



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

April 29, 2019

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank and Trust Company of Ardmore  
Charter Number 13677

405 West Main Street  
Ardmore, OK 73401

Office of the Comptroller of the Currency  
Oklahoma City Field Office  
The Harvey Parkway Building  
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Oklahoma City, OK 73116-7908

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

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**Overall CRA Rating: This Institution is rated Satisfactory.**

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

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

The major factors that support this rating include:

- A majority of First National Bank and Trust's (FNBT's) loans were originated within their assessment areas (AAs).
- The loan-to-deposit (LTD) ratio is reasonable and meets the standard for satisfactory performance.
- The bank's distribution of loans to businesses of different sizes and individuals of different income levels reflects reasonable penetration and is satisfactory.
- The geographic distribution of loans reflects a reasonable dispersion throughout the AAs and is satisfactory.
- FNBT's community development (CD) performance demonstrates satisfactory responsiveness to the CD needs of its AAs.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Description of Institution

As of December 31, 2018, FNBT reported total assets of is a \$511 million and is headquartered in Ardmore, Oklahoma, located in South Central Oklahoma. FNBT is a subsidiary of The First National Corporation of Ardmore, Inc., a one-bank holding company headquartered in Ardmore, Oklahoma.

The main bank is located at 405 West Main Street with a detached drive-in facility and ATM located across the street. FNBT has nine locations that are all located within the state of Oklahoma and within its AAs. FNBT has not opened or closed any branches since the previous CRA evaluation. However, in July of 2016, the bank converted a loan production office (LPO) in Norman to a branch. The Norman branch is located in Cleveland County, which is part of the OKC MSA. The tables below provide information on FNBT's branch and ATM locations. All of the branch locations, except the limited service Norman branch, have a drive-in facility.

FNBT'S BRANCH LOCATIONS		
Location	Address	City
Main Bank	405 West Main Street	Ardmore
Broadway Branch	1226 West Broadway	Ardmore
12 <sup>th</sup> Street Branch (Drive-In Facility only)	1402 12 <sup>th</sup> Street North West	Ardmore
Lone Grove Branch	Highway 70 & Newport Road.	Lone Grove
Marietta Branch	1101 Memorial Drive	Marietta
Ringling Branch	125 West Main	Ringling
Sulphur Branch	2013 West Broadway	Sulphur
Velma Branch	4 <sup>th</sup> & Main Street	Velma
Norman Branch	716 Wall Street	Norman

FNBT'S ATM LOCATIONS		
Location	Address	City
Main Bank Drive-In Facility	115 D Street NW	Ardmore
Broadway Branch	1226 West Broadway	Ardmore
12 <sup>th</sup> Street Branch	1402 12 <sup>th</sup> Street North West	Ardmore
OK One Stop (ATM only)	2500 West Broadway	Ardmore
Lone Grove Branch	Highway 70 & Newport Road	Lone Grove
Marietta Branch	1101 Memorial Drive	Marietta
Ringling Branch	125 West Main Street	Ringling
Speedy G's Store (ATM only)	31298 US Hwy 7	Ringling
Sulphur Branch	2013 West Broadway	Sulphur
Speedy G's Store (ATM only)	102 Purdue Street	Velma
Velma Branch	4th & Main Street	Velma

The bank's primary focus is to serve commercial and consumer customers located in the AAs. FNBT meets these needs by providing various types of loan and deposit products



and services, as well as Internet banking, telephone banking, and asset management services. The bank has recently added mobile banking. Through a third-party provider, the bank also sells non-deposit investment products to retail customers. The bank lobby services are provided Monday through Friday at all locations. All locations have Saturday drive-in services except the Velma and Norman branches. The ability to lend in its AAs continues to be impacted by very strong competition from a substantial number of other banks and financial institutions or branches of those institutions.

As of December 31, 2018, FNBT’s total assets equaled \$511 million, of which \$329 million, or 64 percent, were comprised of various types of loans to individuals, commercial businesses, and commercial and residential real estate. Specifically, the bank’s loan portfolio consists of the following:

LOAN CATEGORY	\$ (000)	%
Commercial Real Estate	\$104,211	31.64%
Commercial and Industrial	\$100,841	30.62%
Residential Real Estate	\$59,958	18.20%
Agricultural	\$35,893	10.90%
Individual Loans	\$17,339	5.26%
Other	\$11,111	3.38%
Total	\$329,353	100.00%

There are no legal, financial, or other factors impeding the bank’s ability to help meet the credit needs of the AAs. FNBT is involved in and provides support to meet the community’s financial needs. The bank received an overall rating of “**Satisfactory**” at the last CRA evaluation dated August 17, 2015.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The full-scope review of FNBT’s Non-MSA AA included a random sample of small business loans originated in 2016-2018 and all HMDA loans (home purchase, home refinance, and home improvement) originated in 2017-2018. FNBT became a HMDA reporter starting in 2017 with the conversion of the Norman LPO into a branch in 2016.

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 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 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 Community Development Test are based on CD activities from August 17, 2015 through December 31, 2018.

## **Data Integrity**

A data integrity review commenced on December 14, 2018, to test Home Mortgage Disclosure Act Loan Application Register (HMDA LAR) data for years 2017-2018. The bank became a HMDA reporting starting in 2017. Our findings indicated that the bank has instituted effective processes and internal controls for collecting, verifying, and submitting reliable HMDA data.

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

The AA adopted by FNBT consists of whole geographies, does not reflect illegal discrimination, and does not arbitrarily exclude low- or moderate-income geographies. As of the examination, the bank's AA consisted of five counties in their entirety: Carter, Jefferson, Love, Murray, and Stephens counties. The composition of the AA meets the requirements of the CRA regulation and is comprised of 31 census tracts with no low-income census tracts, three moderate-income census tracts, 20 middle-income census tracts, and eight upper-income census tracts based on the updated 2015 ACS census data. Refer to Appendix A for more information on the bank's Non-MSA AA.

In July 2016, the bank converted an LPO in Norman, OK to a branch. This would be the first branch location in the Oklahoma City MSA and caused the bank to become a HMDA reporter beginning in 2017. This is a limited service branch in that it does not take cash deposits, does not have an ATM, night drop or drive-thru facility, has limited hours of operation, and has not originated any mortgage loans and limited consumer loans during the evaluation period. The branch holds less than 5 percent of the bank's loans and less than 1 percent of the bank's total deposits. An evaluation of this AA was not performed since meaningful performance data would not result.

## **Ratings**

The bank's overall rating is based on the bank's lending performance in the Non-MSA AA. More weight was given to small business lending performance than to the home mortgage lending since small business lending is by far the bank's primary loan type. Also, more weight was given to the distribution of loans to borrowers of different incomes and to businesses of different sizes than to the geographic distribution of loans. The bank has no low-income census tracts during the evaluation period. In 2016, the bank had five moderate-income census tracts. In 2017-2018, the number of moderate-income tracts was reduced to three.

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

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

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

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

# Conclusions with Respect to Performance Tests

## LENDING TEST

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

To evaluate FNBT’s lending performance, we reviewed all HMDA loans originated in 2017 and 2018. In addition, we evaluated a random sample of 60 small business loans originated in 2016 through 2018. Small business and residential real estate loans serve as FNBT’s primary loan products. Based on the analysis and consistent with available resources and capabilities, FNBT is meeting the credit needs of the AA in a satisfactory manner. The bank’s LTD is satisfactory and meets the standard for satisfactory performance. The distribution of home mortgage loans and business loans to individuals of different income levels and businesses of different sizes reflects a reasonable penetration and is satisfactory. The geographic distribution of loans reflects a reasonable dispersion of loans to LMI geographies and reflects satisfactory performance.

### Loan-to-Deposit Ratio

FNBT’s LTD ratio is satisfactory and meets the standard for satisfactory performance. The bank’s LTD ratio as of December 31, 2018 was 79 percent. The bank’s average quarterly LTD ratio from September 30, 2015 through December 31, 2018 was 67 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 \$400 million and \$650 million, for the same time period. FNBT’s average LTD ratio of 67 percent is consistent with the average of the four comparable banks of 73 percent. These average LTD ratios are detailed in the following table.

Loan-to-Deposit Ratios		
Institution	Total Assets \$000’s (As of 12/31/18)	Average Loan to Deposit Ratio
<b>First National Bank &amp; Trust Co. of Ardmore</b>	<b>\$510,897</b>	<b>67.27%</b>
American Nation Bank, Ardmore	\$411,203	66.22%
Republic Bank & Trust, Norman	\$555,744	79.13%
First Bank & Trust, Duncan	\$585,397	78.30%
First National Bank and Trust, Chickasha	\$626,286	70.26%

Source: Institution Reports of Condition from September 30, 2015 to December 31, 2018.

## Lending in Assessment Area

FNBT's lending in their AAs is satisfactory and meets the standard for satisfactory performance. FNBT originated a majority of the number and dollar amount of home mortgage and small business in its AAs. As depicted in the following table, 81.7 percent of the number and 75.1 percent of the dollar amount of loans originated in FNBT's AAs.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	184	80.0	46	20.0	230	16,461	73.7	5,876	26.3	22,337
Small Business	53	88.3	7	11.7	60	4,444	80.8	1,052	19.2	5,496
<b>Total</b>	<b>237</b>	<b>81.7</b>	<b>53</b>	<b>18.3</b>	<b>290</b>	<b>20,905</b>	<b>75.1</b>	<b>6,928</b>	<b>24.9</b>	<b>27,833</b>

Source: 1/1/2017-12/31/2018 HMDA and 1/1/2016-12/31/2018 CRA Bank Data

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

### Ardmore Non-MSA AA

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

FNBT's distribution of home mortgage loans reflects a poor distribution to low-income families and an adequate distribution to moderate-income families. The distribution of business loans reflects reasonable penetration for overall satisfactory performance.

When assessing the penetration of home mortgage lending to low-income families, consideration is given to the fact that LMI families have difficulty qualifying for conventional home mortgage products without flexible terms or reduced closing costs. In FNBT's Non-MSA AA, a low-income person earns less than \$27,250 annually, based on the 2018 median family income (MFI), while the average median housing cost in the bank's AA is \$94,600. Consequently, many LMI families choose to rent rather than purchase homes. According to the updated 2015 ACS Census data, approximately 54 percent of households in the AA are on fixed income from social security or retirement; and 28 percent of the housing units in the AA are rental property. Fifteen percent of the population in the bank's AA are below the poverty level or on public assistance.

The borrower distribution of home mortgage loans based on 2017-2018 originations reflects a poor penetration to low-income families and excellent penetration when compared to aggregate peer data. The distribution of home mortgage loans to moderate-income families reflects an adequate penetration to moderate-income families and a good penetration compared to aggregate peer data.

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

The borrower distribution of loans to small businesses based on a sample of 2017-2018 originations reflects a reasonable penetration of loans to businesses with revenues of less than \$1.0 million and an excellent penetration compared to aggregate peer data.

### **Geographic Distribution of Loans**

Refer to Table O and Q in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases. Note that for 2016-2018 the bank has no low-income census tracts and only three moderate-income tracts in their 31 tract Non-MSA AA for the 2017-2018 time period. As a result, less weight was given to the geographic distribution of loans than to the borrower distribution of loans.

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

FNBT's geographic distribution of home mortgage loans for 2017-2018 is satisfactory. The geographic distribution to moderate-income tracts is adequate compared to the percentage of home ownership in those areas and excellent when compared to aggregate peer data.

FNBT's overall geographic distribution of business loans is reasonable. The geographic distribution for 2016 was adequate as the percent of bank loans originated in moderate-income tracts was somewhat lower than both the percentage of business loans in those tracts and to aggregate peer data. The geographic distribution for 2017-2018 was excellent as the percentage of the bank's business loans to moderate-income tracts exceeded both the percentage of businesses located in moderate-income tracts and aggregate peer data.

### **Responses to Complaints**

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

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the CD Test is rated "Satisfactory." FNBT's CD performance demonstrates adequate responsiveness to the CD needs of its AA.

Opportunities for qualified community development loans and investments are limited in the bank's AA. A majority of the AA is comprised of rural, low-density areas. The largest city in the AA is Ardmore, which has a population of approximately 24,000. None of the five counties in the bank's full-scope AA are located in a MSA.

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

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

Qualifying CD loans are those that meet the definition of CD, as defined in the CRA regulations. FNBT's level of CD loans indicates adequate responsiveness to the needs of the bank's AA. During the evaluation period, the bank originated or renewed 82 loans totaling \$40 million that qualify as CD loans.

Fifteen loans totaling \$24 million were funded that provided community services. Forty loans totaling \$13.2 million were extended to businesses that promoted economic development by creating or maintaining LMI jobs. Nineteen loans totaling \$2.3 million were extended in the Downtown Historic District contributing to revitalization/stabilization or economic development of the area. Eight loans totaling \$521 thousand provided affordable housing. Following are details on some of the CD loans originated by the bank during the evaluation period.

FNBT originated or renewed 15 loans totaling \$24 million that provided funding for community services. FNBT originated two loans totaling \$12.9 million that funded the construction and provided equipment for a new school in Loan Grove and a new high school, library, and media center in Davis. In the Lone Grove and Davis ISDs, 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. Four loans totaling \$9.8 million were extended to one borrower for the construction and permanent financing of a two-county DHS building in southern Oklahoma. The DHS building houses all employees from Carter and Love counties. The DHS center expanded the community services in the AA, as well as created and maintained LMI jobs.

Five loans totaling \$177 thousand were extended to purchase and/or renovate multiple properties, and to purchase transportation to be used by a nonprofit organization. The organization's mission is to provide safe, faith based, structured based living environment for men in early recovery from substance and alcohol abuse. Three additional loans

financed the purchase or renovation of property used by service organizations to provide community services for LMI individuals.

FNBT extended or renewed 40 loans to 19 different borrowers for \$13.2 million that created or maintained LMI jobs. Of those loans, 15 loans to nine borrowers totaling \$3.1 million were extended to purchase, renovate and/or equip convenience stores. The bank originated several additional loans to purchase, renovate and/or equip restaurants and a grocery store. The majority of the jobs in the stores and restaurants are LMI jobs. Nine loans to one borrower included funds to operate and expand the business, which maintained and created LMI jobs. One loan for \$7 million was to refinance and consolidate multiple projects taking place in Ardmore. The organization serves as the financing vehicle for the ongoing City of Ardmore projects. The majority of the projects financed related to the preservation of downtown Ardmore, which is part of the Historic Preservation Plan.

FNBT has also extended 17 revitalization/stabilization loans to nine borrowers in the downtown Ardmore area. The loans were extended to purchase, refinance and/or make improvements to a variety of businesses. Businesses included restaurants, retail stores, commercial offices and service industry businesses. All of the businesses are located in the Downtown Historic District. The city, in conjunction with the Ardmore Main Street Authority and the Ardmore Historic Preservation Board, have developed a Historic Preservation Plan to encourage economic redevelopment and revitalization of downtown Ardmore as a viable economic unit critical to the tax base of the community. The Plan supports and encourages efforts to establish downtown Ardmore as a mixed use center that includes a variety of businesses. The financing of many of these businesses also provided economic development through job creation and retention of LMI jobs. Two additional loans totaling \$55 thousand were extended to the town of Cornish to assist with repairs to the wastewater lift station that was not operational. Cornish is located in a designated Distressed/Underserved middle-income geography due to the high level of poverty in this remote rural area. The loans provided the necessary funds to assist the town in meeting the essential infrastructure needs of the community.

FNBT extended eight loans to two different borrowers to purchase and/or renovate homes that provide affordable housing in the Ardmore and Lone Grove areas. Loans were to purchase, repair, and maintain the homes. All of the units rent for rates that are below the fair market rents in the area, thus providing housing for LMI individuals.

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

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

During the evaluation period, CD investments and donations totaled \$3.3 million. The bank invested in three qualified school bonds issued by Love County ISD totaling \$1.35



million. The purpose of the bonds were to construct, furnish, and equip a new elementary school and gymnasium in Thackerville. An additional \$1.8 million represents eight prior period investments that are still outstanding. Seven of the bonds were to remodel and repair Carter County ISD school facilities in Dickson and Fox. One bond was to construct and equip a safe room/classroom addition at a Marietta Elementary School in Love County ISD. The bonds were issued by Carter and Love County ISDs, where the 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.

The bank made a total of 73 qualified donations totaling \$107 thousand during the evaluation period. Donations were made to local non-profit organizations that provide a wide variety of social services, healthcare services, and youth programs that are targeted to LMI persons. Donations were also made to organizations that promote economic development in the local communities in FNBT's AA.

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

The level of qualified CD services indicates adequate responsiveness to the needs of the bank's AA. Bank officers serve in leadership positions of organizations that provide community services to LMI families. In these roles, they provide technical expertise and financial assistance to these organizations. Bank officers also serve in leadership positions of organizations involved in economic and small business development. The following are examples of some qualified CD services:

- ***Ardmore Chamber of Commerce/Sulphur Chamber of Commerce/Chamber of Commerce Foundation***  
Bank officers are active in the local Chambers of Commerce. Four bank officers serve on the board and various committees of these organizations, as well as, hold various officer positions within the Chambers. The Chamber of Commerce for these areas are focused on CD. They provide technical expertise through their involvement with the planning, budgeting, and financing activities. The Chambers are active with regard to economic development and the retention and recruiting of new businesses within their communities. The Ardmore Chamber of Commerce is very active in economic and small business development.
- ***Partners in Education (PIE)***  
Bank officers serve as Treasurer of PIE and on the Youth Advisory Board Committee, as well as one officer being a founding member. PIE is managed and funded through the Chamber of Commerce Foundation. It is a collaborative effort with local businesses to address the education readiness of the students in the local school district. The PIE initiative has funded day long educational competitions and funded software that is used by the local schools to assess student development. When the Community in Schools program lost their funding, PIE stepped in with help from local businesses and churches to provide a summer long day care program for LMI families.

- ***Mercy West Statewide Board/Mercy Community Activity Committee/Mercy Hospital***  
 Two bank officers serve on the Board and Finance Committee of Mercy West, with one officer previously being Chairman of the Finance Committee. One of the officers has also served on the Executive Committee of the Mercy Community Activity Committee. The officers use their banking and finance knowledge to assist the hospital on financial matters. Mercy Hospital, a nonprofit organization, is the premier health facility in Southern Oklahoma serving 100,000 residents. Many of the patients can't afford health care. Mercy Hospital meets the essential health care needs for the public welfare of a large portion of South Central Oklahoma.
- ***United Way Southern Oklahoma/United Way Stephens County***  
 Three officers are active in the local United Way organizations. Bank officers serve on the board and one is Chairman of the United Way Commercial Division in Southern Oklahoma. An officer in the Velma branch serves as Chairman of the Board and Chairman of the Financial Committee in Stephens County. The officers provide financial expertise on various matters within the organization. The United Way works to help improve the health, safety, education, and economic well-being of at-risk individuals and families.
- ***Family Shelter of Southern Oklahoma***  
 A bank officer served as Board Secretary and served on the Finance Committee of this organization. The officer consulted on financial decisions for the shelter, aided with fundraising, and budgeting. This organization helps women and children acquire the information and survival skills necessary to take control of their lives and encourages them to remove themselves from violent and dangerous situations.
- ***Salvation Army***  
 A bank officer serves on the board of this organization that provides food, housing assistance, and job-related services to disadvantaged and homeless individuals.

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

FNBT has demonstrated adequate responsiveness to the identified needs within their AA. The level of CD lending is adequate and has been responsive to the need for LMI jobs, affordable housing, and the revitalization of the Ardmore business district. LMI jobs and affordable housing, both owner occupied and rental, have been identified as critical needs within the bank's AA. Bank officers have taken on leadership positions with local organizations that provide a wide variety of community services.

# Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (1/1/16 to 12/31/18) Investment and Service Tests and CD Loans: (8/17/15 to 12/31/18)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank and Trust (FNBT), Ardmore, OK	Home Mortgage Loans Small Business Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Ardmore Non-MSA	Full-Scope	

# Appendix B: Community Profiles for Full-Scope Areas

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Ardmore 2016 Non-MSA AA, 2010 Census</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)	31	0.0	16.1	64.5	19.4	0.0
Population by Geography	121,988	0.0	16.1	63.4	20.5	0.0
Housing Units by Geography	56,274	0.0	12.8	64.2	23.0	0.0
Owner-Occupied Units by Geography	34,684	0.0	12.8	64.2	22.0	0.0
Occupied Rental Units by Geography	12,060	0.0	24.8	60.6	14.7	0.0
Vacant Units by Geography	9,530	0.0	18.4	67.2	14.4	0.0
Businesses by Geography	6,864	0.0	12.1	69.6	18.3	0.0
Farms by Geography	358	0.0	13.7	67.6	18.7	0.0
Family Distribution by Income Level	32,332	17.3	18.1	21.4	43.2	0.0
Household Distribution by Income Level	46,744	21.5	15.6	18.6	44.3	0.0
Median Family Income Non-MSAs - OK		\$47,749	Median Housing Value			80,917
			Median Gross Rent			550
			Households Below Poverty			10.4
<i>Source: 2010 U.S. Census and 2016 D&amp;B Data. 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: Ardmore 2017-2018 Non- MSA AA, 2015 ACS</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)	31	0.0	9.7	64.5	25.8	0.0
Population by Geography	122,977	0.0	7.9	61.4	30.8	0.0
Housing Units by Geography	56,795	0.0	8.3	61.0	30.6	0.0
Owner-Occupied Units by Geography	32,857	0.0	5.9	60.4	33.7	0.0
Occupied Rental Units by Geography	13,894	0.0	12.2	59.5	28.4	0.0
Vacant Units by Geography	10,044	0.0	11.0	65.1	23.8	0.0
Businesses by Geography	6,830	0.0	5.1	61.8	33.1	0.0
Farms by Geography	324	0.0	4.9	67.9	27.2	0.0
Family Distribution by Income Level	31,283	18.4	17.1	20.2	44.3	0.0
Household Distribution by Income Level	46,751	22.5	16.2	16.9	44.4	0.0
Median Family Income Non-MSAs - OK		\$51,698	Median Housing Value			94,600
			Median Gross Rent			649
			Households Below Poverty			11.2
<i>Source: 2015 updated ACS Census and 2017 D&amp;B Data. 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 FNBT consists of whole geographies, does not reflect illegal discrimination, and does not arbitrarily exclude low- or moderate-income geographies. It meets the requirements of the CRA regulation.

FNBT's full-scope Non-MSA AA consists of 31 contiguous census tracts in five different Oklahoma counties: Carter, Jefferson, Love, Murray, and Stephens Counties. None of these counties are located in an MSA. During the 2016-2018 evaluation period, there were no low-income census tracts. Based on the 2015 updated ACS census, there were thirty-one census tracts in FNBT's Non-MSA AA with no low-income tracts, three moderate-income tracts, 20 middle income tracts, and eight upper income tracts. Two of the middle-income tracts in Jefferson County are designated distressed and underserved nonmetropolitan geographies. The main bank and four of the branches are located in middle-income census tracts, with the Ringling branch located in one of the distressed and underserved middle-income tracts. The two branches in Ardmore are located in upper-income census tracts.

According to the 2015 updated ACS Census data, FNBT's Non-MSA AA has a population of 122,977 people. Although there are not any low-income census tracts in the AA, there are low- and moderate-income families in the AA. Of the 31,283 families, 18.4 percent are low-income families and 17.1 percent are moderate-income families. The AA contains 56,795 housing units with 32,857 or 58 percent being owner occupied. Households below the poverty level are 15 percent and households that receive public assistance total 3 percent.

The local economy is considered good and unemployment continues to be below national levels. Ardmore serves as the primary retail center for a seven county area of Southern Oklahoma. Over 400 general merchandise and specialty stores create retail sales of approximately \$505 million per year. Manufacturing, healthcare, wholesale distribution, agriculture, energy, and retail merchandizing are among the leading sources of income for the area. Michelin North America, Mercy Memorial Health Center, Dollar General Distribution Center, and Wal-Mart Supercenter are the largest employers in Ardmore and the surrounding communities. The Chickasaw Nation has several locations in the AA that provide employment opportunities. Valero Energy Corporation also has a large facility in Ardmore. The Ardmore Development Authority owns and operates four industrial parks.

Ardmore also has a growing research and development community. The Samuel Roberts Noble Foundation is highly regarded worldwide for research in biomedicine, plant biology, and agriculture. The Foundation conducts plant science and agricultural research that assists farmers and ranchers. The programs enhance agricultural productivity regionally, nationally, and internationally.

The community credit needs and business opportunities are also served by several other national and state chartered banks, as well as branches of those institutions, which are located in the AAs. The community contacts confirmed banking in South Central Oklahoma is competitive and that the banks were involved in the community and have been supportive of the programs.

Community contacts conducted with organizations that provide support and services in the bank's AAs were reviewed to help ascertain the credit needs of the AA. One contact thought

there was an increasing need for services for low- and moderate-income residents, specifically with a growing need for affordable housing.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

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



Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			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	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Ardmore Non-MSA	184	16,461	100.0	2,655	18.4	7.1	5.9	17.1	11.4	15.0	20.2	20.7	20.4	44.3	52.2	43.1	0.0	8.7	15.6		
<b>Total</b>	184	16,461	100.0	2,655	18.4	7.1	5.9	17.1	11.4	15.0	20.2	20.7	20.4	44.3	52.2	43.1	0.0	8.7	15.6		

Source: 2015 updated ACS Census 1/1/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Ardmore Non-MSA	27	2,642	100.0	1,908	79.0	59.3	56.3	6.5	40.7	14.4	0.0
<b>Total</b>	27	2,642	100.0	1,908	79.0	59.3	56.3	6.5	40.7	14.4	0.0
<i>Source: 2016 D&amp;B Data; 1/01/2016 - 12/31/2016 Bank Data, 2016 -CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>											

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	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Ardmore Non-MSA	26	1,802	100.0	1,979	78.6	61.5	58.2	6.5	38.5	15.0	0.0
<b>Total</b>	26	1,802	100.0	1,979	78.6	61.5	58.2	6.5	38.5	15.0	0.0
<i>Source: 2017 D&amp;B Data; 1/01/2017 - 12/31/2018 Bank Data, 2017 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>											

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Ardmore Non-MSA	184	16,641	100.0	2,655	0.0	0.0	0.0	5.9	3.8	3.3	60.4	70.7	61.0	33.7	25.5	35.7	0.0	0.0	0.0	
<b>Total</b>	184	16,641	100.0	2,655	0.0	0.0	0.0	5.9	3.8	3.3	60.4	70.7	61.0	33.7	25.5	35.7	0.0	0.0	0.0	

Source: 2015 updated ACS Census; 1/1/2017 - 12/31/2018 Bank Data, 2018 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		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Ardmore Non-MSA	27	2,642	100.0	1,908	0.0	0.0	0.0	12.1	7.4	10.0	69.6	85.2	62.8	18.3	7.4	27.3	0.0	0.0	0.0
<b>Total</b>	<b>27</b>	<b>2,642</b>	<b>100.0</b>	<b>1,908</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>12.1</b>	<b>7.4</b>	<b>10.0</b>	<b>69.6</b>	<b>85.2</b>	<b>62.8</b>	<b>18.3</b>	<b>7.4</b>	<b>27.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2016 D&B Data; 1/1/2016 - 12/31/2016 Bank Data, 2016 CRA Aggregate Data, "--" data not available due to rounding, totals may not equal 100.0*

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-2018**

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	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Ardmore Non-MSA	26	1,802	100.0	1,979	0.0	0.0	0.0	5.2	11.5	3.5	62.3	57.7	61.1	32.4	30.8	35.4	0.0	0.0	0.0
<b>Total</b>	<b>26</b>	<b>1,802</b>	<b>100.0</b>	<b>1,979</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>5.2</b>	<b>11.5</b>	<b>3.5</b>	<b>62.3</b>	<b>57.7</b>	<b>61.1</b>	<b>32.4</b>	<b>30.8</b>	<b>35.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2017 D&B Data; 1/1/2017 - 12/31/2018 Bank Data, 2018 CRA Aggregate Data, "--" data not available due to rounding, totals may not equal 100.0*