# PUBLIC DISCLOSURE

August 8, 2018

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Idabel National Bank Charter Number 11913

1201 Southwest Washington Idabel, Oklahoma 74745

Office of the Comptroller of the Currency Tulsa Field 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.

## **Table of Contents**

OVERALL CRA RATING	3
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION	9
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	11
LENDING TEST	11
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

# **Overall Community Reinvestment Act Rating**

#### This institution is rated: Satisfactory.

#### The Lending Test is rated: Satisfactory.

The Idabel National Bank (TINB) has a **satisfactory** record of meeting the credit needs of the community.

- TINB's quarterly loan-to-deposit (LTD) ratio is **reasonable**.
- A **majority** of lending is within the bank's assessment area (AA) by the number of loans originated or purchased, during the review period.
- The overall geographic distribution of loans reflects **reasonable dispersion** in the low and moderate-income census tracts (CTs).
- The overall distribution of loans by income level of the borrower reflects **reasonable** penetration amongst home mortgage loans and small loans to businesses.

## **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 Metropolitan Area/AA.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CTs 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. CTs 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 AA(s) or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(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 CT 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 (MSA) 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/AA.

**Median Family Income:** 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 MSA 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 MSA 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 Businesses:** 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 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**

TINB is a \$121 million rural community bank located in Idabel, Oklahoma. TINB is 100 percent owned by Southeast Capital Corporation ESOP, a one-bank holding company. TINB operates from its one banking location at 1201 Southeast Washington, Idabel, Oklahoma. The bank location has a drive-thru and automated teller machine. The bank location provides service during reasonable hours Monday through Friday. The drive-thru facility provides services during reasonable hours Monday through Saturday. During the evaluation period, there were no branch openings or closures.

Based on the June 30, 2017 FDIC Deposit market Share Report, the bank's presence in the AA is reasonable with 17 percent of the deposit market share in the AA.

A CRA Performance Evaluation (PE) was last prepared on February 10, 2014, and a **"Satisfactory"** rating was assigned. There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of the AA.

The bank's lending practices primarily focus on providing banking services to retail and commercial customers in McCurtain County. To accomplish this, TINB offers a variety of loan and deposit products, including Internet Banking, telephone banking, and other financial services. The bank's lending strategy focuses on residential real estate loans, commercial real estate loans, and commercial loans to meet the credit needs of the community.

The table below illustrates the composition of the bank's loan portfolio as of December 31, 2017. Total loan and leases comprised 59 percent of total assets, based on the information captured in the December 31, 2017 call report. Management does not anticipate any significant changes in the composition of the loan portfolio in the near future.

Loan Category	Dollar (000's)	% of Portfolio
Commercial Real Estate Loans	\$18,112	26%
Commercial Loans	\$8,500	12%
Residential Real Estate Loans	\$24,635	34%
Farm Production Loans	\$2,076	3%
Farm Real Estate Loans	\$11,004	15%
Consumer Loans	\$6,762	9%
Other Loans	\$859	1%
Total	\$71,948	100%

Source: December 31, 2017 Consolidated Reports of Condition and Income

# Scope of the Evaluation

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

We completed a full-scope review of TINB's CRA activities in its AA utilizing the Small Bank examination procedures. TINB's primary loan products include residential real estate loans (33 percent of total loans), commercial real estate (CRE) loans (27 percent of total loans), and commercial loans (12 percent of total loans).

The lending test evaluates the bank's record of meeting the credit needs of the bank's AA through its lending activities inside/outside the AA, to small businesses and small borrowers with gross operating revenue above and below \$1 million, and penetrations within various income tract levels. To determine the bank's lending pattern we sampled home mortgage loans and small loans to businesses originated between January 1, 2015 and December 31, 2017. TINB is not required to report lending activity under the HMDA.

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

The full-scope review comprised originations within the bank's pre-determined AA, McCurtain County, Oklahoma. There are no limited-scope review areas.

### Ratings

As there is only one AA, the bank's overall rating is based solely on the full-scope review.

# **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 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 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.

# **Conclusions with Respect to Performance Tests**

## LENDING TEST

TINB's performance under the Lending Test is **Satisfactory**.

This determination is based on our sampling of loans to finance home mortgage loans and small loans to businesses as these are the bank's primary lending products.

### Loan-to-Deposit Ratio

TINB's LTD ratio is reasonable. The bank's quarterly LTD ratio since the previous CRA evaluation averaged 67.12 percent, with a high ratio of 76.86 percent during the fourth quarter of 2017. We compared the bank's LTD ratio to three similarly situated banks (peer group banks) with footprints in McCurtain County and total assets in the range of \$62 million to \$249 million, compared to TINB with total assets of \$121 million. The peer group bank's average 64.09 percent with a high average ratio of 71.46 percent and a low average ratio of 57.69 percent.

		Number o	f Loans	6		Dollar A	mount of	Loans S	6(000s)	
Loan Category	Ins	side	Outs	side	Total	Insi	de	Outs	side	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	40	100.00	0	0.00	40	3,800	100.00	0	0.00	3,800
CRE/Commercial	38	95.00	2	5.00	40	9,364	93.06	698	6.94	10,062
Total	78	97.50%	2	2.50%	80	\$13,164	93.06%	\$698	6.94%	\$13,862

### Lending in Assessment Area

Lending in the AA is reasonable with a **substantial majority** of loans originated inside the AA. Based on our sample of lending during the evaluation period, January 1, 2015 to December 31, 2017, TINB meets the standard for satisfactory performance of lending within the AA. Overall lending in the AA based on number of loans originated is 97.50 percent, compared to 2.50 percent outside of the AA. Overall lending in the AA based on dollar size of loans is 93.06 percent compared to 6.94 percent outside the AA. This analysis is supported by the bank's lending strategy to support the financing of home mortgage loans and small loans to businesses within its AA.

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

The overall borrower distribution of loans by income level reflects a **reasonable penetration** among borrowers of different income levels and small loans to business applicants. The sample indicates that 80 percent of the CRE and commercial loans

sampled were originated to individuals and businesses with gross revenues below \$1 million. Please refer to Tables O, P, Q and R in Appendix C for additional information and data used to evaluate borrower distribution of the bank's loan originations of home mortgage loans and loans to small business applicants.

#### **Geographic Distribution of Loans**

The overall geographic distribution of loans for home mortgage loans and small loans to businesses, reflects **reasonable dispersion** of loans in most tracts within the AA. There is one low-income, one medium-income, and six middle-income CTs in the AA. A substantial majority of the bank's lending is in the bank's AA. Please refer to Tables O, P, Q and R in Appendix C for a geographic analysis of loans in our samples compared to demographic data relative to the income level of the CTs in the AA.

#### **Residential Real Estate Geography Distribution**

The overall geographic distribution of home mortgage loans reflects **reasonable dispersion** amongst low-moderate income (LMI) CTs. The assessment period in 2015-2016 and 2017 revealed reasonable dispersion and meets the standards for satisfactory performance. A substantial majority of these loans are in the bank's AA. Refer to Tables O and P in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

#### **Small Business Geography Distribution**

The overall geographic distribution of loans for small loans to businesses reflects **reasonable dispersion** amongst LMI CTs. The assessment period in 2015-2016 and 2017 revealed reasonable dispersion and meets the standards for satisfactory performance. Refer to Tables Q and R in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases of loans and small loans to businesses. For the assessment periods 79 percent of the loans to small loans to businesses in our sample were to small businesses.

#### **Responses to Complaints**

The bank did not receive any CRA-related complaints 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: (01/01/1	5 to 12/31/17)
Financial Institution		Products Reviewed
The Idabel National Bank (TINB) Idabel, Oklahoma		Home Mortgage Loans and Small loans to Businesses
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Ty	pe of Examination	
Assessment Area	Type of Exam	Other Information
McCurtain County, Oklahoma	Full-Scope	

#### **Community Contact**

During the evaluation process, we contacted a community leader to gain a better understanding of the community's credit needs within the AA. The contact identified that affordable housing is always in short supply due to the large number of families working minimum wage jobs.

#### **Community Profile**

Assessmen	nt Area: Mo	cCurtain Co	ounty 2010 Ce	nsus		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	12.5	12.5	75.0	0.0	0.0
Population by Geography	33,151	13.1	16.9	70.0	0.0	0.0
Housing Units by Geography	15,600	12.1	16.6	71.2	0.0	0.0
Owner-Occupied Units by Geography	8,931	9.9	11.9	78.2	0.0	0.0
Occupied Rental Units by Geography	4,324	19.8	24.6	55.6	0.0	0.0
Vacant Units by Geography	2,345	6.5	20.0	73.5	0.0	0.0
Businesses by Geography	1,684	6.6	21.9	71.6	0.0	0.0
Farms by Geography	91	11.0	7.7	81.3	0.0	0.0
Family Distribution by Income Level	8,975	32.1	13.6	20.6	33.7	0.0
Household Distribution by Income Level	13,255	33.6	15.6	15.4	35.4	0.0
Median Family Income Non-MSAs - OK		\$47,749	Median Housi	ng Value		\$72,048
			Median Gross	Rent		\$504
			Families Belov	w Poverty Lev	vel	22.5%

TINB has one AA, comprising the entire McCurtain County, Oklahoma. This designation meets the technical requirements of the regulation. There are eight CTs in McCurtain County, Oklahoma. According to the 2015 ACS Census and 2017 D&B Data, there is one low, one moderate, and six middle-income CTs. TINB operates from its main bank and drive through facility both in Idabel, Oklahoma. According to the June 30, 2017 FDIC Deposit market Share Report, TINB's total deposits of \$90,507 thousand represents 17 percent of the total deposits in the AA. Cities and towns located in the AA include Battiest, Broken Bow, Garvin, Haworth, Hochatown, Idabel, Smithville, Tom, Valliant, and Wright City. The economy in McCurtain County is strained. Twenty-one percent of the families in McCurtain County are below the poverty level. There are 2,663 vacant units in McCurtain County with 74 percent in middle-income tracts and 26 percent in moderate-income tracts.

Tables A and B summarize the demographic characteristics of TINB's AA. Table A reflects the demographic characteristics of the AA according to the 2010 Census Data, while table B reflects identical characteristics based on 2015 Census Data. The population has remained stable between the two periods, with a decline of only eight persons. The number of businesses grew by ten, while the number of small farms declined by seven. The median family income based on the 2010 and 2015 Census data were \$47,749 and \$51,698, respectively. Families below the poverty level were 22.5 percent and 20.7 percent, respectively.

Table B – Dem Assessmer	•		of the Assessn ounty 2015 Ce			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	37.5	62.5	0.0	0.0
Population by Geography	33,143	0.0	34.5	65.5	0.0	0.0
Housing Units by Geography	15,571	0.0	33.0	67.0	0.0	0.0
Owner-Occupied Units by Geography	8,902	0.0	27.9	72.1	0.0	0.0
Occupied Rental Units by Geography	4,006	0.0	49.2	50.8	0.0	0.0
Vacant Units by Geography	2,663	0.0	25.8	74.2	0.0	0.0
Businesses by Geography	1,694	0.0	35.4	64.6	0.0	0.0
Farms by Geography	84	0.0	25.0	75.0	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		\$51,698	Median Housi	ng Value		\$73,474
			Median Gross	Rent		\$555
			Families Below	w Poverty Lev	vel	20.7%

Source: 2015 ACS Census and 2017 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.

# **Content of Standardized Tables**

For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data is compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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<br/>of the Geography Compares the percentage distribution of the number of loans<br/>originated and purchased by the bank in low-, moderate-, middle-, and upper-<br/>income geographies to the percentage distribution of owner-occupied housing<br/>units throughout those geographies. The table also presents aggregate peer data<br/>for the years the data is available.
- Table P.Assessment Area Distribution of Home Mortgage Loans by Income Category<br/>of the Borrower Compares the percentage distribution of the number of loans<br/>originated and purchased by the bank to low-, moderate-, middle-, and upper-<br/>income borrowers to the percentage distribution of families by income level in each<br/>MA/AA. The table also presents aggregate peer data for the years the data is<br/>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 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) throughout those geographies. Because small business data is 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 AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

 Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

	Tot	tal Home	Mortgag	e Loans	Low-I	ncome T	Fracts	Moderat	e-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	able-Inco	ome Tracts
AA:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate												
Idabel NB McCurtain AA 2018 Exam	20	2,001	89.7	223	9.9	5.0	5.8	11.9	15.0	21.1	78.2	80.0	73.1	0.0		0.0	0.0		0.0
Total	20	2,001	89.7	223	9.9	5.0	5.8	11.9	15.0	21.1	78.2	80.0	73.1	0.0		0.0	0.0		0.0

2015-2016

Table O: As	sessm	ent Are	a Dist	ribution	of Home	Mortg	age Loan	s by Incol	me Cat	egory of (	the Geogr	aphy							2017
	Tota	l Home M	lortgage	Loans	Low-l	ncome 7	Fracts	Moderat	e-Incom	e Tracts	Middle	Income	Tracts	Upper-	Income	Tracts	Not Availa	able-Inco	ome Tracts
АА:	#	\$	% 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
Idabel NB McCurtain AA 2018 Exam	20	1,799	5.7	352		25.0		27.9	5.0	16.5	72.1	70.0	83.5	0.0		0.0	0.0		0.0
Total	20	1,799	5.7	352		25.0		27.9	5.0	16.5	72.1	70.0	83.5	0.0		0.0	0.0		0.0

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

	Tota	al Home I	Mortgage	e Loans	Low-Inc	come Bo	rrowers	Moderate-	Income	Borrowers	Middle-I	ncome B	orrowers	Upper-In	come Bo	orrowers		ailable-I Sorrower	
AA:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregat									
Idabel NB McCurtain AA 2018 Exam	20	2,001	9.0	223	32.2	5.0	5.4	13.6	10.0	12.1	20.6	35.0	17.0	33.6	50.0	45.7	0.0		19.7
Total	20	2,001	9.0	223	32.2	5.0	5.4	13.6	10.0	12.1	20.6	35.0	17.0	33.6	50.0	45.7	0.0		19.7

	Tota	al Home N	<b>Iortgage</b>	Loans	Low-In	come Bo	rrowers	Moderate	-Income	Borrowers	Middle-I	ncome B	orrowers	Upper-Iı	ncome B	orrowers		/ailable-] Borrowei	
AA:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate									
Idabel NB McCurtain AA 2018 Exam	20	1,799	5.7	352	31.8	20.0	2.6	18.7	30.0	13.9	21.7	15.0	13.9	27.8	35.0	54.8	0.0		14.8
Total	20	1,799	5.7	352	31.8	20.0	2.6	18.7	30.0	13.9	21.7	15.0	13.9	27.8	35.0	54.8	0.0		14.8

 Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

	Total	Loans to	Small B	usinesses	Low-	Income T	racts	Moderat	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	ble-Inco	me Tracts
AA:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregat									
Idabel NB McCurtain AA 2018 Exam	19	2,495	7.9	242	7.9	5.2	10.3	32.0	26.3	28.5	60.1	68.4	61.2	0.0		0.0	0.0		0.0
Total	19	2,495	7.9	242	7.9	5.2	10.3	32.0	26.3	28.5	60.1	68.4	61.2	0.0		0.0	0.0		0.0

2015-2016

	Total	Loans to	Small B	usinesses	Low-	Income T	fracts	Moderat	te-Incom	e Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Availa	able-Inco	me Tracts
AA:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregat									
Idabel NB McCurtain AA 2018 Exam	20	5,422	8.3	242		10.0		35.4	5.0	32.2	64.6	85.0	67.8	0.0		0.0	0.0		0.0
Total	20	5,422	8.3	242		10.0		35.4	5.0	32.2	64.6	85.0	67.8	0.0		0.0	0.0		0.0

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

AA:		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	
Idabel NB McCurtain AA 2018 Exam	19	2,495	7.9	242	69.0	79.0	41.3	4.0	21.0	27.0	0.0	
Total	19	2,495	7.9	242	69.0	79.0	41.3	4.0	21.0	27.0	0.0	

Table R: Assessment A	rea Distribution	n of Loans to	Small Busir	nesses by Gi	ross Annual F	Revenues					201
AA:	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
Idabel NB McCurtain AA 2018 Exam	20	5,422	8.3	242	79.1	80.0	43.0	5.1	20.0	15.8	0.0
Total	20	5,422	8.3	242	79.1	80.0	43.0	5.1	20.0	15.8	0.0

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0 2015-2016