



## **PUBLIC DISCLOSURE**

March 15, 2021

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

**Lakeside Bank of Salina  
RSSD# 391557**

**103 West Ferry Street  
Salina, Oklahoma 74365**

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

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

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

The bank is rated **Outstanding**. 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 an excellent penetration among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.
- The bank's investment record enhances credit availability in the AA.

## SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics and credit needs. Lending performance was assessed within the bank's Mayes County AA. The following data was reviewed:

- The bank's 27-quarter average NLTD ratio.
- A sample of 56 small business loans selected from a universe of 78 loans originated between May 5, 2014 and December 31, 2019.
- A sample of 120 motor vehicle loans selected from a universe of 293 loans originated between January 1, 2019 and December 31, 2019.
- While both loan products considered in this evaluation represent a strategic focus for the bank and comprise a similar portion of the loan portfolio by dollar volume, the bank's motor vehicle lending performance was weighted more heavily in the analysis due to its higher origination volume.

While conclusions regarding the bank's small business lending were based on performance over multiple years, only 2017-2019 lending tables are reflected in the body of the report, as the AA demographics changed during this time. The bank's 2014-2016 lending data is included in Appendix B of this report.

**DESCRIPTION OF INSTITUTION**

The bank is a community bank headquartered in Salina, Oklahoma. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of First Pryor Bancorp, Inc.
- The bank is affiliated with Bank of Locust Grove and First Priority Bank through common ownership under the holding company. These institutions are also state chartered, member banks of the Federal Reserve System.
- The bank had total assets of \$46.4 million (MM) as of September 30, 2020.
- The bank operates from a single location in Salina, Oklahoma. The location also has an automated teller machine.
- The bank is a consumer, commercial, and residential real estate lender, with an emphasis in aircraft lending for both consumer and commercial purpose loans.

<b>TABLE 1 COMPOSITION OF LOAN PORTFOLIO AS OF SEPTEMBER 30, 2020</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Consumer	11,162	32.2
Commercial	10,194	29.4
Residential Real Estate	10,116	29.2
Agriculture	2,933	8.5
Other	229	0.7
Gross Loans	34,634	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Outstanding under the CRA at its May 5, 2014 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.

**DESCRIPTION OF ASSESSMENT AREA**

The bank’s AA is comprised of Mayes County in its entirety (see Appendix A for an AA map).

- The AA’s nine census tracts are comprised of one moderate-, six middle-, and two upper-income census tracts. Since the previous evaluation, the income designation for several census tracts in the AA changed; this occurred in 2017. This resulted in changes to key demographic figures used to evaluate the bank’s lending performance.
- Prior to 2017, the bank’s main office, in Salina, Oklahoma, was located in the AA’s only moderate-income census tract until its income designation was changed to middle-income. After the change, the AA’s only moderate-income census tract is now located in Pryor, approximately nine miles west of Salina and across Lake Hudson.
- Salina is located on the eastern side of Lake Hudson, which runs vertically through the center of Mayes County.
- In addition, First Priority Bank, an affiliate institution, also operates in Pryor.

- According to the June 30, 2020 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank has a 5.2 percent deposit market share and ranks 4<sup>th</sup> out of 13 FDIC-insured institutions operating in the AA.
- One community contact that was conducted as part of the public evaluation of another financial institution in the area was utilized to provide context behind local demographic and economic conditions. The community member was a representative of a local business organization that promotes economic development in the AA.

<b>TABLE 2 POPULATION CHANGE</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
Mayes County AA	41,259	41,007	(0.6)
Non-MSA Oklahoma	1,327,624	1,333,350	0.4
State of Oklahoma	3,751,351	3,849,733	2.6

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

- The AA is rural in nature with a stable population.
- The city of Pryor is the county seat and largest city in Mayes County with a population of 9,379 in 2019.
- In comparison, Salina had a population of 1,225 in 2019.

<b>TABLE 3 MEDIAN FAMILY INCOME CHANGE</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
Mayes County AA	55,259	51,842	(6.1)
NonMSA Oklahoma	51,664	51,491	(0.3)
State of Oklahoma	58,375	58,029	(0.5)

Source: 2006-2010 U.S. Census Bureau: American Community Survey  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.

- A higher percentage of AA families are below the poverty line compared to the rest of the state and other rural areas.
- Specifically, the percentage of AA families below the poverty line is 16.3 percent, compared to 12.4 percent in the state of Oklahoma and 14.2 percent in other rural areas.

**TABLE 4  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Mayes County AA	89,200	104,000	16.6	581	629	8.3
Non-MSA Oklahoma	81,740	91,490	11.9	552	634	14.9
State of Oklahoma	104,300	117,900	13.0	633	727	14.8

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

- A community contact stated there is a need for moderate-priced housing stock in the area. This increased demand is primarily due to the influx of people coming to work at the MidAmerica Industrial Park.

**TABLE 5  
UNEMPLOYMENT RATES**

Region	2015	2016	2017	2018	2019
Mayes County AA	4.3	5.1	4.7	3.4	3.1
NonMSA Oklahoma	5.0	5.4	4.5	3.6	3.6
State of Oklahoma	4.4	4.8	4.2	3.4	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- A community contact stated the local economy has been stable and is experiencing growth as a result of new business growth in the MidAmerica Industrial Park.
- The AA's largest employers include Google, Orchid Paper Products, the Grand River Dam Authority, and Pryor Public Schools.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, and location. The bank's NLTD ratio is reasonable as it is within the range of NLTD ratios of the similarly situated banks.

TABLE 6 COMPARATIVE NLTD RATIOS			
Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			27 Quarter Average
Lakeside Bank of Salina	Salina, OK	46,409	79.6
Bank of Locust Grove	Locust Grove, OK	45,812	74.1
Oklahoma State Bank	Vinita, OK	213,227	91.2
Bank of Commerce	Chouteau, OK	40,900	51.9

### Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. A majority of the bank’s total loans, by number and dollar, were originated inside the AA.

By individual product, a majority of motor vehicle loans were originated inside the AA by number and dollar. Conversely, a majority of the bank’s small business loans were originated outside the AA by number and dollar. The small business concentration outside the AA is due to the bank’s strategic focus on aircraft lending, which serves a broad market and often involves lending to borrowers outside the bank’s AA. All 38 small business loans that were originated outside the AA were aircraft loans. The bank’s more traditional commercial lending occurs inside the AA, as all 18 small business loans that were originated inside the AA were non-aircraft loans.

TABLE 7 LENDING INSIDE AND OUTSIDE THE AA								
Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Motor Vehicle Loans	95	794	79.2	75.9	25	253	20.8	24.1
Small Business Loans	18	1,233	32.1	45.2	38	1,493	67.9	54.8
<b>Total Loans</b>	<b>113</b>	<b>2,027</b>	<b>64.2</b>	<b>53.7</b>	<b>63</b>	<b>1,746</b>	<b>35.8</b>	<b>46.3</b>

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

### Geographic Distribution of Loans

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

#### Small Business Lending

The geographic distribution of small business lending is reasonable. Due to the census tract designation changes that occurred in the AA in 2017, small business lending performance was evaluated for two different review periods using applicable demographic figures for each period. The bank’s 2017-2019 small business lending data is displayed in Table 8 below, and the bank’s 2014-2016 small business lending data is located in Table B-7.

Between 2017 and 2019, the bank did not originate any small business loans in the AA’s moderate-income tract. However, a greater distribution of the bank’s lending occurred in the AA’s moderate-income census tract prior to 2017, making the bank’s overall performance more comparable to AA demographics. Due to the change in census tract designations, the bank faces several barriers that may limit its reach to the AA’s new moderate-income tract in Pryor, Oklahoma, including the geographic barrier of Lake Hudson and the presence of an affiliate institution in Pryor. This context supports an overall reasonable distribution of lending among census tracts of different income levels throughout the evaluation period.

In addition, while there were gaps in lending in the moderate-income tract between 2017 and 2019 as described above, the overall evaluation of the dispersion of small business lending during the evaluation period did not identify any concerning gaps in lending among geographies in the AA.

**TABLE 8**  
**DISTRIBUTION OF 2017-2019 SMALL BUSINESS LENDING**  
**BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
<b>Low</b>	0	0	0.0	0.0	0.0
<b>Moderate</b>	0	0	0.0	0.0	22.4
<b>Middle</b>	10	787	71.4	71.9	55.5
<b>Upper</b>	4	307	28.6	28.1	22.0
<b>Unknown</b>	0	0	0.0	0.0	0.0
<b>Not Reported</b>	0	0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
 2019 Dun & Bradstreet Data  
 2011–2015 U.S. Census Bureau: American Community Survey  
 NOTE: Percentages may not add up to 100.0 due to rounding.

Motor Vehicle Lending

The geographic distribution of motor vehicle lending is reasonable. Motor vehicle lending in the AA’s moderate-income census tract is below the demographic figure. However, as discussed previously, lending in the Pryor area is challenging for the bank. The geographic boundary of Lake Hudson and the presence of a larger affiliate institution are significant barriers to lending in this geography. Considering this context, the bank’s distribution of motor vehicle lending is reasonable.

In addition, loan dispersion was also evaluated and did not reveal any gaps in lending among the individual census tracts in the AA.



**TABLE 9  
DISTRIBUTION OF 2019 MOTOR VEHICLE LENDING  
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Households
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	3	36	3.2	4.6	11.3
Middle	85	691	89.5	87.1	63.8
Upper	7	66	7.4	8.4	24.9
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and to businesses of different revenue sizes. The bank's lending reflects excellent distribution among borrowers of different income levels and businesses of different sizes.

#### Small Business Lending

The borrower distribution of small business lending is excellent. The bank's distribution of lending to businesses with gross annual revenues of \$1MM or less is above the demographic figure. The bank's performance in Table 10 is supplemented by the four small business loans that were originated between 2014 and 2016, which were all to businesses with gross annual revenues of \$1MM or less (see Table B-8 in Appendix B).

**TABLE 10  
DISTRIBUTION OF 2017-2019 SMALL BUSINESS LENDING  
BY REVENUE SIZE OF BUSINESSES**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
<b>By Revenue</b>					
\$1 Million or Less	13	1,087	92.9	99.4	90.3
Over \$1 Million	0	0	0.0	0.0	7.4
Not Known	1	6	7.1	0.6	2.2
<b>Total</b>	<b>14</b>	<b>1,094</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>By Loan Size</b>					
\$100,000 or less	9	341	64.3	31.1	
\$100,001 – \$250,000	5	753	35.7	68.9	
\$250,001 – \$1 Million	0	0	0.0	0.0	
<b>Total</b>	<b>14</b>	<b>1,094</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
\$100,000 or less	8	334	61.5	30.7	
\$100,001 – \$250,000	5	753	38.5	69.3	
\$250,001 – \$1 Million	0	0	0.0	0.0	
<b>Total</b>	<b>13</b>	<b>1,087</b>	<b>100.0</b>	<b>100.0</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 add up to 100.0 due to rounding.</i>					

Motor Vehicle Lending

The borrower distribution of motor vehicle lending is excellent. The distribution of lending to LMI borrowers is above the demographic figures for both income categories. Moreover, the majority of the bank’s motor vehicle lending was originated to low-income borrowers by both number and dollar volume.

**TABLE 11  
DISTRIBUTION OF 2019 MOTOR VEHICLE LENDING  
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				% of Households
	#	\$(000)	#%	\$%	
<b>Low</b>	36	273	37.9	34.4	23.9
<b>Moderate</b>	28	188	29.5	23.7	15.7
<b>Middle</b>	17	155	17.9	19.5	16.9
<b>Upper</b>	14	178	14.7	22.4	43.5
<b>Unknown</b>	0	0	0.0	0.0	0.0
<i>Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</i>					
<i>NOTE: Percentages may not add up to 100.0 due to rounding.</i>					

## Investments

Although not required under the FFIEC's *Interagency Small Institution Examination Procedures*, the bank's qualified investment activity was also evaluated as part of the bank's CRA performance to determine the degree it enhances credit availability in the AA.

Based on this analysis, the bank's investment record enhances credit availability in the AA. The dollar amount of qualified investments and the impact of those investments in the AA had a positive impact on the bank's overall CRA rating. Since the previous CRA evaluation, the bank made 18 qualified investments totaling \$5.3MM, and six donations totaling \$31,500.

Within the bank's AA, the bank made six investments for \$1.9MM in bonds for the local Salina School District and one investment for \$185,000 for the Ketchum School District. All six of the bank's donations were also within the AA. Five donations supported the bank's annual sponsorship of the Salina School District Afterschool Program, where 100 percent of the student population is eligible for the National School Free and Reduced Lunch School Program, and one donation was to a local food pantry serving LMI individuals.

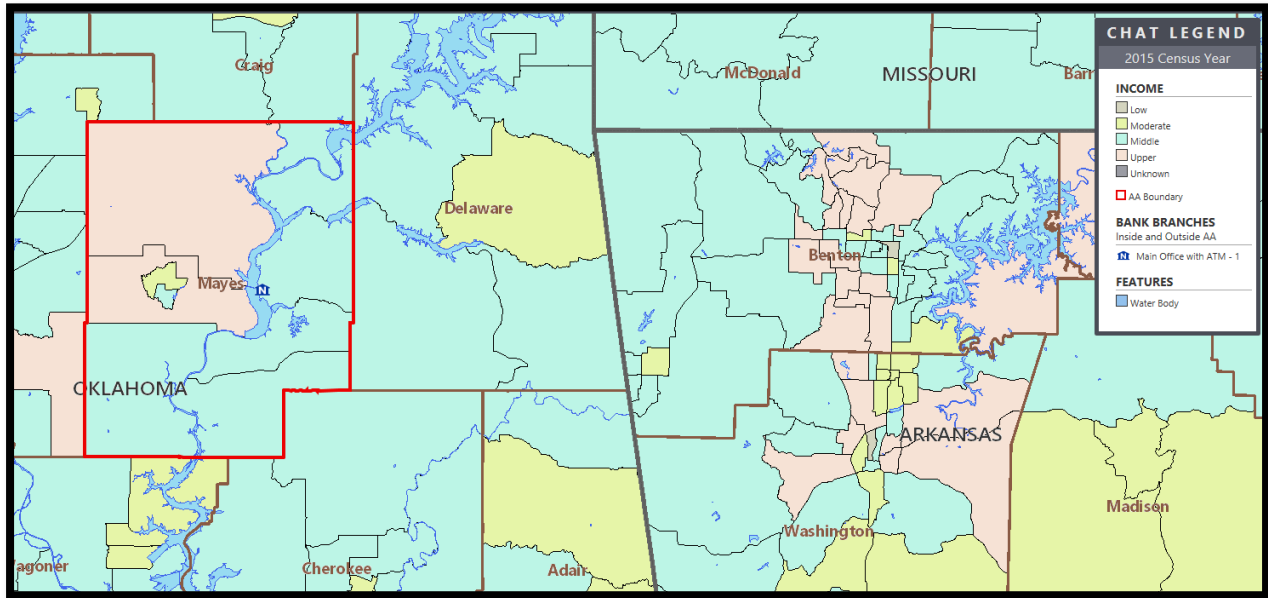
In addition, because the bank is satisfactorily meeting the credit needs of its AA, qualified investment activities made beyond the AA in the broader, statewide region were considered. This included 11 qualified investments totaling \$3.3MM in bonds to school districts in surrounding counties, where a majority of the student populations were also eligible for the National School Free and Reduced Lunch Program. The bank actively purchases qualified school bonds to fulfill pledging requirements to maintain the Salina School District deposits.

## FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

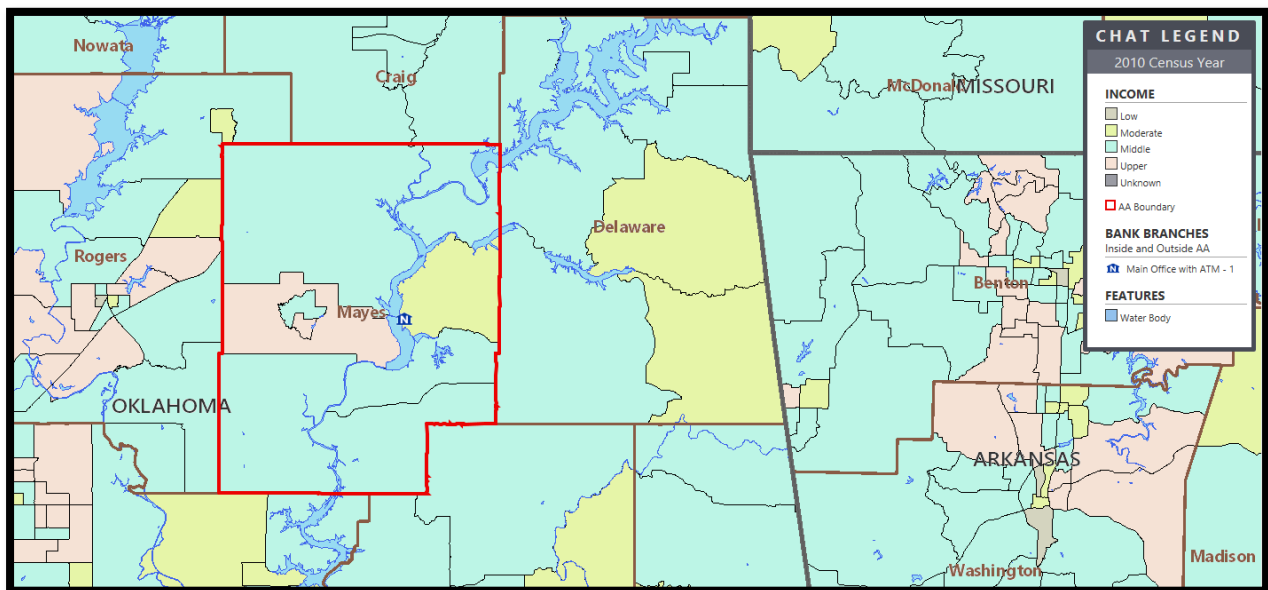
An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal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

APPENDIX A – MAP OF THE ASSESSMENT AREA

2017-2019 Mayes County AA



2014-2016 Mayes County AA



APPENDIX B – DEMOGRAPHIC INFORMATION

TABLE B-1 2019 MAYES COUNTY 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	2,435	21.7
Moderate	1	11.1	1,198	10.7	298	24.9	1,975	17.6
Middle	6	66.7	6,843	60.9	1,266	18.5	2,543	22.6
Upper	2	22.2	3,188	28.4	270	8.5	4,276	38.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>9</b>	<b>100.0</b>	<b>11,229</b>	<b>100.0</b>	<b>1,834</b>	<b>16.3</b>	<b>11,229</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	2,076	909	7.9	43.8	873	42.1	294	14.2
Middle	12,705	7,391	64.1	58.2	2,648	20.8	2,666	21.0
Upper	4,450	3,231	28.0	72.6	688	15.5	531	11.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>19,231</b>	<b>11,531</b>	<b>100.0</b>	<b>60.0</b>	<b>4,209</b>	<b>21.9</b>	<b>3,491</b>	<b>18.2</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	301	22.4	277	22.8	20	20.0	4	13.3
Middle	746	55.5	674	55.6	53	53.0	19	63.3
Upper	296	22.0	262	21.6	27	27.0	7	23.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,343</b>	<b>100.0</b>	<b>1,213</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>7.4</b>		<b>2.2</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	2	2.6	2	2.6	0	0.0	0	0.0
Middle	41	52.6	41	53.2	0	0.0	0	0.0
Upper	35	44.9	34	44.2	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>78</b>	<b>100.0</b>	<b>77</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.7</b>		<b>0.0</b>		<b>1.3</b>
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.								

**TABLE B-2  
2018 MAYES COUNTY 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	2,435	21.7
Moderate	1	11.1	1,198	10.7	298	24.9	1,975	17.6
Middle	6	66.7	6,843	60.9	1,266	18.5	2,543	22.6
Upper	2	22.2	3,188	28.4	270	8.5	4,276	38.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>9</b>	<b>100.0</b>	<b>11,229</b>	<b>100.0</b>	<b>1,834</b>	<b>16.3</b>	<b>11,229</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	2,076	909	7.9	43.8	873	42.1	294	14.2
Middle	12,705	7,391	64.1	58.2	2,648	20.8	2,666	21.0
Upper	4,450	3,231	28.0	72.6	688	15.5	531	11.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>19,231</b>	<b>11,531</b>	<b>100.0</b>	<b>60.0</b>	<b>4,209</b>	<b>21.9</b>	<b>3,491</b>	<b>18.2</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	299	22.0	275	22.5	20	18.7	4	12.9
Middle	765	56.3	689	56.4	55	52.3	20	64.5
Upper	295	21.7	257	21.0	31	29.0	7	22.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,359</b>	<b>100.0</b>	<b>1,221</b>	<b>100.0</b>	<b>107</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>89.8</b>	<b>7.9</b>	<b>2.3</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	3	4.3	3	4.4	0	0.0	0	0.0
Middle	36	52.2	36	52.9	0	0.0	0	0.0
Upper	30	43.5	29	42.6	0	0.0	1	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>69</b>	<b>100.0</b>	<b>68</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>98.6</b>	<b>0.0</b>	<b>1.4</b>			

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

**TABLE B-3  
2017 MAYES COUNTY 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	2,435	21.7
Moderate	1	11.1	1,198	10.7	298	24.9	1,975	17.6
Middle	6	66.7	6,843	60.9	1,266	18.5	2,543	22.6
Upper	2	22.2	3,188	28.4	270	8.5	4,276	38.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>9</b>	<b>100.0</b>	<b>11,229</b>	<b>100.0</b>	<b>1,834</b>	<b>16.3</b>	<b>11,229</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	2,076	909	7.9	43.8	873	42.1	294	14.2
Middle	12,705	7,391	64.1	58.2	2,648	20.8	2,666	21.0
Upper	4,450	3,231	28.0	72.6	688	15.5	531	11.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>19,231</b>	<b>11,531</b>	<b>100.0</b>	<b>60.0</b>	<b>4,209</b>	<b>21.9</b>	<b>3,491</b>	<b>18.2</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	256	22.6	230	22.8	23	22.8	3	13.6
Middle	650	57.4	585	58.0	50	49.5	15	68.2
Upper	226	20.0	194	19.2	28	27.7	4	18.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,132</b>	<b>100.0</b>	<b>1,009</b>	<b>100.0</b>	<b>101</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>89.1</b>		<b>8.9</b>		<b>1.9</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	2	3.7	2	3.7	0	0.0	0	0.0
Middle	31	57.4	31	57.4	0	0.0	0	0.0
Upper	21	38.9	21	38.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>54</b>	<b>100.0</b>	<b>54</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: 2017 FFIEC Census Data  
2017 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-4  
2016 MAYES COUNTY 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	2,172	19.1
Moderate	1	11.1	1,147	10.1	192	16.7	1,946	17.1
Middle	6	66.7	7,709	67.8	1,058	13.7	2,405	21.2
Upper	2	22.2	2,506	22.1	203	8.1	4,839	42.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>9</b>	<b>100.0</b>	<b>11,362</b>	<b>100.0</b>	<b>1,453</b>	<b>12.8</b>	<b>11,362</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	1,986	1,243	10.3	62.6	381	19.2	362	18.2
Middle	13,145	8,355	69.4	63.6	2,626	20.0	2,164	16.5
Upper	3,884	2,446	20.3	63	1,022	26.3	416	10.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>19,015</b>	<b>12,044</b>	<b>100.0</b>	<b>63.3</b>	<b>4,029</b>	<b>21.2</b>	<b>2,942</b>	<b>15.5</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	70	5.5	61	5.3	7	6.7	2	8.7
Middle	964	75.7	870	75.9	76	73.1	18	78.3
Upper	239	18.8	215	18.8	21	20.2	3	13.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,273</b>	<b>100.0</b>	<b>1,146</b>	<b>100.0</b>	<b>104</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.0</b>		<b>8.2</b>		<b>1.8</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	2	2.9	2	2.9	0	0.0	0	0.0
Middle	60	87.0	60	87.0	0	0.0	0	0.0
Upper	7	10.1	7	10.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>69</b>	<b>100.0</b>	<b>69</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: 2016 FFIEC Census Data  
2016 Dun & Bradstreet Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.



**TABLE B-5  
2015 MAYES COUNTY 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	2,172	19.1
Moderate	1	11.1	1,147	10.1	192	16.7	1,946	17.1
Middle	6	66.7	7,709	67.8	1,058	13.7	2,405	21.2
Upper	2	22.2	2,506	22.1	203	8.1	4,839	42.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>9</b>	<b>100.0</b>	<b>11,362</b>	<b>100.0</b>	<b>1,453</b>	<b>12.8</b>	<b>11,362</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	1,986	1,243	10.3	62.6	381	19.2	362	18.2
Middle	13,145	8,355	69.4	63.6	2,626	20.0	2,164	16.5
Upper	3,884	2,446	20.3	63	1,022	26.3	416	10.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>19,015</b>	<b>12,044</b>	<b>100.0</b>	<b>63.3</b>	<b>4,029</b>	<b>21.2</b>	<b>2,942</b>	<b>15.5</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	80	5.9	67	5.5	8	8.2	5	14.3
Middle	1,002	74.4	920	75.8	59	60.2	23	65.7
Upper	265	19.7	227	18.7	31	31.6	7	20.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,347</b>	<b>100.0</b>	<b>1,214</b>	<b>100.0</b>	<b>98</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.1</b>		<b>7.3</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	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3	4.0	3	4.1	0	0.0	0	0.0
Middle	64	85.3	63	85.1	0	0.0	1	100.0
Upper	8	10.7	8	10.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>75</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>98.7</b>		<b>0.0</b>		<b>1.3</b>	

Source: 2015 FFIEC Census Data  
2015 Dun & Bradstreet Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-6  
2014 MAYES COUNTY 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	2,172	19.1
Moderate	1	11.1	1,147	10.1	192	16.7	1,946	17.1
Middle	6	66.7	7,709	67.8	1,058	13.7	2,405	21.2
Upper	2	22.2	2,506	22.1	203	8.1	4,839	42.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>9</b>	<b>100.0</b>	<b>11,362</b>	<b>100.0</b>	<b>1,453</b>	<b>12.8</b>	<b>11,362</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	1,986	1,243	10.3	62.6	381	19.2	362	18.2
Middle	13,145	8,355	69.4	63.6	2,626	20.0	2,164	16.5
Upper	3,884	2,446	20.3	63	1,022	26.3	416	10.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>19,015</b>	<b>12,044</b>	<b>100.0</b>	<b>63.3</b>	<b>4,029</b>	<b>21.2</b>	<b>2,942</b>	<b>15.5</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	80	5.9	67	5.5	8	8.2	5	14.3
Middle	1,002	74.4	920	75.8	59	60.2	23	65.7
Upper	265	19.7	227	18.7	31	31.6	7	20.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,347</b>	<b>100.0</b>	<b>1,214</b>	<b>100.0</b>	<b>98</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>90.1</b>		<b>7.3</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	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3	4.0	3	4.1	0	0.0	0	0.0
Middle	64	85.3	63	85.1	0	0.0	1	100.0
Upper	8	10.7	8	10.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>75</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>98.7</b>		<b>0.0</b>		<b>1.3</b>	

Source: 2014 FFIEC Census Data  
2014 Dun & Bradstreet Data  
2006 – 2010 U.S. Census Bureau: American Community Survey  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-7  
DISTRIBUTION OF 2014-2016 SMALL BUSINESS LENDING  
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	3	107	75.0	77.0	5.5
Middle	1	32	25.0	23.0	75.7
Upper	0	0	0.0	0.0	18.8
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

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

**TABLE B-8  
DISTRIBUTION OF 2014-2016 SMALL BUSINESS LENDING  
BY REVENUE SIZE OF BUSINESSES**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
<b>By Revenue</b>					
\$1 Million or Less	4	140	100.0	100.0	90.0
Over \$1 Million	0	0	0.0	0.0	8.2
Not Known	0	0	0.0	0.0	1.8
<b>Total</b>	<b>4</b>	<b>140</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>By Loan Size</b>					
\$100,000 or less	4	140	100.0	100.0	
\$100,001 – \$250,000	0	0	0.0	0.0	
\$250,001 – \$1 Million	0	0	0.0	0.0	
<b>Total</b>	<b>4</b>	<b>140</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenue \$1 Million or Less</b>					
\$100,000 or less	4	140	100.0	100.0	
\$100,001 – \$250,000	0	0	0.0	0.0	
\$250,001 – \$1 Million	0	0	0.0	0.0	
<b>Total</b>	<b>4</b>	<b>140</b>	<b>100.0</b>	<b>100.0</b>	

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

## APPENDIX C – GLOSSARY

**Aggregate lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**Consumer loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-scope review:** Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-scope review:** Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

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

**Middle-income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

**Moderate-income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-occupied units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small loan(s) to farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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