's full-scope Non-MSA AA consists of 43 census tracts in six (6) different Oklahoma counties: Pottawatomie, Seminole, Hughes, Greer, Jackson, and Kiowa. None of these counties are located within an MDA. Based on the 2015 updated ACS census, there was one (1) low income-tract, 10 moderate-income tracts, 26 middle-income tracts, and six (6) upper income tracts. FNB&T's AA contains several underserved and distressed middle-income tracts including three (3) in Kiowa, three (3) in Hughes, two (2) in Greer, and seven (7) in Seminole. FNB&T has four (4) full-service branches and five (5) ATMs in the AA. FNB&T's branch in Shawnee is located in a middle-income tract, while the remaining branches in Holdenville, Mangum, and Granite are considered underserved and distressed middle-income tracts.

According to the updated ACS Census data, FNB&T's Non-MSA AA has a population of 151,877 people and has 37,932 families. Of the 37,932 families, 21.3 percent are considered low income, while 18.5 percent are considered moderate income. The AA contains 67,505 housing units with 56 percent being owner occupied. Households below the poverty level are 18 percent and households that receive public assistance total four percent.

Unemployment in the AA was 3.8 percent, which is slightly above the national unemployment rate of 3.7 percent. The economy is considered stable. Major employers in Shawnee, OK include the Citizen Potawatomie Nation, St. Anthony Hospital, Shawnee Public Schools, Walmart Supercenter, and others.

The community and business credit needs of the AA are served by other state and nationally chartered banks located in the AA and surrounding area. Community contact information indicated that consumer credit needs of the assessment area generally for auto loans and affordable housing. Improvements in the economy have increased demand for affordable housing somewhat, although the housing market remains depressed. Our contact indicated that local financial institutions were doing a good job of providing for these credit needs.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Lawton Partial MSA AA 2016</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)	32	9.4	28.1	37.5	21.9	3.1
Population by Geography	124,098	8.0	21.2	42.7	28.0	0.1
Housing Units by Geography	49,484	5.8	21.9	44.1	28.2	0.0
Owner-Occupied Units by Geography	25,720	2.9	11.2	47.4	38.5	0.0
Occupied Rental Units by Geography	18,037	8.4	33.2	41.9	16.5	0.0
Vacant Units by Geography	5,727	10.6	34.1	36.3	19.1	0.0
Businesses by Geography	5,354	15.7	21.5	38.1	24.2	0.5
Farms by Geography	276	3.3	6.5	44.2	46.0	0.0
Family Distribution by Income Level	30,269	22.0	17.6	21.0	39.3	0.0
Household Distribution by Income Level	43,757	23.7	16.1	18.4	41.7	0.0
Median Family Income MSA - 30020 Lawton, OK MSA		\$50,410	Median Housing Value			\$102,200
			Median Gross Rent			\$659
			Families Below Poverty Level			14.1%
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Lawton Partial MSA AA 2017</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)	32	9.4	31.3	34.4	21.9	3.1
Population by Geography	125,531	6.4	23.8	41.1	28.6	0.1
Housing Units by Geography	51,481	7.0	25.4	38.4	29.2	0.0
Owner-Occupied Units by Geography	23,887	4.2	16.8	38.9	40.1	0.0
Occupied Rental Units by Geography	19,353	9.9	33.1	38.1	18.8	0.0
Vacant Units by Geography	8,241	8.2	32.2	37.7	21.9	0.0
Businesses by Geography	5,546	5.5	36.5	31.9	25.9	0.2
Farms by Geography	249	1.6	14.1	27.7	56.6	0.0
Family Distribution by Income Level	28,272	22.4	18.3	18.6	40.7	0.0
Household Distribution by Income Level	43,240	23.5	16.4	17.9	42.1	0.0
Median Family Income MSA - 30020 Lawton, OK MSA		\$57,051	Median Housing Value			\$110,561
			Median Gross Rent			\$772
			Families Below Poverty Level			13.9%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

The AA adopted by FNB&T consists of whole geographies, does not reflect illegal discrimination, and does not arbitrarily exclude LMI geographies. It meets the requirements of the CRA regulation.

FNB&T's full-scope Lawton MSA AA consists of the 32 tracts comprising Comanche County. Based on the 2015 updated ACS census, the AA contains three (3) low-income tracts, 10 moderate-income tracts, 11 middle-income tracts, and seven upper income tracts. FNB&T has two (2) branches located in the AA and two (2) ATMs. Both locations are within upper and middle-income census tracts. It was noted that both branches are in very close proximity to moderate-income tracts. The Lawton area is considered a competitive market for financial institutions with 13 FDIC-insured institutions operating within the Lawton MSA. FNB&T has a relatively small presence in Comanche County with only 0.7 percent of the area's market share in 2018.

According to the updated ACS Census data, the Lawton MSA AA has a population of 125,531 people and has 28,272 families. Of the 28,272 families, 22.4 percent are considered low income, while 18.3 percent are considered moderate income. The AA contains 51,481 housing units with 46 percent being owner occupied. Households below the poverty level are 16 percent and households that receive public assistance total 5 percent.

Unemployment in the AA was 7.3 percent compared to the national average of 3.7 percent. Fort Sill is the area's largest employer followed by Goodyear Tire & Rubber Co., Lawton Public Schools and Comanche County Memorial Hospital. Approximately 300,000 soldiers attend basic training at Fort Sill annually. Fort Sill is primarily a training base for Army service members. As such, most recruits will not remain in the area after their training period.

Primary credit needs for new military personnel typically do not include housing as they are provided housing or housing subsidies, which reduces opportunities for HMDA loans in the AA. They also do not generally require commercial lending. Community contact information indicated that the primary credit needs of the AA were being met overall. There is still a need for consumer credit with reasonable rates and financial literacy education programs given the volume of new military recruits in the area.

## 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. Tables without data are not included in this PE.

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.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
Lawton MSA	13	802	21.7	3,126	2.9	7.7	1.5	11.2	15.4	6.7	47.4	61.5	45.4	38.5	15.4	46.3	0.0	0.0	0.2
Non-MSA	47	4,909	78.3	3,151	1.4	0.0	0.5	11.8	8.5	8.2	71.8	80.9	68.7	15.0	10.6	22.7	0.0	0.0	0.0
<b>Total</b>	<b>60</b>	<b>5,711</b>	<b>100.0</b>	<b>6,277</b>	<b>2.0</b>	<b>1.7</b>	<b>1.0</b>	<b>11.6</b>	<b>10.0</b>	<b>7.4</b>	<b>62.2</b>	<b>76.7</b>	<b>57.1</b>	<b>24.2</b>	<b>11.7</b>	<b>34.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017 – 2018
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 Loan	Aggt.	% of Owner-Occupied Housing Units	% Bank Loan	Aggt.	% of Owner-Occupied Housing Units	% Bank Loan	Aggt.	% of Owner-Occupied Housing Units	% Bank Loan	Aggt.	% of Owner-Occupied Housing Units	% Bank Loan	Aggt.
Lawton MSA	28	2,762	27.5	2,870	4.2	0.0	1.6	16.8	10.7	11.5	38.9	42.9	38.4	40.1	46.4	48.4	0.0	0.0	0.0
Non-MSA	74	5,280	72.5	3,133	0.9	0.0	0.4	16.1	21.6	14.6	61.9	67.6	57.4	21.1	10.8	27.6	0.0	0.0	0.0
<b>Total</b>	<b>102</b>	<b>8,042</b>	<b>100</b>	<b>6,003</b>	<b>2.2</b>	<b>0.0</b>	<b>1.0</b>	<b>16.4</b>	<b>18.6</b>	<b>13.1</b>	<b>53.0</b>	<b>60.8</b>	<b>48.3</b>	<b>28.4</b>	<b>20.6</b>	<b>37.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0.



Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
Lawton MSA	13	802	21.7	3,126	22.0	0.0	3.4	17.6	7.7	9.9	21.0	7.7	19.1	39.3	23.1	36.6	0.0	61.5	31.0
Non-MSA	47	4,909	78.3	3,151	22.3	10.6	4.2	17.1	10.6	13.2	20.6	12.8	20.7	39.9	59.6	43.1	0.0	6.4	18.8
<b>Total</b>	<b>60</b>	<b>5,711</b>	<b>100.0</b>	<b>6,277</b>	<b>22.2</b>	<b>8.3</b>	<b>3.8</b>	<b>17.3</b>	<b>10.0</b>	<b>11.6</b>	<b>20.8</b>	<b>11.7</b>	<b>19.9</b>	<b>39.7</b>	<b>51.7</b>	<b>39.8</b>	<b>0.0</b>	<b>18.3</b>	<b>24.9</b>

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017 – 2018
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	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.	% Families	% Bank Loans	Aggt.
Lawton MSA	28	2,762	50.0	2,870	22.4	3.6	3.5	18.3	7.1	11.3	18.6	28.6	18.1	40.7	39.3	33.1	0.0	21.4	34.0
Non-MSA	74	5,280	72.5	3,133	21.3	5.4	4.3	18.5	27.0	14.8	20.8	21.6	20.1	39.4	35.1	41.6	0.0	10.8	19.2
<b>Total</b>	<b>102</b>	<b>8,042</b>	<b>100.0</b>	<b>6,003</b>	<b>21.8</b>	<b>4.9</b>	<b>3.9</b>	<b>18.4</b>	<b>21.6</b>	<b>13.1</b>	<b>19.9</b>	<b>23.5</b>	<b>19.2</b>	<b>39.9</b>	<b>36.3</b>	<b>37.5</b>	<b>0.0</b>	<b>13.7</b>	<b>26.3</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
Lawton MSA		--	--	1,444	15.7	--	12.5	21.5	--	20.3	38.1	--	33.1	24.2		34.1	0.5	--	0.1
Non MSA	22	1,546	100	1,831	5.3	4.55	4.2	14.9	4.54	8.4	65.8	81.82	75.8	14.1	9.09	11.7	0.0	--	0.0
<b>Total</b>	<b>22</b>	<b>1,546</b>	<b>100</b>	<b>3,275</b>	<b>9.7</b>	<b>4.55</b>	<b>7.8</b>	<b>17.7</b>	<b>4.54</b>	<b>13.6</b>	<b>54.1</b>	<b>81.82</b>	<b>57.0</b>	<b>18.3</b>	<b>9.09</b>	<b>21.6</b>	<b>0.2</b>	<b>--</b>	<b>0.0</b>

Source: 2016 D&B Data; 2016 CRA Aggregate Data. Bank Data; 01-01-16 – 12-31-16 Sample, "--" data not available.  
Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017 – 2018
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	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
Lawton MSA	22	1,723	30.43	1,388	5.5	0.00	3.4	37.1	59.09	33.6	31.7	18.18	30.4	25.6	22.73	32.4	0.1	--	0.2
Non MSA	24	3,939	69.57	1,807	5.1	4.17	4.8	21.8	8.33	14.9	55.8	70.83	59.7	17.3	16.67	20.7	0.0	--	0.0
<b>Total</b>	<b>46</b>	<b>5,662</b>	<b>100</b>	<b>3,195</b>	<b>5.3</b>	<b>4.17</b>	<b>4.2</b>	<b>28.4</b>	<b>33.71</b>	<b>23.0</b>	<b>45.4</b>	<b>44.51</b>	<b>46.9</b>	<b>20.8</b>	<b>19.7</b>	<b>25.8</b>	<b>0.0</b>	<b>--</b>	<b>0.1</b>

Source: 2017 D&B Data; 2017 CRA Aggregate Data. Bank Data: 01/01/2017 - 12/31/2018 Sample, "--" data not available.  
Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$ (000's)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lawton MSA	--	--	--	1,444	79.3	--	63.9	4.7	--	16.0	--
Non MSA	22	1,304	100	1,831	78.2	86.36	60.9	5.1	13.64	16.7	--
<b>Total</b>	<b>22</b>	<b>1,304</b>	<b>100</b>	<b>3,275</b>	<b>78.7</b>	<b>86.36</b>	<b>62.2</b>	<b>4.9</b>	<b>13.64</b>	<b>16.4</b>	<b>--</b>

Source: 2016 D&B Data; 2016 CRA Aggregate Data. Bank Data: 01/01/2016 - 12/31/2016 Sample, "--" data not available.  
Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017 – 2018
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	Aggt.	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Lawton MSA	22	1,723	30.4	1,388	79.1	86.36	61.5	4.9	13.64	15.9	--
Non MSA	24	3,939	69.6	1,807	77.8	91.67	57.9	5.4	8.33	16.8	--
<b>Total</b>	<b>46</b>	<b>5,662</b>	<b>100</b>	<b>3,195</b>	<b>78.4</b>	<b>89.02</b>	<b>59.5</b>	<b>5.2</b>	<b>11.0</b>	<b>16.4</b>	<b>--</b>

Source: 2017 D&B Data; 2017 CRA Aggregate Data. Bank Data: 01/01/2017 - 12/31/2018 Sample. "--" data not available.  
Due to rounding, totals may not equal 100.0.