



## **PUBLIC DISCLOSURE**

February 5, 2024

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

First Bank of Thomas  
RSSD# 328058

301 West Broadway Street  
Thomas, Oklahoma 73669

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**

First Bank of Thomas (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 AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among 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.

## **SCOPE OF EXAMINATION**

Examiners used 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 only AA. Examiners reviewed the following data:

- The bank's 18-quarter average NLTD ratio,
- A universe of 27 outstanding small farm loans originated between October 1, 2019, and December 31, 2022; and
- A universe of 6 outstanding small business loans originated between October 1, 2019, and December 31, 2022.

For this evaluation, greater weight was placed on small farm lending based on the higher number of small farm loans originated during the evaluation period. Furthermore, greater consideration was given to the volume of loan originations rather than the dollar amount, as it is more representative of the number of entities served.

## **DESCRIPTION OF INSTITUTION**

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

- The bank is a wholly owned subsidiary of First Thomas Bancorp, Thomas, Oklahoma.

- The bank has one affiliate, Southwest Bank of Weatherford, Weatherford, Oklahoma.
- The bank has total assets of \$50.4 million as of September 30, 2023.
- The bank has one location in Thomas, Oklahoma.
- The bank maintains one cash-only automated teller machine at its headquarters.
- As shown in the table below, the bank’s primary business focus is agricultural and commercial lending. Although real estate lending comprises a meaningful portion of the bank’s loan portfolio, most of these loans are purchased loan participations and are not considered in this evaluation.

**Table 1**

<b>Composition of Loan Portfolio as of September 30, 2023</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	4,909	22.5
Farmland	499	2.3
1- to 4-Family Residential Real Estate	4,951	22.7
Multifamily Residential Real Estate	936	4.3
Nonfarm Nonresidential Real Estate	6,765	31.0
Agricultural	2,191	10.0
Commercial and Industrial	1,272	5.8
Consumer	271	1.2
Other	11	0.1
<b>Gross Loans</b>	<b>21,805</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 September 30, 2019, performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its community.

**DESCRIPTION OF ASSESSMENT AREA**

The bank’s Western Oklahoma AA consists of portions of Custer County and Dewey County (see Appendix A for an AA map and Appendix B for additional demographic data).

- The AA delineation remains unchanged since the prior CRA evaluation.
- From 2019-2021, the AA consisted of two middle- and one upper-income census tracts. In 2022, the AA changed to reflect three middle-income census tracts due to changes in the 2016-2020 American Community Survey (ACS) data.
- According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Summary of Deposit Market Share Report, the bank ranked 12 of 19 FDIC-insured depository institutions, with a total deposit market share of 3.5 percent.

- To further augment the CRA performance evaluation, one interview with a member of the community was conducted to ascertain the credit needs of the area communities and for perspective on local economic conditions. The community member interviewed represents a local governmental organization.

**Table 2**

<b>Population Change</b>			
<b>Assessment Area: Western Oklahoma</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Western Oklahoma	33,841	32,997	(2.5)
Custer County, OK	28,978	28,513	(1.6)
Dewey County, OK	4,863	4,484	(7.8)
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*

- As illustrated in Table 2, Dewey County experienced a larger decrease in population than the larger AA and other rural areas. There was an overall increase in population statewide during the same period.
- The population of residents in the AA ages 65 and older, at 20.0 percent, is higher relative to the statewide figure of 15.6 percent, but comparable to other rural areas, at 18.3 percent.

**Table 3**

<b>Median Family Income Change</b>			
<b>Assessment Area: Western Oklahoma</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Western Oklahoma	60,518	67,130	10.9
Custer County, OK	58,817	69,596	18.3
Dewey County, OK	66,539	62,122	(6.6)
NonMSA Oklahoma	56,258	58,565	4.1
Oklahoma	63,401	67,511	6.5

*Source: 2011-2015 U.S. Census Bureau: American Community Survey  
2016-2020 U.S. Census Bureau: American Community Survey*

*Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*

- As illustrated in Table 3, Dewey County experienced a decrease in median family income, while the AA, state of Oklahoma, and other rural areas experienced notable increases.
- The percentage of families living below poverty is comparable among the AA, state of Oklahoma, and other rural areas, at 12.6 percent, 11.3 percent, and 13.5 percent respectively, but is lower in Dewey County, at 8.7 percent.

**Table 4**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Western 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>
Western Oklahoma	64.5	11.0	34.1	58.3	18.0	15.0
Custer County, OK	65.2	12.4	35.1	58.0	19.5	15.3
Dewey County, OK	56.6	0.0	24.4	60.0	13.3	13.9
NonMSA Oklahoma	64.4	27.6	34.5	48.4	21.4	15.5
Oklahoma	71.1	30.5	37.9	52.5	24.5	16.0

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*

- The AA housing affordability ratio<sup>1</sup> of 52.2 percent indicates greater affordability when compared to rural areas statewide and the state of Oklahoma, at 42.0 percent and 37.8 percent, respectively.
- The AA’s median housing value of \$105,173 is lower than the figures for rural areas statewide and the state of Oklahoma, at \$110,370 and \$142,400, respectively.
- A member of the community indicated that there is a need for additional housing in the City of Thomas, as most units are occupied.

**Table 5**

<b>Unemployment Rates</b>					
<b>Assessment Area: Western Oklahoma</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Western Oklahoma	3.0	2.3	2.4	5.4	3.2
Custer County, OK	3.1	2.3	2.4	5.5	3.2
Dewey County, OK	2.7	1.8	2.0	4.9	2.7
NonMSA Oklahoma	4.3	3.5	3.4	6.0	3.8
Oklahoma	4.0	3.3	3.1	6.2	3.8

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

- Unemployment rates in the AA have remained consistently lower than other rural areas statewide and the state of Oklahoma.
- According to a member of the community, the primary industries within the assessment area are agriculture and energy.

<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.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

The bank’s overall lending test performance is Satisfactory. This conclusion is based on reasonable performance noted in each criterion, including the bank’s net loan-to-deposit ratio, a majority of loan originations which occurred within the bank’s AA, and the geographic and borrower distributions.

For the geographic and borrower analyses, 2019-2021 loan data was combined and evaluated aggregately within the AA, and compared to 2021 demographic data, as there were no significant changes during the multi-year review period. A geographic distribution analysis of 2022 lending was not conducted as the AA consisted solely of middle-income census tracts. See Appendix C for 2022 lending data tables.

**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 and business strategy, 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 asset size, product offerings, and area of operations in proximity to the bank’s AA.

The bank’s NLTD ratio is reasonable. As illustrated in Table 6, the bank’s 18-quarter average NLTD ratio of 53.4 percent fell within the ratios of the five comparator financial institutions with ratios ranging from 45.0 percent to 101.1 percent.

**Table 6**

<b>Comparative NLTD Ratios June 30, 2019 – September 30, 2023</b>			
<b>Institution</b>	<b>Location</b>	<b>Asset Size \$(000)</b>	<b>NLTD Ratio (%)</b>
			<b>18 Quarter Average</b>
<b>First Bank of Thomas</b>	Thomas, OK	50,425	53.4
<b>Similarly Situated Institutions</b>			
<b>Community State Bank</b>	Canton, OK	65,612	77.4
First Bank & Trust Company	Clinton, OK	57,544	45.0
Bank of Vici	Vici, OK	33,676	55.8
Bank 360	Cordell, OK	55,987	101.1
First Summit Bank	Ryan, OK	26,981	77.5

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a 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)	\$%
Small Business	5	83.3	136	80.1	1	16.7	34	19.9
Small Farm	23	85.2	996	69.1	4	14.8	446	30.9
<b>Total Loans</b>	28	84.8	1,132	70.2	5	15.2	480	29.8

*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 geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

Small Business Lending

The geographic distribution of small business lending is reasonable. As illustrated in Table 8, the distribution of outstanding small business loans originated in 2021 in middle-income tracts was comparable to the total percentage of businesses operating in those tracts. There were no outstanding small business loans originated in 2020 or the last quarter of 2019.

A review of the dispersion of loans among the various tracts throughout the AA revealed no conspicuous gaps or lapses.

**Table 8**

Distribution of 2021 Small Business Lending By Income Level of Geography					
Assessment Area: Western Oklahoma					
Geographic Income Level	Bank Loans				Total Businesses
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	3	100.0	72	100.0	72.0
Upper	0	0.0	0	0.0	28.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	3	100.0	72	100.0	100.0

*Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey*

*Note: Percentages may not total 100.0 percent due to rounding.  
There are no outstanding small business loans from 2019 or 2020.*



Small Farm Lending

The geographic distribution of small farm lending is reasonable. As illustrated in Table 9, the distribution of outstanding small farm loans in years 2020 and 2021 in middle-income tracts was comparable to the percentage of farms operating in those tracts. There were no outstanding small farm loans originated during the last quarter of 2019.

A review of the dispersion of loans among the various tracts throughout the AA revealed no conspicuous gaps or lapses.

**Table 9**

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Western Oklahoma									
Geograph ic Income Level	Bank Loans By Year								Total Farms %
	2020				2021				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Middle	4	100.0	291	100.0	6	100.0	132	100.0	80.7
Upper	0	0.0	0	0.0	0	0.0	0	0.0	19.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0	0.0
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>291</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>132</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.  
There are no outstanding small farm loans from 2019.

**Lending to Businesses and Farms of Different Sizes**

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

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending in 2021 to businesses with revenues of \$1MM or less was comparable to the percentage of businesses with revenues of \$1MM or less operating in the AA.

The borrower distribution of small business lending in 2022 reflected performance consistent with 2021 lending.

**Table 10**

<b>Distribution of 2021 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Western 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>	3	100.0	72	100.0	86.0
<b>Over \$1 Million</b>	0	0.0	0	0.0	9.7
<b>Revenue Unknown</b>	0	0.0	0	0.0	4.3
<b>Total</b>	3	100.0	72	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	3	100.0	72	100.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	
<b>Total</b>	3	100.0	72	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	3	100.0	72	100.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	
<b>Total</b>	3	100.0	72	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. There are no outstanding small business loans from 2019 or 2020.</i>					

**Small Farm Lending**

The borrower distribution of small farm lending is reasonable. The bank’s lending to farms with revenues of \$1MM or less in years 2020 and 2021 was comparable to the percentage of farms with revenues of \$1MM or less operating in the AA.

The bank’s performance in 2022 was consistent with performance in 2020 and 2021. While the distribution of loans originated to small farms in 2022 was below the demographic figure, 92.3 percent of the bank’s loans were originated in amounts of \$100,000 or less. This demonstrates the bank’s willingness to meet the credit needs of small farms which generally seek smaller dollar loans. This performance supported the overall conclusion.

**Table 11**

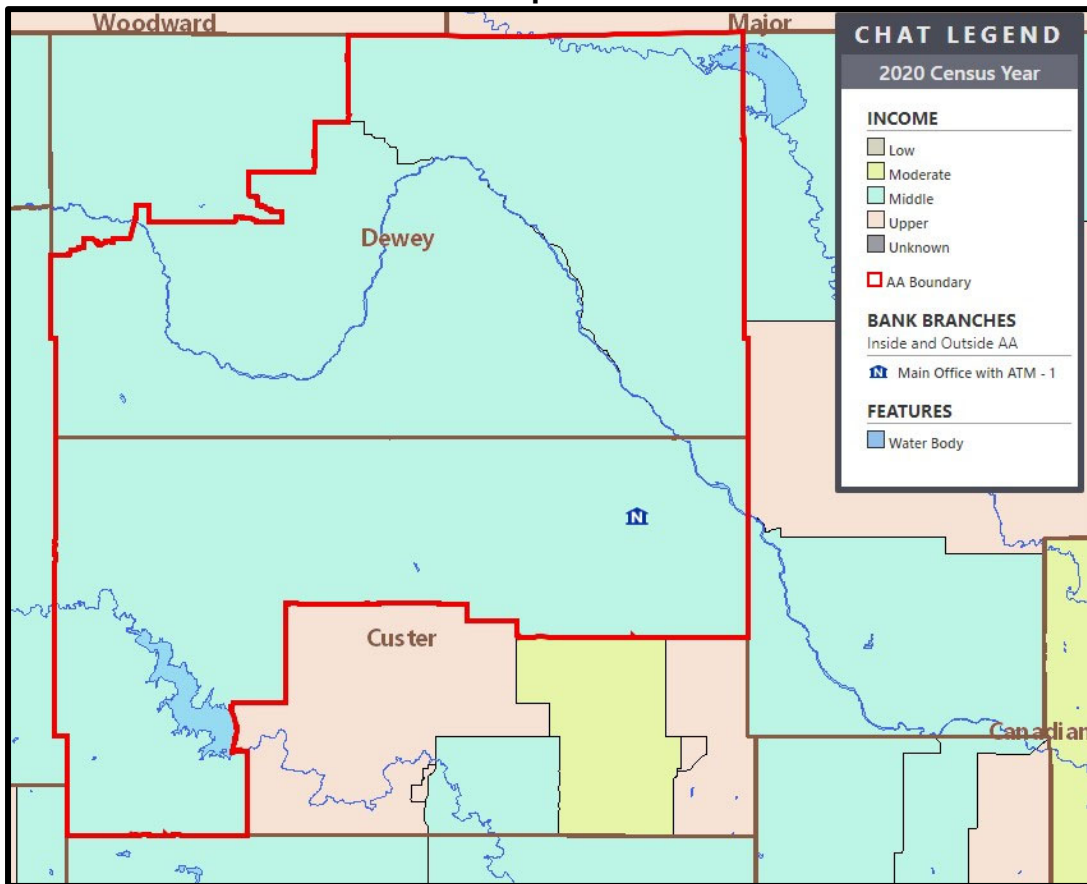
<b>Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms</b>									
<b>Assessment Area: Western Oklahoma</b>									
	<b>Bank Loans By Year</b>								<b>Total Farms %</b>
	<b>2020</b>				<b>2021</b>				
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>									
<b>\$1 Million or Less</b>	4	100.0	291	100.0	4	66.7	67	50.8	98.9
<b>Over \$1 Million</b>	0	0.0	0	0.0	2	33.3	65	49.2	1.1
<b>Revenue Unknown</b>	0	0.0	0	0.0	0	0.0	0	0.0	0.0
<b>Total</b>	4	100.0	291	100.0	6	100.0	132	100.0	100.0
<b>By Loan Size</b>									
<b>\$100,000 or Less</b>	3	75.0	41	14.1	6	100.0	132	100.0	
<b>\$100,001 - \$250,000</b>	1	25.0	250	85.9	0	0.0	0	0.0	
<b>\$250,001 - \$500,000</b>	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total</b>	4	100.0	291	100.0	6	100.0	132	100.0	
<b>By Loan Size and Revenue \$1 Million or Less</b>									
<b>\$100,000 or Less</b>	3	75.0	41	14.1	4	100.0	67	100.0	
<b>\$100,001 - \$250,000</b>	1	25.0	250	85.9	0	0.0	0	0.0	
<b>\$250,001 - \$500,000</b>	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total</b>	4	100.0	291	100.0	4	100.0	67	100.0	
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>									
<i>Note: Percentages may not total 100.0 percent due to rounding. There are no outstanding small farm loans from 2019.</i>									

**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



**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table B-1**

2022 Western 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	307	18.9
Moderate	0	0.0	0	0.0	0	0.0	301	18.5
Middle	3	100.0	1,624	100.0	205	12.6	302	18.6
Upper	0	0.0	0	0.0	0	0.0	714	44.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3</b>	<b>100.0</b>	<b>1,624</b>	<b>100.0</b>	<b>205</b>	<b>12.6</b>	<b>1,624</b>	<b>100.0</b>
Income Categories	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	3,364	1,810	100.0	53.8	562	16.7	992	29.5
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,364</b>	<b>1,810</b>	<b>100.0</b>	<b>53.8</b>	<b>562</b>	<b>16.7</b>	<b>992</b>	<b>29.5</b>
Income Categories	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	300	100.0	258	100.0	31	100.0	11	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>300</b>	<b>100.0</b>	<b>258</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>86.0</b>		<b>10.3</b>		<b>3.7</b>
Income Categories	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	93	100.0	93	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>93</b>	<b>100.0</b>	<b>93</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>0.0</b>		<b>0.0</b>
Source: 2022 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 B-2**

2021 Western 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	353	18.9
Moderate	0	0.0	0	0.0	0	0.0	280	15.0
Middle	2	66.7	1,400	74.9	172	12.3	311	16.6
Upper	1	33.3	468	25.1	65	13.9	924	49.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3</b>	<b>100.0</b>	<b>1,868</b>	<b>100.0</b>	<b>237</b>	<b>12.7</b>	<b>1,868</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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,494	1,457	74.0	58.4	411	16.5	626	25.1
Upper	916	511	26.0	55.8	164	17.9	241	26.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,410</b>	<b>1,968</b>	<b>100.0</b>	<b>57.7</b>	<b>575</b>	<b>16.9</b>	<b>867</b>	<b>25.4</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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	201	72.0	176	73.3	18	66.7	7	58.3
Upper	78	28.0	64	26.7	9	33.3	5	41.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>279</b>	<b>100.0</b>	<b>240</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>86.0</b>		<b>9.7</b>		<b>4.3</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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	71	80.7	70	80.5	1	100.0	0	0.0
Upper	17	19.3	17	19.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>88</b>	<b>100.0</b>	<b>87</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>98.9</b>		<b>1.1</b>		<b>0.0</b>
<i>Source: 2021 FFIEC Census Data 2021 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Table B-3**

2020 Western 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	353	18.9
Moderate	0	0.0	0	0.0	0	0.0	280	15.0
Middle	2	66.7	1,400	74.9	172	12.3	311	16.6
Upper	1	33.3	468	25.1	65	13.9	924	49.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3</b>	<b>100.0</b>	<b>1,868</b>	<b>100.0</b>	<b>237</b>	<b>12.7</b>	<b>1,868</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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,494	1,457	74.0	58.4	411	16.5	626	25.1
Upper	916	511	26.0	55.8	164	17.9	241	26.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,410</b>	<b>1,968</b>	<b>100.0</b>	<b>57.7</b>	<b>575</b>	<b>16.9</b>	<b>867</b>	<b>25.4</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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	202	71.6	177	72.8	18	66.7	7	58.3
Upper	80	28.4	66	27.2	9	33.3	5	41.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>282</b>	<b>100.0</b>	<b>243</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>86.2</b>		<b>9.6</b>		<b>4.3</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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	74	81.3	74	81.3	0	0.0	0	0.0
Upper	17	18.7	17	18.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>91</b>	<b>100.0</b>	<b>91</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>0.0</b>		<b>0.0</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-4**

2019 Western 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	353	18.9
Moderate	0	0.0	0	0.0	0	0.0	280	15.0
Middle	2	66.7	1,400	74.9	172	12.3	311	16.6
Upper	1	33.3	468	25.1	65	13.9	924	49.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3</b>	<b>100.0</b>	<b>1,868</b>	<b>100.0</b>	<b>237</b>	<b>12.7</b>	<b>1,868</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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	2,494	1,457	74.0	58.4	411	16.5	626	25.1
Upper	916	511	26.0	55.8	164	17.9	241	26.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,410</b>	<b>1,968</b>	<b>100.0</b>	<b>57.7</b>	<b>575</b>	<b>16.9</b>	<b>867</b>	<b>25.4</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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	196	72.3	171	73.7	18	66.7	7	58.3
Upper	75	27.7	61	26.3	9	33.3	5	41.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>271</b>	<b>100.0</b>	<b>232</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>85.6</b>		<b>10.0</b>		<b>4.4</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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	75	81.5	74	81.3	1	100.0	0	0.0
Upper	17	18.5	17	18.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>92</b>	<b>100.0</b>	<b>91</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>98.9</b>		<b>1.1</b>		<b>0.0</b>
<i>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								



**APPENDIX C – ADDITIONAL LENDING TABLES**

**Table C-1**

<b>Distribution of 2022 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Western 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>	2	100.0	64	100.0	86.0
<b>Over \$1 Million</b>	0	0.0	0	0.0	10.3
<b>Revenue Unknown</b>	0	0.0	0	0.0	3.7
<b>Total</b>	2	100.0	64	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	2	100.0	64	100.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	
<b>Total</b>	2	100.0	64	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	2	100.0	64	100.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	
<b>Total</b>	2	100.0	64	100.0	
<i>Source: 2022 FFIEC Census Data 2022 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>					

**Table C-2**

<b>Distribution of 2022 Small Farm Lending By Revenue Size of Farms</b>					
<b>Assessment Area: Western Oklahoma</b>					
	<b>Bank Loans</b>				<b>Total Farms</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>%</b>
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	8	61.5	252	44.0	100.0
<b>Over \$1 Million</b>	5	38.5	320	55.8	0.0
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.0
<b>Total</b>	13	100.0	573	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	12	92.3	413	72.1	
<b>\$100,001 - \$250,000</b>	1	7.7	160	27.9	
<b>\$250,001 - \$500,000</b>	0	0.0	0	0.0	
<b>Total</b>	13	100.0	573	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	8	100.0	252	100.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$500,000</b>	0	0.0	0	0.0	
<b>Total</b>	8	100.0	252	100.0	
<i>Source: 2022 FFIEC Census Data                  2022 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>					

## 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.