

## PUBLIC DISCLOSURE

April 10, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

McCurtain County National Bank Charter Number 17269

20 North Park Drive Broken Bow, Oklahoma 74728

Office of the Comptroller of the Currency 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.

## **Table of Contents**

Overall CRA Rating	1
Description of Institution	
Scope of the Evaluation	3
Discriminatory or Other Illegal Credit Practices Review	4
State Rating	4
State of Oklahoma	4
Lending Test	6
Appendix A: Scope of Examination	Appendix A-1
Appendix B: Summary of MMSA and State Ratings	Appendix B-1
Appendix C: Definitions and Common Abbreviations	Appendix C-1
Appendix D: Tables of Performance Data	Appendix D-1

## **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 substantial majority of loans were originated or purchased inside the bank's AA.
- The bank exhibits excellent geographic distribution of loans in moderate-income census tracts (CTs).
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank did not receive any complaints related to the Community Reinvestment Act (CRA) during the evaluation period.

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

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

McCurtain County National Bank's (bank) quarterly LTD ratio since the previous CRA performance evaluation (PE) averaged 55.29 percent. The bank's LTD ratio had a high average of 61.73 percent in the third quarter of 2019 and low average of 49.14 percent in second quarter 2021. We compared the bank's LTD ratio to three similarly situated banks (peer group banks) in their market area and a nearby county ranging in total asset sizes of \$94 million to \$589 million. The aggregate average LTD ratio for competing banks was 77.99 percent, with a low average of 71.90 percent and a high average of 81.23 percent.

### **Lending in Assessment Area**

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

The bank originated 93 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.

		Table D	- Lend	ing Insid	le and Ou	tside of th	e Assessm	ent Area					
	1	Number (	of Loan	s		Dollar	Dollar Amount of Loans \$(000s)						
Loan Category	Ins	side	Ou	tside	Total	In	side	Out	side	Total			
	#	%	#	%	#	\$	%	\$	%	\$(000s)			
Home Mortgage													
2019 - 2021	20	95.2	1	4.8	21	1,366	87.1	202	12.9	1,568			
Subtotal	20	95.2	1	4.8	21	1,366	87.1	202	12.9	1,568			
Small Business													
2019 - 2021	21	91.3	2	8.7	23	2,484	98.9	27	1.1	2,511			
Subtotal	21	91.3	2	8.7	23	2,484	98.9	27	1.1	2,511			
Total	41	93.1	3	6.9	44	3,850	94.4	229	5.6	4,079			

Source: Bank Data

Due to rounding, totals may not equal 100.0%

### **Description of Institution**

McCurtain County National Bank (MCNB) is a single-state bank chartered in Broken Bow, Oklahoma, and a subsidiary of McCurtain County Bancshares, a one-bank holding company located at the main bank address. As of December 31, 2021, MCNB reported total assets of \$351 million, with loans of \$160 million (46 percent of total assets), and tier 1 capital of \$40 million. The bank's loan portfolio comprises 50 percent one- to four-family residential loans, 32 percent commercial loans, seven percent consumer loans, four percent automobile loans, four percent agricultural/farm loans, and three percent other loan products. The bank's primary focus remains centered in one- to four-family residential mortgage loans.

MCNB has designated one AA comprising eight CTs all located within McCurtain County in Oklahoma. There are no low-income CTs located within the bank's AA. The main banking facility, located at 1501 Southeast Washington Street, Idabel, Oklahoma is in a middle-income CT within McCurtain County. MCNB has three full-service branch locations with Automated Teller Machines located at 20 N Park Drive, Broken Bow, Oklahoma, in a moderate-income CT, 101 W Wilson Street, Valliant, Oklahoma, in a middle-income CT, and 50 Pinyon Road, Broken Bow, Oklahoma, also in a middle-income CT all within McCurtain County. The bank offers reasonable branch lobby hours Monday through Friday, with extended drive-thru hours at all full-service branch locations. There were no new branch openings or closings during the evaluation period.

There is moderate competition for banking services to meet the credit and deposit needs of the AA. MCNB offers a diverse line of loan and deposit products, including savings and checking accounts and an internet banking product that provides customers with deposit, transfer, and bill payment opportunities when a bank facility is not convenient. MCNB's strategic lending remains residential real estate purchase, construction and land development, commercial real estate, general commercial and industrial, and consumer and automobile. The bank is not subject to the data collection and reporting requirements of the Home Mortgage Disclosure Act (HMDA).

There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AA. The bank received an overall rating of "Satisfactory" at the previous CRA evaluation dated January 7, 2019.

## **Scope of the Evaluation**

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

We completed a full-scope review of McCurtain County Bank's CRA activities in its AA 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 U.S. Census American Community Survey (ACS), Federal Financial Institutions Examination Council (FFIEC) adjusted median family income, 2020 Dun and Bradstreet (D&B) small business demographic and small business data reported under CRA, and 2020 peer mortgage loan data reported under HMDA.

Conclusions regarding the lending performance are based on samples of one- to four-family residential real estate and small business loans originated for the period January 1, 2019, through December 31, 2021. When evaluating the bank's performance under the Lending Test, we place greater weight on one- to four-family residential real estate lending, as this is the bank's primary product. Home mortgage information was considered in context, as the analyses for non-HMDA reporting banks and small business loans are typically based on a sample of loans, rather than on total bank originations and purchases over the evaluation period.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) 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.

MCNB's AA includes all eight census tracks within McCurtain County. The bank serves its AA through branch facilities all located in McCurtain County. There are no limited scope review areas.

### **Ratings**

The bank's overall rating is based primarily on performance in the AA. As of December 31, 2021, one-to four-family residential real estate loans represented 50 percent of total bank loans. For the Lending Test, we analyzed both home mortgage loans and small loans to businesses. We placed greater weight on home mortgage loans based on the percentage of loan activities, which is consistent with MCNB's lending strategy.

MCNB has only one AA in one state. Ratings are based solely on the results of this AA.

The state rating is based on performance in the bank 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.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national banks 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 Bureau of Consumer Financial Protection, 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 reasonable.

## Description of Institution's Operations in Oklahoma

MCNB has one AA in the state of Oklahoma, which meets the requirements of the regulation, and does not arbitrarily exclude low- and moderate-income geographies.

MCNB's AA consists of eight contiguous CTs, which includes all of McCurtain County. MCNB's AA consists of no low-income CTs, two moderate-income CTs, six middle-income CTs, and no upper income CTs. The bank's facilities are all located in McCurtain County.

Table A – Den	nographic II	nformation	of the Assessn	nent Area		
Asses	sment Area	: McCurtai	n County 2021	[		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	25.0	75.0	0.0	0.0
Population by Geography	33,143	0.0	29.9	70.1	0.0	0.0
Housing Units by Geography	15,571	0.0	28.2	71.8	0.0	0.0
Owner-Occupied Units by Geography	8,902	0.0	22.2	77.8	0.0	0.0
Occupied Rental Units by Geography	4,006	0.0	46.4	53.6	0.0	0.0
Vacant Units by Geography	2,663	0.0	20.7	79.3	0.0	0.0
Businesses by Geography	2,131	0.0	29.0	71.0	0.0	0.0
Farms by Geography	110	0.0	22.7	77.3	0.0	0.0
Family Distribution by Income Level	9,103	31.8	18.7	21.7	27.8	0.0
Household Distribution by Income Level	12,908	32.5	18.4	16.7	32.4	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housi	ng Value		\$73,474
			Median Gross	Rent		\$555
			Families Belo	w Poverty Le	vel	20.7%

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0%

Competition in the AA is adequate with eight other financial institutions in the surrounding area. According to the December 31, 2021, Federal Deposit Insurance Corporation (FDIC) deposit market share report in the state of Oklahoma, the bank has \$299 million in deposits with a deposit share of 38.9 percent. The bank ranks first in deposit market share out of five banks in the AA.

The table above summarize the demographic characteristics of the CTs that make up the AA. The table shows the demographic characteristics of the AA according to the 2015 ACS and 2020 D&B data. McCurtain County has a population of 33,143 and the average medium family income was \$51,491. As of December 31, 2021, the unemployment rate was 3 percent, and there are approximately 21 percent of families living below the poverty level.

## **Community Contact**

The OCC relied on a community contact within the AA to gain a better understanding of the general community credit and development needs, as well as local economic conditions. The community contact included a housing authority organization that oversees both housing and voucher programs. The community contact stated that the conditions in the area are stable, the area has not experienced major layoffs, and there is anticipation of many job opportunities for small and large businesses in McCurtain County.

The community contact indicated that the city of Hochatown, Oklahoma, which is in the bank's AA, is thriving and bringing many jobs opportunities. The contact stated that there's considerable business and housing development however, the homes being built are outside of the price range of low- and moderate-income families or individuals. The area's affordable housing stock is very limited.

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

The population is the area is increasing, primarily in Hochatown, Oklahoma, due to high income individuals purchasing lake cabins and houses. The cost of rent and housing in the area has drastically increased with the ongoing development. The contact's organization maintains a long waiting list of people desperate to get into the housing authorities' duplexes and triplexes. The organization maintains a rent to own program for low- and moderate-income families. The contact identified one area bank offering a low or no down payment home financing program. Other banks may also offer the same or similar programs as well. The community contact was not aware of any issues of individuals being denied credit opportunities based on gender, race, and/or ethnicity.

MCNB partners with the United States Department of Agriculture (USDA) Rural Housing Development Program to offer supervised accounts for USDA loans to allow low- and moderate-income households the opportunity to purchase, build, rehabilitate, and improve residential real estate in eligible rural areas. The program offers 100 percent financed, no money down mortgage loans to eligible low- and moderate-income applicants. The program allows lenders to work with low- and moderate-income households living in rural areas to make homeownership a reality.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF OKLAHOMA

### 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 lending performance in the state of Oklahoma is excellent when considering there are no low-income CTs, the percentage of families living below the poverty level, and the lack of affordable housing in the AA.

## Distribution of Loans by Income Level of the Geography

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

There are no low-income CTs in the AA. 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.

During the 2019-2021 analysis period, the distribution of home mortgage loans to moderate-income geographies was excellent. The percentage of loans in moderate-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate distribution.

#### Small Loans to Businesses

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

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.

During the 2019-2021 analysis period, the distribution of small loans to businesses in moderate-income geographies was excellent. The percentage of small loans to businesses exceeded both the percentage of businesses in moderate-income geographies and the aggregate distribution.

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

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

### Home Mortgage Loans

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

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.

During 2019-2021, the distribution of home mortgages to moderate-income borrowers was reasonable. The percentage of loans was somewhat lower than the percentage of moderate-income families and exceeds the aggregate distribution.

### Small Loans to Businesses

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

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.

During 2019-2021, the distribution of the bank's loans to small businesses by revenue was reasonable. The percentage of loans was somewhat lower than the percentage of small businesses and exceeds the aggregate distribution of loans to those businesses.

### **Responses to Complaints**

MCNB received no CRA-related complaints during the evaluation periods.

## **Appendix A: Scope of Examination**

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."

Time Period Reviewed:	01/01/2019 to 12/3	1/2021				
Bank Products Reviewed:	Home Mortgage ar	nd Small Business Loans				
Affiliate(s)	Affiliate	<b>Products Reviewed</b>				
	Relationship					
N/A						
List of Assessment Areas and Ty	pe of Examination					
Rating and Assessment Areas	Type of Exam	Other Information				
Oklahoma						
Non MSA	Full Scope	McCurtain County				

## **Appendix B: Summary of MMSA and State Ratings**

RATINGS – McCu	ırtain County National Bank
Overall Bank:	Lending Test Rating
McCurtain County National Bank	Outstanding
State:	
Oklahoma	Outstanding

## **Appendix C: Definitions and Common Abbreviations**

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 Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low-or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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.

**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 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 Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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.

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

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.

**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.

**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**

### **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.
- 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.

Table O: Assessment Area	a Distribution of Hor	ne Mortgage Loans l	ov Income Categor	v of the Geography
I abic O. Assessificit After	a Distribution of froi	ne mortgage Loans i	Jy income Categor	y of the Geography

2019-2021

	Т	otal Ho	me Mo	rtgage	Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of	Overall Market	( lecunied		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units	% Bank	Aggregate
McCurtain County AA	20	1,366	100	854	0.0		0.0	22.2	55	17.4	77.8	45	82.6	0.0	1	0.0	0.0		0.0
Total	20	1,366	100	854	0.0		0.0	22.2	55	17.4	77.8	45	82.6	0.0		0.0	0.0		0.0

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2019-2021

	Т		ne Mor oans	9 9					Middle-l	ncome l	Borrowers	Upper-I	ncome I	Borrowers	Not Available-Income Borrowers				
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
McCurtain County AA	20	1,366	100	854	31.8	10	1.9	18.7	15	3.9	21.7	20	7.3	27.8	55	68.0	0.0		19.0
Total	20	1,366	100	854	31.8	10	1.9	18.7	15	3.9	21.7	20	7.3	27.8	55	68.0	0.0		19.0

Source: 2015 ACS; 01/01/2019 - 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.

2019-2021

	1	Total Loans to Small Businesses Low-Income Tracts					Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
McCurtain County AA	21	2,484	100	332	0.0	1	0.0	29.0	33.3	26.8	71.0	66.7	73.2	0.0		0.0	0.0	1	0.0
Total	21	2,484	100	332	0.0		0.0	29.0	33.3	26.8	71.0	66.7	73.2	0.0		0.0	0.0		0.0

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2019-2021

	T	otal Loans to	Small Busines	ses	Businesses	with Revenue	s <= 1MM	Businesses wi > 1M		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
McCurtain County AA	23	2,511	100	332	82.5	57.1	45.2	4.0	42.9	13.5	
Total	23	2,511	100	332	82.5	57.1	45.2	4.0	42.9	13.5	

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 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.