



## **PUBLIC DISCLOSURE**

February 23, 2026

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

FirstBank  
RSSD# 296456

100 North High Street  
Antlers, Oklahoma 74523

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

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

This institution is rated: **Satisfactory.**  
The Lending Test is rated: **Satisfactory.**  
The Community Development Test is rated: **Satisfactory.**

FirstBank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- 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 substantial majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.
- Community development (CD) activity reflects adequate responsiveness to the CD needs of the bank's AA.

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* 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. In addition, available aggregate data from 2024 was referenced for additional perspective to gauge credit demand within the bank's AA. Performance was assessed within the bank's single AA. Examiners reviewed the following data:

- The bank's 13-quarter average NLTD ratio.
- A statistical sample of 91 home mortgage loans from a universe of 166 loans originated between January 1, 2024, and December 31, 2024; and
- A statistical sample of 126 small business loans from a universe of 332 loans originated between January 1, 2024, and December 31, 2024.
- A statistical sample of 114 small farm loans from a universe of 261 loans originated between January 1, 2024, and December 31, 2024; and

- CD loans, qualified investments, and CD services from July 2, 2022, through December 31, 2025.
- All products were weighted equally for this evaluation.

**DESCRIPTION OF INSTITUTION**

FirstBank is a community bank headquartered in Antlers, Oklahoma. Although the bank is chartered in Antlers, the Atoka branch serves as the main office due to its central location compared to the other eight branch offices. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of First Antlers Bancorporation, Inc.
- The bank has total assets of \$640.6 million (MM) as of September 30, 2025.
- In addition to its main office in Atoka, the bank operates eight additional offices located in Antlers, Coal, Kiowa, Hugo, Broken Bow, Wright City, Hochatown and Idabel, Oklahoma, for a total of nine locations.
- The bank operates a total of fourteen full-service automated teller machines (ATMs); located in each of the bank’s nine locations, and five stand-alone ATMs located in Antlers, Atoka, Broken Bow, Rattan, and Smithville.
- As shown in the table below, the bank’s primary business focus is residential real estate.

**Table 1**

<b>Composition of Loan Portfolio as of September 30, 2025</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	32,529	8.1
Farmland	55,581	13.9
1- to 4-Family Residential Real Estate	161,978	40.4
Multifamily Residential Real Estate	3,182	0.8
Nonfarm Nonresidential Real Estate	45,837	11.4
Agricultural	10,454	2.6
Commercial and Industrial	30,760	7.7
Consumer	57,060	14.2
Other	3,184	0.8
<b>Gross Loans</b>	<b>400,565</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its prior performance evaluation on December 5, 2022. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

**DESCRIPTION OF ASSESSMENT AREA**

The bank’s Southeast Oklahoma AA consists of Atoka, Bryan, Choctaw, Coal, McCurtain, Pittsburg, and Pushmataha Counties in their entirety (see Appendix A for an AA map and Appendix B for additional demographic data).

- There were no changes to the bank’s delineation of its Southeast Oklahoma AA since the prior evaluation.
- The AA is comprised of 1 low-, 12 moderate-, 34 middle-, 3 upper-, and 1 unknown-income census tracts. At the previous evaluation the AA contained 13 moderate-, 29 middle- and 4 upper-income census tracts. These changes were due to the 2016-2020 American Community Survey (ACS) release.
- The counties of Atoka, Choctaw, Coal, McCurtain, and Pushmataha were designated as distressed and/or underserved during this evaluation period.
- According to the June 30, 2024, Federal Deposit Insurance Corporation (FDIC) Market Share Report, the bank held a 7.8 percent share of AA deposits, which ranked second of 19 FDIC-insured financial institutions operating within the AA from 59 banking offices.
- An interview with a member of the community within the bank’s AA was conducted to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented a local economic development association.

**Table 2**

<b>Population Change</b>			
<b>Assessment Area: Southeast Oklahoma</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Southeast Oklahoma	168,171	165,079	(1.8)
Atoka County, OK	13,906	14,143	1.7
Bryan County, OK	44,003	46,067	4.7
Choctaw County, OK	15,120	14,204	(6.1)
Coal County, OK	5,812	5,266	(9.4)
McCurtain County, OK	33,143	30,814	(7.0)
Pittsburg County, OK	44,961	43,773	(2.6)
Pushmataha County, OK	11,226	10,812	(3.7)
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
Oklahoma	3,849,733	3,959,353	2.8

*Source: 2020 U.S. Census Bureau: Decennial Census  
2011-2015 U.S. Census Bureau: American Community Survey*

- According to the 2020 ACS 5-year average, the AA’s population of 165,079 residents accounts for 12.8 percent of the state’s nonmetropolitan area and 4.2 percent of the statewide population.

- A member of the community noted that Bryan County, which borders Texas, is experiencing increasing population as Texas grows.

**Table 3**

<b>Median Family Income Change Assessment Area: Southeast Oklahoma</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Southeast Oklahoma	51,323	54,833	6.8
Atoka County, OK	46,549	53,415	14.7
Bryan County, OK	53,786	56,874	5.7
Choctaw County, OK	47,800	52,125	9.0
Coal County, OK	53,426	53,026	(0.7)
McCurtain County, OK	44,726	48,901	9.3
Pittsburg County, OK	58,639	59,763	1.9
Pushmataha County, OK	45,441	48,940	7.7
NonMSA Oklahoma	56,258	58,565	4.1
Oklahoma	63,401	67,511	6.5
<i>Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- The AA experienced growth in the median family income (MFI) in the period between 2015 and 2020, at a level which outpaced the overall state of Oklahoma and the nonMSA figure; however, the 2020 MFI of the AA remained lower than the overall statewide figure and the nonMSA figure.
- Of AA families, 42.8 percent are LMI, which is slightly above the statewide figure of 39.1 percent and the non-MSA figure of 39.4 percent.
- The percentage of families living below the poverty level in the AA, at 15.4 percent, reflected a higher concentration than the overall statewide figure of 11.3 percent and the non-MSA figure of 13.5 percent.
- The AA's concentration of families living below the poverty level represents a slight decline from 16.5 percent noted at the last evaluation based on 2015 census data.

**Table 4**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Southeast Oklahoma</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Southeast Oklahoma	62.9	31.7	35.6	45.1	17.8	13.4
Atoka County, OK	56.1	27.5	35.8	38.9	16.2	12.9
Bryan County, OK	76.4	39.6	37.3	52.2	20.3	14.1
Choctaw County, OK	51.3	26.3	32.6	47.1	19.9	14.8
Coal County, OK	58.1	13.0	28.0	45.0	17.2	15.9
McCurtain County, OK	55.5	21.0	30.8	36.8	11.2	11.7
Pittsburg County, OK	64.9	33.9	39.1	47.0	21.3	13.0
Pushmataha County, OK	48.3	19.4	31.9	46.3	13.5	14.8
NonMSA Oklahoma	66.5	30.6	35.0	48.2	22.2	14.9
Oklahoma	72.5	35.3	37.9	52.2	26.2	15.4

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*

- Housing cost burden in the AA was more prevalent for LMI renters relative to LMI homeowners, which may impede individuals and families currently renting from obtaining homeownership, absent special downpayment loan programs.
- A review of 2015 and 2020 median housing values indicated that housing values in the AA have experienced a 22.0 percent increase during this time, from \$85,109 to \$103,802, which further illustrates challenges with home affordability.
- A review of the AA's affordability ratio, which measures the AA's median household income by the median housing value, indicates that, at 41.9 percent, the AA is slightly more affordable compared to the overall statewide ratio of 37.8 percent, but in line with the state's non-MSA ratio of 42.0 percent.
- A member of the community noted an overall need for housing, especially within single family homes, multifamily housing, rental housing, and housing for senior citizens.

**Table 5**

<b>Unemployment Rates</b>					
<b>Assessment Area: Southeast Oklahoma</b>					
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Southeast Oklahoma	6.7	4.6	3.7	3.7	3.8
Atoka County, OK	7.0	4.7	3.7	3.4	3.6
Bryan County, OK	5.4	3.6	2.8	3.0	3.1
Choctaw County, OK	7.5	5.3	4.5	3.6	3.4
Coal County, OK	7.6	5.1	3.5	4.1	3.7
McCurtain County, OK	7.2	4.8	4.2	4.2	4.2
Pittsburg County, OK	7.3	5.2	4.1	4.2	4.5
Pushmataha County, OK	7.0	4.6	4.0	3.9	4.7
NonMSA Oklahoma	6.2	4.1	3.3	3.4	3.5
Oklahoma	6.3	4.0	3.0	3.2	3.3

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

- Major industries in the AA are healthcare and social assistance (9,321), retail trade (7,399), manufacturing (3,234), educational services (2,453), and public administration (2,344).
- A member of the community noted that within Bryan County, Cardinal Glass is a large employer, as well as the Choctaw Nation with a local resort and casino. Additionally, Lake Texoma is a popular tourist destination for hunting and fishing.
- Unemployment in the AA trended similarly to, but remained slightly above overall statewide figures, as the area transitioned out of the Coronavirus 2019 Pandemic in 2020 and 2021. The most recent 2024 unemployment rate reflects a slightly higher figure than overall statewide figures; however, the AA remained below the national unemployment rate of 4.0 percent.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

**LENDING TEST**

The bank’s overall lending test performance is satisfactory based on a reasonable NLTD ratio, a substantial majority of loans originated within the bank’s AA, a reasonable geographic distribution, and a reasonable borrower distribution of loans within the AA.

**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 FDIC-insured institutions. The

similarly situated institutions were selected based on similar lending portfolio compositions and geographic proximity to the bank.

The bank’s NLTD ratio is reasonable. The bank’s 13-quarter NLTD ratio of 73.9 percent is in line with similarly situated financial institutions during the same period, which ranged from 51.2 percent to 82.5 percent.

**Table 6**

Comparative NLTD Ratios September 30, 2022 – September 30, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			13 Quarter Average
FirstBank	Antlers, OK	640,630	73.9
<b>Similarly Situated Institutions</b>			
Vision Bank	Ada, OK	947,094	82.5
Shamrock Bank NA	Coalgate, OK	491,517	63.3
McCurtain County NB	Broken Bow, OK	368,288	51.2
Ameristate Bank	Atoka, OK	458,519	80.2
Bank NA	McAlester, OK	451,962	57.8

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a substantial majority of loans, by number and dollar, inside the AA.

**Table 7**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Residential Loans	86	94.5	13,018	94.8	5	5.5	710	5.2
Small Business	119	94.4	8,217	83.7	7	5.6	1,601	16.3
Small Farm	105	92.1	4,862	89.1	9	7.9	596	10.9
<b>Total Loans</b>	<b>310</b>	<b>93.7</b>	<b>26,098</b>	<b>90.0</b>	<b>21</b>	<b>6.3</b>	<b>2,908</b>	<b>10.0</b>

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

**Geographic Distribution of Loans**

This performance criterion evaluates the bank’s distribution of lending within its AA by income level of census tracts, with consideration given to the dispersion of loans throughout the AA. The bank’s overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

When evaluating dispersion, gaps or lapses were identified in three moderate-income census tracts in Bryan County for all three lending products. These moderate-income census tracts are located approximately 30 to 50 miles from the bank's nearest branches.

Additionally, there are competitive pressures from nearby banks that are able to serve these moderate-income census tracts in Bryan County more easily. Based on this performance context, these gaps did not impact the individual or overall conclusions.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of total home mortgage loans in the low- and moderate-income census tracts was comparable to the demographic figure, which represents the percentage of owner-occupied units in each census tract income category.

**Table 8**

<b>Distribution of 2024 Home Mortgage Lending By Income Level of Geography</b>					
<b>Assessment Area: Southeast Oklahoma</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Owner Occupied Units %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	0.9
<b>Moderate</b>	15	17.4	1,742	13.4	17.9
<b>Middle</b>	68	79.1	10,967	84.2	73.9
<b>Upper</b>	3	3.5	309	2.4	7.3
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	86	100.0	13,018	100.0	100.0

*Source: 2024 FFIEC Census Data  
2016 - 2020 U.S. Census Bureau: American Community Survey*  
*Note: Percentages may not total 100.0 percent due to rounding.*

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank's performance in the low- and moderate-income census tracts was comparable to the demographic figure, which represents the percentage of small businesses located in each census tract income category.

**Table 9**

Distribution of 2024 Small Business Lending By Income Level of Geography					
Assessment Area: Southeast Oklahoma					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	1	0.8	10	0.1	1.2
Moderate	29	24.4	1,279	15.6	30.1
Middle	88	73.9	6,737	82.0	61.5
Upper	1	0.8	191	2.3	7.2
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>119</b>	<b>100.0</b>	<b>8,217</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Small Farm Lending**

The geographic distribution of small farm lending is excellent. The bank’s performance in lending to the low-income census tract was comparable to the demographic figure, which represents the percentage of farms located in each census tract income category, while lending to moderate-income census tracts was above the demographic figure.

**Table 10**

Distribution of 2024 Small Farm Lending By Income Level of Geography					
Assessment Area: Southeast Oklahoma					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.4
Moderate	22	21.0	1,308	26.9	14.8
Middle	82	78.1	3,546	72.9	78.4
Upper	1	1.0	8	0.2	6.4
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>105</b>	<b>100.0</b>	<b>4,862</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

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

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

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The bank’s lending to low-income borrowers was below the percentage of families by family income (demographic figure); while lending to moderate-income borrowers was comparable to the demographic figure. While the bank is not a HMDA reporter, a review of 2024 aggregate HMDA data was performed to gauge overall demand in this area. 2024 aggregate lending figures showed lending to low-income borrowers was 3.1 percent by number, while lending to moderate-income borrowers was 12.0 percent, by number. Given this additional context, an overall reasonable rating was determined.

**Table 11**

Distribution of 2024 Residential Lending By Borrower Income Level					
Assessment Area: Southeast Oklahoma					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	%	
Low	9	10.5	1,183	9.1	24.4
Moderate	11	12.8	1,425	10.9	18.3
Middle	18	20.9	1,696	13.0	19.9
Upper	48	55.8	8,714	66.9	37.3
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>86</b>	<b>100.0</b>	<b>13,018</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with revenues of \$1.0MM or less was comparable to the percentage of total businesses operating in the AA with revenues of \$1.0MM or less. Additionally, reviewing small business lending by loan amount, 96.6 percent of the bank’s loans to small businesses were originated in amounts of \$250,000 or less, which is typically indicative of financing requested by smaller business entities and further demonstrates responsiveness to small business needs.

**Table 12**

<b>Distribution of 2024 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Southeast Oklahoma</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	93	78.2	4,038	49.1	89.7
<b>Over \$1 Million</b>	23	19.3	3,975	48.4	7.8
<b>Revenue Unknown</b>	3	2.5	204	2.5	2.6
<b>Total</b>	119	100.0	8,217	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	99	83.2	3,438	41.8	
<b>\$100,001 - \$250,000</b>	16	13.4	2,535	30.9	
<b>\$250,001 - \$1 Million</b>	4	3.4	2,245	27.3	
<b>Total</b>	119	100.0	8,217	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	85	91.4	2,607	64.6	
<b>\$100,001 - \$250,000</b>	7	7.5	1,106	27.4	
<b>\$250,001 - \$1 Million</b>	1	1.1	324	8.0	
<b>Total</b>	93	100.0	4,037	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun &amp; Bradstreet Data 2016 - 2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**Small Farm Lending**

The borrower distribution of small farm lending is reasonable. The bank’s lending to small farms was comparable to the percentage of small farms operating in the AA with revenues of \$1.0MM or less. Additionally, reviewing small farm lending by loan amount, 96.2 percent of the bank’s loans to small farms were originated in amounts of \$250,000 or less, which is typically associated with credit demands of smaller farming entities and reflects the bank’s willingness to meet the credit needs of small farms in the AA.

**Table 13**

Distribution of 2024 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Southeast Oklahoma					
	Bank Loans				Total Farms
	#	#%	\$(000)	%	%
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	92	87.6	4,121	84.8	98.1
<b>Over \$1 Million</b>	5	4.8	379	7.8	1.5
<b>Revenue Unknown</b>	8	7.6	363	7.5	0.4
<b>Total</b>	105	100.0	4,862	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	92	87.6	2,306	47.4	
<b>\$100,001 - \$250,000</b>	9	8.6	1,475	30.3	
<b>\$250,001 - \$500,000</b>	4	3.8	1,082	22.3	
<b>Total</b>	105	100.0	4,862	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	82	89.1	2,087	50.6	
<b>\$100,001 - \$250,000</b>	7	7.6	1,205	29.2	
<b>\$250,001 - \$500,000</b>	3	3.3	829	20.1	
<b>Total</b>	92	100.0	4,121	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**COMMUNITY DEVELOPMENT TEST**

The CD test evaluates the bank’s responsiveness to CD needs of its AA through CD loans, qualified investments and donations, and CD services, considering the bank’s capacity and the need and availability of such opportunities in the bank’s AA.

The bank’s overall CD test performance is Satisfactory and demonstrates adequate responsiveness to the CD needs of its AA. Qualified CD activities for this evaluation are shown in Table 14 below, including:

- 11 investments in community services totaling \$8.1MM, which were comprised of municipal bonds that served to support improvements to schools in the local area. These schools all had a majority of students who were eligible for free and reduced lunch.
- One investment for \$500,000 that was made within the state of Oklahoma, but outside of the AA. This investment was also for a bond for the purpose of making improvements to a local school district. This investment is reflected in the outside activities in the table below.

- 37 loans totaling \$3.4MM which served to spur economic development in the area and revitalize and stabilize distressed and underserved areas. These loans spanned across diverse businesses including transportation, agriculture, logging, retail, and others, demonstrating broad support to various industries in the area.
- 23 donations totaling \$87,000 demonstrating support to various organizations focused on providing community services to LMI families and individuals. This included donations to area food banks, a public library, and a pregnancy center. The bank also made donations to nearby schools that helped to revitalize and stabilize local areas.
- Since the last evaluation, the bank has implemented a financial literacy program called, “Piggybank Tales” for children in pre-kindergarten through fourth grade. Information regarding this program had been sent to all the local schools within the bank’s AA.
- In November 2025, the bank enrolled in the Choctaw Nation Capital Fund that receives funding from the U.S. Treasury State Small Business Credit Initiative. This is a revolving fund designed to increase the availability of capital to small businesses through loans that would not otherwise be available in the market through conventional terms. As the bank had only just entered the program, no loans had yet been originated during the review period.

**Table 14**

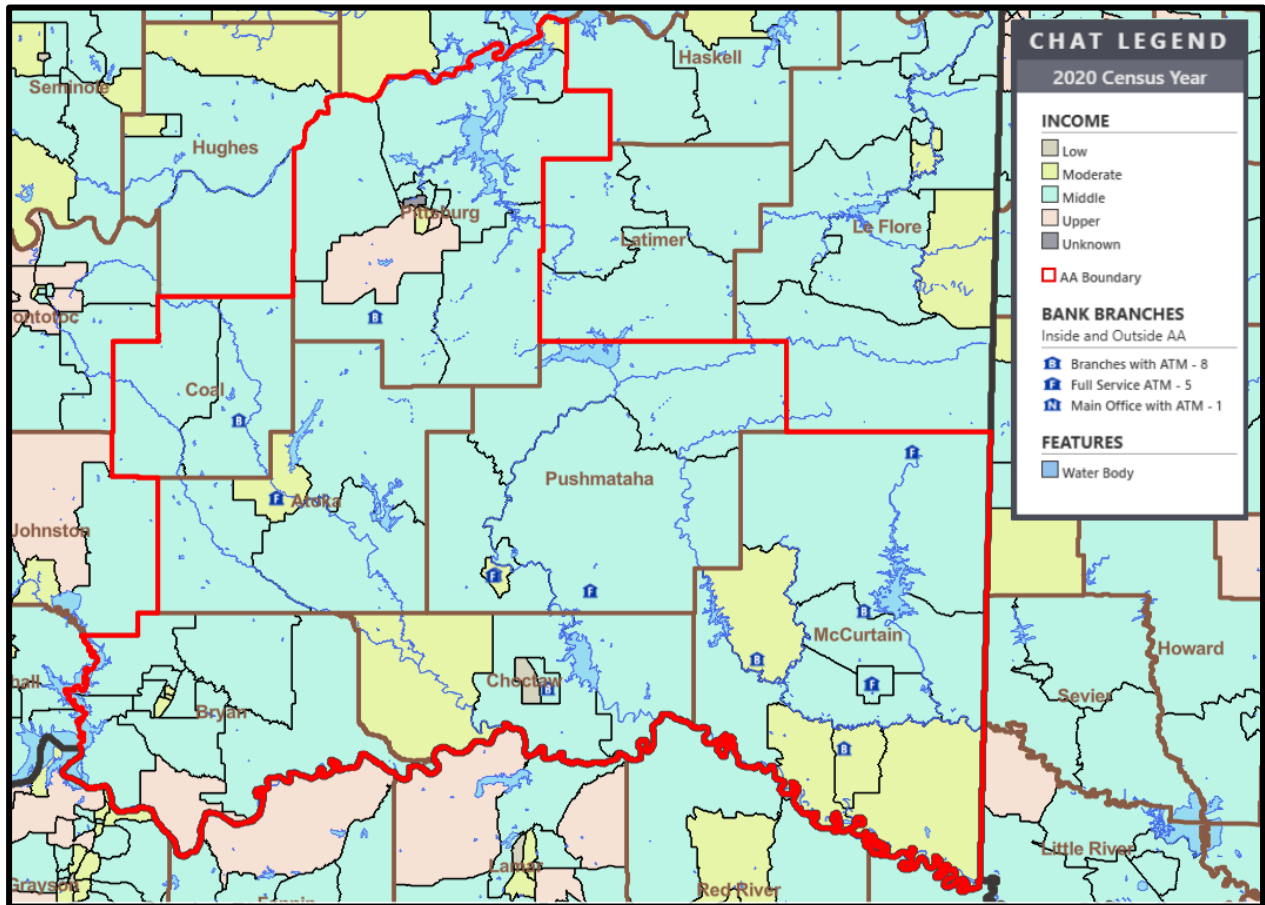
<b>Community Development Activity</b>									
<b>Assessment Area: State of Oklahoma / Southeast Oklahoma AA</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	
<b>Affordable Housing</b>	0	0	0	0	0	0	0	0	0
<b>Community Services</b>	0	0	11	8,070	19	11	30	8,081	54
<b>Economic Development</b>	27	2,126	0	0	0	0	0	0	0
<b>Revitalization and Stabilization</b>	10	1,270	0	0	4	76	4	76	7
<b>Outside Activities</b>	0	0	1	500	0	0	1	500	0
<b>Totals</b>	<b>37</b>	<b>3,396</b>	<b>12</b>	<b>8,570</b>	<b>23</b>	<b>87</b>	<b>35</b>	<b>8,657</b>	<b>61</b>

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

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – MAP OF THE ASSESSMENT AREA

Map A-1  
Southeast Oklahoma AA



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2024 Southeast Oklahoma Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	2.0	501	1.1	226	45.1	11,002	24.4
Moderate	12	23.5	9,098	20.2	2,082	22.9	8,241	18.3
Middle	34	66.7	32,204	71.6	4,349	13.5	8,974	19.9
Upper	3	5.9	3,188	7.1	265	8.3	16,786	37.3
Unknown	1	2.0	12	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>51</b>	<b>100.0</b>	<b>45,003</b>	<b>100.0</b>	<b>6,922</b>	<b>15.4</b>	<b>45,003</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	1,083	429	0.9	39.6	473	43.7	181	16.7
Moderate	18,003	8,228	17.9	45.7	6,145	34.1	3,630	20.2
Middle	58,092	34,031	73.9	58.6	12,293	21.2	11,768	20.3
Upper	5,104	3,348	7.3	65.6	1,169	22.9	587	11.5
Unknown	23	4	0.0	17.4	14	60.9	5	21.7
<b>Total AA</b>	<b>82,305</b>	<b>46,040</b>	<b>100.0</b>	<b>55.9</b>	<b>20,094</b>	<b>24.4</b>	<b>16,171</b>	<b>19.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	62	1.2	55	1.2	5	1.3	2	1.6
Moderate	1,505	30.1	1,362	30.4	113	29.0	30	23.4
Middle	3,076	61.5	2,760	61.5	227	58.4	89	69.5
Upper	360	7.2	309	6.9	44	11.3	7	5.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>5,003</b>	<b>100.0</b>	<b>4,486</b>	<b>100.0</b>	<b>389</b>	<b>100.0</b>	<b>128</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.7</b>		<b>7.8</b>		<b>2.6</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	0.4	1	0.4	0	0.0	0	0.0
Moderate	39	14.8	38	14.7	1	25.0	0	0.0
Middle	207	78.4	204	78.8	2	50.0	1	100.0
Upper	17	6.4	16	6.2	1	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>264</b>	<b>100.0</b>	<b>259</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.1</b>		<b>1.5</b>		<b>0.4</b>
<p>Source: 2024 FFIEC Census Data 2016 - 2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</p>								

## **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, 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.

**Nonmetropolitan area (NonMSA):** Any area that is not located within an MSA.

**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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

**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 Consolidated Reports of Condition and Income (Call Report) instructions. 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.