

# **Community Reinvestment Act**

## **Public File Contents:**

- 1. All Written Comments Received from the Public**
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## Written CRA Comments and Responses

For the period of 2022 through March 1, 2024, there are no public comments related to the Community Reinvestment Act (CRA).



## **PUBLIC DISCLOSURE**

MAY 13, 2019

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

**THE COMMUNITY STATE BANK  
RSSD# 706254**

**1409 NORTH BROADWAY  
POTEAU, OKLAHOMA 74953**

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

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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## INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

The Community State Bank (the bank) is rated **Satisfactory** and was also rated Satisfactory under the Community Reinvestment Act (CRA) at its March 16, 2015 performance evaluation.

- The bank is meeting the credit needs of its community based on an analysis of lending activity.
- The bank's net loan-to-deposit (NLTD) ratio is reasonable given the bank's size, financial condition, and the credit needs of its assessment areas (AAs).
- A substantial majority of the bank's loans are originated inside the AAs.
- A reasonable dispersion of loans occurs throughout the bank's AAs.
- Lending reflects a poor penetration among individuals of different income levels, including low- and moderate-income (LMI), but a reasonable penetration to businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any CRA-related complaints since the previous evaluation.

## SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* was utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, and market competition, as well as AA demographic and economic characteristics, and credit needs. Lending performance was assessed in both of the bank's AAs, the Le Flore County Metropolitan AA and the Latimer County AA. The branch located in the Latimer County AA was opened on February 28, 2017. The following criteria were reviewed:

- **NLTD** – A 16-quarter average NLTD ratio was calculated for the bank and compared to a sample of similarly situated institutions.
- **Lending in the AA, Geographic Distribution, and Distribution to Borrowers of Different Income Levels and to Businesses and Farms of Different Sizes** – The universe of home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and originated from January 1, 2017 through December 31, 2017, and statistical samples of the bank's small business and small farm loans originated from January 1, 2018 through December 31, 2018, were reviewed and compared to applicable demographic and aggregate data. Although lending performance in both AAs was weighted equally, by product, more weight was placed on small business and small farm lending in these analyses due to the bank's strategic focus on these products.

- **Response to Substantiated Complaints** – Neither the bank nor the Reserve Bank received any CRA-related complaints since the previous evaluation. Therefore, this criterion was not evaluated.
- **Community Contacts** – Two community representatives, one from an economic development organization and the other from a local chamber of commerce, were contacted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions.

## DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Poteau, Oklahoma. The bank's characteristics include the following:

- Total assets of \$262.7 million as of September 30, 2018.
- In addition to its main office in Poteau, the bank has five additional offices located in Poteau, Spiro, Talihina, Wister, and Wilburton, Oklahoma.
- The main office and five other branches are all full-service branches with full-service automated teller machines at their locations.
- The bank's primary business focus is agricultural and commercial lending.

**TABLE 1**  
**THE COMMUNITY STATE BANK LOAN PORTFOLIO**  
**AS OF SEPTEMBER 30, 2018**

Loan Type	\$(000)	%
Agriculture	76,708	37.1
Commercial	61,405	29.7
Residential Real Estate	58,400	28.2
Consumer	8,554	4.1
Other	1,838	0.9
<b>Gross Loans</b>	<b>206,905</b>	<b>100.0</b>

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

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

## OVERALL CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the

AAs, and in comparison to several similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The bank's NLTD ratio is reasonable.

TABLE 2 COMPARATIVE NLTD RATIOS	
Institution	NLTD Ratio (%)
	16-Quarter Average
The Community State Bank	87.0
FirstBank	96.7
First Bank and Trust Company	64.9
Central National Bank of Poteau	68.4

### Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. A substantial majority of the bank's loans, by number and dollar, are originated inside the AAs.

TABLE 3 LENDING INSIDE AND OUTSIDE THE AA								
Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	75	7,372	94.9	93.7	4	498	5.1	6.3
Home Refinance	13	4,607	92.9	93.9	1	300	7.1	6.1
Home Improvement	6	741	85.7	88.1	1	100	14.3	11.9
Multifamily	0	0	0.0	0.0	1	2,490	100.0	100.0
<b>Total HMDA Loans</b>	<b>94</b>	<b>12,720</b>	<b>93.1</b>	<b>79.0</b>	<b>7</b>	<b>3,388</b>	<b>6.9</b>	<b>21.0</b>
<b>Small Business Loans</b>	<b>106</b>	<b>10,073</b>	<b>90.6</b>	<b>90.8</b>	<b>11</b>	<b>1,024</b>	<b>9.4</b>	<b>9.2</b>
<b>Small Farm Loans</b>	<b>126</b>	<b>7,627</b>	<b>90.6</b>	<b>91.8</b>	<b>13</b>	<b>682</b>	<b>9.4</b>	<b>8.2</b>
<b>Total Loans</b>	<b>326</b>	<b>30,420</b>	<b>91.3</b>	<b>85.7</b>	<b>31</b>	<b>5,094</b>	<b>8.7</b>	<b>14.3</b>

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

The remaining performance criteria consider only those loans originated inside the bank's AAs.

### Geographic and Borrower Distribution

The geographic distribution performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts. The bank's geographic distribution of loans reflects a reasonable penetration among the different census tracts within Le Flore County Metropolitan AA. The geographic distribution was not evaluated in the Latimer County AA as the AA is comprised of only middle-income census tracts and would not render a meaningful analysis.

The borrower distribution performance criterion evaluates the bank's lending to borrowers of different income levels, with emphasis placed on lending to LMI individuals as well as to businesses and farms of different revenue sizes, with emphasis placed on lending to those with gross annual revenues of \$1MM or less. The bank's lending reflects a poor dispersion among individuals of different income levels (including LMI), but a reasonable dispersion among businesses and farms of different revenue sizes.

Additional detail for both geographic and borrower distribution for each specific AA will be provided later in this performance evaluation.

#### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

An evaluation of the bank's compliance with the Equal Credit Opportunity Act and the Fair Housing Act requirements found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.



LE FLORE COUNTY METROPOLITAN ASSESSMENT AREA  
(Full Review)

DESCRIPTION OF THE BANK'S OPERATIONS IN THE LE FLORE COUNTY  
METROPOLITAN ASSESSMENT AREA

The bank's AA is comprised of Le Flore County in its entirety; which is part of the Fort Smith, Oklahoma – Arkansas Metropolitan Statistical Area (MSA). (See **Appendix A** for an AA map).

- The AA is comprised of 12 census tracts (three moderate-, eight middle- and one upper-income tracts).
- The AA composition has changed since the 2015 performance evaluation, which was comprised of two moderate- and ten middle-income tracts. (See **Appendix B** for additional demographic information).
- The bank's head office as well as four branch offices are located in this AA.
- As of June 30, 2018, the bank's market share was 35.3 percent of FDIC-insured deposits in AA, ranking first out of five institutions operating in the AA. However, while the bank has the largest market share, other institutions have multiple branches, which increases competition.

TABLE 4  
POPULATION CHANGE

Area	2010 Population	2015 Population	Percent Change
Le Flore County Metropolitan AA	50,384	49,899	(1.0)
Fort Smith, Arkansas-Oklahoma MSA	280,467	280,384	(0.0)
State of Oklahoma	3,751,351	3,849,733	2.6

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

- The population of the AA experienced a minimal decrease of 1.0 percent between 2010 and 2015, compared to the state of Oklahoma, which saw a 2.6 percent population increase over the same period.
- Poteau, Oklahoma, is the county seat of Le Flore County, home to a majority of the population in the AA. Other areas of the county are largely rural in nature and less densely populated.
- A community representative stated that Le Flore County is a bedroom community for the Fort Smith workforce.

**TABLE 5  
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Le Flore County Metropolitan AA	43,536	45,696	5.0
Fort Smith, Arkansas-Oklahoma MSA	46,436	48,075	3.5
State of Oklahoma	53,607	58,029	8.2

Source: 2006-2010 U.S. Census Bureau: ACS  
2011-2015 U.S. Census Bureau: ACS

- The median family income for the AA is comparable to the Fort Smith, Arkansas-Oklahoma MSA, but slightly below the state of Oklahoma.
- The AA population consists of only 17.3 percent of families living below the poverty level, which is comparable to the MSA at 17.3 percent but above the state of Oklahoma at 12.4 percent.
- As reflected in Table 5, median family income growth was comparable to the MSA and slightly below the state of Oklahoma during the 2011-2015 period captured in the U.S. Census Bureau's American Community Survey (ACS).

**TABLE 6  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Le Flore County Metropolitan AA	72,700	81,600	12.2	529	570	7.8
Fort Smith, Arkansas-Oklahoma MSA	93,272	103,026	10.5	566	621	9.7
State of Oklahoma	104,300	117,900	13.0	633	727	14.8

Source: 2006-2010 U.S. Census Bureau: ACS  
2011-2015 U.S. Census Bureau: ACS

- The median housing value in the AA is lower than both the MSA and state of Oklahoma figures. Additionally, the Le Flore County Metropolitan AA's affordability ratio<sup>1</sup> of 44.8 percent is higher than both the MSA and the state of Oklahoma at 37.5 percent and 39.8 percent, respectively. This ratio indicates that housing in this AA is generally more affordable than housing in both the MSA and the state of Oklahoma.
- The median age of housing stock is 40 years, which could indicate local housing units may be in need of renovation, potentially warranting increased home improvement lending opportunities in the AA.

<sup>1</sup> The house affordability ratio is calculated by dividing the median housing income by the median housing value. A lower ratio reflects less affordable housing.

**TABLE 7  
UNEMPLOYMENT RATES**

Region	2013	2014	2015	2016	2017
Le Flore County Metropolitan AA	8.8	7.0	6.9	7.0	5.8
Fort Smith, Arkansas-Oklahoma MSA	8.0	6.2	5.5	4.7	4.2
State of Oklahoma	5.4	4.5	4.4	4.9	4.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The AA's major employment industries are in healthcare, retail, and manufacturing.
- The unemployment rate for the AA is comparable to the MSA and state of Oklahoma figures.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

### Geographic Distribution of Loans

The bank's geographic distribution of loans reflects a reasonable dispersion among the different census tracts within the AA.

### Home Mortgage Disclosure Act-Reportable Lending

The geographic distribution of HMDA lending is reasonable. The bank's lending in the moderate-income census tracts by number was below the other HMDA lenders operating in the AA (aggregate data) and also the percentage of owner-occupied units (demographic figure). By dollar volume, lending in moderate-income census tracts was comparable to aggregate data and slightly trailed the demographic figure. While the bank's lending performance was lower than the demographic and aggregate figures by both number and dollar, there were some mitigating factors that helped to raise the bank's performance rating in this category to reasonable.

The bank has five offices in LeFlore County; however, only one of the bank's five offices is located in close proximity, ten miles northwest, to the LMI tracts in LeFlore County. Additionally, there are two competing banks with three total locations inside the moderate-income tracts. The bank does not have a location in either of these census tracts. Lastly, the Poteau River creates a natural barrier between the moderate-income tracts and the closest branch. The bank offers limited mortgage products and does not offer several products, such as Veterans Administration (VA), Farm Services Agency, Fair Housing Act (FHA) and U.S. Department of Agriculture loans, which other lenders in the market include within their loan portfolio.

The bank's lending in middle-income census tracts was above aggregate data and the demographic figure by both number and dollar volume. Lending in the upper-income census tract was comparable by number to both aggregate data and the demographic figure, but below by dollar volume when compared to aggregate data.

**TABLE 8**  
**DISTRIBUTION OF 2017 HMDA LOANS**  
**BY INCOME LEVEL OF GEOGRAPHY**  
**LE FLORE COUNTY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	9	1,861	11.0	16.1	16.0	18.5	19.8
Middle	62	8,794	75.6	76.1	69.8	65.9	68.6
Upper	11	902	13.4	7.8	14.3	15.6	11.6
Unknown	0	0	0.0	0.0	0.0	0.0	0.0

Originations and Purchases  
2017 FFIEC Data

NOTE: Percentages may not add up to 100.0 due to rounding.

### Small Business Lending

The geographic distribution of small business lending is poor. The bank's lending in moderate-income tracts is below the percentage of businesses located in moderate-income tracts. However, lending in the middle-income tracts is comparable to the demographic data, while lending in upper-income tracts was above demographics. As previously stated, there are geographic factors that affect access to the bank's nearest branch from the moderate-income tracts, as well as the presence of two competing banks with three offices operating in the moderate-income tracts. While considering this context, the bank's performance is still below the level expected to reasonably serve the entire AA, including the two contiguous moderate-income tracts.

**TABLE 9**  
**DISTRIBUTION OF 2018 SMALL BUSINESS LOANS**  
**BY INCOME LEVEL OF GEOGRAPHY**  
**LE FLORE COUNTY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	5	219	5.1	2.6	14.8
Middle	75	6,891	75.8	81.4	73.7
Upper	19	1,354	19.2	16.0	11.5
Unknown	0	0	0.0	0.0	0.0

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS.

NOTE: Percentages may not add up to 100.0 due to rounding.

### Small Farm Lending

The geographic distribution of small farm lending is reasonable. The bank's lending in moderate-income tracts is comparable to the percentage of farms in moderate-income tracts. Additionally, the bank's lending in middle-income tracts is below the percentage of farms, while lending in the upper-income tracts is above the percentage of small farms in the area.

**TABLE 10**  
**DISTRIBUTION OF 2018 SMALL FARM LOANS**  
**BY INCOME LEVEL OF GEOGRAPHY**  
**LE FLORE COUNTY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				% of Farms
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	21	2,113	18.8	30.8	19.0
Middle	65	2,751	58.0	40.1	70.2
Upper	26	1,997	23.2	29.1	10.7
Unknown	0	0	0.0	0.0	0.0

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS.  
NOTE: Percentages may not add up to 100.0 due to rounding.

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

The bank's lending has a poor penetration among individuals of different income levels (including LMI), but a reasonable penetration to businesses and farms of different sizes.

### Home Mortgage Disclosure Act-Reportable Lending

The borrower distribution of HMDA lending is poor. Lending to low-income borrowers was comparable to aggregate HMDA lenders by both number and dollar, but significantly below the percentage of low-income families in the AA. The bank's lending to moderate-income borrowers was significantly below the aggregate data and the demographic figure and was a primary factor in the rating for this component. While the bank's mortgage loan product line does not include FHA or other mortgage loan products with lower down payment requirements and specifically tailored to first time home buyers, there is typically demand for traditional lending products from LMI borrowers that appears to be unmet. Lending to middle-income borrowers was also below aggregate and the demographic figure, while lending to upper-income borrowers significantly exceeded aggregate data and the demographic figure.

**TABLE 11**  
**DISTRIBUTION OF 2017 HMDA LOANS**  
**BY BORROWER INCOME LEVEL**  
**LE FLORE COUNTY METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	2	83	2.4	0.7	3.6	1.7	23.4
Moderate	3	143	3.7	1.2	14.6	8.8	17.6
Middle	5	475	6.1	4.1	19.3	15.1	20.1
Upper	46	8,094	56.1	70.0	39.4	52.0	38.9
Unknown	26	2,762	31.7	23.9	23.0	22.4	0.0

Originations and Purchases  
2017 FFIEC Data

NOTE: Percentages may not add up to 100.0 due to rounding.

### **Small Business Lending**

The borrower distribution of small business lending is reasonable. The bank's lending to small businesses is comparable to the percentage of small businesses in the AA. Additionally, a majority of the small business loans (90.9 percent by number) were for amounts of \$250,000 or less, indicating the bank's willingness to meet the credit needs of small businesses.

**TABLE 12**  
**DISTRIBUTION OF 2018 SMALL BUSINESS LOANS**  
**BY REVENUE SIZE OF BUSINESSES**  
**LE FLORE COUNTY METROPOLITAN AA**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	92	6,568	92.9	77.6	89.4
Over \$1 Million	7	1,896	7.1	22.4	7.3
Not Known	0	0	0.0	0.0	3.3
Total	99	8,463	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	79	2,433	79.8	28.7	
\$100,001 – \$250,000	11	1,591	11.1	18.8	
\$250,001 – \$1 Million	9	4,439	9.1	52.5	
Total	99	8,463	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	78	2,423	84.8	36.9	
\$100,001 – \$250,000	8	1,215	8.7	18.5	
\$250,001 – \$1 Million	6	2,930	6.5	44.6	
Total	92	6,568	100.0	100.0	

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS.  
NOTE: Percentages may not add up to 100.0 due to rounding.

### Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank's lending to small farms is comparable to the percentage of small farms in the AA. Additionally, a majority of the small farm loans (96.5 percent by number) were for amounts of \$250,000 or less, indicating the bank's willingness to meet the credit needs of small farms.

**TABLE 13**  
**DISTRIBUTION OF 2018 SMALL FARM LOANS**  
**BY REVENUE SIZE OF FARMS**  
**LE FLORE COUNTY METROPOLITAN AA**

	Bank Loans				Total Farms
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	110	6,511	98.2	94.9	97.6
Over \$1 Million	2	350	1.8	5.1	1.2
Not Known	0	0	0.0	0.0	1.2
Total	112	6,862	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	88	2,519	78.6	36.7	
\$100,001 – \$250,000	20	3,158	17.9	46.0	
\$250,001 – \$500,000	4	1,185	3.6	17.3	
Total	112	6,862	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	88	2,519	80.0	38.7	
\$100,001 – \$250,000	18	2,807	16.4	43.1	
\$250,001 – \$500,000	4	1,185	3.6	18.2	
Total	110	6,511	100.0	100.0	

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS.  
NOTE: Percentages may not add up to 100.0 due to rounding.



**LATIMER COUNTY ASSESSMENT AREA**  
(Full Review)

**DESCRIPTION OF THE BANK'S OPERATIONS IN THE LATIMER COUNTY ASSESSMENT AREA**

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

- The AA is comprised of seven middle-income tracts.
- The AA is new since the 2015 performance evaluation, with the addition of the branch in Wilburton in 2017. (See **Appendix B** for additional demographic information).
- As of June 30, 2018, the bank's market share was 15.9 percent of FDIC-insured deposits in the AA, ranking third out of four institutions operating in the AA.

**TABLE 14**  
**POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Latimer County AA	11,154	10,774	(3.4)
State of Oklahoma	3,751,351	3,849,733	2.6

Source: 2010 U.S. Census Bureau Decennial Census  
2011-2015 U.S. Census Bureau: ACS

- The population of the AA experienced a decrease of 3.4 percent between 2010 and 2015, compared to the state of Oklahoma, which saw a 2.6 percent population increase over the same period.
- Bank management indicated that the AA has a heavy agricultural foot print and a high college student population due to Carl Albert State College.

**TABLE 15**  
**MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Latimer County AA	48,817	49,942	2.3
State of Oklahoma	53,607	58,029	8.2

Source: 2006-2010 U.S. Census Bureau: ACS  
2011-2015 U.S. Census Bureau: ACS

- According to the 2015 U.S. Census, median family income grew at a slower pace in the AA when compared to the state of Oklahoma.
- The AA population consists of 15.1 percent of families living below the poverty level, which is comparable to the state of Oklahoma percentage of 12.4 percent.

**TABLE 16  
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Latimer County AA	65,700	80,500	22.5	477	506	6.1
State of Oklahoma	104,300	117,900	13.0	633	727	14.8

Source: 2006-2010 U.S. Census Bureau: ACS  
2011-2015. Census Bureau: ACS

- Lower housing costs in the AA compensate for the lower median family income in Latimer County.
- Median housing costs are far below the Oklahoma statewide figures, suggesting housing affordability in the AA. However, wage growth in the AA was minimal, supporting bank staff's and community contact's statements that local banks have trouble finding qualified home buyers in the AA.

**TABLE 17  
UNEMPLOYMENT RATES**

Region	2013	2014	2015	2016	2017
Latimer County AA	9.6	7.5	8.1	8.8	7.5
State of Oklahoma	5.4	4.5	4.4	4.9	4.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The AA's major industries are comprised of healthcare, education services and construction.
- The unemployment rate for the AA is higher than the state of Oklahoma's and the United States in general.
- Employers are also experiencing a shortage of higher-skilled workers for open job positions in the area, with cannabis production being the only new business ventures or operations experiencing growth.
- A community representative indicated that the AA is also experiencing low employment opportunities, as most employers are not looking to expand their operations.
- A community representative indicated that the few job openings in the AA are hard to fill due to a shortage of skilled workers to fill the positions. The cannabis industry is the only sector experiencing any growth or expansion at this time.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

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

The bank's lending has a reasonable penetration among individuals of different income levels (including LMI) and businesses and farms of different sizes.

#### Home Mortgage Disclosure Act-Reportable Lending

The borrower distribution of HMDA lending is reasonable. The bank did not originate any loans to low-income borrowers. This is below aggregate data and significantly below the percentage of low-income families in the AA. The bank established the AA at the end of February 2017 with only ten percent of the bank's total lending occurring in the AA. Despite the bank's lack of lending in low-income census tracts, the overall rating for HMDA lending is reasonable. The HMDA lending data used for this review utilizes 2017 lending data only and only includes ten months of data for this institution given the opening date of the new branch. Additionally, borrowers may not have been aware of the new branch opening in their area, which may have also impacted lending performance for 2017. The bank's lending to moderate-income borrowers is comparable by number to both the aggregate data and the demographic figure, while lending by dollar exceeded aggregate data. The bank's lending to middle-income borrowers greatly exceeded both aggregate data and the demographic figure, while lending to upper-income borrowers was below aggregate data and the demographic figure.

**TABLE 18  
DISTRIBUTION OF 2017 HMDA LOANS  
BY BORROWER INCOME LEVEL  
LATIMER COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	5.0	4.0	23.6
Moderate	2	313	16.7	26.9	15.8	14.0	17.4
Middle	5	405	41.7	34.8	25.7	28.3	18.2
Upper	4	363	33.3	31.2	38.6	41.1	40.8
Unknown	1	82	8.3	7.1	14.9	12.6	0.0

Originations and Purchases  
2017 FFIEC Data

NOTE: Percentages may not add up to 100.0 due to rounding.

#### Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to small businesses with revenues of \$1MM or less is comparable to the percentage of small businesses in the AA.

**TABLE 19**  
**DISTRIBUTION OF 2018 SMALL BUSINESS LOANS**  
**BY REVENUE SIZE OF BUSINESSES**  
**LATIMER COUNTY AA**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	6	953	85.7	59.2	84.7
Over \$1 Million	1	657	14.3	40.8	10.7
Not Known	0	0	0.0	0.0	4.6
Total	7	1,609	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	3	114	42.9	7.1	
\$100,001 – \$250,000	2	338	28.6	21.0	
\$250,001 – \$1 Million	2	1,157	28.6	71.9	
Total	7	1,609	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	3	114	50.0	12.0	
\$100,001 – \$250,000	2	338	33.3	35.5	
\$250,001 – \$1 Million	1	501	16.7	52.6	
Total	6	953	100.0	100.0	

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS.  
NOTE: Percentages may not add up to 100.0 due to rounding.

### **Small Farm Lending**

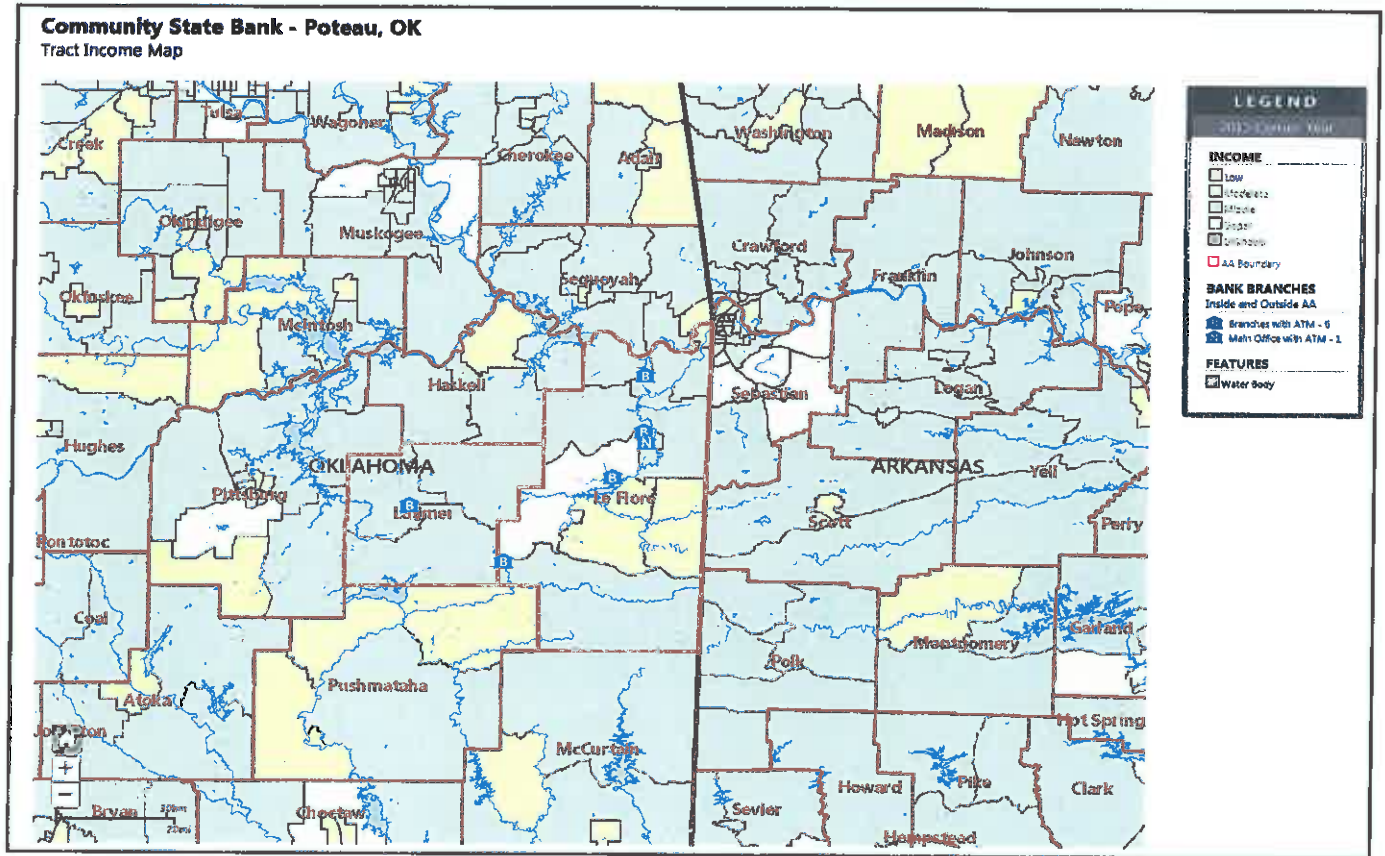
The borrower distribution of small farm lending is reasonable. The bank's lending to small farms with revenues of \$1MM or less, at 100.0 percent by number and dollar, is comparable to the percentage of small farms in the AA. Additionally, all of the small farm loans in the AA were for amounts of \$250,000 or less, indicating the bank's willingness to meet the credit needs of small farms.

**TABLE 20  
DISTRIBUTION OF 2018 SMALL FARM LOANS  
BY REVENUE SIZE OF FARMS  
LATIMER COUNTY AA**

	Bank Loans				Total Farms
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	14	766	100.0	100.0	100.0
Over \$1 Million	0	0	0.0	0.0	0.0
Not Known	0	0	0.0	0.0	0.0
Total	14	766	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	11	269	78.6	35.1	
\$100,001 – \$250,000	3	497	21.4	64.9	
\$250,001 – \$500,000	0	0	0.0	0.0	
Total	14	766	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	11	269	78.6	35.1	
\$100,001 – \$250,000	3	497	21.4	64.9	
\$250,001 – \$500,000	0	0	0.0	0.0	
Total	14	766	100.0	100.0	

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS.  
NOTE: Percentages may not add up to 100.0 due to rounding.

APPENDIX A – Map of the Assessment Area



APPENDIX B – Demographic Information

**TABLE B-1**  
**2018 AA DEMOGRAPHICS**  
**LE FLORE COUNTY METROPOLITAN AA**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,954	23.4
Moderate	3	25.0	2,660	21.1	586	22.0	2,214	17.6
Middle	8	66.7	8,531	67.7	1,452	17.0	2,530	20.1
Upper	1	8.3	1,410	11.2	145	10.3	4,903	38.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>12</b>	<b>100.0</b>	<b>12,601</b>	<b>100.0</b>	<b>2,183</b>	<b>17.3</b>	<b>12,601</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	4,538	2,638	19.8	58.1	1,122	24.7	778	17.1
Middle	14,880	9,136	68.6	61.4	3,387	22.8	2,357	15.8
Upper	2,234	1,548	11.6	69.3	333	14.9	353	15.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>21,652</b>	<b>13,322</b>	<b>100.0</b>	<b>61.5</b>	<b>4,842</b>	<b>22.4</b>	<b>3,488</b>	<b>16.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	204	14.8	173	14.0	15	15.0	16	34.8
Middle	1,016	73.7	922	74.8	74	74.0	20	43.5
Upper	159	11.5	138	11.2	11	11.0	10	21.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,379</b>	<b>100.0</b>	<b>1,233</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>46</b>	<b>100.0</b>
Percentage of Total Businesses:				89.4		7.3		3.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	16	19.0	16	19.5	0	0.0	0	0.0
Middle	59	70.2	57	69.5	1	100.0	1	100.0
Upper	9	10.7	9	11.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>84</b>	<b>100.0</b>	<b>82</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				97.6		1.2		1.2

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS.  
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-2  
2018 AA DEMOGRAPHICS  
LATIMER COUNTY AA**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	692	23.6
Moderate	0	0.0	0	0.0	0	0.0	509	17.4
Middle	3	100.0	2,930	100.0	442	15.1	533	18.2
Upper	0	0.0	0	0.0	0	0.0	1,196	40.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3</b>	<b>100.0</b>	<b>2,930</b>	<b>100.0</b>	<b>442</b>	<b>15.1</b>	<b>2,930</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	4,986	2,833	100.0	56.8	1,302	26.1	851	17.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>4,986</b>	<b>2,833</b>	<b>100.0</b>	<b>56.8</b>	<b>1,302</b>	<b>26.1</b>	<b>851</b>	<b>17.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	327	100.0	277	100.0	35	100.0	15	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>327</b>	<b>100.0</b>	<b>277</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>84.7</b>		<b>10.7</b>		<b>4.6</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	24	100.0	24	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>24</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>0.0</b>		<b>0.0</b>

2018 FFIEC Census Data & 2018 Dun & Bradstreet information according to 2015 ACS.  
NOTE: Percentages may not add up to 100.0 due to rounding.



## APPENDIX C – Glossary

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple

family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

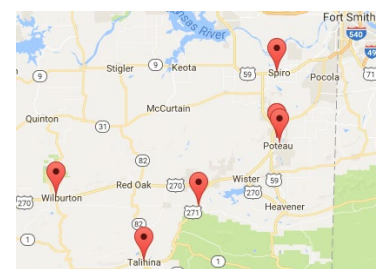
**Small loan(s) to business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured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

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

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

## Hours & Locations

<b>Main Bank – Poteau</b> (ATM Available)			Census Tract: 0404.01
<u>Address</u> 1409 N Broadway Poteau, OK 74953	<u>Lobby Hours</u> Mon-Fri 9am-3pm	<u>Drive Through Hours</u> Mon-Fri 7am-6pm Sat 7am-12pm	
<b>Wal-Mart Supercenter – Poteau</b> (ATM Available)			Census Tract: 0404.01
<u>Address</u> 3108 N Broadway Poteau, OK 74953	<u>Lobby Hours</u> Mon-Thur 8am-6pm Fri 8am-8pm Sat 8am-4pm	<u>Drive Through Hours</u> N/A	
<b>Caboose – Poteau</b> (ATM Available)			Census Tract: 0404.01
<u>Address</u> 3114 N Broadway Poteau, OK 74953	<u>Lobby Hours</u> N/A	<u>Drive Through Hours</u> Mon-Thur 8am-3pm Fri 8am-6pm	
<b>Spiro</b> (ATM Available)			Census Tract: 0402.99
<u>Address</u> 617 W Broadway Spiro, OK 74959	<u>Lobby Hours</u> Mon-Fri 8am-3pm	<u>Drive Through Hours</u> Mon-Thur 8am-4pm Fri 8am-6pm Sat 8am-12pm	
<b>Wister</b> (ATM Available)			Census Tract: 0405.00
<u>Address</u> 405 Hwy 271 Wister, OK 74966	<u>Lobby Hours</u> Mon-Fri 8am-3pm	<u>Drive Through Hours</u> Mon-Thur 8am-4pm Fri 8am-6pm Sat 8am-12pm	
<b>Talihina</b> (ATM Available)			Census Tract: 0407.00
<u>Address</u> 902 Dallas Talihina, OK 74571	<u>Lobby Hours</u> Mon-Fri 8am-3pm	<u>Drive Through Hours</u> Mon-Thur 8am-4pm Fri 8am-6pm Sat 8am-12pm	
<b>Wilburton</b> (ATM Available)			Census Tract: 0872.00
<u>Address</u> 1207 N Hwy 2 Wilburton, OK 74578	<u>Lobby Hours</u> Mon-Fri 8am-3pm	<u>Drive Through Hours</u> Mon-Fri 8am-5:30pm Sat 8am-12pm	





**TCSB**

## **Branches Opened or Closed**

**2019: None**

**2020: None**

**2021: None**

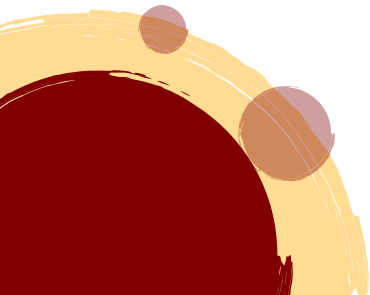
**2022: None**

**2023: None**



## Personal Deposit

Account	EZ Checking	*w/ Benefits	Vintage 55	*w/ Benefits	Teen Checking	Rewards Checking	NOW Checking
Minimum Opening Deposit	\$150	\$150	\$150	\$150	\$25	\$150	\$1,500
Interest	No	No	No	No	No	Yes	Yes
Personalized Checks	No	Yes	No	Yes	No	No	No
Unlimited Check Writing	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Monthly Statement	Yes	Yes	Yes	Yes	Yes	Electronic	Yes
Check Images	No	Yes	Yes	Yes	No	No	Yes
Online Banking	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Mobile Banking	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Bill Pay	Yes	Yes	Yes	Yes	No	Yes	Yes
Voice Access	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Debit Card	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Age	18+	18+	55+	55+	13-17	18+	18+
Bounce Protection	\$400	\$700	\$400	\$700	-0-	\$400	\$1,000
Monthly Service Charge	\$3.00 (-0- w/ e-statements)	\$10.00	-0-	\$5.00	\$3.00 (-0- w/ e-statements)	-0-	\$10 if balance falls below \$1,500

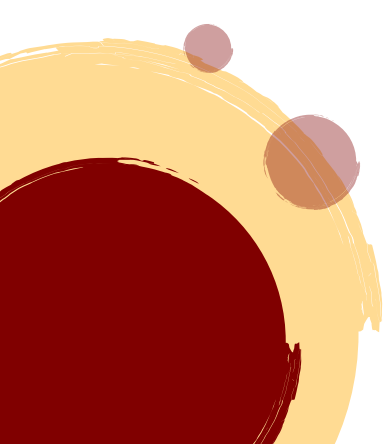


## Personal Deposit

### **Rewards Checking Features (if qualifications are met):**

- Interest-bearing at a tiered rate (ask us about our current rates)
- ATM fee refunds nationwide up to \$25
- Available to personal accounts only (one per individual)
- Qualifications:
  - Have at least 10 debit card purchases post and clear during the qualification cycle. Transactions less than \$3.00 each will not be considered. Transactions may take one or more banking days from the date the transaction was made to post to an account. Intra-bank transfers do not count as qualifying transactions.
  - Have at least 1 automatic payment or direct deposit post and clear
  - Receive e-statements. You must maintain an active NetTeller ID to receive your statements electronically.
  - Accounts not meeting the qualifications for 3 consecutive statement cycles may be converted to an EZ Checking account subject to a service charge.

### **Teen Checking Features:**

- Teens may open this account as a sole owner, with a signed indemnification agreement from an adult.
  - Teen Checking accounts are full-service; however, the following limitations apply:
    - No Payable on Death (POD) beneficiary may be named
    - No Authorized Signer
  - After turning 18, this account will automatically be converted to an EZ Checking. If the customer wishes for the account to be converted to a different product, he/she can contact the bank to change the type.
- 
- A decorative graphic in the bottom-left corner consisting of overlapping yellow and dark red brushstroke-like shapes.

## Personal Deposit

### Benefits Account Package:

- Cell Phone Insurance
  - Reimburse the enrolled accountholder for the damage to or theft of eligible cellular wireless telephones up to \$600 per claim subject to a \$50 co-payment and maximum of 2 claims per 12-month period
  - 1<sup>st</sup> 5 lines listed on cellular phone bill covered
  - Payment for the cellular phone bill must come from the account with Club Benefits
  - Coverage will be shared on joint accounts
- Roadside Assistance
  - Protection by the Nation Safe Drivers Auto Club providing peace-of-mind with service and protection
  - Includes towing up to 15 miles, roadside assistance, delivery of supplies, tire service, battery service, and lockout service
  - 24 hours a day, 7 days a week
  - Maximum of 3 claims per account, per year
- \$20,000 Accidental Death & Dismemberment Insurance Plus \$1,500 Dependent Children – coverage provided immediately at no additional charge that is split equally between authorized signers.
- Cyber Scout – Identity Theft Resolution. Victims will be assigned a highly qualified personal advocate who is the single source of contact in problem resolution. [www.idmemberbenefits.com](http://www.idmemberbenefits.com)
- Telemedicine (provided by Lyric)
  - Visit a doctor by phone, secure video, or on phone app at anytime for \$0 per visit.
  - Prescriptions can be sent to your nearest pharmacy, if medically necessary
  - Registration and activation required.
- Monthly Statement with Images – check images included with monthly statement
- Personalized Checks – No charge for Personalized Checks
- Official Checks & Money Orders – Purchase Fee waived



## Personal Deposit

### Debit Cards: (subject to approval)

- Debit Cards look like a credit card but work like a check. Our debit cards are accepted anywhere MasterCard is accepted, and they can also be used as an ATM card. Our debit cards can be printed at any of our locations and are ready to use within just a few minutes.
  - Due to large amounts of fraud, TCSB blocks internet transactions from foreign countries. When possible, debit card transactions need to be processed via chip readers.

### ATM Cards:

- ATM cards give you added financial flexibility and 24-hour access to your funds

#### MyCardRules:

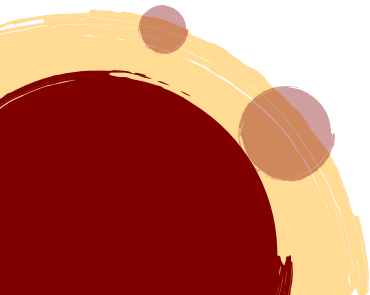
- MyCardRules is an easy-to-use mobile application that lets you turn your cards on or off, set spending limits, and receive transaction alerts, allowing you to take full control of your cards.

### Save-the-Change:

- Enroll in the Save-the-Change program and watch your savings grow! To participate you will need each of the following:
  - Checking Account w/ TCSB
  - Debit Card
  - Savings Account
    - This is a designated TCSB Savings account or alternate TCSB Checking account
- When you make purchases with your TCSB Debit Card, the program will 1) Round up your purchases to the nearest dollar amount, 2) Transfer the difference from your checking to your designated account, and 3) Allow you to track your savings with online banking.

## Personal Savings

Account	Savings	Youth Savings	Health Savings	Money Market	Christmas Club
Minimum Opening Deposit	\$100	\$10	\$150	\$2,500	\$0
Interest	Yes	Yes	Yes	Yes	Yes
Personalized Checks	No	No	No	No	No
Unlimited Check Writing	No	No	Yes	No	No
Statement	Quarterly	Quarterly	Monthly	Monthly	Annually
Check Images	No	No	No	No	No
Online Banking	Yes	Yes	Yes	Yes	Yes
Mobile Banking	Yes	Yes	Yes	Yes	Yes
Bill Pay	Yes	Yes	Yes	Yes	No
Voice Access	Yes	Yes	Yes	Yes	Yes
Debit Card	ATM only	No	Yes	Yes	No
Age	18+	0-17	18+	18+	18+
Bounce Protection	No	No	No	No	No
Withdraw Limits before \$1 per withdraw charge	6	6	None	6	Withdraws not permitted
Service Charge	-0-	-0-	\$2.00	\$10 monthly if balance falls below \$2,500	-0-



## Personal Savings

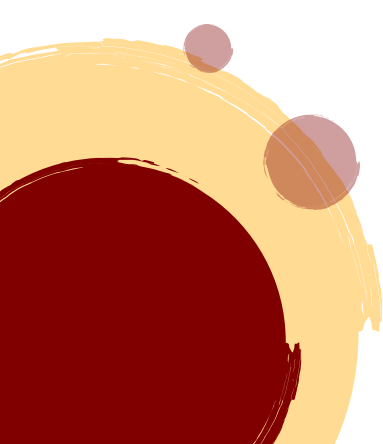
### Youth Savings Features:

- After the minor reaches the age of 18, it is the custodian's responsibility to distribute the funds to the minor by closing the UTMA account. The minor and custodian must both be present. The custodian will need to sign a withdrawal slip to close the account, and an official check will be made payable to the minor.

### Health Savings Features:

- A Health Savings Account (HSA) is established exclusively for the purpose of paying qualified medical expenses for the account beneficiary, spouse, and children who are covered under a high-deductible health plan (HDHP).

### Christmas Club Features:

- This account is designed for customers to make minimal deposits throughout the year to save for holiday expenses.
  - Withdrawals are not permitted.
  - The full account balance plus interest will be paid in November.
  - "Save-the-Change" program is not available with this account.
- 
- In the bottom left corner, there are decorative brushstrokes in red and yellow, mirroring the style of the ones in the top right.

## Investments

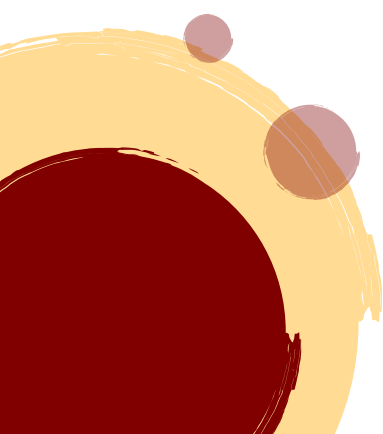
### Certificates of Deposits (CDs)

Account	Minimum Deposit	Interest Payable Frequency	Early Withdrawal Penalty
30-90 Day	\$1,000	At Maturity	30 Days Interest
6 Month	\$1,000	Monthly or At Maturity	30 Days Interest
9 Month	\$1,000	Monthly	30 Days Interest
12 Month	\$1,000	Monthly, Quarterly, or At Maturity	30 Days Interest
18 Month	\$1,000	Monthly, Quarterly, or At Maturity	90 Days Interest

- Interest Payable Methods for all CDs include Adding back to the CD, Deposit to another TCSB account, or by Check.
- All CDs are set up to renew automatically
- All rates are fixed for the Account Term

### Individual Retirement Accounts (IRAs)

Account	Minimum Deposit	Interest Payable Frequency	Early Withdrawal Penalty
Traditional IRA	\$1,000	Quarterly	Subject to IRS Penalties if before 59 ½
Roth IRA	\$1,000	Quarterly	Subject to IRS Penalties if before 59 ½

- Interest Payable Method for all IRAs is Quarterly Compounding
  - All IRAs are set up to renew automatically
  - Traditional IRA allows you to defer taxes on the earnings on your contributions until they are withdrawn
  - Roth IRA regular contributions are not tax deductible, so owners will not pay federal taxes on them.
- 

## Convenience Banking

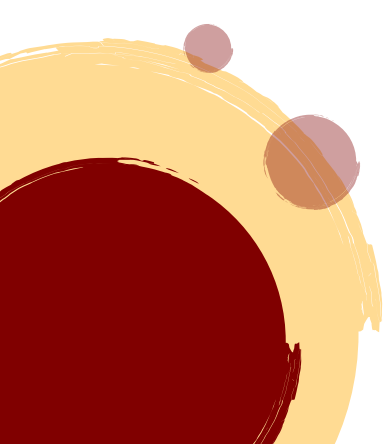
### Online Banking

- Easy to use
- Available 24/7
- Log in from anywhere on any internet-enabled device
- Securely encrypted
- Check balances
- Transfer funds
- Get the latest account information

### Mobile Banking

- Online banking on your Mobile Device through our Mobile App (for iPhone®, Android®, or any web-based phone)
- A free, convenient service
- Access real-time account information
- Transfer funds between accounts
- Pay bills
- Find our locations
- View check images
- Must download the app and have a valid NetTeller ID prior to using the Mobile Banking App

### E-Statements

- Get statements sooner and reduce the chance of identity theft
  - Easy online access 24/7
  - More secure than by mail
  - View past statements with the click of a mouse
- 
- A decorative graphic in the bottom left corner featuring a yellow brushstroke with several overlapping circles in shades of red and orange.



## Convenience Banking

### Bill Pay

- Pay bills any time of the day or night from any computer
- Quick, easy, and secure
- Track your account balances and payment history
- Make automatic recurring payments
- Receive reminders when a bill is due
- Available within Online Banking

### Person-to-Person (P2P)

- Send money to anyone
- Fast, easy, and secure
- All you need is the person's email address or mobile number
- Available within Online Banking

### Mobile Deposit Anywhere

- Conveniently make secure deposits anytime using the Mobile Banking App
- Deposit checks 24 hours a day, any day
- Deposit by taking a picture of the front and back of the check within the Mobile Banking App

### Voice Access

- Automated account information available by phone 24 hours a day, 7 days a week.
- Transfer funds between accounts
- Any transactions you initiate that have not yet been presented to the bank are not reflected in the available balance information
- To enroll please call 800-545-7254

## Convenience Banking

### Bounce Protection

- A Discretionary overdraft service providing a safety net up to an automatically assigned limit
- Available for checks and other transactions made using the checking account (i.e., teller withdrawal, automatic (ACH) payments, automatic bill payment or recurring debit card payment)
- If Opted-in, ATM transfers/withdrawals and everyday debit card purchases can be paid
- Balances displayed as available balances do not include Bounce Protection limits
- If accounts are in good standing, Bounce Protection can pay for items when there isn't enough balance in the account to cover them (up to the established limit) with a convenience fee of \$28 per item
- Accounts should be brought to a positive end-of-day balance at least once every 30 calendar days

### Gift Cards

- Quick, easy, stress-free, one-stop shopping for any gifting occasion
- Accepted everywhere VISA® is accepted

### Reloadable Cards

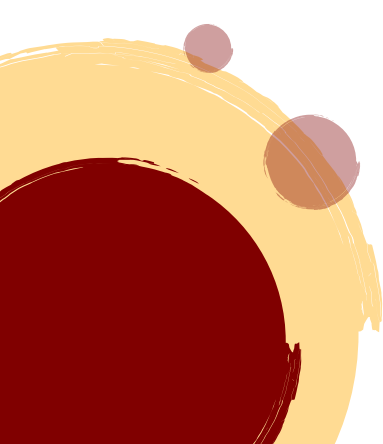
- Pay with protection and spend only what you load with no links to your other accounts
- Replaceable if lost or stolen
- Accepted everywhere VISA® is accepted
- Convenient features: Transaction Monitoring, Cash Withdrawals from ATMs, Reload Options

## Convenience Banking

### Safe Deposit Boxes

- Safe and secure
- Easy to access
- Various sizes available
- Box contents not insured by Bank or FDIC
- Annual Fees:
  - 3x5x21: \$22
  - 5x5x21: \$25 (Main Bank only)
  - 3x10x21: \$40 (Main Bank only)
  - 4x10x21: \$45
  - 5x10x21: \$50
  - 10x10x21: \$75
  - Late Fee (after 30 days): \$5
  - Drill/Lock Replacement: \$60

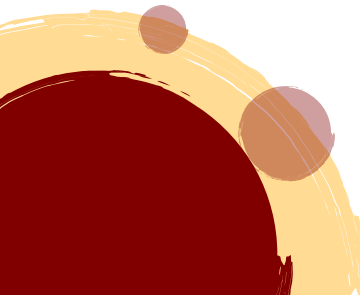
### Wire Transfers

- Direct, digital money transfer between 2 banks, which does not need to be cleared by a 3<sup>rd</sup> party
  - Fast and irreversible
  - Visit one of our locations with correct wiring instructions (Bank Name, Routing Number, Account Number, Name on Account)
- 
- A decorative graphic is located in the bottom left corner. It features a dark red circle, similar to the one in the top right, with a light yellow brush-stroke border. Several smaller, semi-transparent circles in shades of yellow and light red are scattered around the main circle, creating a layered, artistic effect.



## Business Deposit

Account	Commercial Checking	Small Business	EZ Business	NOW Account Business	Money Market Business
Minimum Opening Deposit	\$500	\$150	\$150	\$1,500	\$2,500
Interest	No	No	No	Yes	Yes
Ideal for	Over 200 monthly transactions	Under 200 monthly transactions	Limited transaction business	Sole Proprietorship DBA (Doing Business As)	Very limited transaction business
Earns Interest	No	No	No	Yes	Yes
Personalized Checks	1 <sup>st</sup> free up to \$25	1 <sup>st</sup> free up to \$25	No	Yes	No
Item Limit (Debit / Credit / POS / ACH)	Unlimited	Unlimited	\$0.25 per item in excess of 20 debits	Unlimited	\$1 charge for each withdrawal after the 6 <sup>th</sup>
Statement	Monthly	Monthly	Monthly	Monthly	Monthly
Check Images	Yes	Yes	No	Yes	Yes
Online Banking	Yes	Yes	Yes	Yes	Yes
Mobile Banking	Yes	Yes	Yes	Yes	Yes
Mobile Deposit	Yes	Yes	Yes	Yes	Yes
Bill Pay	Yes	Yes	Yes	Yes	Yes
Voice Access	Yes	Yes	Yes	Yes	Yes
Debit Card	Yes	Yes	Yes	Yes	Yes
Monthly Service Charge	\$18 w/ e-statements \$20 w/ paper statements	\$8 w/ e-statements \$10 w/ paper statements	-0- w/ e-statements \$3 w/ paper statements	\$10 if balance falls below \$1,500	\$10 if balance falls below \$2,500



## Business Deposit

### Cash Management Services:

- ACH Originations – ACH file uploads. Electronically collecting recurring receipts such as payments, memberships, dues, regular charitable contributions, and periodic subscription fees.
- ACH Electronic Payroll – ACH file uploads. Pay your employees via direct deposit to their account.

### Remote Deposit Capture:

- Deposit checks electronically from your office any time of day.
- Utilizes a desktop scanner, software, PC, and internet connection
- \$65 monthly fee that includes equipment rental and scanner maintenance

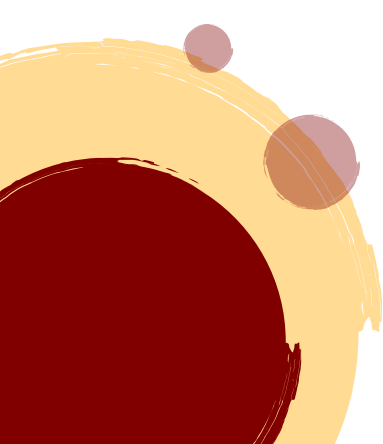
### Merchant Card Services:

- Accept all major credit cards
- Competitive rates with no hidden costs
- State of the art electronic payment terminals with quick equipment replacement and terminal updates

### Credit Cards

- Flexible MasterCard Business Credit Card to help manage business cash flows, limit spending for each employee, and track expenses.
- Underwritten and issues by TIB (The Independent BankersBank, N.A.) under the expressed written consent of The Community State Bank

### Positive Pay

- A line of defense against check fraud. Checks presented against an enrolled account will be compared against a list of approved items provided by the business to the bank.
- 
- In the bottom left corner, there are decorative brushstrokes in shades of yellow and red, mirroring the design elements in the top right corner.

## Loans

### Personal:

- Auto Loans – New or Used – fixed rate installments – competitive rates – no prepayment penalty
- Recreational – Motorcycle, Boat, Travel Trailer, Motor Home, Jet Ski, UTV, ATM, etc. – fixed competitive rates – no prepayment penalty
- Debt Consolidation – Personal loan to combine debt into one manageable installment – fixed competitive rates – no prepayment penalty
- Unsecured – fixed rate installments – competitive rates – no prepayment penalty
- CD Secured – Loan secured by CD(s) – CD continues to accrue interest – loan rate tied to CD rate – no prepayment penalty

### Business:

- Equipment – Purchase or Refinance – Construction, Industrial vehicles, general-purpose machines
- Working Capital – cash to operate a business – helps maintain daily operations in a business cycle
- Letters of Credit – finance short-term borrowing needs – borrow and repay without a fixed schedule
- Letters of Credit – contract between the bank, our customer, and the beneficiary as a guaranty of the work to be completed or payment will be received

### Real Estate:

- Personal – Purchase/Refinance/Home Improvement/Construction/Vacant Land – competitive rates – no prepayment penalty – in-house approvals, underwriting, and servicing
- Business – Commercial Property Purchase/Refinance/Construction/Development – competitive rates – no prepayment penalty – in-house approvals, underwriting, and servicing
- Agriculture – Farmland Purchase/Refinance/Construction – competitive rates – no prepayment penalty – in-house approvals, underwriting, and servicing

## Loans

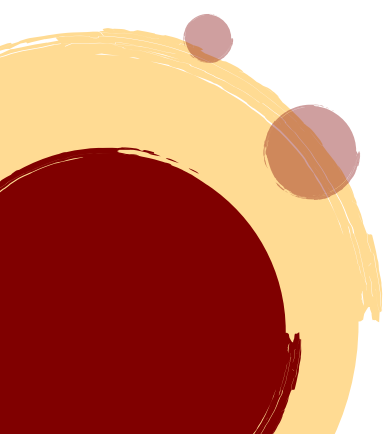
### Agriculture:

- Equipment – Purchase or Refinance – competitive rates – no prepayment penalty – flexible payment options
- Working Capital –Cash to operate a farm – competitive rates – no prepayment penalty – flexible payment options
- Cattle – Cow/Calf Operations & Stocker Cattle – competitive rates – no prepayment penalty – flexible payment options
- Lines of Credit – Finance short-term borrowing needs – competitive rates – no prepayment penalty – borrow and repay without a fixed schedule
- FSA Programs – We work with Farm Service Agency for loan programs to help farmers and ranchers to obtain loans at reasonable terms

### Credit Cards:

- Business or Personal cards available
- Low rates or rewards, choose the card that's right for you
- No annual fee
- A world of advantages with MasterCard<sup>®</sup>
- Underwritten and issues by TIB (The Independent BankersBank, N.A.) under the expressed written consent of The Community State Bank


### Online Payment Portal:

- Make a payment from a non-TCSB account
  - One-Time quick payments without signing in OR create an account to make payments (even recurring), view payment history, or manage payment accounts
- 
- A decorative graphic in the bottom left corner consists of several overlapping circles in shades of yellow and dark red, with a hand-painted, brushstroke-like texture.

## Additional Fees

Return Item Debit Fee/Charged Back Items	4.00
Coin Processing (Non-Customer)	10%
Collection Fee	5.00
Non-Customer	10.00
Computer Printout	1.00
Copies (each)	1.00
Fax (each page)	1.00
NSF Returned Item Charge	28.00
Paid Item O/D Fee	28.00
Legal Processing (Garnishment/Levy)	50.00
Official Checks	
Non-Benefit Account Customer	2.00
Non-Customer	5.00
Night Deposit Bag w/ Lock & Key	10.00
Zipper Deposit Bag	5.00
Notary Service	2.00
Non-Customer	5.00
Research	20.00/hour – 10.00 minimum
Special Request/Duplicate Statement	5.00
Statement Reconciliation	20.00/hour 10.00 minimum
Stop Payments (each)	28.00
Telephone Transfer	1.00
Temporary Checks (each page)	1.00
Temporary Statement	2.00
Wire Transfers (Incoming)	15.00
Domestic (Outgoing)	25.00
Foreign (Outgoing)	75.00
New Account Closed Fee (within 60 days of opening)	15.00
Money Orders	
Non-Benefit Account Customer	2.00
Non-Customer	5.00
Dormant Accounts per month 3 years no activity	2.00

We reserve the right to change fees for all services

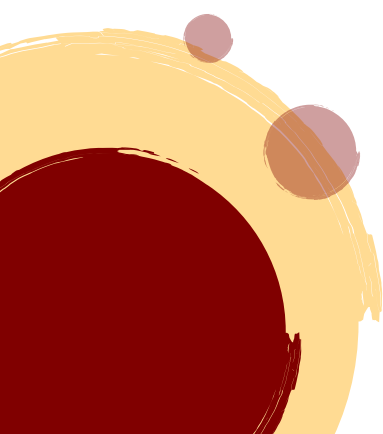


## Education

### **Banzai – Online Financial Wellness:**

- Saving Money
  - Basic Saving, Planning for an Emergency, Saving for a Vacation, Opening a Checking Account
- Insurance
  - Health Insurance, Paying for Health Care
- Retirement
  - Planning for Retirement, Saving for Retirement
- Taxes
  - Taxes
- Life Changes
  - Managing Crisis, Fraud and Security, Growing Family, Losing a Job, Getting a New Car, Starting a New Job, Getting Married, Estate Planning, Managing Illness, Moving, Managing a Divorce, Paying for College, Elder Fraud, Going to College
- Housing
  - Owning a Home, Selling a Home, Renting a Place to Live
- Borrowing & Credit
  - Buying a Home, Managing Debt, Greenpath Financial Wellness, Building Credit, Paying Student Loans, Using Credit Cards
- Investing
  - Begin Investing, Building a Portfolio, Giving to Charity
- Budgeting
  - Learning to Budget
- Running a Business
  - Raising Capital for your Business, Starting a Business, Managing Employee Benefits, Bookkeeping
- Teaching Kids Finances

All courses are free and offered by age groups for kids, teens, and adults

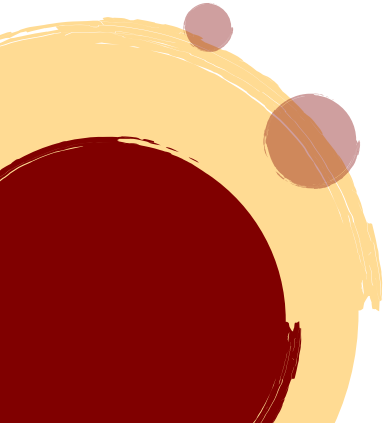
In the bottom left corner, there are decorative brush strokes in yellow and red, mirroring the style of the TCSB logo.

## Facility-Based Assessment Area

LeFlore County: Comprised of twelve (12) block numbering areas (BNAs)

- 0401.02
- 0401.98
- 0402.99
- 0403.01
- 0403.02
- 0403.03
- 0404.01
- 0404.02
- 0405.00
- 0406.01
- 0406.02
- 0407.00

Latimer County: Comprised of three (3) block numbering areas (BNAs)

- 0871.00
  - 0872.00
  - 0873.00
- 
- In the bottom left corner, there are decorative brushstrokes consisting of a large dark red circle and several smaller, overlapping circles in shades of yellow and light red.

## Facility-Based Assessment Area

2023 FFIEC Census Report - Summary Census Demographic Information  
State: 40 - OKLAHOMA (OK)  
County: 079 - LE FLORE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
40	079	0401.02	Middle	Yes*	94.75	\$68,700	\$65,093	\$55,496	4632	27.55	1276	1298	1883
40	079	0401.98	Moderate	No	62.86	\$68,700	\$43,185	\$36,818	1930	25.28	488	449	850
40	079	0402.99	Middle	Yes*	90.78	\$68,700	\$62,366	\$53,170	3533	30.31	1071	956	1688
40	079	0403.01	Middle	Yes*	90.87	\$68,700	\$62,428	\$53,220	5545	28.71	1592	1639	2609
40	079	0403.02	Middle	Yes*	104.07	\$68,700	\$71,496	\$60,952	3482	26.02	906	1124	1671
40	079	0403.03	Middle	Yes*	98.76	\$68,700	\$67,848	\$57,841	3471	35.26	1224	1132	1689
40	079	0404.01	Middle	Yes*	100.06	\$68,700	\$68,741	\$58,602	5483	37.26	2043	1098	1977
40	079	0404.02	Moderate	No	73.53	\$68,700	\$50,515	\$43,068	3722	38.82	1445	722	1508
40	079	0405.00	Middle	Yes*	88.93	\$68,700	\$61,095	\$52,083	5108	31.26	1597	1632	2298
40	079	0406.01	Moderate	No	65.78	\$68,700	\$45,191	\$38,527	3333	42.93	1431	940	1496
40	079	0406.02	Middle	Yes*	85.70	\$68,700	\$58,876	\$50,195	5096	38.42	1958	1139	2067
40	079	0407.00	Middle	Yes*	86.03	\$68,700	\$59,103	\$50,385	2794	42.16	1178	1000	1744

2023 FFIEC Census Report - Summary Census Demographic Information  
State: 40 - OKLAHOMA (OK)  
County: 077 - LATIMER COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
40	077	0871.00	Middle	Yes*	91.63	\$68,700	\$62,950	\$53,667	2056	37.31	767	757	1176
40	077	0872.00	Middle	Yes*	80.17	\$68,700	\$55,077	\$46,952	4876	36.46	1778	1382	2388
40	077	0873.00	Middle	Yes*	89.27	\$68,700	\$61,328	\$52,283	2512	43.03	1081	755	1396
40	077	9999.99	Middle	No	84.90	\$68,700	\$58,326	\$49,727	9444	38.39	3626	2894	4960

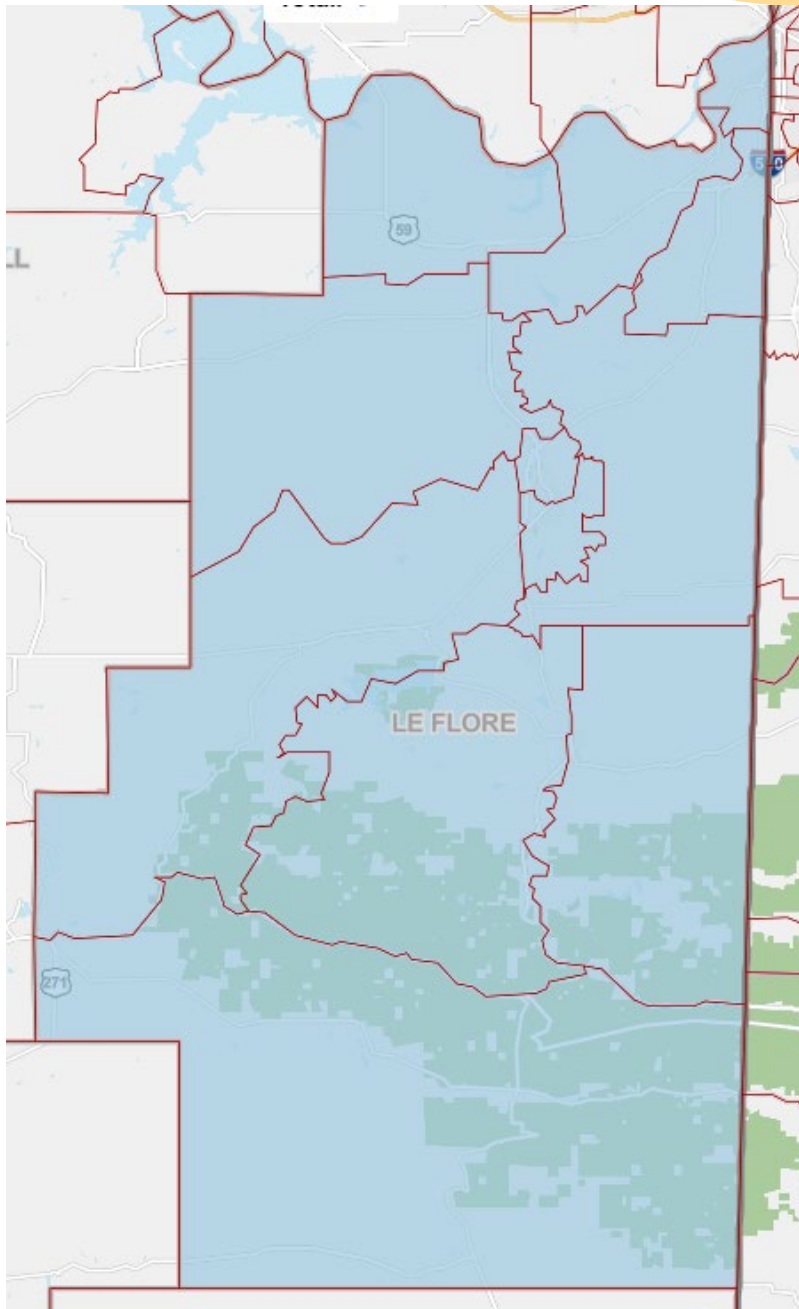
\*Will automatically be included in the 2023 Distressed or Underserved Tract List

<http://www.ffiec.gov/census/default.aspx>



# TCSB

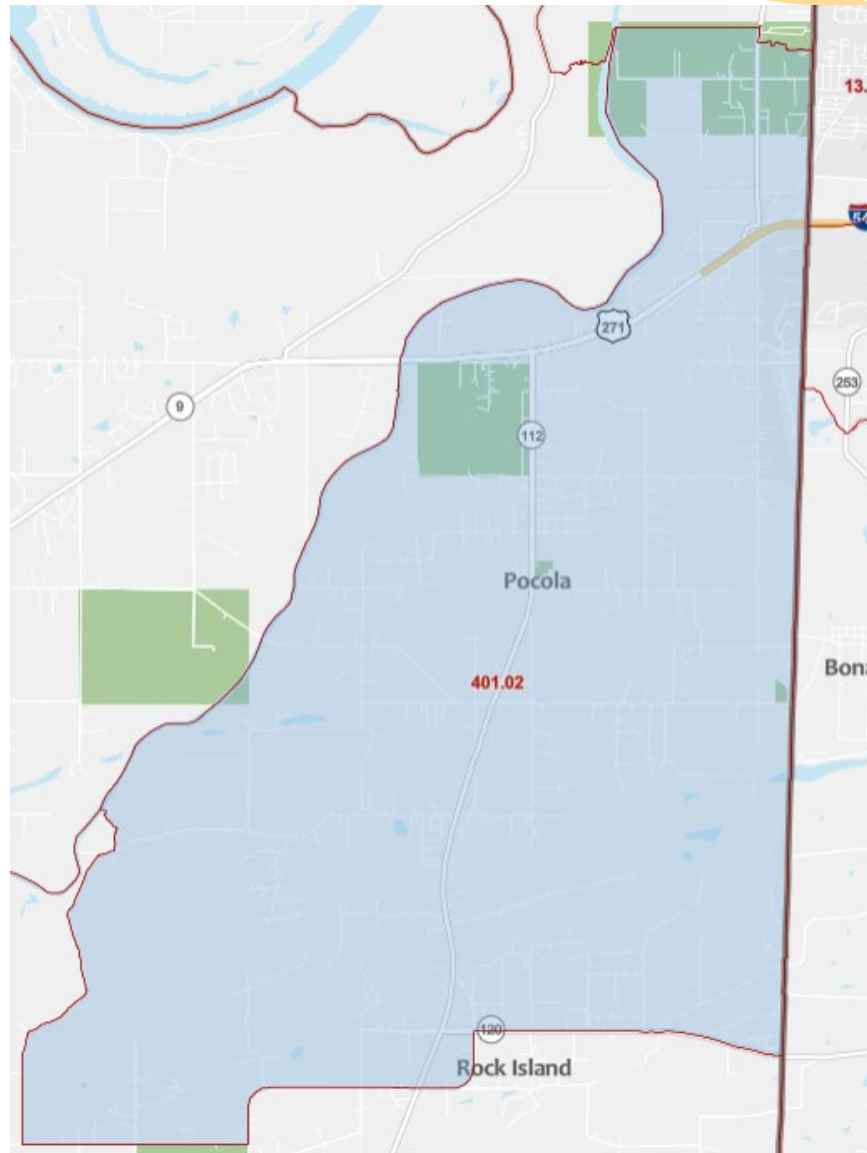
## Facility-Based Assessment Area



\*Le Flore County by United States Census Bureau

## Facility-Based Assessment Area

Census Tract 0401.02

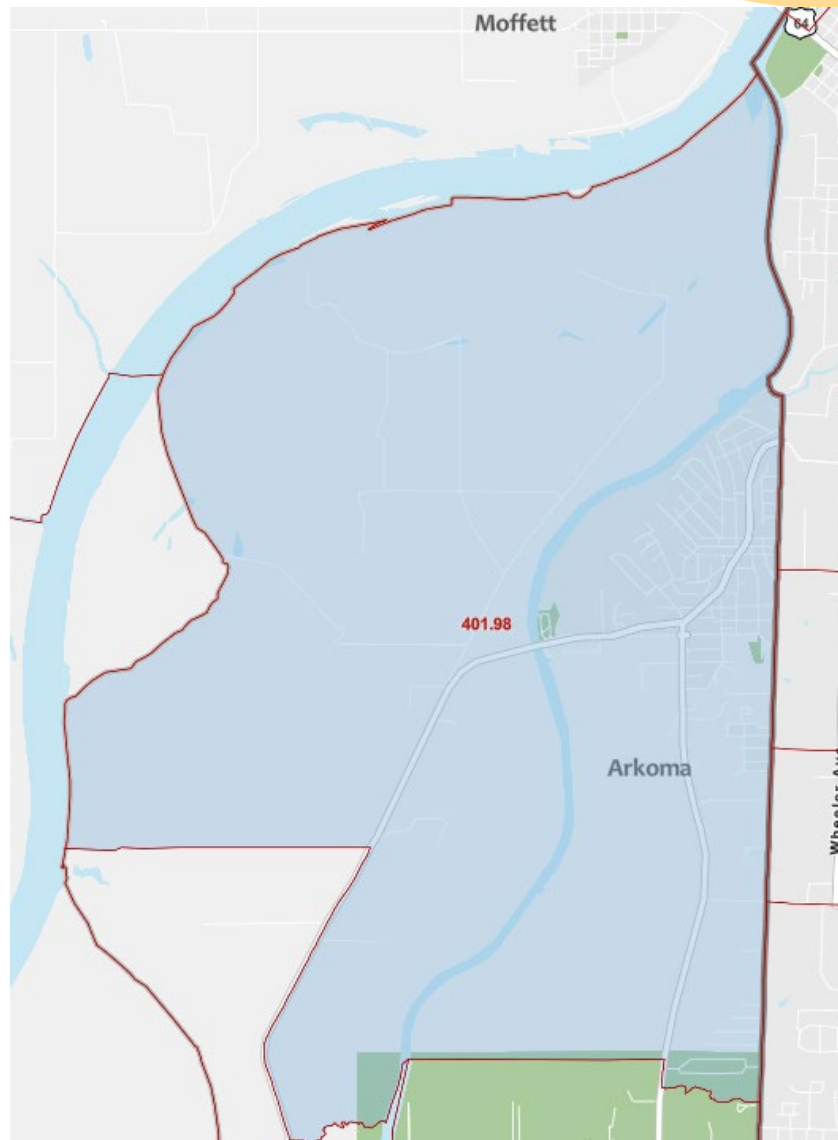


\*Census Tract 0401.02 by United States Census Bureau

**TCSB**

## Facility-Based Assessment Area

Census Tract 0401.98

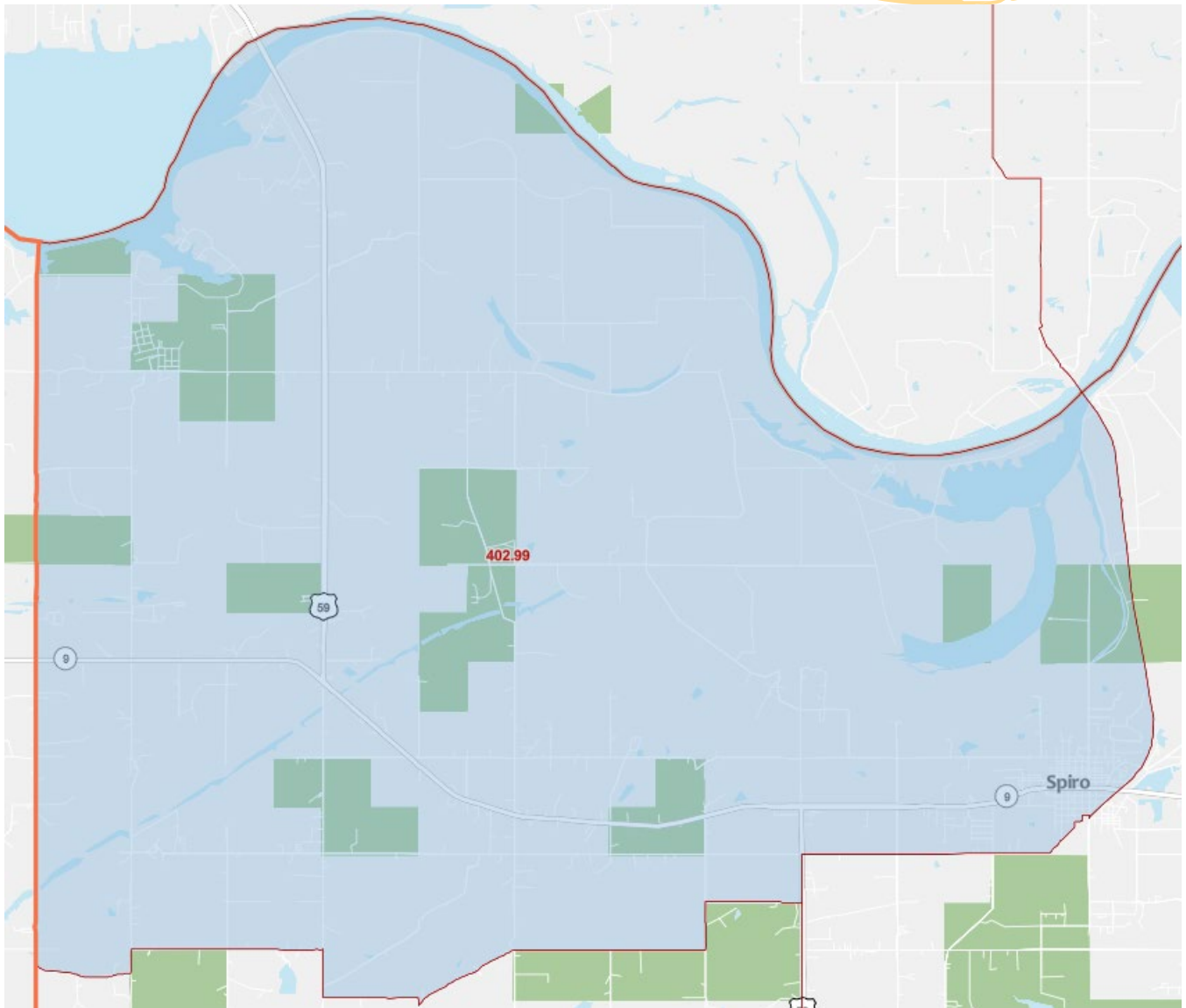


\*Census Tract 0401.98 by United States Census Bureau

**TCSB**

# Facility-Based Assessment Area

Census Tract 0402.99

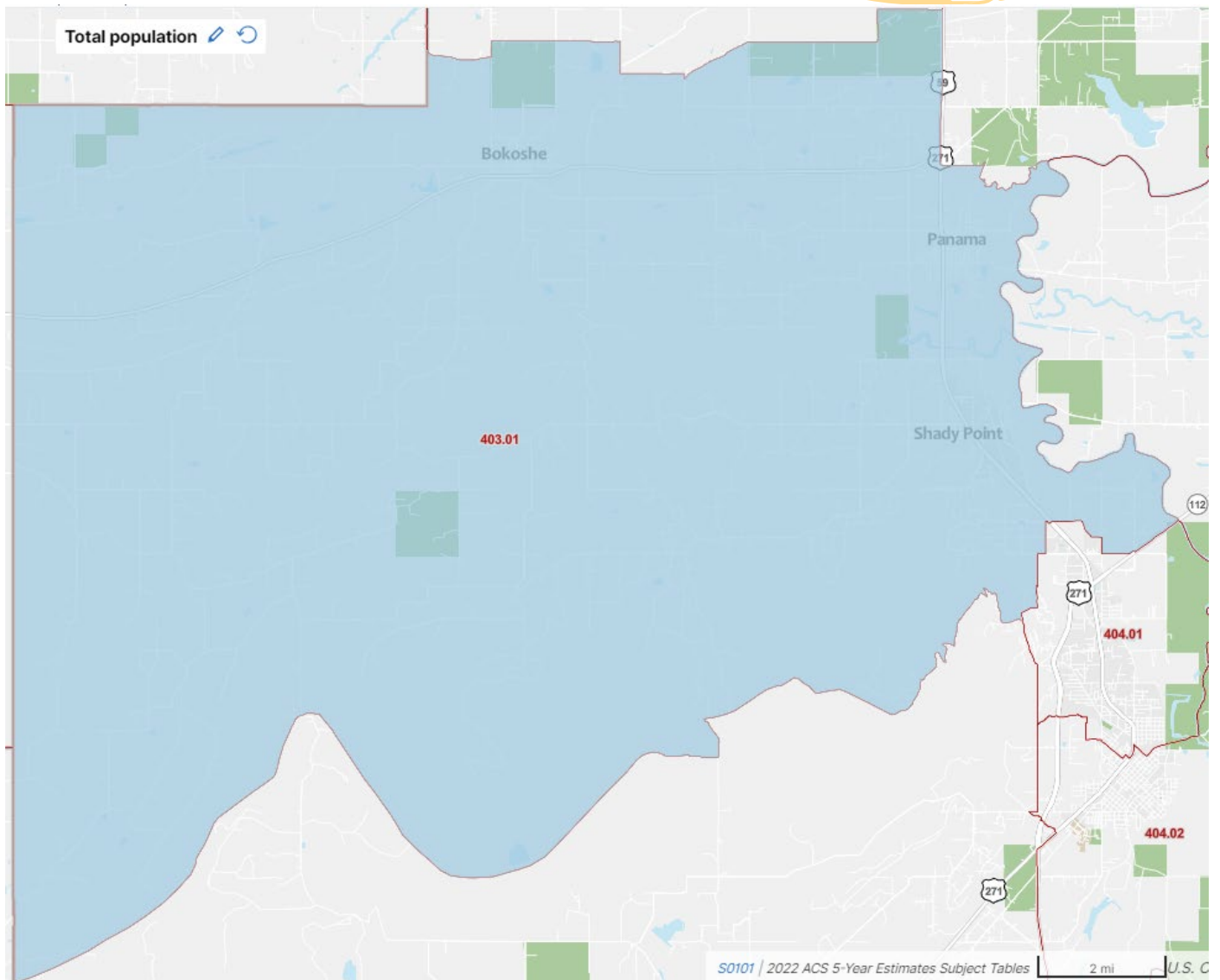


\*Census Tract 0402.99 by United States Census Bureau

# TCSB

## Facility-Based Assessment Area

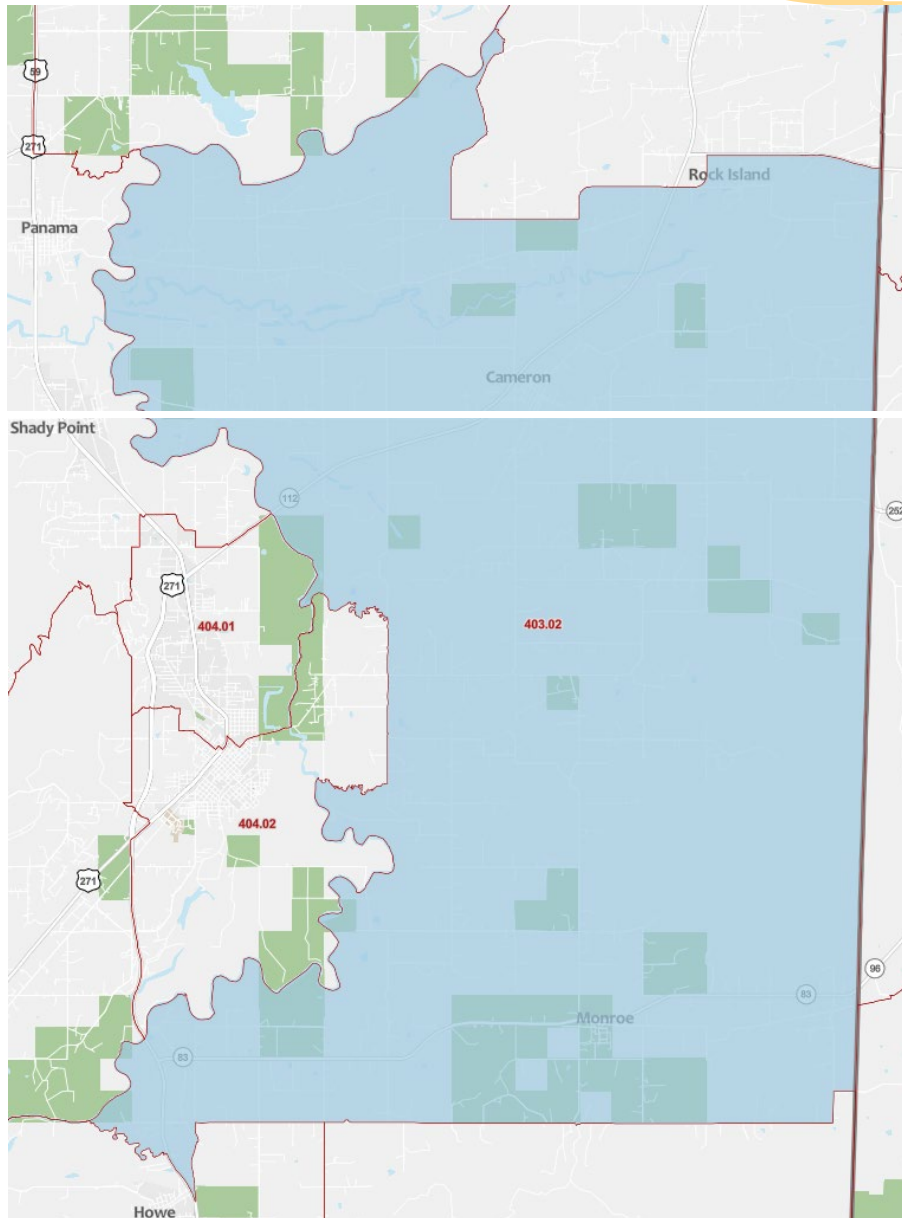
Census Tract 0403.01



\*Census Tract 0403.01 by United States Census Bureau

## Facility-Based Assessment Area

Census Tract 0403.02



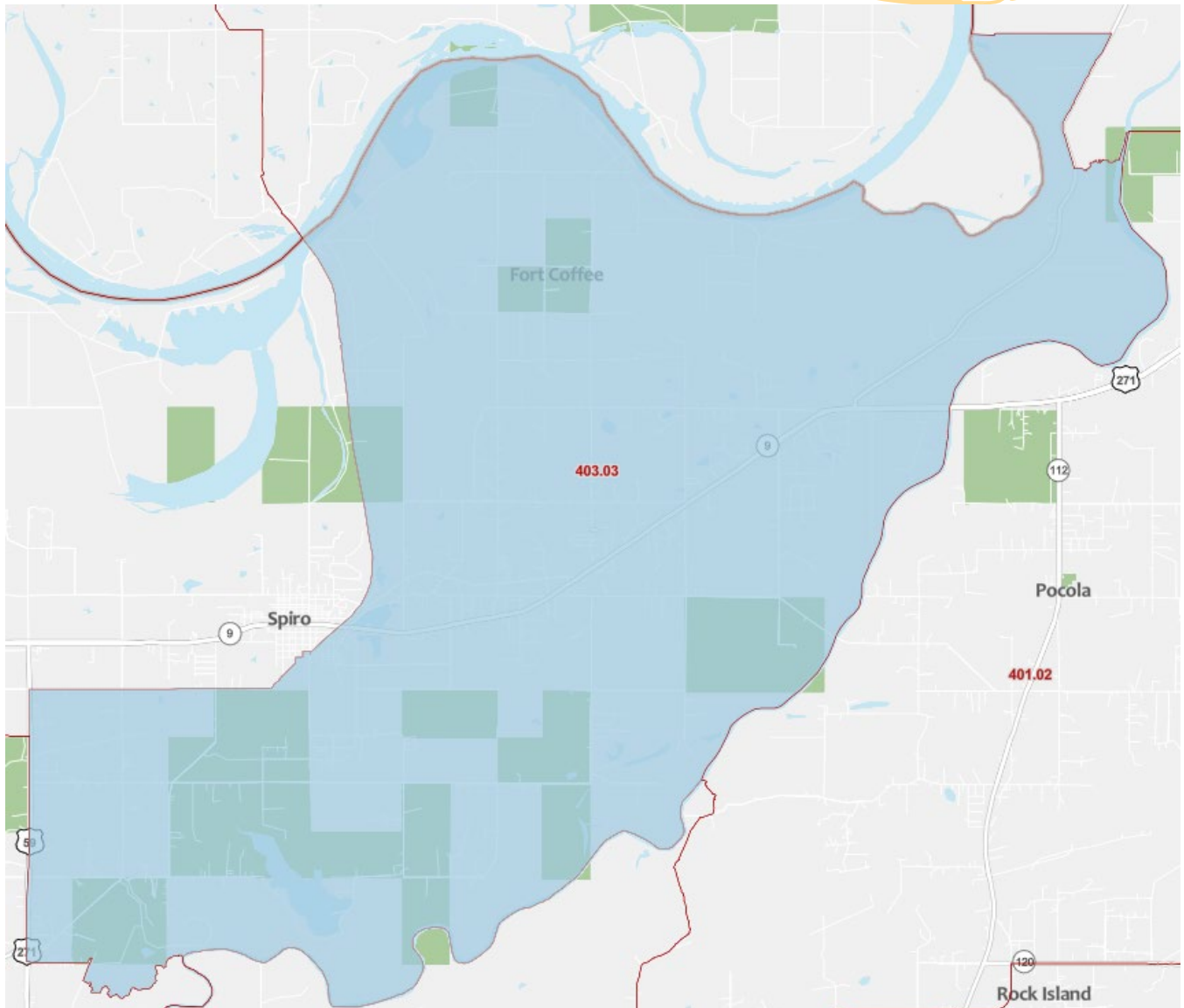
\*Census Tract 0403.02 by United States Census Bureau



# TCSB

## Facility-Based Assessment Area

Census Tract 0403.03

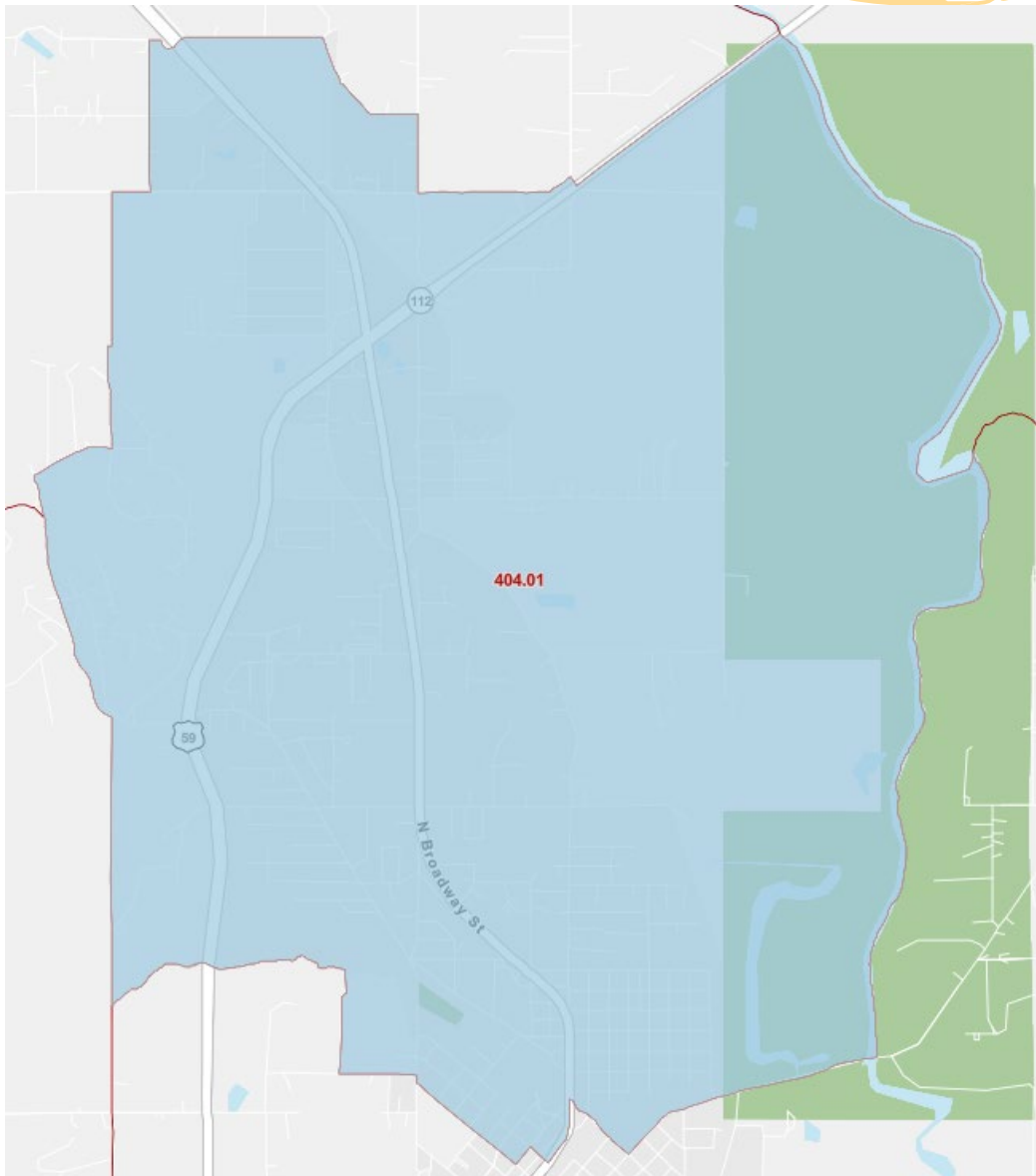


\*Census Tract 0403.03 by United States Census Bureau

**TCSB**

## Facility-Based Assessment Area

Census Tract 0404.01



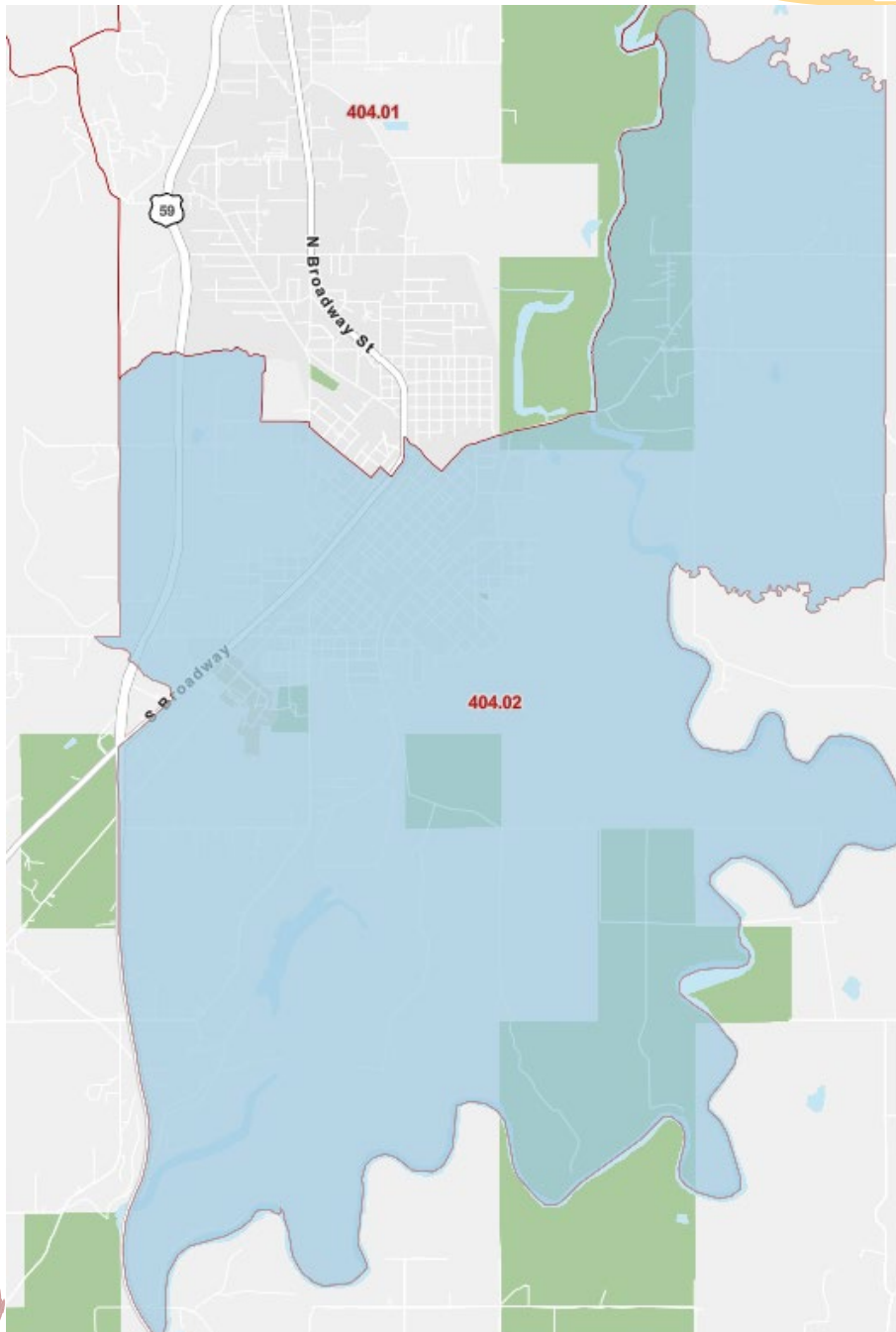
\*Census Tract 0404.01 by United States Census Bureau



**TCSB**

## Facility-Based Assessment Area

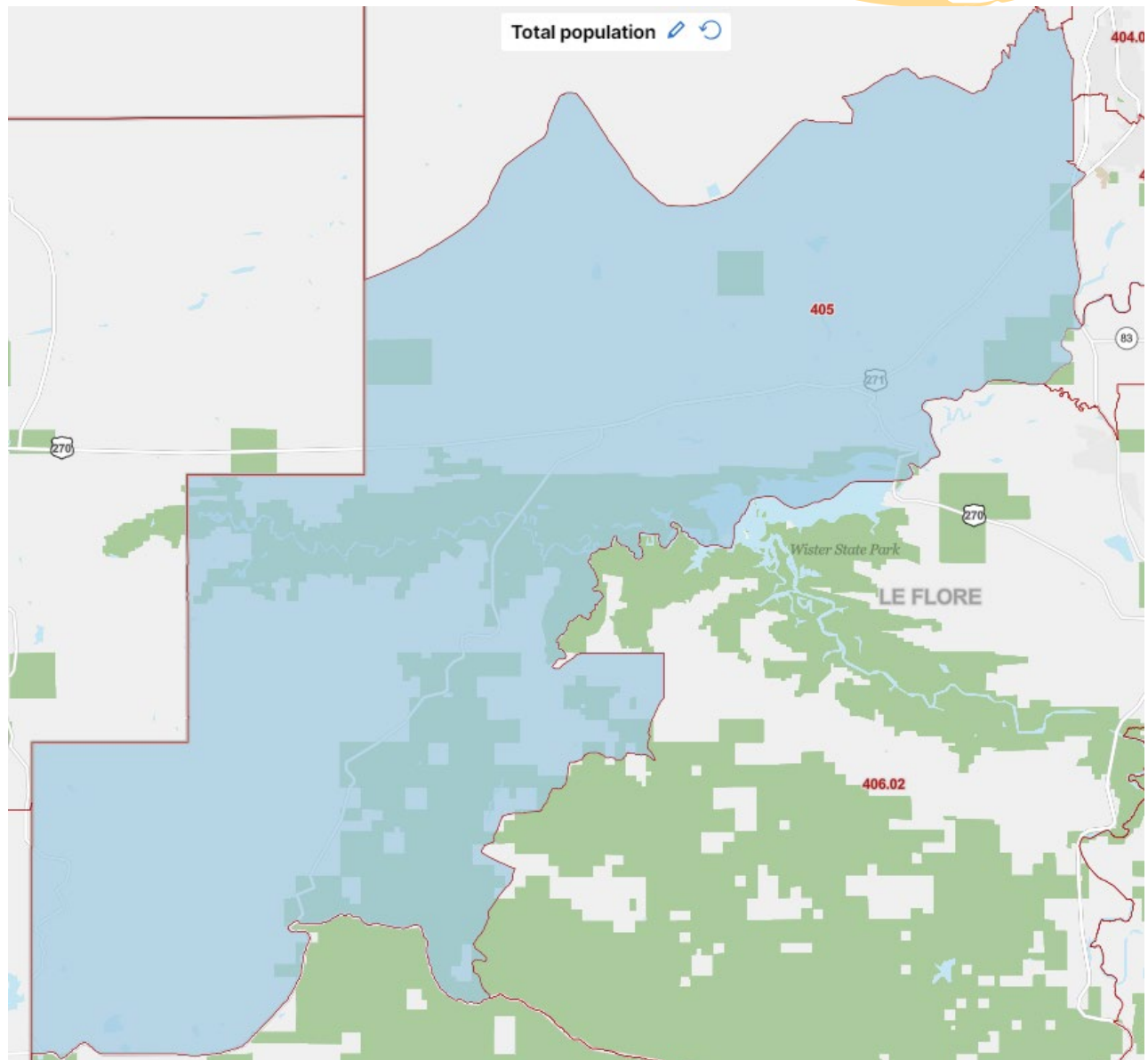
Census Tract 0404.02



\*Census Tract 0404.02 by United States Census Bureau

## Facility-Based Assessment Area

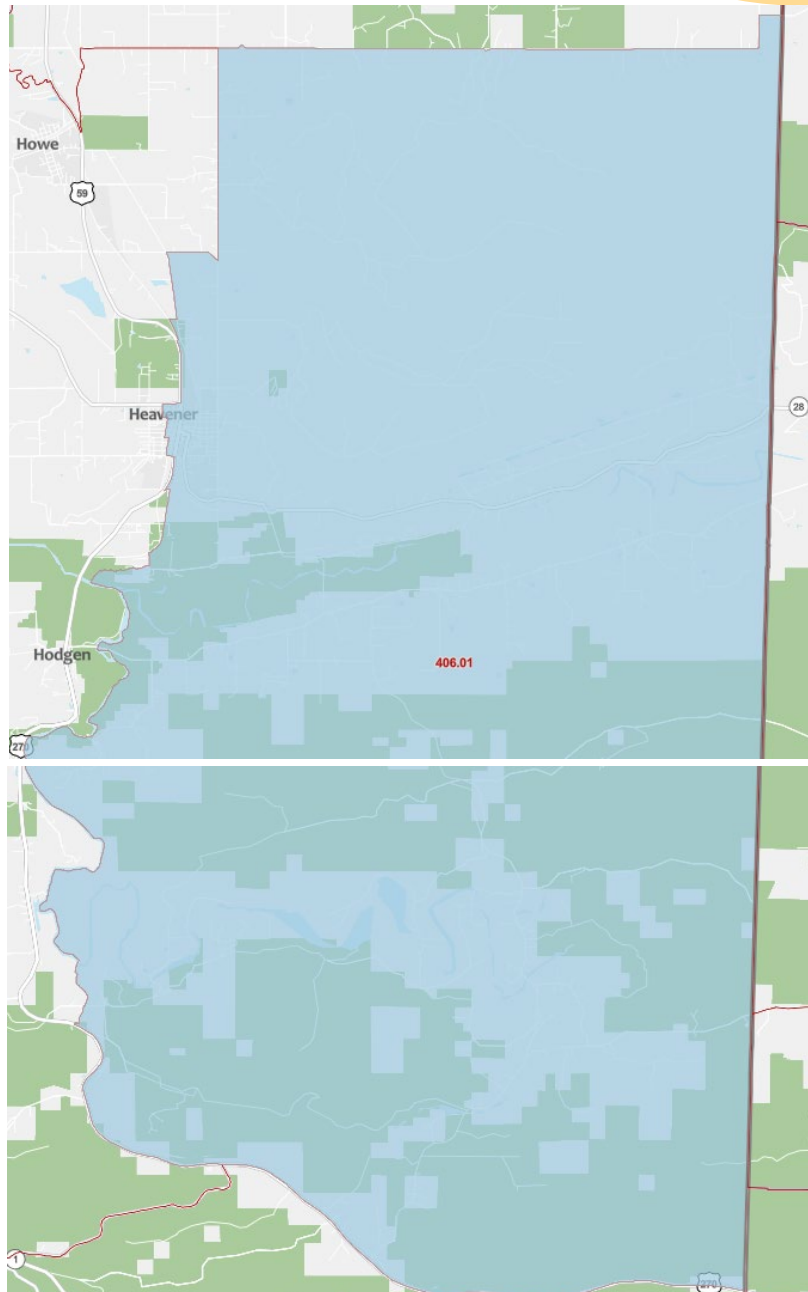
Census Tract 0405.00



\*Census Tract 0405.00 by United States Census Bureau

## Facility-Based Assessment Area

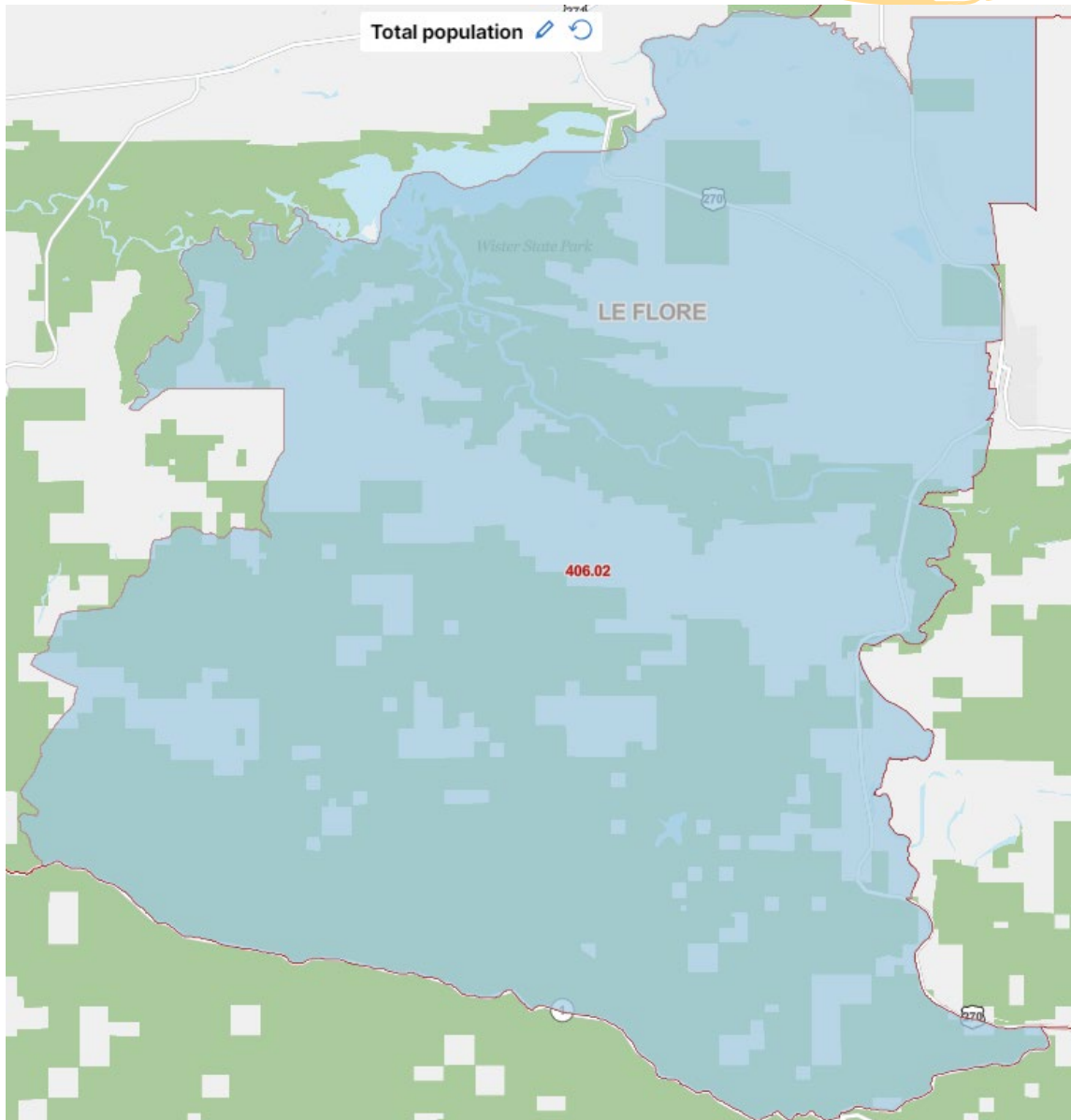
Census Tract 0406.01



\*Census Tract 0406.01 by United States Census Bureau

## Facility-Based Assessment Area

Census Tract 0406.02

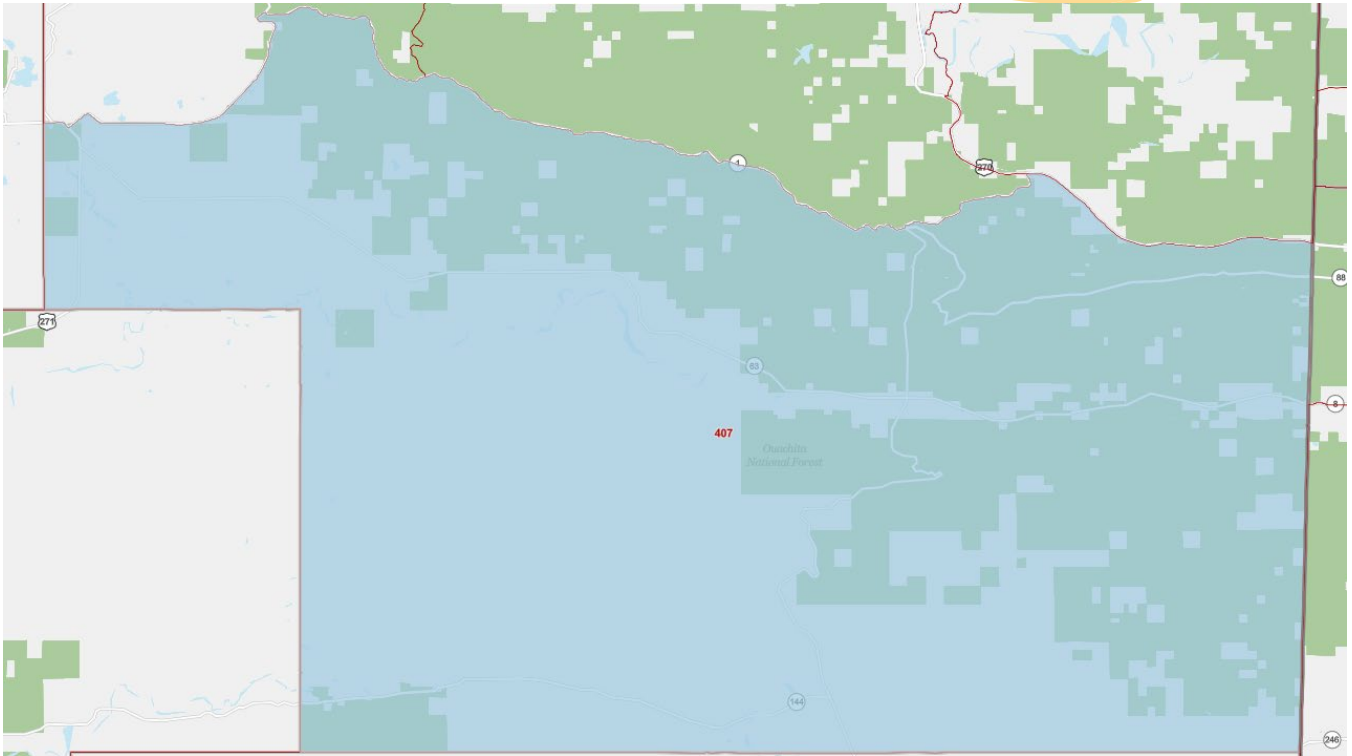


\*Census Tract 0406.02 by United States Census Bureau

**TCSB**

## Facility-Based Assessment Area

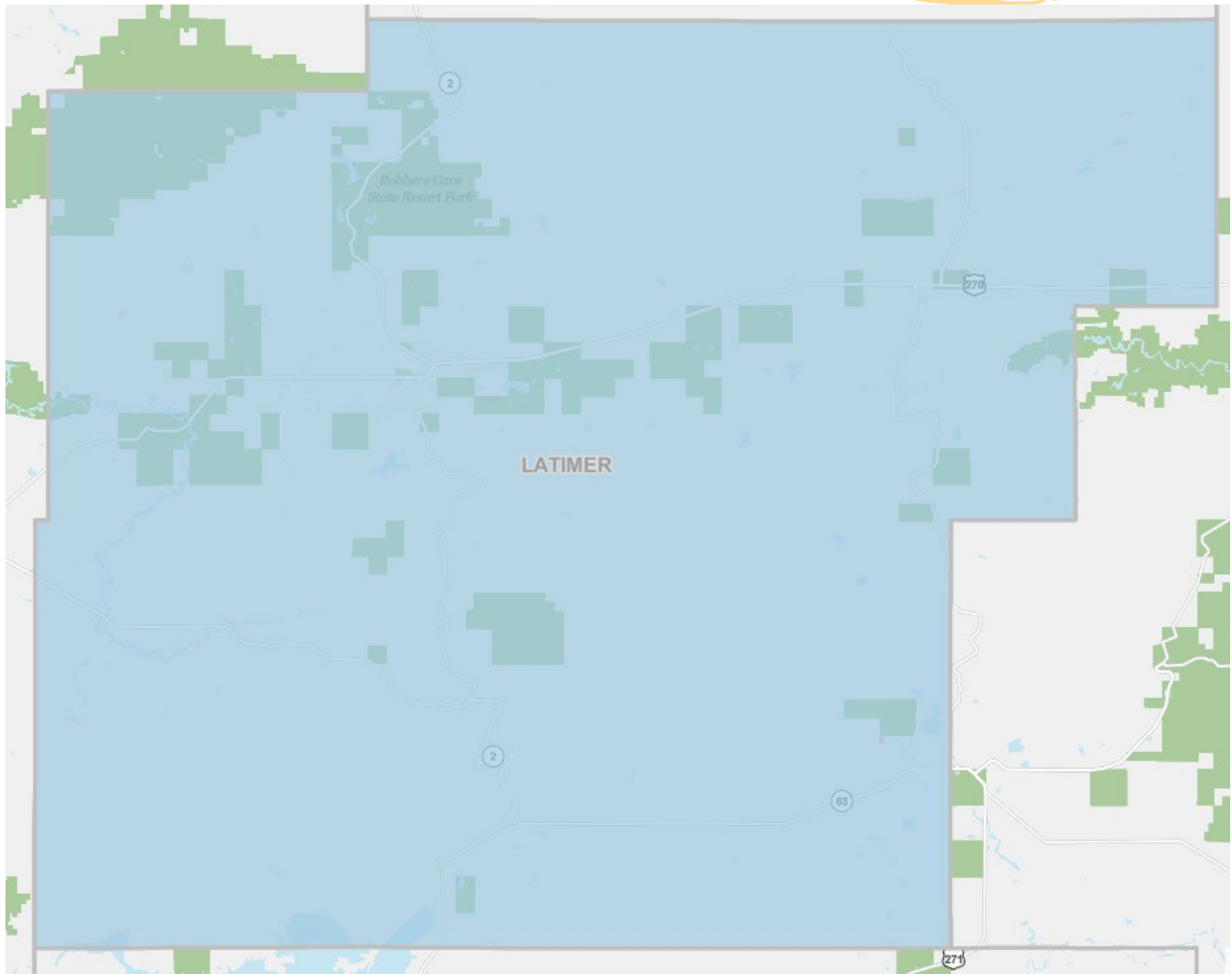
Census Tract 0407.00



\*Census Tract 0407.00 by United States Census Bureau

## Facility-Based Assessment Area

Latimer County

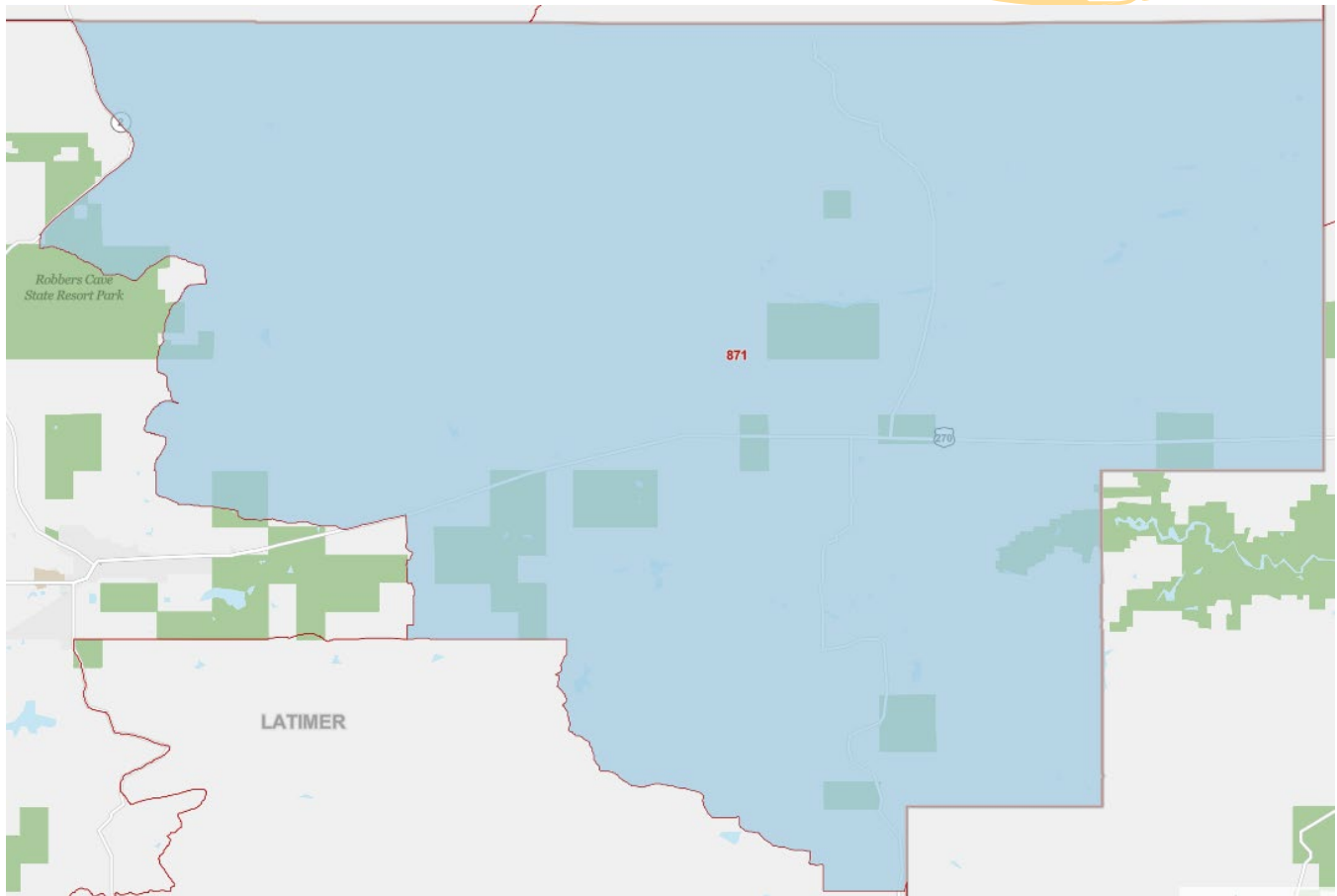


\*Latimer County by United States Census Bureau

**TCSB**

## Facility-Based Assessment Area

Census Tract 0871.00



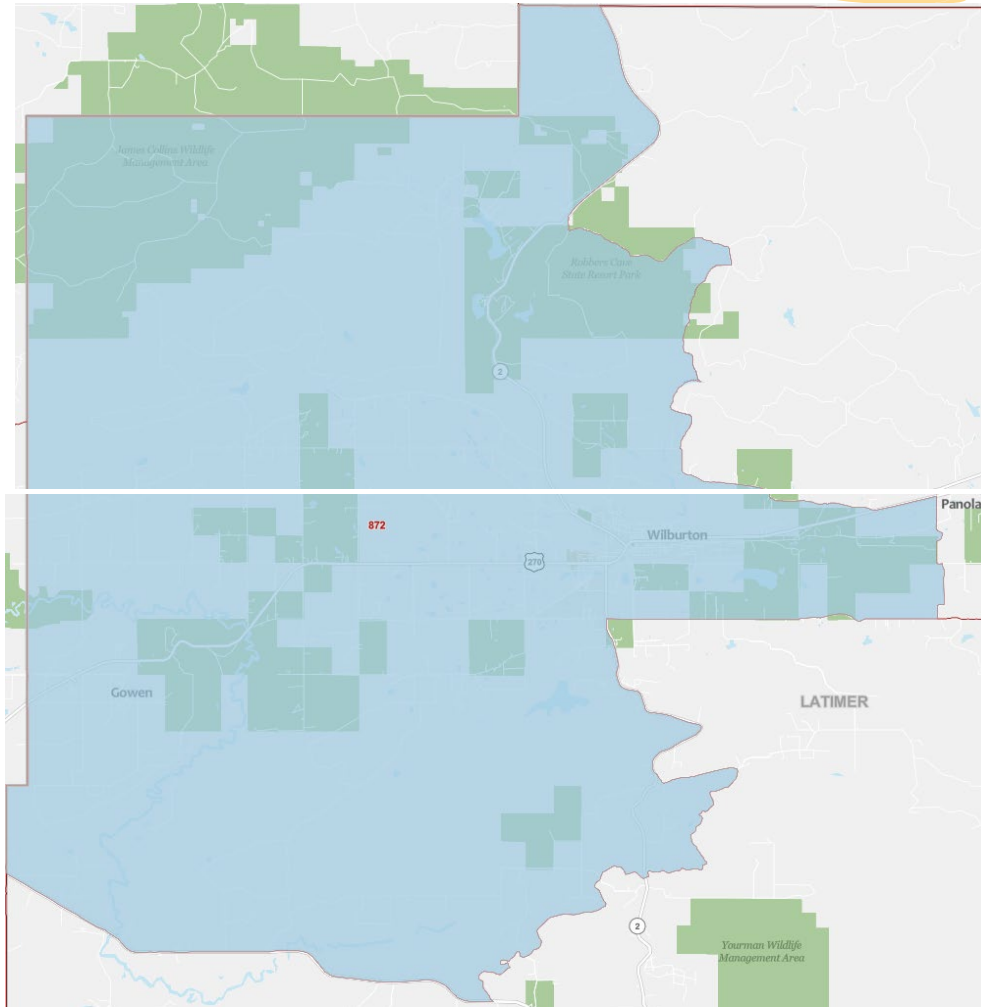
\*Census Tract 0871.00 by United States Census Bureau



# TCSB

## Facility-Based Assessment Area

Census Tract 0872.00



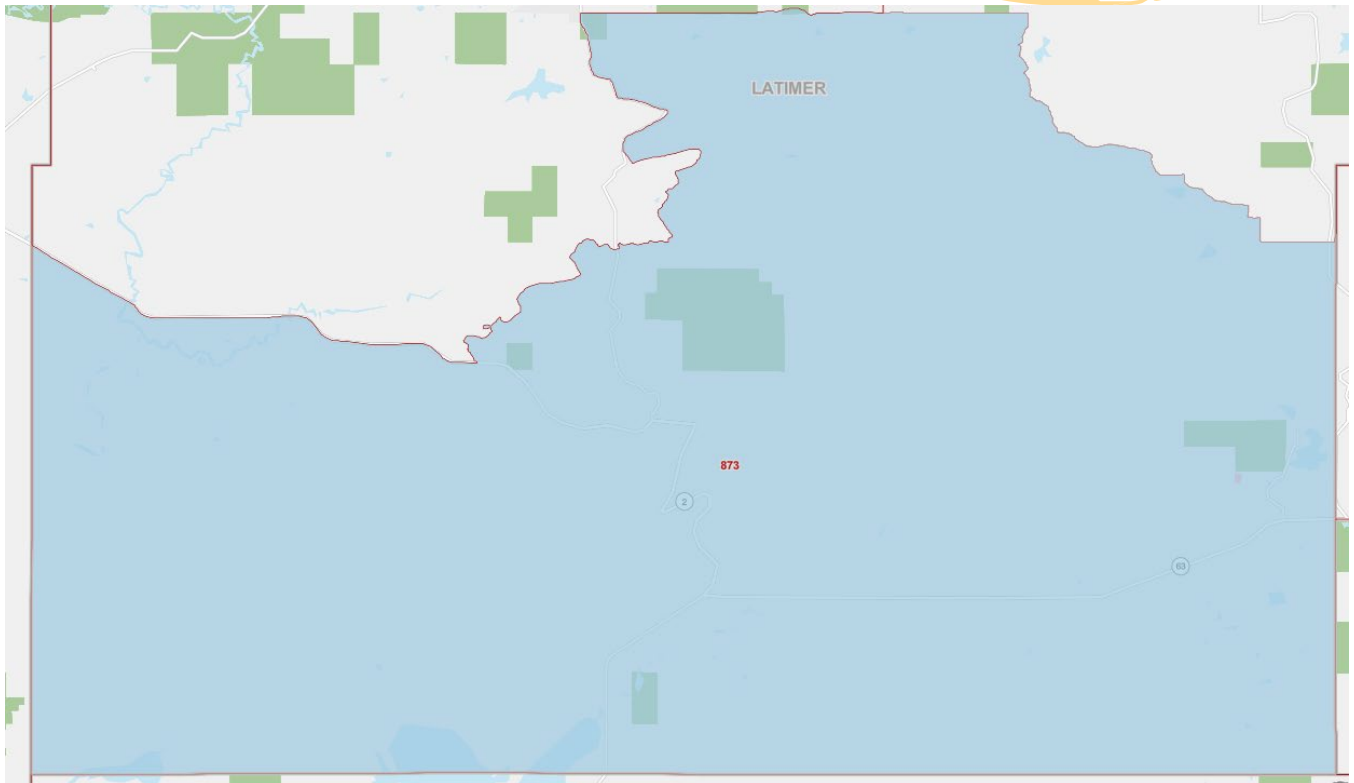
\*Census Tract 0872.00 by United States Census Bureau



**TCSB**

## Facility-Based Assessment Area

Census Tract 0873.00



\*Census Tract 0873.00 by United States Census Bureau



## HMDA Data

As of year 2019, TCSB is exempt from HMDA reporting requirements.

If anyone requests a copy of any of this data, a copy of the requested document(s) will be delivered with a charge of a copy fee only.

## Loan-to-Deposit Ratios

**First Quarter 2022:** 67.27%

**Second Quarter 2022:** 71.12%

**Third Quarter 2022:** 75.16%

**Fourth Quarter 2022:** 81.27%

**First Quarter 2023:** 75.11%

**Second Quarter 2023:** 77.21%

**Third Quarter 2023:** 81.52%

**Fourth Quarter 2023:** 84.29%

