

Danny W Seibel
Debra G Seibel

Answer to Summons served 11-6-2024
Case # CJ2024-276

STATE OF OKLAHOMA }
GARVIN COUNTY } SS.
FILED
NOV 26 2024
AT _____ O'CLOCK _____ M.
LAURA LEE, Court Clerk
BY _____ DEPUTY

In response to the allegations laid forth in the above-referenced summons, we offer the following answers:

First Cause of Action:

Debra had no knowledge of any of the stated allegations put forth, she had no part in any of the allegations.

Danny did make misrepresentations, material (both in documentation and communications), which were relied upon by Mr. Justice and other Directors for the purpose of decision making. This was discovered in the fall of 2024 during the OCC safety and soundness examination of the First National Bank of Lindsay, Oklahoma.

Danny was aware of the fiduciary responsibility he owed to the shareholders and customers of the institution.

It was never my (Danny) intention to deceive, mislead, or falsely assure Mr. Justice, or other directors of the institution, nor Federal oversight.

Mr. Justice and others placed much trust in me (Danny) from his purchase of the bank in 2007. Together we all worked very hard to restore the bank from the brink of failure in just one year's time. As time progressed, especially during the COVID outbreak, many accounts (deposits and loans) began to experience problems. In addition, my father's health from heart disease (he had five bypasses conducted in the early 2000s) and Parkinson's Disease had progressed as well, which did require me to be away from the bank, at most once to twice per month.

I, Danny, did miss work over the past few years on what could be considered a frequent basis because of this and other personal health factors. I assert I did not go to Casinos during those work hours that were missed. The Casino was an emotional outlet and entertainment for Debra and I and we did frequent such places.

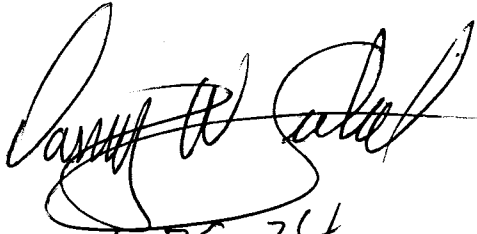
I, Danny, vehemently deny taking monies from the Bank (that I was not legally entitled to) for any purpose, nor taking bank property for personal use or any other purpose. I was provided "perks" or other benefits such as tickets for sporting events, a \$700/month car allowance which was added into my payroll, reimbursement for my cell phone expense, and other bank expenses for which I provided receipts and should still be kept at the bank, if not confiscated by federal regulators or other.


To the point that I told employees or others "not to tell" Mr. Jack Justice of things, I completely deny such statements. I do not recall any instance of telling any person "not to tell" or "don't tell" Jack Justice of anything. I claim any such assertion to be false.

To the claim of spending time with "known felons" and "at bars", I would ask the Plaintiff for specific persons. Debra and I both would many times when out for dinner or at casinos or other places encounter people who were customers of the bank or friends of acquaintances, the

statement of "bars" is misleading, as is "known felons", and leads to character defamation. Any "bars" we may have been to from our bank statements, with which I am certain the Plaintiff has had access to prior to October 18, 2024, were either at a casino where yes, we did consume bar drinks, or they were restaurants. We did not go to what would be considered "dive bars" or other places one would consider "bad places".

I, Danny, solely took actions that went against my fiduciary responsibilities to the Board of Directors of the First National Bank of Lindsay, and its customers. Those actions were wrongly taken out of deep internal fear for my job and position within the community. I truly believed I could eventually correct these actions with minimal loss to the bank. I truly wanted to help the Lindsay community and believed in certain customers, now knowing that belief was a mistake.


11-25-24


11-25-24