



PUBLIC DISCLOSURE

June 18, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fairview S&LA
Charter Number 702049

301 N. Main St
Fairview, OK 73737-1624

Office of the Comptroller of the Currency
The Harvey Parkway Building
301 NW 63rd Street, Suite 490
Oklahoma City, OK 73116-7908

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

The Lending Test is rated: Satisfactory.

Major factors that support this rating include:

- The loan-to-deposit ratio is more than reasonable and exceeds the standard for satisfactory performance.
- A majority of the institution's loans were originated within the association's assessment area (AA).
- The institution meets the standard for satisfactory performance for lending to borrowers of different income levels and farms of different sizes.

Fairview S&LA of Fairview, Oklahoma is committed to serving the community. This is demonstrated by satisfactory lending performance as described in this Public Evaluation.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Census Tract (CT): 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 areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, 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 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing).

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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 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 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 MA/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. 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 it and half below it.

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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.

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 multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state 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.

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 One 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.

Description of Institution

Fairview S&LA (FSLA) is a \$47 million institution that is headquartered in Fairview, Oklahoma. The association is a federally chartered mutual institution, whose only office is located in Fairview, Oklahoma. The association does not have any affiliates.

The main bank and drive-thru facility are located at 301 N. Main Street in Fairview, Oklahoma. A 24-hour access Automated Teller Machine (ATM) is located on the premises. No branches or ATMs have been opened or closed since the prior Community Reinvestment Act (CRA) examination.

FSLA's primary focus is to serve the consumer, agricultural and commercial customers in the AA and surrounding communities. FSLA meets these needs by providing various loan and deposit products and services, as well as Internet Banking and Automated Clearing House services. Traditional loan products are offered such as consumer, home purchase, business and agricultural loans; however, residential and farm real estate loans are the primary lending products offered by FSLA. Since the association offers up to 30 year mortgage loans, they are referred customers from the surrounding banking institutions. Traditional checking and savings accounts, in addition to CDs and IRAs are offered.

As of March 31, 2018, FSLA's total assets equaled \$47 million, of which \$34 million, or 72 percent, were comprised of various types of loans to individuals and businesses. The association's portfolio composition is depicted in the following table.

Loan Portfolio Composition as of March 31, 2018		
Loan Category	\$ (000)	%
Residential Real Estate	\$15,783	46.43%
Agricultural Loans	\$12,926	38.03%
Commercial and Industrial	\$4,487	13.20%
Other	\$795	2.34%
Total	\$33,991	100.00%

There are no known legal, financial, or other factors impeding management's ability to help meet the credit needs of the designated AA. FSLA is involved in and provides support to meet the community's financial needs. The association received an overall rating of "Satisfactory" at the last evaluation dated September 2, 2012.

Scope of the Evaluation

FSLA was evaluated under the Small Bank examination procedures, which primarily focuses on the Lending Test. The Lending Test evaluates the association's record of meeting the credit needs of its AA through its lending activities. FSLA's 2015 and 2016 lending activity during the evaluation period was compared to 2010 U.S. Census demographic information. 2017 lending activity was compared to certain information updated by the 2015 American Community Survey (ACS). The association's AA was reviewed and included the census tract that has the main and drive-thru facility, as well as the surrounding geographies.

Conclusions regarding the lending test are based on a sample of home mortgage loans and a sample of agricultural loans originated from January 1, 2015 through December 31, 2017. Equal weight was given to each loan product. FSLA does not have any offices in a Metropolitan Statistical Area and is therefore not required to complete the Home Mortgage Disclosure Act reporting log.

The AA has no low- or moderate-income census tracts and therefore a geographical distribution of loans was not performed.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, 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 assessment area 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 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 performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Conclusions with Respect to Performance Tests

This Performance Evaluation assesses FSLA's performance focusing primarily on five performance criteria: the loan-to-deposit ratio; lending in the AA; lending to borrowers of different incomes and to businesses of different sizes; geographic distribution of loans; and responses to CRA related complaints.

To evaluate FSLA's lending performance, the major loan products offered by the association were evaluated. A random sample of 66 residential real estate loans and 52 agricultural loans that originated from January 1, 2015 through December 31, 2017 were selected. Based on the analysis and consistent with available resources and capabilities, FSLA is meeting the credit needs of the AA in a satisfactory manner.

LENDING TEST

The association's lending performance is satisfactory given its size, financial condition, and the credit needs of its AA.

Loan-to-Deposit Ratio

FSLA's loan-to-deposit (LTD) ratio is more than reasonable and exceeds the standard for satisfactory performance. The association's quarterly average LTD ratio from June 30, 2012 to March 31, 2018 was 90 percent, which has decreased from the quarterly average LTD ratio of 125 percent at the prior CRA evaluation. The quarterly average LTD ratio for the other similarly situated and local institutions is 54 percent with a range from 39 percent to 72 percent. The LTD ratio as of March 31, 2018 was 88 percent.

Loan-to-Deposit Ratio		
Institution	Total Assets \$000's (As of 3/31/18)	Average LTD Ratio
Fairview S&LA, Fairview, OK	\$46,682	90.00%
Cleo State Bank, Cleo Springs, OK	\$89,333	39.06%
The Farmers and Merchants National Bank of Fairview	\$118,532	39.01%
State Guaranty Bank, Okeene, OK	\$54,115	65.41%
Community State Bank of Canton, Canton, OK	\$49,307	61.13%
Bank of Vici, Vici, OK	\$36,455	45.99%
First National Bank in Okeene, Okeene, OK	\$77,683	71.68%

Source: Institution Reports of Condition from June 30, 2012 to March 31, 2018.

Lending in Assessment Area

FSLA’s lending in its AA meets the standard for satisfactory performance. A majority of the number and dollar amount of home mortgage loans and agricultural loans were originated within the association’s AA. As depicted in the table below, 64 percent of the number and 52 percent of the dollar amount of loans were originated in FSLA’s AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	35	53.0	31	47.0	66	3,167	46.7	3,621	53.3	6,788
Small Farm	41	78.9	11	21.1	52	933	80.1	232	19.9	1,165
Totals	76	64.4	42	35.6	118	4,100	51.5	3,853	48.5	7,953
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 Association Data Due to rounding, totals may not equal 100.0</i>										

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

FSLA’s borrower distribution in the AA is reasonable and meets the standard for satisfactory performance for lending to borrowers of different incomes and farms of different sizes. The borrower distribution reflected poor penetration for home mortgage loans and excellent penetration for small farm loans for overall reasonable penetration. The tables on the following page represent the distribution of lending based on the sample of 66 residential mortgage loans and 52 agricultural loans originated within the association’s AA between 2015 and 2017.

The overall distribution of home mortgage loans to low- and moderate-income borrowers is poor when considering there were no loans to low-income borrowers and low penetration to moderate-income borrowers. A lack of penetration to low-income borrowers is expected given the barriers for low-income persons to purchase a home. A low-income family earns less than \$26,000 annually and the medium housing value is \$91,159. The ability of a low-income family to meet the association’s required 20 percent down payment is difficult. A 30-year mortgage at the association’s current rate with the required down payment, taxes, insurance, and utility bills would make purchasing a house difficult for most low-income families.

There are additional factors affecting the housing market in the AA. Available housing in the area is currently limited due to oil and gas employees that need housing. Fairview also has two multi-family housing complexes that provide rent subsidized housing for low-income persons.

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-2016		
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		
Major County AA	18	1,344	100	70	14.5	0.0	4.3	14.8	11.1	20.0	22.6	16.7	11.4	48.0	72.2	54.3	0.0	0.0	10.0		
Total	18	1,344	100	70	14.5	0.0	4.3	14.8	11.1	20.0	22.6	16.7	11.4	48.0	72.2	54.3	0.0	0.0	10.0		

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Association Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017		
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		
Major County AA	17	1,735	100	112	14.9	0.0	2.7	11.5	0.0	13.4	22.2	23.5	19.6	51.4	76.5	45.5	0.0	0.0	18.8		
Total	17	1,735	100	112	14.9	0.0	2.7	11.5	0.0	13.4	22.2	23.5	19.6	51.4	76.5	45.5	0.0	0.0	18.8		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Association Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

FSLA’s borrower distribution to small agricultural operations with revenues of \$1 million or less is excellent. The percentage of association loans by number and dollar exceeds the standard for satisfactory performance.

Borrower Distribution of Loans to Farms in AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Farms	100%	0.00%	0.00%	100%
% of Bank Loans in AA by #	100%	0.00%	0.00%	100%
% of Bank Loans in AA by \$	100%	0.00%	0.00%	100%

Geographic Distribution of Loans

An analysis of the geographic distribution of loans sampled would not be meaningful since there are no low- or moderate-income census tracts in FSLA's AA.

Responses to Complaints

There have been no consumer complaints pertaining to FSLA's CRA performance during this evaluation period.

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 metropolitan and nonmetropolitan areas 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	Lending Test: (03/31/12 to 06/18/18)	
Financial Institution	Products Reviewed	
Fairview S&LA, Fairview, OK	Home Mortgage Small Farm	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Oklahoma Oklahoma Non-MSA	Full Scope	

Appendix B: Community Profiles for Full-Scope Areas

The AA adopted by FSLA consists of whole geographies, does not reflect illegal discrimination, and does not arbitrarily exclude low- or moderate-income geographies. It meets the requirements of the CRA regulation.

FSLA’s AA is comprised of the entire political subdivision classified as Major County. Major County is located in northwestern Oklahoma and is comprised of three contiguous census tracts; one middle-income and two upper-income based on 2016 Census information. The main facility, drive-thru, and ATM are located in the City of Fairview which lies within census tract 9553.

The following table describes major demographic and economic characteristics of the AA, based on 2010 U.S. Census data. This information was used to analyze 2015 and 2016 loan data.

Demographic Information of the Assessment Area						
Assessment Area: Major County AA, 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	66.7	33.3	0.0
Population by Geography	7,527	0.0	0.0	62.9	37.1	0.0
Housing Units by Geography	3,659	0.0	0.0	63.7	36.3	0.0
Owner-Occupied Units by Geography	2,543	0.0	0.0	65.6	34.4	0.0
Occupied Rental Units by Geography	595	0.0	0.0	52.1	47.9	0.0
Vacant Units by Geography	521	0.0	0.0	67.4	32.6	0.0
Businesses by Geography	510	0.0	0.0	42.0	58.0	0.0
Farms by Geography	88	0.0	0.0	65.9	34.1	0.0
Family Distribution by Income Level	2,236	0.0	0.0	22.6	48.0	0.0
Household Distribution by Income Level	3,138	0.0	0.0	16.4	52.0	0.0
Median Family Income Non-MSAs - GA		\$47,749	Median Housing Value			\$78,815
			Median Gross Rent			\$482
			Families Below Poverty Level			7.9%

*Source: 2010 U.S. Census and 2016 D&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.*

The following table describes major demographic and economic characteristics of the AA, based on 2015 American Community Survey (ACS) data. ASC is a nationwide survey conducted by the U.S. Census Bureau that updates the decennial census to provide communities with more current and accurate demographic, social, economic, and housing data. This updated information was used to analyze 2017 loan data.

Demographic Information of the Assessment Area						
Assessment Area: Major County AA, 2015 ACS						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	0.0	33.3	66.7	0.0
Population by Geography	7,700	0.0	0.0	18.1	81.9	0.0
Housing Units by Geography	3,651	0.0	0.0	22.7	77.3	0.0
Owner-Occupied Units by Geography	2,273	0.0	0.0	20.2	79.8	0.0
Occupied Rental Units by Geography	778	0.0	0.0	18.4	81.6	0.0
Vacant Units by Geography	600	0.0	0.0	37.3	62.7	0.0
Businesses by Geography	531	0.0	0.0	9.4	90.6	0.0
Farms by Geography	69	0.0	0.0	20.3	79.7	0.0
Family Distribution by Income Level	2,181	0.0	0.0	22.2	51.4	0.0
Household Distribution by Income Level	3,051	0.0	0.0	17.3	52.2	0.0
Median Family Income Non-MSAs - GA		\$51,698	Median Housing Value			\$91,159
			Median Gross Rent			\$549
			Families Below Poverty Level			10.6%
<i>Source: 2015 ACS Census and 2017 D&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 economy of Major County is characterized as good and stable. The economic conditions are driven in part by the recovering oil & gas sector in the surrounding areas. Oil & gas activity is picking up in neighboring counties which is increasing the traffic through the area.

Major employers in the AA are the U.S. Gypsum Plant, Fairview Fellowship Home and Village (retirement & nursing), Fairview Public Schools, and Fairview Regional Medical Center. While no individual oil & gas company is considered a major employer, the industry as a whole has become a major employer in the area. The labor market in the area is holding stable. The unemployment rate in Major County is low at 2.6 percent compared to the Oklahoma State unemployment rate of 4.0 percent. This is according to the Bureau of Labor Statistics as of July 2018.

The community credit needs and business opportunities are also served by two other financial institutions in Fairview, as well as other financial institutions in the surrounding communities.

A community contact was conducted during a separate review for another financial institution in Fairview in August 2017 to help ascertain the credit needs of the AA. The contact indicated that the credit needs of the community are being adequately met. A possible need in the community is for additional housing, as the current stock is moving quickly and the rentals are staying occupied due to the influx of oil & gas workers.