



## **PUBLIC DISCLOSURE**

July 22, 2024

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

Patrons Bank, NA  
Charter Number 11001

610 East 8<sup>th</sup> Street  
Okmulgee, Oklahoma 74447

Office of the Comptroller of the Currency  
Tulsa Office  
8282 South Memorial Drive, Suite 300  
Tulsa, Oklahoma 74133

**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, and should not 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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## **Overall CRA Rating**

**Institution's CRA Rating:** This institution is rated **Outstanding**.

**The lending test is rated: Outstanding.**

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, market focus, competition, and lending opportunities in the assessment area (AA).
- A majority of loans were originated inside the bank's AA.
- The bank exhibits excellent geographic distribution of loans in low and moderate-income census tracts (CTs).
- The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank did not receive any complaints related to the CRA during the evaluation period.

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

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable.

Patrons Bank, N.A. (Patrons or bank) quarterly LTD ratio averaged 63.59 percent since the previous CRA performance evaluation (PE). The bank's LTD ratio had a high average of 66.17 percent in the fourth quarter of 2021 and low average of 59.70 percent in first quarter 2023. We compared the bank's LTD ratio to four similarly situated banks in their market area ranging in total asset sizes of \$92 million to \$352 million. The aggregate average LTD ratio for competing banks was 75.35 percent, with a low average of 58.96 percent and a high average of 93.11 percent.

### **Lending in Assessment Area**

A majority of the bank's loans are inside its AAs.

The bank originated and/or purchased 69 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>											
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$	
	Inside		Outside			Inside		Outside			
	#	%	#	%		\$	%	\$	%		
<b>Home Mortgage</b>											
2021	63	58.9	44	41.1	107	3,952,405	18.0	17,952,789	82.0	21,905,194	
2022	59	63.4	34	36.6	93	4,326,355	28.6	10,812,093	71.4	15,138,448	
2023	68	75.6	22	24.4	90	6,063,470	57.4	4,495,816	42.6	10,559,286	
<b>Total Home Mortgage</b>	<b>190</b>	<b>65.5</b>	<b>100</b>	<b>34.5</b>	<b>290</b>	<b>14,342,231</b>	<b>30.1</b>	<b>33,260,697</b>	<b>69.9</b>	<b>47,602,928</b>	
<b>Small Business</b>											
<b>Seminole County Non-MSA</b>											
2021	20	83.3	4	16.7	24	722,981	77.2	213,806	22.8	936,787	
2022-2023	20	87.0	3	13.0	23	1,093,047	75.2	361,090	24.8	1,454,137	
<b>Okmulgee County – Tulsa MSA</b>											
2021	21	84.0	4	16.0	25	1,096,834	65.9	567,006	34.1	1,663,840	
2022-2023	20	90.9	2	9.1	22	7,952,690	79.6	2,035,000	20.4	9,987,690	
<b>Total Small Business</b>	<b>81</b>	<b>86.2</b>	<b>13</b>	<b>13.8</b>	<b>94</b>	<b>10,865,552</b>	<b>77.4</b>	<b>3,176,902</b>	<b>22.6</b>	<b>14,042,454</b>	
<b>Total Loans</b>	<b>271</b>	<b>70.6</b>	<b>113</b>	<b>29.4</b>	<b>384</b>	<b>25,207,783</b>	<b>40.9</b>	<b>36,437,599</b>	<b>59.1</b>	<b>61,645,382</b>	
<i>Source: Bank Data</i>											
<i>Due to rounding, totals may not equal 100.0%</i>											

## Description of Institution

Patrons is a rural community bank located in Okmulgee, Oklahoma, and a wholly owned subsidiary of First Okmulgee Corporation, a single bank holding company headquartered at the main bank location. As of June 1, 2024, the corporate title of the bank changed from The First National Bank and Trust Company of Okmulgee to Patrons Bank, N.A.

As of December 31, 2023, the bank reported total assets of \$284.3 million, with total loans of \$162.4 million (57 percent of total assets) and tier 1 capital of \$32.5 million. The bank's loan portfolio comprises 59 percent commercial/business loans, 36 percent one- to four-family residential loans, 3 percent consumer loans, and 2 percent other loan products. No subsidiaries were considered as part of this evaluation.

Patrons has one rating area within the state of Oklahoma, with two AAs, Okmulgee County – Tulsa Metropolitan Statistical Area (MSA) and Seminole County non MSA. The Okmulgee County AA consists of all of Okmulgee County and is located within the Tulsa MSA. In the previous PE, the Okmulgee County AA included ten CTs. As a result of CT changes from 2021 to 2022, the Office of Management and Budget (OMB) expanded the total number of CTs in the AA from 10 to 11. One middle-income tract in the town of Beggs, Oklahoma was split into two middle-income tracts. There are three branch locations in the Okmulgee County AA. The main bank and the Walmart Supercenter branch are in Okmulgee, Oklahoma, and the Henryetta

branch is in Henryetta, Oklahoma. The Seminole County AA consists of all Seminole County and is located within the Oklahoma non-MSA. The bank has one branch within the Seminole County AA which is located in downtown Wewoka, Oklahoma. Drive-through services are offered at the main bank, the Henryetta branch, and the Wewoka branch. The bank operates five automated teller machines (ATMs), one at each branch and one additional standalone ATM in Okmulgee, Oklahoma. The bank does not operate any deposit-taking ATMs.

The bank's primary geographic lending area comes from within the communities it's located in and secondarily within the state of Oklahoma. The bank offers a variety of loan and deposit products to meet community needs and achieve its overall business strategy. Patrons also offers automated telephone banking, mobile banking, and internet banking. The bank offers reasonable lobby hours Monday through Friday. Extended drive-through hours are offered Monday through Saturday.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. A CRA PE was last performed as of July 26, 2021, and the bank received an overall rating of "Satisfactory".

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We completed full-scope reviews of Patrons Bank's CRA activities in its AAs under the Small Bank CRA procedures, which includes the lending test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities.

The OCC compared bank loan data for all applicable years to demographic data using the 2015 U.S. American Community Survey (ACS), 2020 U.S. Census data, Federal Financial Institutions Examination Council adjusted median family income, 2021 and 2023 Dun and Bradstreet (D&B) small business demographic, 2021 and 2023 aggregate data, small business data reported under CRA and, 2021 and 2022 aggregate peer mortgage loan data reported under Home Mortgage Disclosure Act (HMDA).

Conclusions regarding the lending performance are based on HMDA data collected from January 1, 2021, through December 31, 2023, and samples of commercial small business loans originated during the same period. In evaluating the income level of geography and income level of borrower criteria under the lending test, year 2021 was evaluated separately from years 2022-2023 due to changes in recent updates to HMDA data. When evaluating the bank's performance under the lending test, we placed greater weight on commercial small business loans, as this is the bank's primary loan product.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of the AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same

state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. Patrons Bank has two AAs in the state of Oklahoma. These AAs include the Okmulgee County AA, which includes only Okmulgee County within the Tulsa MSA, and the Seminole County AA, which includes only Seminole County within the Oklahoma non-MSA.

The bank’s overall rating is based primarily on performance in the AA. As of December 31, 2023, commercial small business loans represented 59 percent of total bank loans and one- to four-family residential real estate mortgage loans represented 36 percent of total loans. For the lending test, we analyzed both commercial small business and home mortgage loans. We placed greater weight on commercial small business loans based on the percentage of loan activity, which is consistent with the bank’s lending strategy.

The state rating is based on performance in the bank’s AAs. Refer to the “Scope” section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Data Integrity**

We performed a HMDA data integrity review in the second quarter 2024 (as of December 31, 2023) prior to the CRA evaluation to assess the reliability of loan data subject to the HMDA reporting requirements. We performed transaction testing of one- to four-family residential real estate loans reported on the HMDA Loan Application Register. We found data for all years to be reliable. As a result, we relied on filed HMDA data for this CRA evaluation to assess Patrons’ lending performance.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next PE in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this PE.

## **State Rating**

### **State of Oklahoma**

**CRA rating for the State of Oklahoma:** Outstanding.

**The lending test is rated:** Outstanding.

The major factors that support this rating include:

- The geographic distribution of loans reflects excellent distribution throughout the AA.
- The distribution of loans to individuals of different income levels and businesses of different sizes is excellent.

### **Description of Institution's Operations in Oklahoma**

Patrons has two AAs in the state of Oklahoma, which meet the requirements of the regulation, and does not arbitrarily exclude low- and moderate-income geographies. The bank operates four locations in the two AAs. These locations are in the Okmulgee County AA and the Seminole County AA.

The Okmulgee County AA is within the Tulsa MSA and includes all 11 CTs in Okmulgee County. The Okmulgee County AA consists of two low-income CTs, three moderate-income CTs, and six middle-income CTs. In 2021, there were no low-income or upper-income CTs in the AA. The main bank and the Walmart Supercenter branch are located in middle-income CTs, while the Henryetta branch is located in a moderate-income CT. The city of Okmulgee is the county seat for Okmulgee County, which is located within the Muscogee Nation Reservation. Major cities within Okmulgee County include Henryetta, Beggs, Morris, Preston, Schalter, Grayson, Dewar, Hoffman, and Winchester. The local economy and industry base remain diverse in the areas of government, education, manufacturing, health care and social assistance, retail trade, and food services. As of December 2023, the unemployment rate for Okmulgee County was 4.1 percent compared to the state unemployment rate of 3.5 percent.

The Seminole County AA (non-MSA) consists of all nine CTs in Seminole County including one low-income CT, three moderate-income CTs, and five middle-income CTs. In 2021, there were no low-income or upper-income CTs in the AA. The Wewoka branch is located in a moderate-income CT. The city of Wewoka is the county seat for Seminole County. Most of the county is a reservation for the Seminole Nation of Oklahoma. Major cities within Seminole County include Seminole, Wewoka, Konawa, Bowlegs, Sasakwa, Cromwell, and Lima. The largest industries in Seminole County are retail trade, health care and social assistance, manufacturing, and oil and gas

extraction. As of December 2023, the unemployment rate for Seminole County was 4.8 percent compared to the state unemployment rate of 3.5 percent.

There is strong competition for banking services to meet the credit and deposit needs of the AA. According to the June 30, 2023, Federal Deposit Insurance Corporation (FDIC) Market Share report for the Seminole County Non-MSA AA, Patrons Bank has \$37 million in deposits with a deposit market share of 6.67 percent. The bank ranks fourth out of six institutions in the AA. The largest depository institutions in the AA were Security State Bank of Oklahoma, Bancfirst, and First United Bank & Trust, which held a combined market share of 86 percent. In the Okmulgee County Tulsa MSA AA, Patrons Bank ranked second out of five institutions in the market, with a market share of 37 percent and deposits totaling \$216 million. Mabrey Bank ranked first with a market share of 42 percent and deposits totaling \$243 million.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Okmulgee County (Tulsa MSA) and Seminole County (Non-MSA) 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	19	0.0	36.8	63.2	0.0	0.0
Population by Geography	64,927	0.0	35.0	65.0	0.0	0.0
Housing Units by Geography	29,487	0.0	37.7	62.3	0.0	0.0
Owner-Occupied Units by Geography	17,087	0.0	29.3	70.7	0.0	0.0
Occupied Rental Units by Geography	7,137	0.0	48.9	51.1	0.0	0.0
Vacant Units by Geography	5,263	0.0	49.5	50.5	0.0	0.0
Businesses by Geography	4,303	0.0	38.2	61.8	0.0	0.0
Farms by Geography	275	0.0	18.9	81.1	0.0	0.0
Family Distribution by Income Level	16,037	27.1	21.0	19.8	32.1	0.0
Household Distribution by Income Level	24,224	30.8	18.7	17.8	32.7	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$74,052
Median Family Income Non-MSAs - OK		\$51,491	Median Gross Rent			\$578
			Families Below Poverty Level			15.6%
<i>Source: 2015 ACS and 2021 D&amp;B Data                      Due to rounding, totals may not equal 100.0%                      (*) The NA category consists of geographies that have not been assigned an income classification.</i>						



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Okmulgee County (Tulsa MSA) and Seminole County (Non-MSA) 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	20	15.0	30.0	55.0	0.0	0.0
Population by Geography	60,262	12.2	36.6	51.3	0.0	0.0
Housing Units by Geography	29,567	13.2	37.0	49.8	0.0	0.0
Owner-Occupied Units by Geography	16,679	8.5	32.1	59.3	0.0	0.0
Occupied Rental Units by Geography	7,322	20.9	47.1	32.1	0.0	0.0
Vacant Units by Geography	5,566	17.2	38.3	44.5	0.0	0.0
Businesses by Geography	5,715	15.6	33.9	50.5	0.0	0.0
Farms by Geography	397	5.0	18.4	76.6	0.0	0.0
Family Distribution by Income Level	16,163	31.9	18.9	20.7	28.4	0.0
Household Distribution by Income Level	24,001	32.3	17.5	17.9	32.3	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$72,203	Median Housing Value			\$85,116
Median Family Income Non-MSAs - OK		\$58,565	Median Gross Rent			\$655
			Families Below Poverty Level			16.7%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The tables above summarize the demographic characteristics of the CTs that make up the AA. The tables show the demographic characteristics of the AA according to the 2015 ACS, 2020 U.S. Census, and 2021-2023 D&B Data. Okmulgee and Seminole Counties have a population of 60,262 and the median housing value was \$85,116. Comparison of the 2020 and 2023 census periods reflects an increase in the number of businesses by geography. As of December 31, 2023, the average median family income in the Tulsa MSA was \$72, 203 compared to 58,565 in the non-MSA.

### **Scope of Evaluation in Oklahoma**

The rating for Oklahoma is based on a full-scope review of the Okmulgee County Tulsa MSA AA and the Seminole County Non-MSA AA. However, more weight was given to the Okmulgee County Tulsa MSA AA due to the significant percentage of loan and deposit volume as well as the number of branches located within this AA.

## **LENDING TEST**

The bank's performance under the lending test in the state of Oklahoma is rated Outstanding. Based on a full-scope review, the bank's performance in the state of Oklahoma is excellent.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits excellent geographic distribution of loans in the AA.

Prior to the OMB income tract changes in 2022, there were no low-income CTs in the AA. For the 2021 evaluation period, the bank's performance is based on its lending in moderate-income CTs.

#### ***Home Mortgage Loans***

The bank's geographic distribution of home mortgage is excellent.

Refer to table O in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

#### ***Seminole County Non-MSA AA***

During the evaluation period, in the non-MSA AA for year 2021, the bank originated six loans and in years 2022-2023, the bank originated eight loans. To perform a meaningful lending test analysis, there must be at least 20 loans originated or purchased for a specific loan product. For mortgage loans in this AA, the bank did not originate enough loans for a meaningful analysis.

#### ***Okmulgee County Tulsa MSA AA***

During the 2021 analysis period, the distribution of home mortgage loans to moderate-income geographies was excellent. The percentage of bank loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate distribution. There were no low-income CTs in the bank's AA.

During the 2022-2023 analysis period, the distribution of home mortgage loans to low-income geographies was excellent. The percentage of home mortgage loans in low-income geographies exceeds both the percentage of owner-occupied housing units and the aggregate distribution. The distribution of home mortgage loans to moderate-income geographies was excellent. The percentage of bank loans in moderate-income geographies exceeds both the percentage of owner-occupied housing units and the aggregate distribution.

#### ***Small Loans to Businesses***

The geographic distribution of small business loans to businesses reflects excellent distribution.

Refer to table Q in the state of Oklahoma section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

***Seminole County Non-MSA AA***

During the 2021 analysis period, there were no low-income CTs in the bank's non-MSA AA. The distribution of small loans to businesses in moderate-income geographies was excellent. The percentage of small loans to businesses exceeds both the percentage of businesses and the aggregate distribution.

During the 2022-2023 analysis period, the distribution of small loans to businesses in low-income geographies was poor. The percentage of small loans to businesses was lower than both the percentage of businesses and the aggregate distribution. The distribution of small loans to businesses in moderate-income geographies was excellent. The percentage of small loans to businesses exceeds both the percentage of businesses and the aggregate distribution.

***Okmulgee County Tulsa MSA AA***

During the 2021 analysis period, there were no low-income CTs in the bank's Tulsa MSA AA. The distribution of small loans to businesses in moderate-income geographies was excellent. The percentage of small loans to businesses exceeds both the percentages of businesses and the aggregate distribution.

During the 2022-2023 analysis period, the distribution of small loans to businesses in low-income geographies was adequate. The percentage of small loans to business was somewhat lower than both the percentage of businesses and the aggregate distribution. The distribution of small loans to businesses in moderate-income geographies was excellent. The percentage of small loans to businesses exceeds both the percentage of businesses and the aggregate distribution.

**Distribution of Loans by Income Level of the Borrower**

The bank exhibits excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

***Home Mortgage Loans***

The bank's distribution of home mortgage loans is excellent.

Refer to table P in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

***Seminole County Non-MSA AA***

For mortgage loans in this AA, the bank did not originate enough loans for a meaning analysis.

***Okmulgee County Tulsa MSA AA***

During the 2021 analysis period, the distribution of home mortgages by the income of the borrowers was excellent. The percentage of home mortgage loans to low-income borrowers was

somewhat lower than the percentage of low-income families and exceeds the aggregate distribution. The distribution of home mortgage loans to moderate-income borrowers was excellent. The percentage of home mortgage loans to moderate-income borrowers exceeds both the percentage of moderate-income families and the aggregate distribution.

During the 2022-2023 analysis period, the distribution of home mortgages by the income of the borrowers was reasonable. The percentage of home mortgage loans to low-income borrowers was somewhat lower than the percentage of low-income families and exceeds the aggregate distribution. The distribution of loans to moderate-income borrowers was reasonable. The percentage of home mortgage loans was near to both the percentage of moderate-income families and the aggregate distribution.

### ***Small Loans to Businesses***

The bank's distribution of small loans to businesses by revenue is excellent.

Refer to table R in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

### ***Seminole County Non-MSA AA***

During the 2021 evaluation period, the distribution of the bank's loans to small businesses by revenue was excellent. The percentage of loans exceeds both the percentage of small businesses and the aggregate distribution of loans.

During the 2022-2023 evaluation period, the distribution of the bank's loans to small businesses by revenue was reasonable. The percentage of loans was near to the percentage of small businesses and exceeds the aggregate distribution of loans to those businesses.

### ***Okmulgee County Tulsa MSA AA***

During 2021 evaluation period, the distribution of the bank's loans to small businesses by revenue was excellent. The percentage of loans exceeds both the percentage of small businesses and the aggregate distribution of loans to those businesses.

During the 2022-2023 evaluation period, the distribution of the bank's loans to small businesses by revenue was excellent. The percentage of loans exceeds both the percentage of small businesses and the aggregate distribution of loans to those businesses.

### **Responses to Complaints**

Patrons Bank received no CRA-related complaints during the evaluation periods.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	1/01/2021 to 12/31/2023	
<b>Bank Products Reviewed:</b>	Home Mortgage and Small Business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Oklahoma</b>		
Okmulgee County Tulsa MSA AA	Full-Scope	Okmulgee County, Oklahoma
Seminole County Non-MSA AA	Full-Scope	Seminole County, Oklahoma

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS – Patrons Bank, NA</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
Patrons Bank, NA	Outstanding
<b>State:</b>	
Oklahoma	Outstanding

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**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 non-relatives 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 under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county, or counties as measured through commuting.

**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.

**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.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

**Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2021</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Seminole County Non MSA 2021	6	334,581	9.5	444	0.0	0.0	0.0	19.3	16.7	8.3	80.7	83.3	91.7	0.0	0.0	0.0	0.0	0.0	0.0	
Okmulgee County MSA 2021	57	3,617,825	90.5	797	0.0	0.0	0.0	35.7	47.4	24.3	64.3	52.6	75.7	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>63</b>	<b>3,952,405</b>	<b>100.0</b>	<b>1,241</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>29.3</b>	<b>44.4</b>	<b>18.6</b>	<b>70.7</b>	<b>55.6</b>	<b>81.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2022-2023</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Seminole County Non-MSA 2022-2023	8	958,731	6.3	338	4.7	12.5	5.3	41.5	25.0	42.3	53.8	62.5	52.4	0.0	0.0	0.0	0.0	0.0	0.0	
Okmulgee County MSA 2022-2023	119	9,431,094	93.7	771	10.9	12.6	8.6	26.4	44.5	25.8	62.8	42.9	65.6	0.0	0.0	0.0	0.0	0.0	0.0	
<b>Total</b>	<b>127</b>	<b>10,389,826</b>	<b>100.0</b>	<b>1,109</b>	<b>8.5</b>	<b>12.6</b>	<b>7.6</b>	<b>32.1</b>	<b>43.3</b>	<b>30.8</b>	<b>59.3</b>	<b>44.1</b>	<b>61.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Seminole County Non MSA 2021	6	334,581	9.5	444	24.3	0.0	3.4	21.1	16.7	15.1	20.9	33.3	19.6	33.7	50.0	40.8	0.0	0.0	21.2
Okmulgee County Tulsa MSA 2021	57	3,617,825	90.5	797	29.0	17.5	8.0	20.9	22.8	19.1	19.1	19.3	20.1	31.0	24.6	26.2	0.0	15.8	26.6
<b>Total</b>	<b>63</b>	<b>3,952,405</b>	<b>100.0</b>	<b>1,241</b>	<b>27.1</b>	<b>15.9</b>	<b>6.4</b>	<b>21.0</b>	<b>22.2</b>	<b>17.6</b>	<b>19.8</b>	<b>20.6</b>	<b>19.9</b>	<b>32.1</b>	<b>27.0</b>	<b>31.4</b>	<b>0.0</b>	<b>14.3</b>	<b>24.7</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%  
 First National Bank & Trust Co (11001) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-2023
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Seminole County Non MSA 2022-2023	8	958,731	6.3	338	31.9	12.5	8.6	19.4	12.5	15.1	19.6	25.0	23.4	29.1	37.5	37.0	0.0	12.5	16.0
Okmulgee County MSA 2022-2023	119	9,431,094	93.7	771	32.0	16.0	12.5	18.5	15.1	16.9	21.5	19.3	23.7	28.0	29.4	24.0	0.0	20.2	23.0
<b>Total</b>	<b>127</b>	<b>10,389,826</b>	<b>100.0</b>	<b>1,109</b>	<b>31.9</b>	<b>15.7</b>	<b>11.3</b>	<b>18.9</b>	<b>15.0</b>	<b>16.3</b>	<b>20.7</b>	<b>19.7</b>	<b>23.6</b>	<b>28.4</b>	<b>29.9</b>	<b>28.0</b>	<b>0.0</b>	<b>19.7</b>	<b>20.8</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Seminole County Non MSA 2021	20	722,981	83.3	441	0.0	--	0.0	32.4	55.0	23.3	67.6	45.0	76.3	0.0	--	0.0	0.0	--	0.5	
Okmulgee County MSA 2021	21	1,096,834	84.0	400	0.0	--	0.0	41.6	66.7	29.9	58.4	33.3	67.2	0.0	--	0.0	0.0	--	2.9	
<b>Total</b>	<b>41</b>	<b>1,819,815</b>	<b>83.7</b>	<b>841</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>38.2</b>	<b>60.9</b>	<b>26.4</b>	<b>61.8</b>	<b>39.2</b>	<b>71.9</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>	<b>1.6</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%  
 First National Bank & Trust Co (11001) excluded from Aggregate

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2022-2023</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Seminole County Non MSA 2022-2023	20	1,093,047	86.9	348	14.2	5.0	10.9	41.9	75.0	32.5	43.9	20	56.6	0.0	--	0.0	0.0	--	0.0	
Okmulgee County MSA 2022-2023	20	7,952,690	90.9	523	16.4	10.0	14.9	29.1	65.0	25.4	54.5	25	59.7	0.0	--	0.0	0.0	--	0.0	
<b>Total</b>	<b>40</b>	<b>9,045,737</b>	<b>100</b>	<b>871</b>	<b>15.6</b>	<b>7.5</b>	<b>13.3</b>	<b>33.9</b>	<b>70.0</b>	<b>28.2</b>	<b>50.5</b>	<b>22.5</b>	<b>58.4</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	<b>0.0</b>	<b>--</b>	<b>0.0</b>	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Seminole County Non MSA 2021	20	722,981	83.3	441	81.5	100.0	39.1	4.8	--	13.7	--	
Okmulgee County MSA 2021	21	1,096,834	84.0	400	85.3	90.4	44.7	2.8	9.6	11.8	--	
<b>Total</b>	<b>41</b>	<b>1,819,815</b>	<b>83.7</b>	<b>841</b>	<b>83.9</b>	<b>95.1</b>	<b>41.8</b>	<b>3.6</b>	<b>4.8</b>	<b>12.5</b>	<b>--</b>	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%  
First National Bank & Trust Co (11001) excluded from Aggregate

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2022-2023</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Seminole County Non-MSA 2022-2023	20	1,093,047	86.9	348	86.0	75.0	62.1	3.5	25.0	10.4	--	
Okmulgee County MSA 2022-2023	20	7,952,690	90.9	523	88.5	90.0	58.7	2.2	10.0	9.3	--	
<b>Total</b>	<b>40</b>	<b>9,045,737</b>	<b>88.9</b>	<b>871</b>	<b>87.6</b>	<b>82.5</b>	<b>60.0</b>	<b>2.7</b>	<b>17.5</b>	<b>9.7</b>	<b>--</b>	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data "--" data not available.  
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.