



## **PUBLIC DISCLOSURE**

JANUARY 06, 2020

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

**BANK OF COMMERCE  
RSSD# 152057**

**322 WEST 6TH STREET  
CHELSEA, OKLAHOMA 74016**

**Federal Reserve Bank of Kansas City  
1 Memorial Drive  
Kansas City, Missouri 64198**

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Bank of Commerce (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- An excellent distribution of loans occurs throughout the bank's AAs for the two products subject to this review.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

## SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. A full-scope review of the bank's lending performance was assessed within the bank's Tulsa Metropolitan AA, while the Northeast Oklahoma AA was subject to a limited-scope review based on lower lending volume. The following data was reviewed and considered, as follows:

- The bank's 16-quarter average NLTD ratio; and,
- A statistical sample of 70 small business loans taken from a universe of 107 loans originated between January 1, 2018 and December 31, 2018. The home mortgage review included the entire universe of 65 loan originations reported on the bank's 2016 and 2017 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers. More weight was placed on small business loans based on the bank's strategic focus on commercial lending.
- While conclusions with respect to home mortgage lending performance were evaluated for multiple years, only 2017 lending tables are reflected in the body of the report, with comparisons made to the bank's 2016 performance. The bank's 2016 home mortgage lending data can be found in Appendix B of this report.

## **DESCRIPTION OF INSTITUTION**

The bank is a community bank headquartered in Chelsea, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Commerce Bancshares, Inc., Catoosa, Oklahoma.
- The bank has total assets of \$146.9 million (MM) as of June 30, 2019.
- In addition to its main office in Chelsea, the bank has five additional offices located in Adair, Catoosa, Claremore, Sequoyah, and Tulsa.
- The bank operates five cash-dispensing only automated teller machines (ATMs) in Adair, Catoosa, Chelsea, Sequoyah, and Tulsa.
- The bank's primary business focus is commercial lending.

**TABLE 1  
COMPOSITION OF LOAN PORTFOLIO AS OF JUNE 30, 2019**

<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Commercial	61,308	60.8
Residential Real Estate	21,600	21.4
Consumer	10,850	10.8
Agricultural	4,727	4.7
Other	2,338	2.3
<b>Gross Loans</b>	<b>100,823</b>	<b>100.0</b>

*Note: Percentages may not total 100.0 percent due to rounding.*

The bank was rated Satisfactory under the CRA at its October 26, 2015 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

### **Net Loan-to-Deposit Ratio**

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and location within at least one of the bank's two AAs. The bank's NLTD ratio is reasonable.

The bank's NLTD ratio is below two of the comparable institutions but just slightly below the range of one other. Additionally, the bank's NLTD ratio is trending upward since the prior CRA

evaluation. The bank's NLTD ratio at 76.2 percent is an improvement from its ratio at the prior CRA evaluation, which was 67.7 percent.

**TABLE 2  
COMPARATIVE NLTD RATIOS**

Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			16-Quarter Average
Bank of Commerce	Chelsea, Oklahoma	146,937	76.2
First National Bank & Trust Company of Broken Arrow	Broken Arrow, Oklahoma	185,247	79.7
Triad Bank	Tulsa, Oklahoma	165,458	94.3
Yorktown Bank	Pryor, Oklahoma	119,388	101.1

### Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. A majority of the bank's loans, by number and dollar, are originated inside the AAs.

**TABLE 3  
LENDING INSIDE AND OUTSIDE THE AAs**

Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	31	6,395	88.6	97.4	4	172	11.4	2.6
Home Refinance	16	4,501	88.9	70.9	2	1,846	11.1	29.1
Home Improvement	8	639	72.7	78.7	3	173	27.3	21.3
Multifamily	1	990	100.0	100.0	0	0	0.0	0.0
<b>Total HMDA Loans</b>	<b>56</b>	<b>12,525</b>	<b>86.2</b>	<b>85.1</b>	<b>9</b>	<b>2,191</b>	<b>13.8</b>	<b>14.9</b>
Small Business Loans	50	4,671	71.4	67.5	20	2,247	28.6	32.5
<b>Total Loans</b>	<b>106</b>	<b>17,196</b>	<b>78.5</b>	<b>79.5</b>	<b>29</b>	<b>4,438</b>	<b>21.5</b>	<b>20.5</b>

Note: Percentages may not add to 100.0 percent due to rounding.

### Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts. The bank's overall geographic distribution of loans reflects excellent distribution throughout the AAs. The bank's distribution of lending by income level of census tract was reasonable for home mortgage loans and excellent for small business loans.

**Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has an overall reasonable penetration among individuals of different income levels and businesses of different sizes.

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**TULSA METROPOLITAN AA  
METROPOLITAN AREA  
(FULL-SCOPE REVIEW)**

**DESCRIPTION OF THE TULSA METROPOLITAN AA**

The bank's AA is comprised of Tulsa, Rogers, and Wagoner Counties in their entirety, as well as three census tracts in Northeastern Creek County (see Appendix A for an AA map). These counties are all part of the Tulsa Metropolitan Statistical Area (Tulsa MSA), which includes a total of seven counties.

- The Tulsa Metropolitan AA remains unchanged since the October 2015 performance evaluation and is comprised of 228 census tracts, including 17 low-, 62 moderate-, 81 middle-, and 68 upper-income tracts. The census tract designations represent a slight change since the prior evaluation in 2015, although the total numbers of tracts remain the same.
- Based on the June 30, 2019 FDIC Deposit Market Share Report, the bank's AA market share, at 0.4 percent, ranks 33rd of 51 FDIC-insured institutions operating from a total of 252 offices.
- To further augment the evaluation, two interviews recently conducted as part of the CRA evaluations of other area financial institutions in the AA were reviewed to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and to obtain perspectives on local economic conditions. One contact was a representative from an economic development organization that is involved in providing funding to small businesses for various projects that do not meet conventional loan underwriting standards. The second contact represented an organization that acts as an intermediary between start-up businesses and non-traditional funding sources.

**TABLE 4  
POPULATION CHANGE**

<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Tulsa County, Oklahoma	603,403	623,335	3.3
Wagoner County, Oklahoma	73,085	75,391	3.2
Rogers County, Oklahoma	86,905	89,190	2.6
Creek County, Oklahoma	69,967	70,761	1.1
Tulsa, Oklahoma MSA	937,478	962,676	2.7
State of Oklahoma	3,751,351	3,849,733	2.6

Source: 2010 U.S. Census Bureau Decennial Census  
2011-2015 U.S. Census Bureau: American Community Survey

- Tulsa and Wagoner Counties experienced the highest population growth rates and outpaced the entire MSA as well as the state of Oklahoma. The growth is attributed

to the stable economy in the city of Tulsa, which is home to a number of companies and industries that employ between 1,000 and 10,000 individuals.

- The AA's population represents 82.6 percent of the total Tulsa MSA population based on 2015 American Community Survey (ACS) data.
- Creek County had the lowest population growth of the four AA counties, which may be partially attributed to its rural nature, when compared to the other three AA counties. Aside from the three tracts in Creek County that abut the southwest portion of the city of Tulsa, the remainder of the county has vast areas of tilled acreage and grassland interspersed with smaller rural communities.

**TABLE 5  
MEDIAN FAMILY INCOME CHANGE**

<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Tulsa County, Oklahoma	58,820	61,809	5.1
Wagoner County, Oklahoma	61,694	64,107	3.9
Rogers County, Oklahoma	65,861	67,773	2.9
Creek County, Oklahoma	51,242	54,639	6.6
Tulsa, Oklahoma MSA	58,038	61,182	5.4
State of Oklahoma	53,607	58,029	8.2

*Source: 2006-2010 U.S. Census Bureau: American Community Survey  
2011-2015 U.S. Census Bureau: American Community Survey*

- Approximately 11.2 percent of AA families live below the poverty line, which is slightly lower than the state of Oklahoma, at 12.4 percent. Notable outliers are Rogers and Wagoner Counties, in which 7.0 percent and 8.1 percent of families, respectively, live below the poverty line.
- The state of Oklahoma, as a whole, had the highest growth rate in median family income from 2010 to 2015, although Rogers, Tulsa, and Wagoner Counties had higher income levels.
- According to 2015 ACS data, 37.9 percent of AA families were designated as LMI, which is comparable to the statewide and MSA figure of 39.2 percent.



**TABLE 6  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Tulsa County, Oklahoma	126,200	138,500	9.7	689	774	12.3
Wagoner County, Oklahoma	133,800	141,700	5.9	682	784	15.0
Rogers County, Oklahoma	139,200	144,600	3.9	734	779	6.1
Creek County, Oklahoma	100,600	105,000	4.4	621	689	11.0
Tulsa, Oklahoma MSA	121,879	131,392	7.8	676	759	12.3
State of Oklahoma	104,300	117,900	13.0	633	727	14.8

Source: 2006-2010 U.S. Census Bureau: American Community Survey  
2011-2015 U.S. Census Bureau: American Community Survey

- Median housing costs among the four AA counties varied significantly in 2015, with the value in Creek County falling well below the state of Oklahoma figure. The AA had a lower affordability ratio<sup>1</sup> at 36.6 percent when compared to the MSA and state at 38.1 percent and 39.8 percent, respectively. Housing affordability ratios also varied among the four AA counties, ranging from a high of 42.9 percent in Creek County to a low of 35.9 percent in Tulsa County.
- The percentage of rental units was more pronounced within the AA's LMI census tracts when compared to its middle- and upper-income census tracts. Total housing units devoted to rental property in the AA's LMI tracts were 53.7 percent and 46.0 percent, respectively. The AA's middle-income tracts had 30.5 percent of housing in rental units, while the figure for upper-income tracts was 19.6 percent. This factor could impact the bank's ability to originate owner-occupied home purchase, home refinance, or home improvement loans in the AA's LMI tracts.
- The age of housing stock in LMI census tracts may suggest some physical deterioration and a need for home improvement loans. The median age of AA housing stock by census tract income level was 61 years in low-, 52 years in moderate-, 43 years in middle-, and 32 years in upper-income census tracts. The vacancy rate was also higher in the AA's LMI tracts, at 17.2 percent and 14.0 percent, respectively, compared to 8.8 percent in middle- and 6.9 percent in upper-income tracts. These statistics suggest higher demand for home improvement and housing rehabilitation loans in area LMI tracts.

<sup>1</sup> The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

**TABLE 7  
UNEMPLOYMENT RATES**

<b>Region</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Tulsa County, Oklahoma	4.3	4.1	4.7	4.3	3.3
Wagoner County, Oklahoma	4.2	4.2	4.8	4.4	3.3
Rogers County, Oklahoma	4.2	4.4	5.1	4.4	3.3
Creek County, Oklahoma	5.0	4.9	5.9	5.0	3.8
Tulsa, Oklahoma MSA	4.5	4.4	5.0	4.4	3.5
State of Oklahoma	4.5	4.4	4.9	4.2	3.4

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- Most recent unemployment figures suggest a highly stable economy, not only within the AA and entire Tulsa MSA, but also across the state of Oklahoma.
- Some of the AA's largest companies with over 1,000 employees include American Airlines, AT&T, Bank of Oklahoma, Hillcrest Healthcare System, Nordam Group, Oklahoma State University Medical Center, St. Francis Health System, and Spirit Aerosystems. These entities are predominately located in Tulsa and are integral to the Tulsa area's stable economy.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE TULSA METROPOLITAN AA**

### **Geographic Distribution of Loans**

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts. The bank's overall geographic distribution of loans reflects excellent dispersion among the different census tracts within the AA.

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank had no loan originations in the AA's low-income census tracts, although the distribution in moderate-income census tracts was above the aggregate lending data by number, comparable by dollar volume, and comparable to the demographic figure by number. The bank's lending in middle-income census tracts was above the aggregate lending data and demographic figure by both number and dollar amount, while the bank's lending in upper-income census tracts was below the aggregate lending data and demographic figure. Additionally, when loan dispersion was evaluated, no significant gaps and lapses in lending were identified within the AA.

The bank's relatively low volume of HMDA-reportable loans is primarily based on a limited product offering that only includes variable-rate conventional loans, mobile home loans, and jumbo mortgage loans. The bank does not offer 30-year fixed-rate purchase or refinance mortgage products. In light of the bank's limited product offering, demand for home mortgage loans is substantially constrained.

The bank's performance in 2016 was below the level noted in 2017. Similar to 2017, there were no bank originations in the AA's low-income census tracts. The distribution in moderate-income census tracts was comparable to the aggregate lending data by number and above by dollar volume, but below the demographic figure by number and comparable by dollar volume. Lending volume in 2016 was slightly lower, at 21 home mortgage loans, and no significant gaps and lapses in lending were identified when reviewing the relatively low volume of lending distributed over a sizable AA.

**TABLE 8  
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	1.0	1.9	3.4
<b>Moderate</b>	5	441	21.7	8.0	13.2	8.3	18.2
<b>Middle</b>	11	4,180	47.8	76.0	39.3	33.5	38.6
<b>Upper</b>	7	877	30.4	16.0	46.5	56.4	39.9
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2017 FFIEC Census Data

2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

### **Small Business Lending**

The geographic distribution of small business lending is excellent. The bank did not originate any small business loans in the AA's low-income census tracts, although only 3.4 percent of AA businesses were located in low-income census tracts. However, the distribution of lending in moderate-income census tracts significantly exceeded the demographic figure, and outweighed the absence of lending in the low-income census tracts. The bank's lending in middle-income census tracts was below the demographic figure, while lending in upper-income census tracts was comparable to the demographic figure. Additionally, when loan dispersion was evaluated, no major gaps or lapses in lending were identified within the AA.

**TABLE 9**  
**DISTRIBUTION OF 2018 SMALL BUSINESS LENDING**  
**BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	3.4
Moderate	13	1,196	38.2	29.4	21.5
Middle	8	453	23.5	11.1	37.3
Upper	13	2,424	38.2	59.5	37.8
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

### **Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes**

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has a reasonable penetration among individuals of different income levels and businesses of different sizes.

#### Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. Bank lending in 2017 was weak, based on the absence of loan originations to LMI borrowers, although performance in 2016 exceeded the 2017 performance. A review of the bank's 2016 HMDA data and 2017 HMDA data revealed that a majority of the loans had unknown incomes and were to purchase nonowner-occupied residences. These loans are for rental or multifamily properties and typically are originated to corporations, partnerships, or other entities that are not natural persons. When factoring out loans with unknown incomes, the bank's lending performance was reasonable.

**TABLE 10  
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	5.7	2.8	20.7
<b>Moderate</b>	0	0	0.0	0.0	16.2	10.8	17.2
<b>Middle</b>	3	244	13.0	4.4	20.4	16.5	20.2
<b>Upper</b>	4	323	17.4	5.9	37.8	46.0	41.9
<b>Unknown</b>	16	4,931	69.6	89.7	19.9	24.0	0.0

Source: 2017 FFIEC Census Data  
2011 – 2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

### Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with gross annual revenues less than or equal to \$1 million (MM) was below the demographic figure. However, the Tulsa area has financing options for small businesses beyond those offered by traditional banking organizations. A community member representing an economic development corporation discussed alternative financing venues for small businesses, with special consideration given to entities that create and retain jobs, to businesses located in special targeted areas, and to entrepreneurs traditionally faced with barriers to capital access. The community member noted that their organization makes or facilitates loans ranging from \$5,000 to \$10MM using both public and private sector funding.

Furthermore, when reviewing the aggregate lending data submitted by CRA reporters for small business lending in 2018 as a proxy for actual loan demand, the bank's lending data indicated reasonable performance. While demographic data indicates 90.6 percent of businesses are small, aggregate lending to small businesses, at 42.0 percent by number and 34.7 percent by dollar, is reflective of lower credit demand. The bank's lending to businesses with gross annual revenues over \$1MM significantly exceeded the demographic figure.

**TABLE 11  
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING  
BY REVENUE SIZE OF BUSINESSES**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	24	1,795	70.6	44.1	90.6
Over \$1 Million	10	2,277	29.4	55.9	8.6
Not Known	0	0	0.0	0.0	0.8
Total	34	4,072	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	20	674	58.8	16.5	
\$100,001 – \$250,000	9	1,482	26.5	36.4	
\$250,001 – \$1 Million	5	1,917	14.7	47.1	
Total	34	4,072	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	17	490	70.8	27.3	
\$100,001 – \$250,000	5	710	20.8	39.5	
\$250,001 – \$1 Million	2	595	8.3	33.1	
Total	24	1,795	100.0	100.0	
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey					
NOTE: Percentages may not add up to 100.0 due to rounding.					

**NORTHEAST OKLAHOMA AA  
NONMETROPOLITAN AREA  
(LIMITED-SCOPE REVIEW)**

**DESCRIPTION OF THE NORTHEAST OKLAHOMA AA**

The bank has delineated rural Mayes, Craig, and Nowata Counties as its Northeast Oklahoma AA. The three AA counties are north and contiguous to the Tulsa Metropolitan AA. The bank's presence in this area includes one full-service branch location with an on-site cash-dispensing ATM in the town of Adair, Oklahoma. According to 2015 ACS data, the AA is sparsely populated with a total of 66,306 residents, which represents a decrease of 0.8 percent from the 2010 Census data. The AA includes 2 moderate-, 14 middle-, and 2 upper-income census tracts; there are no low-income census tracts in this AA. This is a slight change from the 2016 FFIEC tract designations, although the total number of tracts in the county remained unchanged at 18.

There have been no branch openings or closings in this AA since the prior CRA evaluation. This area is primarily rural and includes land devoted to row and field crops as well as an abundance of grassland for cattle grazing. Two of the three counties have economies partially dependent on the recreational areas surrounding Lake Oologah and Lake Hudson. Major employers in the area include the Grand River Dam Authority, Orchids Paper Products, Pryor School System, Home of Hope, and Dupont.

According to the June 30, 2019 FDIC Deposit Market Share Report, the bank's total market share in the area was 1.7 percent, ranking 13th of 17 FDIC-insured financial institutions operating from 29 offices in the AA. Additionally, deposits in this area comprised 18.9 percent of total bank-wide deposits.

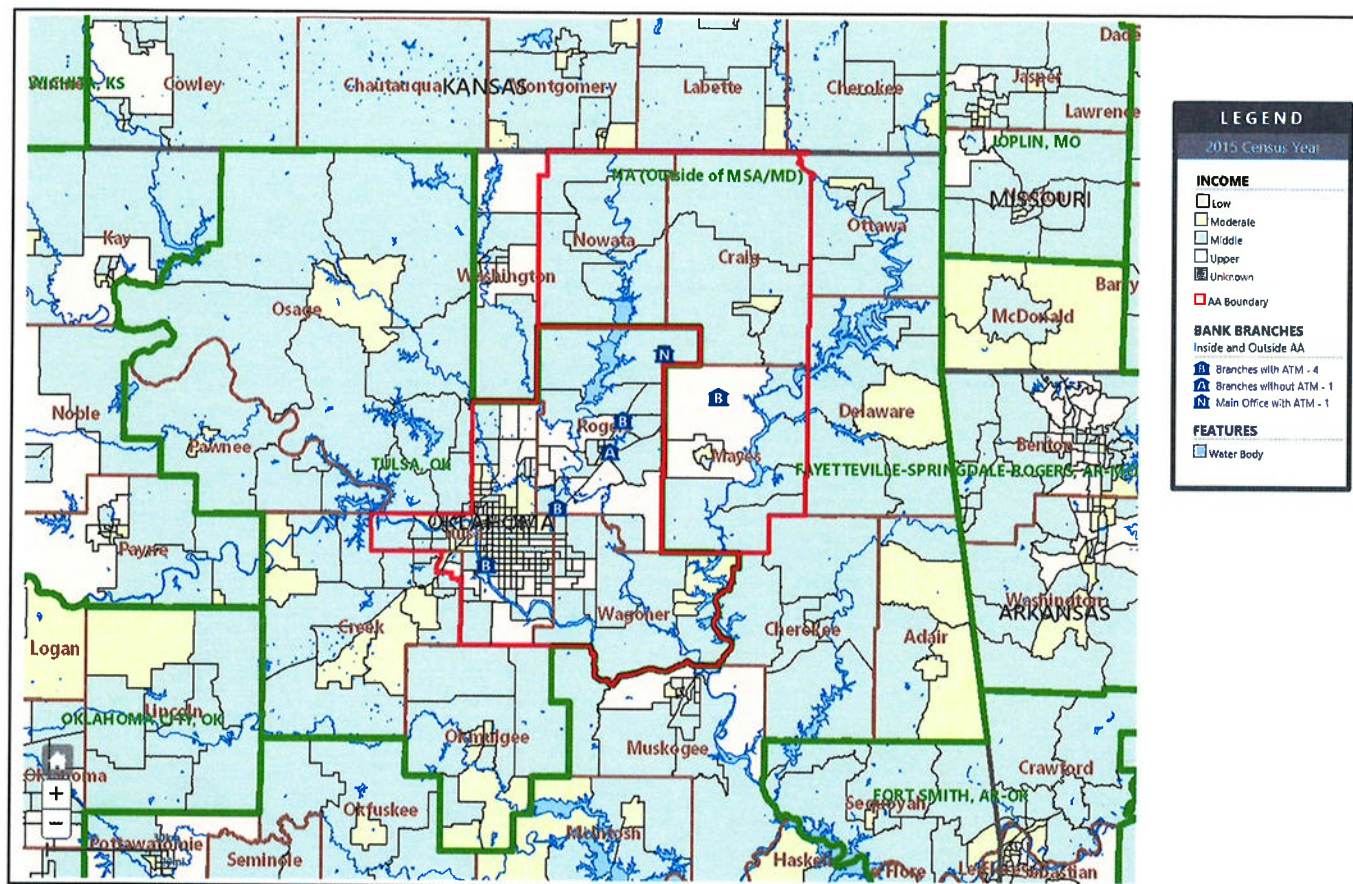
**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE NORTHEAST OKLAHOMA AA**

The institution's lending performance in the area is consistent with the institution's lending performance overall. Under the lending test, the dispersion of loans, as well as the distribution of lending by income level of geography, income level of borrower, and revenue size of business were consistent with the full-scope AA for HMDA and small business loans, with consideration given to the low numbers of originations. The bank's presence in this AA resulted in nine home mortgage loan originations in 2017 and three originations in 2016. In addition, the sample of 2018 small business loans consisted of 16 originations in the Northeast Oklahoma AA. The conclusions for this AA were based on a limited review. Lending and demographic tables for this AA are located in Appendix B.



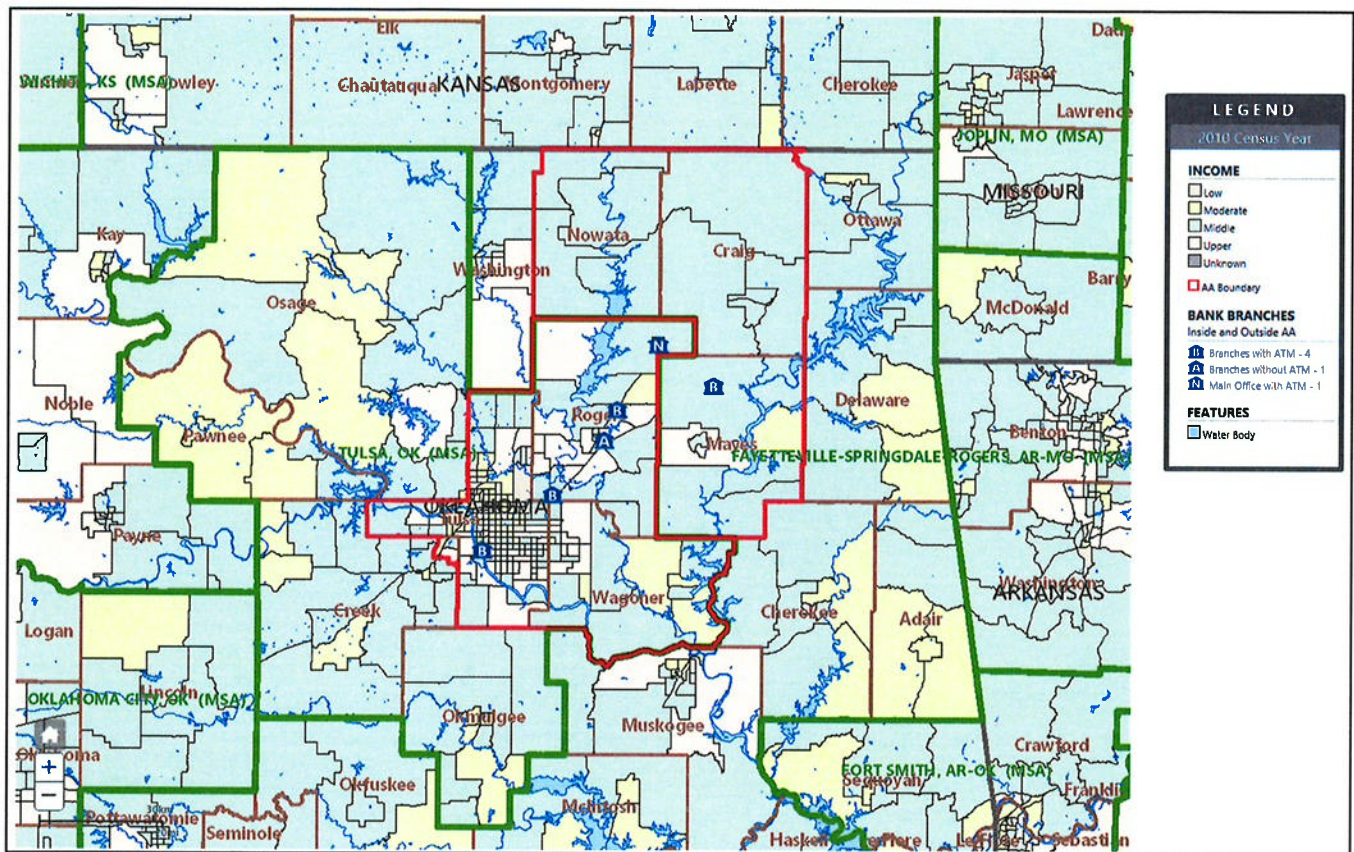
## APPENDIX A – MAP OF THE ASSESSMENT AREAS

2018 and 2017 Tulsa Metropolitan AA and Northeast Oklahoma AA





**2016 Tulsa Metropolitan AA and Northeast Oklahoma AA**



APPENDIX B – DEMOGRAPHIC INFORMATION AND LENDING ANALYSIS TABLES

TABLE B-1 2018 TULSA METROPOLITAN AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	7.5	10,765	5.3	4,413	41.0	42,325	20.7
Moderate	62	27.2	45,565	22.3	9,403	20.6	35,154	17.2
Middle	81	35.5	75,002	36.7	6,157	8.2	41,207	20.2
Upper	68	29.8	73,083	35.8	2,835	3.9	85,729	41.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>228</b>	<b>100.0</b>	<b>204,415</b>	<b>100.0</b>	<b>22,808</b>	<b>11.2</b>	<b>204,415</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	3.4	29.1	12,302	53.7	3,930	17.2
Moderate	89,474	35,764	18.2	40.0	41,161	46.0	12,549	14.0
Middle	125,087	75,947	38.6	60.7	38,142	30.5	10,998	8.8
Upper	106,635	78,449	39.9	73.6	20,866	19.6	7,320	6.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>344,099</b>	<b>196,831</b>	<b>100.0</b>	<b>57.2</b>	<b>112,471</b>	<b>32.7</b>	<b>34,797</b>	<b>10.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,542	3.4	1,311	3.2	219	5.7	12	3.2
Moderate	9,651	21.5	8,434	20.8	1,144	29.7	73	19.4
Middle	16,699	37.3	15,039	37.1	1,533	39.8	127	33.7
Upper	16,930	37.8	15,805	38.9	960	24.9	165	43.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>44,822</b>	<b>100.0</b>	<b>40,589</b>	<b>100.0</b>	<b>3,856</b>	<b>100.0</b>	<b>377</b>	<b>100.0</b>
Percentage of Total Businesses:				90.6		8.6		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	0.8	3	0.6	1	12.5	0	0.0
Moderate	46	9.0	46	9.1	0	0.0	0	0.0
Middle	250	48.7	247	49.1	3	37.5	0	0.0
Upper	213	41.5	207	41.2	4	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>513</b>	<b>100.0</b>	<b>503</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
Percentage of Total Farms:				98.1		1.6		0.4
Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011 – 2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.								

**TABLE B-2  
2017 TULSA METROPOLITAN AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	7.5	10,765	5.3	4,413	41.0	42,325	20.7
Moderate	62	27.2	45,565	22.3	9,403	20.6	35,154	17.2
Middle	81	35.5	75,002	36.7	6,157	8.2	41,207	20.2
Upper	68	29.8	73,083	35.8	2,835	3.9	85,729	41.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	228	100.0	204,415	100.0	22,808	11.2	204,415	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	3.4	29.1	12,302	53.7	3,930	17.2
Moderate	89,474	35,764	18.2	40.0	41,161	46.0	12,549	14.0
Middle	125,087	75,947	38.6	60.7	38,142	30.5	10,998	8.8
Upper	106,635	78,449	39.9	73.6	20,866	19.6	7,320	6.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	344,099	196,831	100.0	57.2	112,471	32.7	34,797	10.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,310	3.5	1,084	3.3	223	5.9	3	1.4
Moderate	8,295	22.2	7,114	21.4	1,137	29.9	44	20.3
Middle	13,691	36.7	12,113	36.4	1,494	39.3	84	38.7
Upper	14,004	37.5	12,970	39.0	948	24.9	86	39.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	37,300	100.0	33,281	100.0	3,802	100.0	217	100.0
Percentage of Total Businesses:			89.2		10.2		0.6	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	1.2	4	1.0	1	12.5	0	0.0
Moderate	46	10.9	46	11.1	0	0.0	0	0.0
Middle	207	49.1	204	49.3	3	37.5	0	0.0
Upper	164	38.9	160	38.6	4	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	422	100.0	414	100.0	8	100.0	0	0.0
Percentage of Total Farms:			98.1		1.9		0.0	

Source: 2017 FFIEC Census Data  
2017 Dun & Bradstreet Data  
2011 – 2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE B-3  
2016 TULSA METROPOLITAN AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	20	8.8	12,504	6.4	4,775	38.2	39,159	19.9
Moderate	61	26.8	42,599	21.7	7,802	18.3	33,833	17.2
Middle	72	31.6	64,081	32.6	4,965	7.7	39,946	20.3
Upper	75	32.9	77,399	39.4	2,852	3.7	83,645	42.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	228	100.0	196,583	100.0	20,394	10.4	196,583	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	26,685	8,340	4.3	31.3	13,612	51.0	4,733	17.7
Moderate	83,941	37,519	19.1	44.7	35,886	42.8	10,536	12.6
Middle	107,450	66,104	33.7	61.5	31,296	29.1	10,050	9.4
Upper	112,055	84,192	42.9	75.1	21,179	18.9	6,684	6.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	330,131	196,155	100.0	59.4	101,973	30.9	32,003	9.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,553	6.1	2,095	5.6	445	11.6	13	5.4
Moderate	9,183	22.0	7,848	20.9	1,271	33.2	64	26.6
Middle	12,695	30.5	11,568	30.7	1,065	27.8	62	25.7
Upper	17,260	41.4	16,109	42.8	1,049	27.4	102	42.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	41,691	100.0	37,620	100.0	3,830	100.0	241	100.0
Percentage of Total Businesses:				90.2		9.2		0.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5	1.0	5	1.0	0	0.0	0	0.0
Moderate	53	10.9	52	10.9	1	12.5	0	0.0
Middle	234	48.0	230	48.0	4	50.0	0	0.0
Upper	195	40.0	192	40.1	3	37.5	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	487	100.0	479	100.0	8	100.0	0	0.0
Percentage of Total Farms:				98.4		1.6		0.0

Source: 2016 FFIEC Census Data  
2016 Dun & Bradstreet Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-4**  
**TULSA METROPOLITAN AA**  
**DISTRIBUTION OF 2016 HOME MORTGAGE LENDING**  
**BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	1.6	1.1	4.3
<b>Moderate</b>	3	1,101	14.3	19.0	11.8	7.2	19.1
<b>Middle</b>	15	2,535	71.4	43.6	34.8	30.3	33.7
<b>Upper</b>	3	2,174	14.3	37.4	51.8	61.4	42.9
<b>Unknown</b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2016 FFIEC Census Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-5**  
**TULSA METROPOLITAN AA**  
**DISTRIBUTION OF 2016 HOME MORTGAGE LENDING**  
**BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
<b>Low</b>	1	37	4.8	0.6	4.8	2.3	19.9
<b>Moderate</b>	3	265	14.3	4.6	16.5	10.8	17.2
<b>Middle</b>	4	265	19.0	4.6	20.2	16.2	20.3
<b>Upper</b>	4	439	19.0	7.6	40.0	49.1	42.5
<b>Unknown</b>	9	4,804	42.9	82.7	18.5	21.7	0.0

Source: 2016 FFIEC Census Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-6**  
**2018 NORTHEAST OKLAHOMA AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,940	22.2
Moderate	2	11.1	1,979	11.2	484	24.5	3,178	17.9
Middle	14	77.8	12,564	70.9	2,037	16.2	3,994	22.5
Upper	2	11.1	3,188	18.0	270	8.5	6,619	37.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	17,731	100.0	2,791	15.7	17,731	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,832	1,762	9.4	46.0	1,443	37.7	627	16.4
Middle	22,475	13,778	73.4	61.3	4,302	19.1	4,395	19.6
Upper	4,450	3,231	17.2	72.6	688	15.5	531	11.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	30,757	18,771	100.0	61.0	6,433	20.9	5,553	18.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	405	18.6	370	19.0	30	17.2	5	8.9
Middle	1,479	67.9	1,322	67.8	113	64.9	44	78.6
Upper	295	13.5	257	13.2	31	17.8	7	12.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,179	100.0	1,949	100.0	174	100.0	56	100.0
Percentage of Total Businesses:				89.4		8.0		2.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	6	3.8	6	3.9	0	0.0	0	0.0
Middle	122	77.2	120	77.4	2	100.0	0	0.0
Upper	30	19.0	29	18.7	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	158	100.0	155	100.0	2	100.0	1	100.0
Percentage of Total Farms:				98.1		1.3		0.6

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011 – 2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-7  
NORTHEAST OKLAHOMA AA  
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING  
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	18.6
Middle	9	467	56.3	78.0	67.9
Upper	7	132	43.7	22.0	13.5
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-8  
NORTHEAST OKLAHOMA AA  
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING  
BY REVENUE SIZE OF BUSINESSES**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	16	599	100.0	100.0	89.4
Over \$1 Million	0	0	0.0	0.0	8.0
Not Known	0	0	0.0	0.0	2.6
Total	16	599	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	15	314	93.8	52.4	
\$100,001 – \$250,000	0	0	0.0	0.0	
\$250,001 – \$1 Million	1	285	6.3	47.6	
Total	16	599	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	15	314	93.8	52.4	
\$100,001 – \$250,000	0	0	0.0	0.0	
\$250,001 – \$1 Million	1	285	6.3	47.6	
Total	16	599	100.0	100.0	

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
2011 – 2015 U.S. Census Bureau: American Community Survey

NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-9**  
**2017 NORTHEAST OKLAHOMA AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,940	22.2
Moderate	2	11.1	1,979	11.2	484	24.5	3,178	17.9
Middle	14	77.8	12,564	70.9	2,037	16.2	3,994	22.5
Upper	2	11.1	3,188	18.0	270	8.5	6,619	37.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>18</b>	<b>100.0</b>	<b>17,731</b>	<b>100.0</b>	<b>2,791</b>	<b>15.7</b>	<b>17,731</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,832	1,762	9.4	46.0	1,443	37.7	627	16.4
Middle	22,475	13,778	73.4	61.3	4,302	19.1	4,395	19.6
Upper	4,450	3,231	17.2	72.6	688	15.5	531	11.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>30,757</b>	<b>18,771</b>	<b>100.0</b>	<b>61.0</b>	<b>6,433</b>	<b>20.9</b>	<b>5,553</b>	<b>18.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	368	19.9	329	20.2	35	20.6	4	9.1
Middle	1,252	67.8	1,109	68.0	107	62.9	36	81.8
Upper	226	12.2	194	11.9	28	16.5	4	9.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,846</b>	<b>100.0</b>	<b>1,632</b>	<b>100.0</b>	<b>170</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.4</b>		<b>9.2</b>		<b>2.4</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	7	5.6	7	5.6	0	0.0	0	0.0
Middle	98	77.8	97	77.6	1	100.0	0	0.0
Upper	21	16.7	21	16.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>126</b>	<b>100.0</b>	<b>125</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>99.2</b>		<b>0.8</b>		<b>0.0</b>

Source: 2017 FFIEC Census Data  
2017 Dun & Bradstreet Data  
2011 – 2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE B-10  
NORTHEAST OKLAHOMA AA  
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING  
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	3	166	33.3	31.4	11.5	8.6	9.4
Middle	2	162	22.2	30.7	65.6	63.2	73.4
Upper	4	200	44.4	37.9	22.8	28.1	17.2
Unknown	0	0	0.0	0.0	0.1	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2017 FFIEC Census Data  
2011 – 2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-11  
NORTHEAST OKLAHOMA AA  
DISTRIBUTION OF 2017 HOME MORTGAGE LENDING  
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	5.4	2.7	22.2
Moderate	2	129	22.2	24.4	16.2	11.0	17.9
Middle	1	66	11.1	12.5	21.0	17.9	22.5
Upper	3	125	33.3	23.7	36.8	45.2	37.3
Unknown	3	208	33.3	39.4	20.7	23.1	0.0

Source: 2017 FFIEC Census Data  
2011 – 2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-12  
2016 NORTHEAST OKLAHOMA AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,543	19.1
Moderate	1	5.6	1,147	6.2	192	16.7	3,405	18.3
Middle	15	83.3	14,932	80.3	1,925	12.9	4,041	21.7
Upper	2	11.1	2,506	13.5	203	8.1	7,596	40.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	18,585	100.0	2,320	12.5	18,585	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,986	1,243	6.3	62.6	381	19.2	362	18.2
Middle	24,695	16,179	81.4	65.5	4,708	19.1	3,808	15.4
Upper	3,884	2,446	12.3	63.0	1,022	26.3	416	10.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	30,565	19,868	100.0	65.0	6,111	20.0	4,586	15.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	70	3.4	61	3.3	7	4.0	2	4.3
Middle	1,749	85.0	1,562	85.0	146	83.9	41	89.1
Upper	239	11.6	215	11.7	21	12.1	3	6.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,058	100.0	1,838	100.0	174	100.0	46	100.0
Percentage of Total Businesses:				89.3		8.5		2.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	1.3	2	1.3	0	0.0	0	0.0
Middle	146	94.2	145	94.2	1	100.0	0	0.0
Upper	7	4.5	7	4.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	155	100.0	154	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.4		0.6		0.0

Source: 2016 FFIEC Census Data  
2016 Dun & Bradstreet Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-13**  
**NORTHEAST OKLAHOMA AA**  
**DISTRIBUTION OF 2016 HOME MORTGAGE LENDING**  
**BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	5.5	5.1	6.3
Middle	3	689	100.0	100.0	73.7	71.3	81.4
Upper	0	0	0.0	0.0	20.4	23.2	12.3
Unknown	0	0	0.0	0.0	0.4	0.4	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2016 FFIEC Census Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-14**  
**NORTHEAST OKLAHOMA AA**  
**DISTRIBUTION OF 2016 HOME MORTGAGE LENDING**  
**BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	5.9	2.7	19.1
Moderate	1	47	33.3	6.8	15.2	10.0	18.3
Middle	0	0	0.0	0.0	18.8	17.1	21.7
Upper	2	642	66.7	93.2	39.7	48.9	40.9
Unknown	0	0	0.0	0.0	20.4	21.3	0.0

Source: 2016 FFIEC Census Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

## APPENDIX C – GLOSSARY

**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 metropolitan area/assessment area.

**Census tract:** 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 statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

**Home mortgage loans:** Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

**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 is analyzed using only quantitative factors (for example, 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 metropolitan area/assessment area.

**Metropolitan area (MA):** A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

**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 multistate 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 multistate metropolitan area, the institution will receive a rating for the multistate 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

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