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**Comptroller of the Currency  
Administrator of National Banks**

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Southwestern District Office  
Licensing Operations  
1600 Lincoln Plaza  
500 North Akard  
Dallas, Texas 75201-3394

January 28, 1999

**CRA Decision #86  
February 1999**

William R. DaBoll  
DD&F Consulting Group  
601 South Rock Street  
Little Rock, AR 72202

Re: Application by First National Bank & Trust Co., Rogers, AR to purchase the Harrison, AR branch of Arvest Savings Bank, Tulsa, OK; Application #1998-SW-02-0069

Dear Mr. DaBoll:

This is to inform you that the Office of the Comptroller of the Currency (OCC) has approved the proposal by First National Bank and Trust Co., Rogers, Arkansas (FNBT) to purchase the assets and assume the liabilities of the Harrison, Arkansas branch of Arvest Savings Bank, Tulsa, Oklahoma.

The approval is granted based on a thorough review of all information available, including the commitments and representations made in the application and the reorganization agreement, as well as those of the bank's representatives. In particular, OCC relied on representations made by FNBT concerning its CRA performance. As you are aware, FNBT received a "Satisfactory" rating overall in its most recent public evaluation under the Community Reinvestment Act dated March 30, 1998, but with a "Needs to Improve" rating under the investment test component. In reviewing this application, we considered information provided subsequent to that evaluation by the bank about its CRA performance. FNBT has also represented that it will review existing plans and activities to identify ways to improve compliance with the investment performance test and will provide appropriate OCC officials with the results for review. In approving this application, we have relied specifically on this representation.

If the purchase and assumption is not consummated within one year from this date, the approval shall automatically terminate unless the OCC has granted an extension. The Southwestern District Office must be advised in writing at least 10 days in advance of the desired effective date for the purchase and assumption so that the OCC may issue the necessary certification letter.

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We will not issue a letter certifying consummation of the transaction until we have received:

1. a Secretary's Certificate for each applicant institution, certifying that a majority of the board of directors has agreed to the proposed purchase and assumption; and
2. an executed purchase and assumption agreement with articles of association for the resulting bank attached.

If you have already submitted any of these documents, it is not necessary to send duplicates.

Also enclosed is a survey letter requesting your feedback on the OCC's application process and the quality of service you received during the processing of this application. Your completion of this survey will assist us in improving our level of service and identifying problem areas.

Should you have any questions, contact me or Senior Corporate Analyst Karen H. Bryant at (214) 720-7052. Please include the application control number in all correspondence.

Yours truly,

/s/

Michael K. Hughes  
Licensing Manager

Enclosure