



PUBLIC DISCLOSURE

May 30, 2024

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 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.

TABLE OF CONTENTS

Institution’s Community Reinvestment Act Rating 2

Scope of Examination 2

Description of Institution 3

Conclusions With Respect to Performance Criteria 4

Fair Lending or Other Illegal Credit Practices Review 5

Tulsa Metropolitan Assessment Area (Full-Scope Review)

 Description of Institution’s Operations 6

 Conclusions With Respect to Performance Criteria 9

Northeast Oklahoma Assessment Area (Limited-Scope Review)

 Description of Institution’s Operations 14

 Conclusions With Respect to Performance Criteria 14

Appendix A – Maps of the Assessment Areas 15

Appendix B – Demographic Information 17

Appendix C – Limited-Scope Review Assessment Area Tables 18

Appendix D – Glossary 21

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 areas' (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution 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 (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for 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. Lending performance was assessed within the bank's two AAs. The Tulsa Metropolitan AA was assessed using a full-scope review. The Northeast Oklahoma AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 18-quarter average NLTD ratio,
- A statistical sample of 75 small business loans from a universe of 119 loans originated between January 1, 2023 and December 31, 2023; and,
- A statistical sample of 151 motor vehicle loans from a universe of 594 loans originated between January 1, 2023 and December 31, 2023.

For this evaluation, small business loans and motor vehicle loans were weighted equally.

DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of Commerce Bancshares, Inc., a one-bank holding company in Catoosa, Oklahoma.
- The bank has total assets of \$191.8 million as of December 31, 2023.
- In addition to its main office in Chelsea, the bank operates five additional full-service branches located in Pryor, Adair, Catoosa, Sequoyah, and Tulsa, Oklahoma.
- The bank maintains six cash-only automated teller machines (ATMs) at each branch location.
- As shown in the table below, the bank's primary business focus is commercial lending. The bank also originates a substantial number of consumer closed-end loans.

Table 1

Composition of Loan Portfolio as of December 31, 2023		
Loan Type	\$(000)	%
Construction and Land Development	12,065	9.3
Farmland	4,771	3.7
1- to 4-Family Residential Real Estate	27,746	21.5
Multifamily Residential Real Estate	755	0.6
Nonfarm Nonresidential Real Estate	44,755	34.7
Agricultural	1,672	1.3
Commercial and Industrial	15,135	11.7
Consumer	20,375	15.8
Other	1,889	1.5
Gross Loans	129,163	100.0

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

The bank was rated Satisfactory under the CRA at its January 6, 2020 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 CRITERIA¹

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth evaluation of performance in the Tulsa Metropolitan AA (full-scope review); and a brief discussion of performance in the Northeast Oklahoma AA (limited-scope review).

The bank’s overall lending test performance is Satisfactory. The bank’s performance under each of the performance criterion, including the loan-to-deposit ratio, lending inside the bank’s AA, geographic distribution by income level of census tracts, and the distribution of lending by size of business and borrower income level is reasonable.

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 AAs, and in comparison to similarly situated 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 18-quarter average NLTD ratio was within the range of the four similarly situated institutions with ratios ranging from 47.3 percent to 92.2 percent.

Table 2

Comparative NLTD Ratios July 1, 2019 through December 31, 2023			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			18 Quarter Average
Bank of Commerce	Chelsea, OK	191,803	72.8
Similarly Situated Institutions			
FNB Coweta	Coweta, OK	112,621	47.3
Triad BK NA	Tulsa, OK	202,545	79.2
Exchange Bank	Skiatook, OK	140,088	49.3
American Bank of Oklahoma	Collinsville, OK	364,074	92.2

¹ The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

Assessment Area Concentration

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

Table 3

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Motor Vehicle	138	91.4	3,121	91.8	13	8.6	280	8.2
Small Business	67	89.3	9,926	81.4	8	10.7	2,224	18.6
Total Loans	205	90.7	12,847	83.7	21	9.3	2,504	16.3
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Geographic Distribution of Loans

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

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 distribution among individuals of different income levels and businesses of different sizes.

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.

**TULSA METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION’S OPERATIONS IN THE TULSA METROPOLITAN AA

The bank’s Tulsa Metropolitan AA consists of Rogers, Tulsa, and Wagoner Counties in their entireties and a portion of Creek County. The AA is unchanged since the prior exam (see Appendix A for an AA map and Appendix B for additional demographic data).

- The Tulsa Metropolitan AA is comprised of 13 low-, 76 moderate- 80 middle-, 94 upper-, and one unknown-income census tracts. This represents a change from the previous examination dated January 6, 2020, where the AA had 17 low-, 62 moderate-, 81 middle- and 68 upper-income census tracts.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank’s total market share in the area was 0.4 percent, ranking 36th of 51 FDIC-insured financial institutions operating from 227 offices in the AA.
- The bank operates four full-service branches and four cash-only automated teller machines (ATMs) within the Tulsa Metropolitan AA.
- To further augment the CRA performance evaluation, an interview with a community member that was recently conducted as part of the CRA evaluation of another financial institution with offices in the bank’s AA was referenced to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and perspective on local economic and demographic characteristics. The community member represents an economic development organization.

Table 4

Population Change Assessment Area: Tulsa Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Tulsa Metropolitan	858,677	917,254	6.8
Creek County, OK	70,761	71,754	1.4
Rogers County, OK	89,190	95,240	6.8
Tulsa County, OK	623,335	669,279	7.4
Wagoner County, OK	75,391	80,981	7.4
Tulsa, OK MSA	962,676	1,015,331	5.5
Oklahoma	3,849,733	3,959,353	2.8
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey 2016 – 2020 U.S. Census Bureau: American Community Survey Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- Tulsa and Wagoner Counties experienced the highest population growth 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 an economic center in the area and home to several large companies and industries.
- Creek County had the lowest population growth of the four AA counties that comprise the AA, which may be partially attributed to its rural nature and limited employment opportunities. Aside from three tracts in Creek County that abut the southwest portion of the city of Tulsa, the remainder of the county is comprised of vast areas of tilled acreage and grassland interspersed with smaller rural communities.

Table 5

Median Family Income Change			
Assessment Area: Tulsa Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Tulsa Metropolitan	67,705	74,155	9.5
Creek County, OK	59,697	66,569	11.5
Rogers County, OK	74,047	79,527	7.4
Tulsa County, OK	67,531	73,515	8.9
Wagoner County, OK	70,042	79,407	13.4
Tulsa, OK MSA	66,846	72,203	8.0
Oklahoma	63,401	67,511	6.5
<i>Source: 2020 U.S. Census Bureau Decennial Census 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. All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- Approximately 10.0 percent of AA families live below the poverty line, which is slightly lower than the state of Oklahoma, at 11.3 percent. Notable outliers are Rogers and Wagoner Counties, where 7.1 percent of families live below the poverty line in each county.

Table 6

Housing Cost Burden						
Assessment Area: Tulsa Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Tulsa Metropolitan	73.4	32.9	38.3	54.4	27.3	16.2
Creek County, OK	53.2	18.5	29.2	40.7	15.9	14.9
Rogers County, OK	67.1	31.9	35.6	52.4	29.2	14.6
Tulsa County, OK	75.4	34.4	39.3	58.0	29.1	17.1
Wagoner County, OK	74.0	23.9	35.9	50.8	26.1	13.9
Tulsa, OK MSA	72.6	32.1	38.0	53.0	25.6	15.9
Oklahoma	71.3	30.7	37.7	50.0	24.0	15.2

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2016 – 2020 Comprehensive Housing Affordability Strategy
Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- Median housing costs among the four counties in the AA varied significantly, with the value in Creek County falling below the state of Oklahoma figure. The AA had a lower affordability ratio, at 36.5 percent, when compared to the MSA and state, at 37.0 percent and 37.8 percent, respectively. Housing affordability ratios also varied among the four counties in the AA, ranging from a high of 40.2 percent in Creek County to a low of 35.5 percent in Tulsa County.
- The median age of AA housing stock by census tract income level was 57 years in low-, 56 years in moderate-, 45 years in middle-, and 35 years in upper-income census tracts. The vacancy rate was also higher in the AA's LMI tracts, at 14.4 percent and 14.6 percent, respectively, compared to 9.6 percent in middle- and 6.9 percent in upper-income tracts.

Table 7

Unemployment Rates					
Assessment Area: Tulsa Metropolitan					
Region	2018	2019	2020	2021	2022
Tulsa Metropolitan	3.3	3.0	6.6	4.1	3.0
Creek County, OK	3.7	3.5	6.7	4.4	3.5
Rogers County, OK	3.2	2.9	6.0	3.7	2.9
Tulsa County, OK	3.2	3.0	6.7	4.2	3.0
Wagoner County, OK	3.2	3.0	5.9	3.7	3.0
Tulsa, OK MSA	3.3	3.1	6.6	4.2	3.1
Oklahoma	3.3	3.1	6.3	4.0	3.0

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics
Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- Most recent unemployment figures suggest a highly stable job market within the AA and entire Tulsa MSA, as well as throughout the state of Oklahoma.
- Some of the AA’s largest employers include American Airlines, Amazon, AAON, ONEOK, Nordam Group, and Whirlpool. These entities are predominately located in Tulsa and are integral to the Tulsa economy.

Table 8

Small Business Loan Trends					
Assessment Area: Tulsa Metropolitan					
Area	2017	2018	2019	2020	2021
Tulsa Metropolitan	15,169	15,186	15,925	17,880	20,038
Creek County, OK	939	867	931	1,013	1,204
Rogers County, OK	1,320	1,402	1,466	1,765	2,011
Tulsa County, OK	12,045	12,047	12,590	13,942	15,507
Wagoner County, OK	865	870	938	1,160	1,316
Tulsa, OK MSA	16,013	16,121	16,842	18,753	21,359
Oklahoma	55,813	56,117	64,639	74,506	82,357
<i>Source: FFIEC CRA Aggregate Data</i>					
<i>Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>					

- The number of small business loans within the AA has steadily increased from 2017 to 2021.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE TULSA METROPOLITAN AA

The bank’s lending test performance in the Tulsa Metropolitan AA is reasonable. The bank’s performance under each of the performance criterion, including geographic distribution by income level of census tracts, and the distribution of lending by size of business and borrower income level, is reasonable.

Geographic Distribution of Loans

The bank’s geographic distribution of both small business and motor vehicle loans reflects a reasonable distribution among the different census tracts and dispersion throughout the AA.

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of small business lending among the moderate-income census tracts was above the percentage of total AA businesses operating in those census tracts, however the bank did not have any small business loans in the AA’s low-income census tracts. An analysis

of lending dispersion was also conducted and while the geographic distribution performance is considered reasonable, conspicuous gaps were identified that contained LMI census tracts. The gaps were noted primarily in Tulsa and Wagoner Counties; however, this did not impact the overall conclusion. The bank’s size, distance from the isolated groups of moderate-income census tracts in the southeastern portion of Wagoner County, and the presence of other financial institutions within or near those census tracts impact the bank’s ability to successfully penetrate these tracts.

Table 9

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Tulsa Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	3.7
Moderate	13	34.2	3,112	47.6	24.7
Middle	17	44.7	2,739	41.9	31.8
Upper	8	21.1	691	10.6	39.6
Unknown	0	0.0	0	0.0	0.1
Tract-Unk	0	0.0	0	0.0	
Total	38	100.0	6,542	100.0	100.0

*Source: 2023 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey*

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

Motor Vehicle Lending

The geographic distribution of motor vehicle lending is reasonable. The bank’s performance in the low-income census tracts was comparable to the percent of households in those areas, while the bank’s performance in the moderate-income census tracts was above the demographic figure. An analysis of lending dispersion was conducted and revealed conspicuous gaps and lapses in lending in Wagoner County, including in moderate-income census tracts. However, this did not impact the overall conclusion given the bank’s distance from the isolated groups of moderate-income census tracts in the southeastern portion of Wagoner County and the presence of other financial institutions within or near those census tracts.

Table 10

Distribution of 2023 Motor Vehicle Lending By Income Level of Geography					
Assessment Area: Tulsa Metropolitan					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	%	
Low	4	4.4	114	5.6	5.2
Moderate	46	50.5	986	48.2	27.7
Middle	34	37.4	800	39.1	31.4
Upper	7	7.7	147	7.2	35.4
Unknown	0	0.0	0	0.0	0.3
Tract-Unk	0	0.0	0	0.0	
Total	91	100.0	2,047	100.0	100.0

Source: 2023 FFIEC Census 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 of Different Sizes

The bank’s lending has a reasonable distribution among individuals of different income levels and businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with gross annual revenues of \$1 million or less was comparable to the percentage of total businesses with revenues of \$1 million or less operating in the AA.

Table 11

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Tulsa Metropolitan					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	28	73.7	2,696	41.2	91.1
Over \$1 Million	10	26.3	3,845	58.8	8.0
Revenue Unknown	0	0.0	0	0.0	0.9
Total	38	100.0	6,542	100.0	100.0
By Loan Size					
\$100,000 or Less	26	68.4	1,310	20.0	
\$100,001 - \$250,000	3	7.9	628	9.6	
\$250,001 - \$1 Million	9	23.7	4,604	70.4	
Total	38	100.0	6,542	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	22	78.6	1,108	41.1	
\$100,001 - \$250,000	2	7.1	382	14.2	
\$250,001 - \$1 Million	4	14.3	1,206	44.7	
Total	28	100.0	2,696	100.0	
<i>Source: 2023 FFIEC Census Data 2022 Dun & 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>					

Motor Vehicle Lending

The borrower distribution of motor vehicle lending is excellent. The bank’s motor vehicle lending to low-income borrowers was above the percent of low-income households in the AA. The bank’s lending to moderate-income borrowers was also above the demographic figure.

Table 12

Distribution of 2023 Motor Vehicle Lending By Borrower Income Level					
Assessment Area: Tulsa Metropolitan					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	\$%	
Low	34	37.4	392	19.1	22.8
Moderate	31	34.1	709	34.6	16.1
Middle	18	19.8	590	28.8	17.7
Upper	8	8.8	356	17.4	43.4
Unknown	0	0.0	0	0.0	2.7
Total	91	100.0	2,047	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey

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

**NORTHEAST OKLAHOMA ASSESSMENT AREA
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHEAST
OKLAHOMA AA**

The Northeast Oklahoma AA is comprised of Craig, Mayes, and Nowata Counties in their entireties and is unchanged from the prior exam.

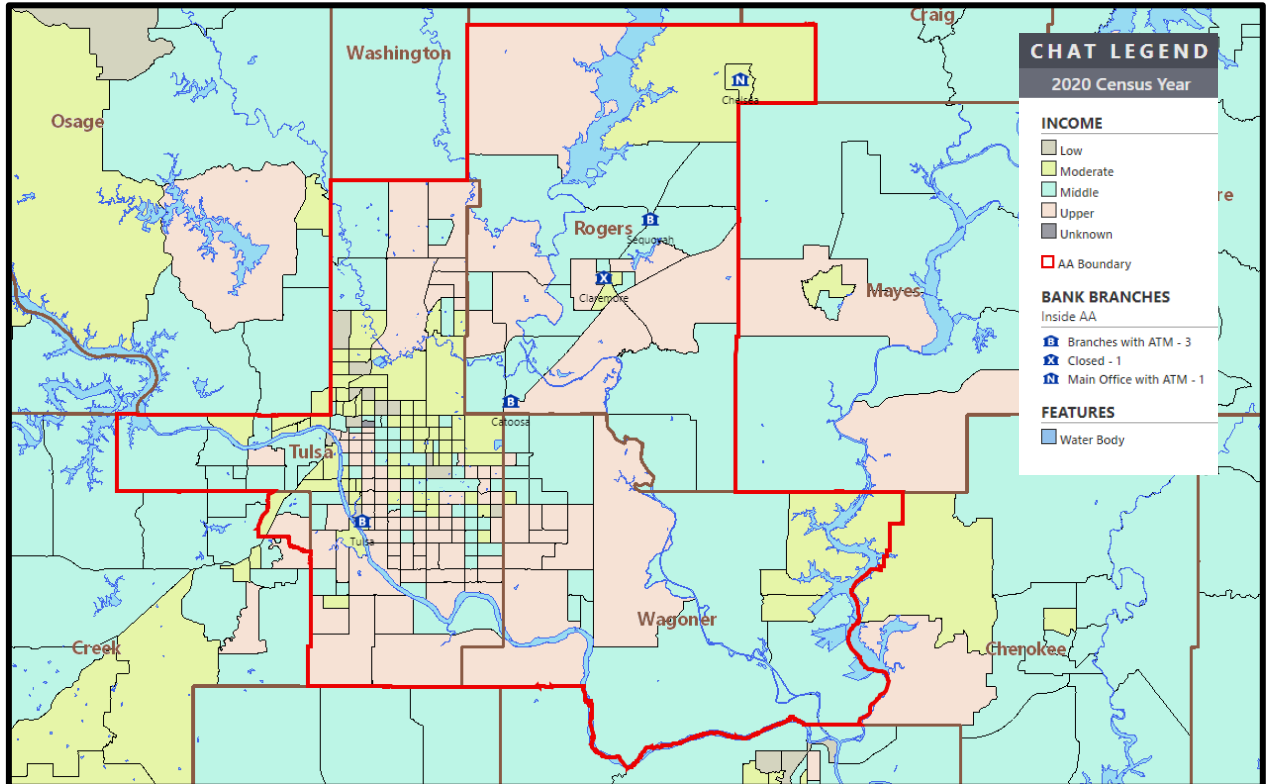
- The AA contains 2 moderate-, 15 middle-, and 2 upper-income census tracts. This represents a change from the last examination, where the AA had 2 moderate-, 14 middle-, and 2 upper-income census tracts.
- Based on the 2020 ACS data, the AA population was 62,473, which reflects a 5.8 percent decrease from the 2015 ACS data.
- The AA is home to 17,749 families. According to 2020 ACS data, 23.8 percent are low-, 17.4 percent are moderate-, 20.5 percent are middle-, and 38.3 percent are upper-income.
- The bank operates two branches in the AA, with one located in a moderate-income census tract and one located in a middle-income census tract.
- The bank maintains two cash-only automated teller machines (ATMs) within the Northeast Oklahoma AA
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 3.5 percent market share of deposits in the AA, ranking 7th of 13 financial institutions operating from 29 offices in the AA.

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

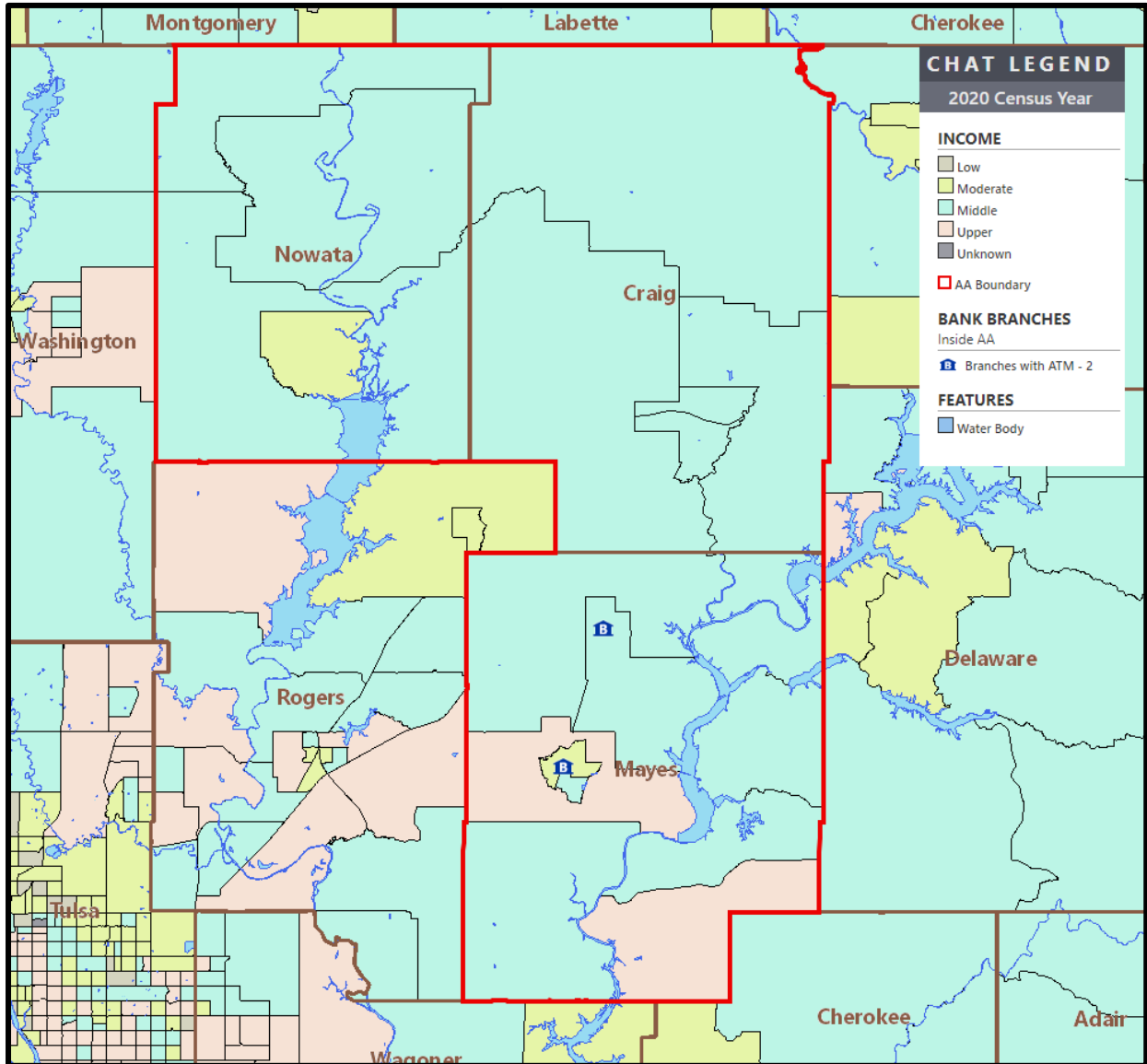
The institution's lending performance in the area is consistent with the institution's lending performance overall. Tables outlining the bank's performance in the Northeast Oklahoma AA are available in Appendix C.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

Tulsa Metropolitan AA



Northeast Oklahoma AA



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2023 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	13	4.9	9,472	4.6	3,988	42.1	42,079	20.2
Moderate	76	28.8	52,378	25.2	9,329	17.8	35,932	17.3
Middle	80	30.3	63,966	30.8	4,646	7.3	40,547	19.5
Upper	94	35.6	81,925	39.4	2,802	3.4	89,318	43.0
Unknown	1	0.4	135	0.1	26	19.3	0	0.0
Total AA	264	100.0	207,876	100.0	20,791	10.0	207,876	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	19,591	5,458	2.7	27.9	11,311	57.7	2,822	14.4
Moderate	103,939	42,122	20.7	40.5	46,681	44.9	15,136	14.6
Middle	111,541	66,147	32.5	59.3	34,705	31.1	10,689	9.6
Upper	122,016	89,742	44.1	73.5	23,899	19.6	8,375	6.9
Unknown	1,185	104	0.1	8.8	796	67.2	285	24.1
Total AA	358,272	203,573	100.0	56.8	117,392	32.8	37,307	10.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,636	3.7	1,409	3.5	217	6.2	10	2.4
Moderate	10,826	24.7	9,617	24.1	1,123	32.1	86	21.0
Middle	13,927	31.8	12,546	31.5	1,243	35.5	138	33.7
Upper	17,351	39.6	16,266	40.8	911	26.0	174	42.5
Unknown	56	0.1	46	0.1	9	0.3	1	0.2
Total AA	43,796	100.0	39,884	100.0	3,503	100.0	409	100.0
Percentage of Total Businesses:			91.1		8.0		0.9	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	6	1.2	6	1.2	0	0.0	0	0.0
Moderate	59	11.8	58	11.8	1	16.7	0	0.0
Middle	183	36.7	181	36.9	2	33.3	0	0.0
Upper	250	50.2	245	50.0	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	498	100.0	490	100.0	6	100.0	2	100.0
Percentage of Total Farms:			98.4		1.2		0.4	
<i>Source: 2023 FFIEC Census Data 2022 Dun & 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>								

APPENDIX C – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Table C-1

2023 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	4,231	23.8
Moderate	2	10.5	2,347	13.2	419	17.9	3,087	17.4
Middle	15	78.9	13,303	75.0	1,987	14.9	3,632	20.5
Upper	2	10.5	2,099	11.8	228	10.9	6,799	38.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	19	100.0	17,749	100.0	2,634	14.8	17,749	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	
Moderate	4,343	2,093	11.1	48.2	1,635	37.6	615	14.2
Middle	23,294	14,206	75.4	61.0	4,753	20.4	4,335	18.6
Upper	3,550	2,542	13.5	71.6	398	11.2	610	17.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	31,187	18,841	100.0	60.4	6,786	21.8	5,560	17.8
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	501	23.4	456	23.7	38	22.8	7	14.0
Middle	1,432	66.8	1,281	66.4	109	65.3	42	84.0
Upper	212	9.9	191	9.9	20	12.0	1	2.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,145	100.0	1,928	100.0	167	100.0	50	100.0
Percentage of Total Businesses:				89.9		7.8		2.3
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	12	7.8	12	7.9	0	0.0	0	0.0
Middle	124	81.0	123	80.9	0	0.0	1	100.0
Upper	17	11.1	17	11.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	153	100.0	152	100.0	0	0.0	1	100.0
Percentage of Total Farms:				99.3		0.0		0.7

Source: 2023 FFIEC Census Data
 2022 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

Table C-2

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Northeast Oklahoma					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	4	13.8	705	22.1	23.4
Middle	24	82.8	2,428	76.3	66.8
Upper	1	3.4	51	1.6	9.9
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	29	100.0	3,184	100.0	100.0

Source: 2023 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey

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

Table C-3

Distribution of 2023 Motor Vehicle Lending By Income Level of Geography					
Assessment Area: Northeast Oklahoma					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	7	14.9	106	9.9	14.5
Middle	30	63.8	778	72.4	74.0
Upper	10	21.3	190	17.7	11.5
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	47	100.0	1,074	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey

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

Table C-4

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Northeast Oklahoma					
	Bank Loans				Total Businesses
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	20	69.0	2,328	73.1	89.9
Over \$1 Million	9	31.0	857	26.9	7.8
Revenue Unknown	0	0.0	0	0.0	2.3
Total	29	100.0	3,184	100.0	100.0
By Loan Size					
\$100,000 or Less	21	72.4	1,083	34.0	
\$100,001 - \$250,000	4	13.8	582	18.3	
\$250,001 - \$1 Million	4	13.8	1,519	47.7	
Total	29	100.0	3,184	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	15	75.0	769	33.0	
\$100,001 - \$250,000	2	10.0	315	13.5	
\$250,001 - \$1 Million	3	15.0	1,244	53.4	
Total	20	100.0	2,328	100.0	
<i>Source: 2023 FFIEC Census Data 2022 Dun & 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>					

Table C-5

Distribution of 2023 Motor Vehicle Lending By Borrower Income Level					
Assessment Area: Northeast Oklahoma					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	%	
Low	5	10.6	86	8.0	23.9
Moderate	17	36.2	271	25.2	17.1
Middle	10	21.3	196	18.2	16.5
Upper	15	31.9	520	48.4	42.5
Unknown	0	0.0	0	0.0	0.0
Total	47	100.0	1,074	100.0	100.0
<i>Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

APPENDIX D – 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.