

PUBLIC DISCLOSURE

March 28, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of Grand Lake
Certificate Number: 57915

201 East 18th Street
Grove, Oklahoma 74344

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Dallas Regional Office

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area (AA), including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

- The loan-to-deposit (LTD) ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and AA's credit needs.
- A majority of loans are in the institution's AA.
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the institution's rating.

DESCRIPTION OF INSTITUTION

Bank of Grand Lake (BGL), headquartered in Grove, Oklahoma, began operations in 2005 as Bank of Grove. The bank's name changed in October 2017. BGL operates from two locations, Grove and Langley, in northeastern Oklahoma. The Langley branch opened in April 2018. BGL did not close any offices, and no merger or acquisition activities occurred since the previous evaluation. Townsend Holding Company, also headquartered in Grove, wholly owns the institution. BGL received a Satisfactory rating at its previous FDIC CRA Performance Evaluation, dated March 22, 2016, based on Small Institution Procedures.

BGL focuses primarily on home mortgage and commercial lending, while also offering agricultural and consumer loans. In addition, bank management worked with the Small Business Administration to offer loans in conjunction with the Paycheck Protection Program (PPP) under the Coronavirus Aid, Relief, and Economic Security (CARES) Act. BGL originated 323 PPP loans totaling \$10.5 million from the program's inception to the date of this evaluation. The bank offers a variety of deposit services including personal checking and savings accounts, money market deposit accounts, certificates of deposit, and individual retirement accounts. Alternative banking systems include internet and mobile banking, telephone banking, and two automated teller machines.

Based on Call Report data as of December 31, 2021, total assets equaled \$239.1 million, total loans equaled \$125.4 million, and total deposits equaled \$216.6 million. Since the previous evaluation, total assets increased 63.2 percent, total loans increased 10.5 percent, and total deposits increased 69.1 percent. The following table details the outstanding loan portfolio as of December 31, 2021.

Loan Portfolio Distribution as of 12/31/2021		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	9,218	7.4
Secured by Farmland	14,282	11.4
Secured by 1-4 Family Residential Properties	47,580	37.9
Secured by Multifamily (5 or more) Residential Properties	911	0.7
Secured by Nonfarm Nonresidential Properties	37,116	29.6
Total Real Estate Loans	109,107	87.0
Commercial and Industrial Loans	6,612	5.3
Agricultural Production and Other Loans to Farmers	3,099	2.4
Consumer Loans	5,464	4.4
Obligations of State and Political Subdivisions in the U.S.	65	0.1
Other Loans	5	0.1
Lease Financing Receivable (net of unearned income)	1,036	0.7
Less: Unearned Income	0	0.0
Total Loans	125,388	100.0
<i>Source: Reports of Condition and Income.</i>		

Examiners did not identify any financial, legal, or other impediments that limit the institution's ability to meet the credit needs of its AA.

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more AAs for its performance evaluation. The bank designated one AA consisting of seven of nine census tracts comprising the northern two thirds of Delaware and one of nine census tracts in northeastern Mayes counties in non-metropolitan Oklahoma. Since the previous evaluation, the bank expanded the AA into Mayes County to include the new branch in Langley. The AA conforms to technical CRA regulatory requirements.

Economic and Demographic Data

According to 2015 American Community Survey (ACS) data, the AA includes one moderate- and seven middle-income census tracts. The two full-service offices operate within middle-income census tracts. The following table provides additional demographic data for the AA.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	12.5	87.5	0.0	0.0
Population by Geography	34,380	0.0	17.3	82.7	0.0	0.0
Housing Units by Geography	22,682	0.0	10.3	89.7	0.0	0.0
Owner-Occupied Units by Geography	10,918	0.0	12.5	87.5	0.0	0.0
Occupied Rental Units by Geography	3,512	0.0	17.6	82.4	0.0	0.0
Vacant Units by Geography	8,252	0.0	4.2	95.8	0.0	0.0
Businesses by Geography	2,949	0.0	11.6	88.4	0.0	0.0
Farms by Geography	159	0.0	21.4	78.6	0.0	0.0
Family Distribution by Income Level	9,439	24.8	17.6	20.4	37.2	0.0
Household Distribution by Income Level	14,430	26.0	18.9	16.7	38.5	0.0
Median Family Income – OK Non-MSA	\$51,491		Median Housing Value			\$121,794
			Median Gross Rent			\$607
			Families Below Poverty Level			15.1%
Source: 2015 ACS data and 2021 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.						

To determine the borrowers' income designation to analyze home mortgage loans under the borrower profile criterion, examiners used the Federal Financial Institutions Examination Council's (FFIEC) 2021 estimated median family income of \$58,100 for Non-Metropolitan Oklahoma.

Median Family Income Ranges – Oklahoma Non-MSA				
Median Family Income	Low < 50%	Moderate 50% to < 80%	Middle 80% to < 120%	Upper ≥ 120%
2021 (\$58,100)	< \$29,050	\$29,050 to < \$46,480	\$46,480 to < \$69,720	≥ \$69,720
Source: FFIEC.				

According to bank management and the Grove Area Chamber of Commerce, the area's major employers include Grove Public Schools, Jay Public Schools, Walmart, and Tyson Foods. The economic outlook and unemployment levels changed significantly in April 2020 due to the national state of emergency related to the COVID-19 pandemic. According to the Bureau of Labor Statistics, unemployment levels increased sharply at the onset of the pandemic and declined gradually during the year. As reflected in the following table, 2021 unemployment levels in the AA reflect more similar performance with that of pre-pandemic levels.

Year-End Unemployment Rates			
Area	2019	2020	2021
Delaware County	3.6	5.3	3.3
Mayes County	2.9	5.0	3.7
Oklahoma	3.1	6.1	3.8
National Average	3.5	6.7	3.9
<i>Source: Bureau of Labor Statistics.</i>			

Competition

The area reflects a high level of competition for financial services. According to FDIC Deposit Market Share data as of June 30, 2021, 16 financial institutions operate 28 full-service offices within Delaware and Mayes counties. Of these institutions, BGL ranked fourth with an 11.6 percent deposit market share.

Community Contact

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying the credit and community needs. This information helps determine financial institutions' responsiveness to these needs and indicates available credit opportunities.

The contact from a local non-profit organization described the area's current economic conditions as improving and highly dependent on manufacturing industries. The contact stated that the area experienced noticeable growth, despite the COVID-19 pandemic, and specified needs for manufacturing, small business, and agricultural lending. Overall, the contact indicated that local financial institutions remain heavily involved in the community and actively support the area's credit needs.

Credit Needs

Considering information obtained from the community contact, demographic data, and bank management, examiners determined that home mortgage and commercial loans represent primary credit needs of the AA.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated March 22, 2016, to the current evaluation dated March 28, 2022. To evaluate performance, examiners applied Small Institution Procedures, which include the Lending Test. The appendix details the test's procedures.

Activities Reviewed

Small Institution Procedures require examiners to determine the bank's major product lines for review. Examiners may select from among the same loan categories used for Large Bank CRA

evaluations, including home mortgage, small business, small farm, and consumer loans. Examiners determined that BGL focuses primarily on home mortgage and commercial lending, considering the dollar volume, number of loans, and management's business strategy. Agricultural and consumer loans comprise nominal percentages of loans by dollar volume. Therefore, this evaluation does not include a review consumer or small farm loans since they would not materially affect conclusions or the rating. The following table shows the bank's loan originations and purchases for the most recent calendar year by loan type.

Loans Originated or Purchased				
Loan Category	\$(000s)	%	#	%
Construction and Land Development	11,921	19.0	30	6.1
Secured by Farmland	5,462	8.7	12	2.4
Secured by 1-4 Family Residential Properties	17,036	27.1	78	15.7
Multifamily (5 or more) Residential Properties	811	1.3	2	0.4
Commercial Real Estate Loans	12,935	20.6	29	5.8
Commercial and Industrial Loans	9,219	14.7	85	17.1
Agricultural Loans	1,826	2.9	25	5.0
Consumer Loans	3,479	5.5	235	47.3
Other Loans	126	0.2	1	0.2
Total Loans	62,815	100.0	497	100.0
<i>Source: 2021 Bank Data.</i>				

Bank records indicate that the lending focus and product mix remained generally consistent throughout the evaluation period. For this evaluation, examiners selected samples of home mortgage and small business loans originated or purchased in the most recent completed calendar year, January 1, 2021, through December 31, 2021. Examiner reviewed a sample of 41 home mortgage loans totaling \$9.7 million taken from a universe of 80 home mortgage loans totaling \$17.8 million. Examiners also reviewed a sample of 47 small business loans totaling \$3.6 million taken from a universe of 106 small business loans totaling \$10.9 million. Examiners used 2015 ACS data as the standard of comparison for home mortgage loans and 2021 D&B data as the standard of comparison for small business loans.

Based on the bank's lending focus and given slightly more consideration to the universe by dollar volume of products reviewed, as reflected in the following table, examiners applied slightly more weight to home mortgage loans when arriving at applicable conclusions.

Loan Products Reviewed				
Loan Category	Universe			
	#	%	\$(000s)	%
Home Mortgage	80	43.0	17,847	62.1
Small Business	106	57.0	10,905	37.9
Total Loans	186	100.0	28,752	100.0
<i>Source: 2021 Bank Data.</i>				

While the evaluation presents both the number and dollar volume of loans, examiners emphasized performance by number of loans since the number of loans better indicates the number of individuals and businesses served.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

BGL demonstrated satisfactory performance regarding the Lending Test. A reasonable LTD ratio, a majority of loans originated inside the AA, and reasonable records regarding geographic distribution and borrower profile support this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and AA's credit needs. The LTD ratio, calculated from Call Report data, averaged 82.4 percent over the past 24 calendar quarters from March 31, 2016, to December 31, 2021, representing a decrease from the 103.4 percent average net LTD ratio reflected at the previous evaluation. The ratio ranged from a high of 92.6 percent as of December 31, 2017, to a low of 57.5 percent as of December 31, 2021.

Examiners did not identify any comparable institutions operating within the bank's AA that report similar asset sizes and lending emphases.

Assessment Area Concentration

A majority of loans are in the institution's AA. The following table shows that the bank originated a majority of home mortgage and small business loans (by both number and dollar) inside the AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	34	82.9	7	17.1	41	7,442	77.1	2,211	22.9	9,653
Small Business	39	83.0	8	17.0	47	3,099	86.0	503	14.0	3,602
Source: 2021 Bank Data.										

Source: 2021 Bank Data.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AA. Reasonable records regarding home mortgage and small business loans support this conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. Examiners focused on lending in moderate-income geographies within the AA since the AA does not contain any low-income geographies.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. The following table shows that the bank's level of lending in moderate-income geographies trails demographic data by 3.7 percentage points, reflecting reasonable performance.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Low	0.0	0	0.0	0	0.0
Moderate	12.5	3	8.8	662	8.9
Middle	87.5	31	91.2	6,780	91.1
Upper	0.0	0	0.0	0	0.0
Total	100.0	34	100.0	7,442	100.0
Source: 2015 ACS Data; 2021 Bank Data.					

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. The following table shows that the bank's level of lending in moderate-income geographies trails demographic data by 9.0 percentage points. Examiners considered certain performance context data supporting reasonable performance, such that both of the bank's branches are located within and are directly surrounded by middle-income geographies comprising the AA, while the sole moderate-income census tract is located farther away in the southeastern corner of the AA.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	0.0	0	0.0	0	0.0
Moderate	11.6	1	2.6	22	0.7
Middle	88.4	38	97.4	3,077	99.3
Upper	0.0	0	0.0	0	0.0
Total	100.0	39	100.0	3,099	100.0
Source: 2021 D&B Data; 2021 Bank Data.					

Borrower Profile

The distribution of borrowers reflects, given the demographics of the AA, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. Reasonable records regarding home mortgage and small business loans support this conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. Examiners focused on the percentage by number of loans to individuals with low- and moderate-incomes and to businesses with gross annual revenues of \$1 million or less in the AA.

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. The following table shows that the bank's lending to low-income borrowers trails demographic data by 21.9 percentage points, which reflects poor performance. Although typically indicative of very poor performance, examiners identified certain performance context data affecting performance in low-income census tracts. Specifically, demographic data reveals that 15.1 percent of families in the AA report income below the poverty level. Low-income families in the AA maintain an average income of less than \$29,050, while the median housing value is \$121,794. Subsequently, many low-income families in the AA likely would not qualify for a mortgage under conventional underwriting standards. Therefore, the opportunity for home mortgage lending to low-income families in the AA appears more limited.

As a result of the performance context data described previously, examiners placed greater weight on performance in moderate-income census tracts when arriving at an overall conclusion. Lending to moderate-income borrowers slightly exceeds demographic data by 3.0 percentage points and demonstrates reasonable performance.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low	24.8	1	2.9	60	0.8
Moderate	17.6	7	20.6	727	9.8
Middle	20.4	3	8.9	271	3.6
Upper	37.2	22	64.7	5,714	76.8
Income Not Available	0.0	1	2.9	670	9.0
Total	100.0	34	100.0	7,442	100.0
Source: 2015 ACS Data; 2021 Bank Data.					

Small Business Loans

The distribution of borrowers reflects reasonable penetration among businesses of different sizes. The following table shows the bank originated more than eight out of every ten small business loans to businesses with gross annual revenue of \$1 million or less, which compares favorably to demographic data and reflects reasonable performance.

Distribution of Small Business Loans by Gross Annual Revenue					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	59.5	14	35.9	1,417	45.7
\$100,000 - \$249,999	21.3	12	30.7	543	17.5
\$250,000 - \$499,999	4.7	7	17.9	446	14.4
\$500,000 - \$1,000,000	2.7	1	2.6	176	5.7
Subtotal ≤ \$1,000,000	88.2	34	87.1	2,582	83.3
> \$1,000,000	2.9	4	10.3	491	15.8
Revenue Not Available	8.9	1	2.6	26	0.9
Total	100.0	39	100.0	3,099	100.0
Source: 2021 D&B Data; 2021 Bank Data.					

Response to Complaints

The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners reviewed the bank's compliance with the laws relating to discrimination and other illegal credit practices, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

APPENDICES

SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

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.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

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.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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 applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, 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.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary

counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as non-MSA): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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.

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.

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

BANK OF GRAND LAKE
COMMUNITY REINVESTMENT ACT

Approved by Board: January 2013
Revisions Recommended by Board:

REFERENCES: 12 USC 2901
 12CFR 25

POLICY

It is the policy of Bank of Grand Lake to remain informed of, and try to meet, the credit needs of our primary banking community, including low to moderate income neighborhoods, consistent with safe and sound banking practices.

COMMUNITY REINVESTMENT ACT

Operational Procedures

- A) The bank shall post the Community Reinvestment Act (CRA) Notice in the bank lobby and a copy of the branch notice in the lobby of all branch locations. This notice will be posted in an area where it can be easily viewed.
- B) The bank will maintain a CRA Public file. This file will contain the following:
 - 1. A delineation of the bank's assessment area(s) including maps or list showing the boundaries of the area(s) and identifying the geographies contained within the area(s),
 - 2. A list of the specific types of credit and deposit services offered at the bank's branches and material differences in availability or cost of services (include hours of operation, available loan and deposit products and transaction fees),
 - 3. The bank's loan-to-deposit ratio for each calendar quarter of the previous year (small bank only),
 - 4. Written comments received from the public for the current year and each of the past two years that relate to the bank's CRA efforts or performance in the community,
 - 5. The bank's response to written comments received from the public,
 - 6. Copy of public section of the bank's most recent CRA Performance Evaluation,
 - 7. List of branches, street addresses, and geographies including hours of operation,
 - 8. List of branches opened and closed during the current year and each of the prior two calendar years (including street addresses and geographies),
 - 9. If less than satisfactory rating during the last exam, a description of current efforts to improve performance,
- C) The public file will be available for public inspection. All requests by the public to review this file will be directed to the CRA Officer.
- D) The most recent CRA Performance Evaluation and a list of services will be maintained at each branch
- E) The Board of Directors will review annually the bank's CRA Public file prior to May 1st of each year.
- F) The bank will provide for the credit needs of the community, including lending to low- and moderate-income individuals, businesses and farms of different sizes, and borrowers of different income levels.
- H) Any violation of law or policy will be reported immediately to the Compliance Officer.

BANK OF GRAND LAKE

ADDRESS:

201 E 18th Street
Grove, Oklahoma 74344

CENSUS: 3757.00

Hours:

Lobby

Monday – Friday 8:00 am to 5:00 pm

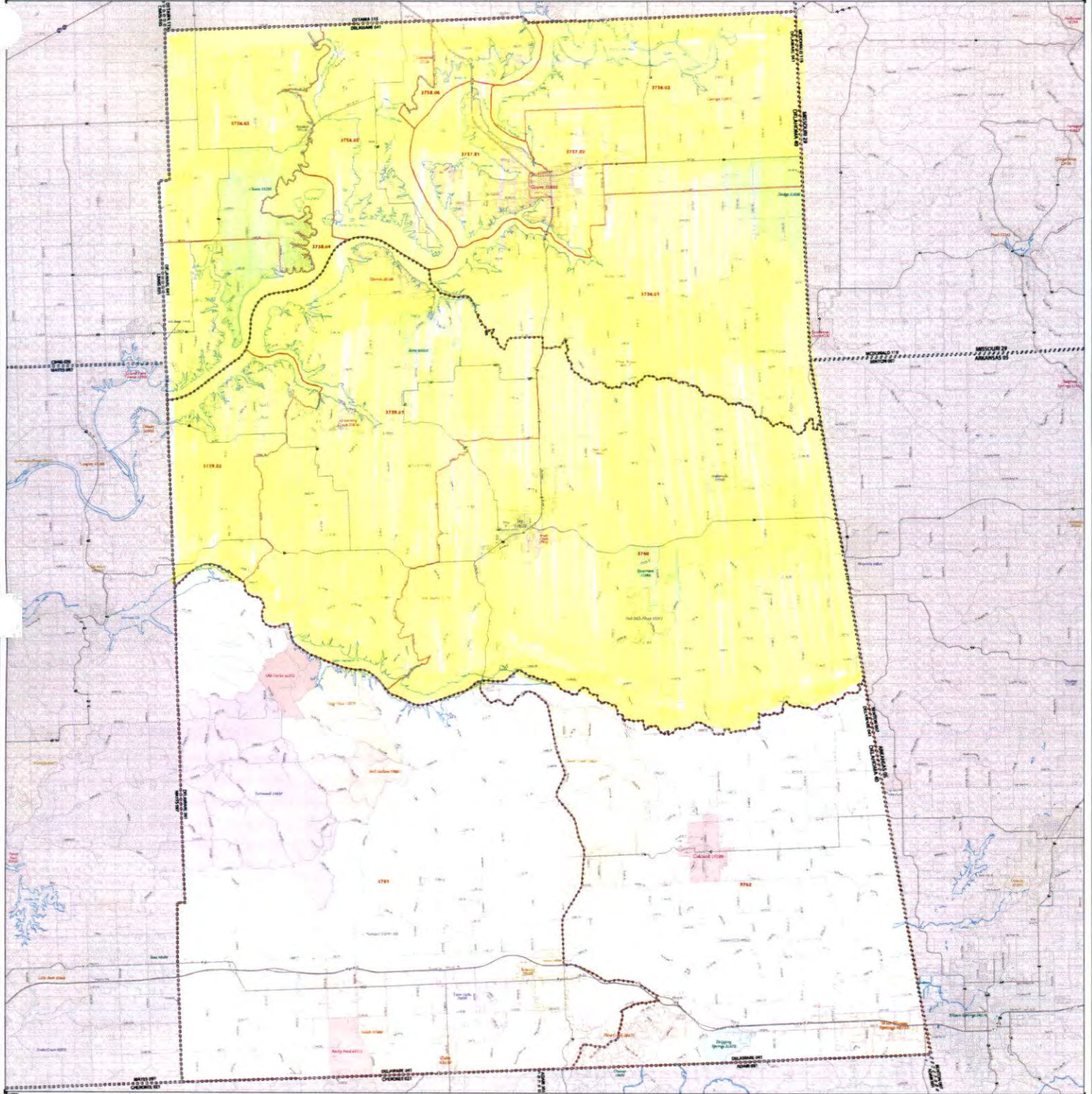
Saturday – Closed

Drive Thru

Monday – Friday 7:30 to 5:30 pm

Saturday – 8:00 to 12:00 pm

2020 CENSUS - CENSUS TRACT REFERENCE MAP: Delaware County, OK

[illegible]

Sheet 1 of 1 PARENT sheets
Total Sheets: 1 (Index 0; Parent 1; Inset 0)
NAME: Delaware County (041)
ENTRY FPM: County or institution equivalent entity
ID: 0410000000

All legal boundaries and names are as of January 1, 2010. The boundaries shown on this map are for Census Bureau statistical data collection and tabulation purposes only. State boundaries and designations for statistical purposes do not constitute a determination of political authority or rights of ownership or jurisdiction.

Geographic Coverage: 2010 Census Tract-level data: January 1, 2010
Data Source: U.S. Census Bureau's 2010 TIGER database (TIGER)
File Created by Geographic Information Systems Division, 10/1/10

U.S. SUPPLEMENTAL TO CONGRESSIONAL U.S. Census Bureau

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 Center for Medicare and Medicaid Services
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United States
census
2020

TYPE;FULLCODE;STATE;COUNTY;TRACT;SHEETS

TRACT;40041375601;40;041;3756.01;1
TRACT;40041375602;40;041;3756.02;1
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TRACT;40041976200;40;041;9762.00;1

BANK OF GRAND LAKE

ADDRESS:

2309 N 3rd
Langley, Oklahoma 74350

CENSUS: 407

Hours:

Lobby

Monday – Friday 8:00 am to 5:00 pm

Saturday – Closed

Drive Thru

Monday – Friday 8:00 to 5:30 pm

Saturday – 8:00 to 12:00 pm

The map displays the City of Houston, Texas, with various districts and their corresponding numbers. The districts are color-coded: yellow for 407, pink for 408, and light blue for 409. Major roads and highways are shown in black, and water bodies are in blue. The map is framed by a dashed line, and the title 'CITY OF HOUSTON, TEXAS' is at the top.

Key districts and areas labeled include:

- 407** (Yellow): Located in the northeast, including areas like 'East Houston' and 'East Houston Heights'.
- 408** (Pink): Located in the central and western parts, including areas like 'West Houston', 'West Houston Heights', and 'West Houston Heights'.
- 409** (Light Blue): Located in the southeast, including areas like 'South Houston' and 'South Houston Heights'.

Other labels on the map include 'CITY OF HOUSTON, TEXAS', 'Harris County', 'Houston, Texas', and various street names and landmarks.

LEGEND

Symbol	Description
[Symbol]	NEW YORK 10
[Symbol]	NEW YORK 20
[Symbol]	NEW YORK 30
[Symbol]	NEW YORK 40
[Symbol]	NEW YORK 50
[Symbol]	NEW YORK 60
[Symbol]	NEW YORK 70
[Symbol]	NEW YORK 80
[Symbol]	NEW YORK 90
[Symbol]	NEW YORK 100
[Symbol]	NEW YORK 110
[Symbol]	NEW YORK 120
[Symbol]	NEW YORK 130
[Symbol]	NEW YORK 140
[Symbol]	NEW YORK 150
[Symbol]	NEW YORK 160
[Symbol]	NEW YORK 170
[Symbol]	NEW YORK 180
[Symbol]	NEW YORK 190
[Symbol]	NEW YORK 200

[illegible]

TYPE;FULLCODE;STATE;COUNTY;TRACT;SHEETS

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TRACT;40097040700;40;097;407.00;1

TRACT;40097040801;40;097;408.01;1

TRACT;40097040802;40;097;408.02;1

Bank of Grand Lake
ASSET/LIABILITY MANAGEMENT

MONTHLY RATIOS
March 31, 2023

	Actual	Policy Limits
Loans to Deposit Ratio	65%	< 120%
Total Borrowings to Total Assets Ratio	4%	< 25%
Marketable Investments, Cash & Unused Lines of Credit to Total Liabilities	31%	> 10%
Brokered Deposits to Total Deposits	6%	<35%
Dependency Ratio-Scenario 1	6.16%	< 35%
Dependency Ratio-Scenario 2	2.17%	< 30%
Liquidity Ratio	43%	> 10%

BANK OF GRAND LAKE

Lending Products:

Commercial:

Commercial-Term Financing
Commercial-Line of Credit
Commercial- Letters of Credit
Ag Production Loans-Terms Financing
Loans to Non-Profits

Consumer:

Automobile Purchase
Boat Purchase
Personal
Loan on Deposits
Loan to Purchase Securities

Real Estate:

Commercial Owner Occupied
Commercial Non-owner Occupied
Single Family Construction
Single Family Residence Purchase
Home Equity Line of Credit
Multi-Family Purchase
Land/Lot Purchase
Land Development
Farmland

Residential Loans	Purchase	Refinance	Construction	HELOC	Bridge
Consumer	Auto	RV-ATV	Boats	Cash Secured	Unsecured
Commercial Real Estate	Purchase	Refinance	Construction		
Commercial	Equipment	Auto	Inventory	Unsecured	
AG - FSA	Purchase	Refinance	Working Capital		
Municipal	Leases				

*see an officer for details on each loan type



Personal Accounts	Free Eagle Checking	Golden Eagle Checking	Eagle Checking	Stellar Eagle Checking	Money Market	Regular Savings	Silver Dollar Savings
Monthly Fee	None	None	\$4.00 if balance falls below \$400.00	None	None	\$2.00 if balance falls below \$200.00	None
Minimum Balance	None	None	\$400.00	None	None	\$200.00	None
Earns Interest (variable rate)	No	Yes	Yes	Yes	Yes	Yes	Yes
Free Visa Business Debit Card	Yes	Yes	Yes	Yes	Yes	No	No
Free Online Banking	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Images of checks on statements	No	Yes	Yes	Yes	Yes	No	No
Bill Pay	Yes	Yes	Yes	Yes	Yes	No	No
Transaction Fees	None	None	None	None	\$5.00 per withdrawal after 6 in statement cycle	\$1.00 per withdrawal after 3 in a month	\$1.00 per withdrawal after 1 in a month

**Certificate of Deposits, ask for current rates & terms



Business Accounts	Eagle Commercial Checking	Eagle Corporate Checking	Commercial Money Market	Regular Savings
Monthly Fee	\$10.00 if balance falls below \$1,000.00	\$10.00 if balance falls below \$1,000.00	None	\$2.00 if balance falls below \$200.00
Minimum Balance	\$1,000.00	\$1,000.00	None	\$200.00
Earns Interest (variable rate)	No	Ask for details	Yes, ask for current rate	Yes, ask for current rate
Free Visa Business Debit Card	Yes	Yes	Yes	No
Free Online Banking	Yes	Yes	Yes	Yes
Cash Management	Ask for details	Ask for details	Ask for details	Ask for details
Images of checks on statements	Yes	Yes	Yes	No
Small Business Bill Pay	Ask for details	Ask for details	Ask for details	Ask for details
Transaction Fees	.25 per item after the first 200 transactions in the statement cycle	.25 per item	5.00 per withdrawal after 6 in statement cycle	1.00 per withdrawal after 3 in statement cycle

**Commercial Certificates of Deposits, ask for current rate & terms

BANK OF GRAND LAKE

LOAN TO DEPOSIT RATIO

2023

1 ST Quarter	65%
2 nd Quarter	64%
3 rd Quarter	66%
4 th Quarter	71%

BANK OF GRAND LAKE

SCHEDULE OF FEES

FEE DESCRIPTION	FEE	FREQUENCY
Stop Payment Fee	\$30.00	Per stop payment
Cashier's Check Fee	\$5.00	Per check
Charge Back Deposited Item Fee	\$10.00	Per item
Paid Overdraft Fee	\$30.00	Assessed each time an item is paid into or on a negative balance, including multiple presentments of the same item.
Returned Non-Sufficient Fee	\$15.00	Assessed each time an item is presented for payment and returned by the bank due to insufficient funds, including multiple presentments of the same item.
Daily Overdraft Fee	\$1.00	Assessed each consecutive business day the account remains overdrawn, starting the first business day the account has a negative balance at the end of the business day
Outgoing Domestic Wire	\$25.00	Per wire transfer
Outgoing Foreign Wire	\$35.00	Per wire transfer
Incoming Domestic Wire	\$15.00	Per wire transfer
Foreign Currency Order	\$30.00	Per order
Foreign Collection Item	\$5.00	Per item
IRS Levies, Garnishments or Court Orders	\$50.00	Per Levy, Garnishment, or Court Order
Domestic Collection	\$25.00	Per item
Telephone Transfer Fee	\$3.00	Per transfer
Statement Print Fee	\$2.00	Per statement
Savings Dormant Fee	\$5.00	Quarterly
Checking Dormant Fee	\$5.00	Monthly
Debit Card Replacement	\$10.00	Per card
Pin Replacement	\$5.00	Per pin
Deposit Zipper Bag	\$5.00	Per bag
Deposit Lock Bag	\$20.00	Per bag
Account Research	\$25.00	Per hour-1 hour minimum
Overdraft Protection Sweep	\$3.00	Per transfer
Non-Customer Cash Check < 500.00	\$10.00	Per check
Non-Customer Cash Check > 500.00	5% of check	Per check

[illegible]

DATE COMPLETED

COMPLAINT
TRACKING FORM

Date Complaint Received:	Complaint was given to:	Date Complaint was given to Compliance Officer:
Customer Name:	Customer Address:	Customer Contact Information:
Complaint was written: (Copy attached)	Complaint was oral: (See Summary)	Complaint was on social media: (Copy attached)

Summary of complaint or additional information

EMPLOYEE NAME

Signature

E-mail

COMPLIANCE REVIEW COMMENTS:

Referred to Legal Counsel:



WEEKEND EDITION
DELCO PAIR EARN MEDALS AT MISSOURI YOUTH MEET

PG 9

DL. 124, ISSUE 12 | 50¢

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Friday, February 11, 2022

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THE GROVE SUN

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REID NEWSPAPER GROUP

SCHOOL BOARD APPROVES STADIUM RENOVATION

Ridgerunner Stadium will have a new look next fall with approval of financing and a construction contract for new bleachers, digital scoreboard and press box by the Grove School Board.

According to superintendent Pat Dodson, the timing of demolition of the current press box and the removal of bleachers will take place immediately after graduation ceremonies. "Timing is essential so that we have everything ready for the first football scrimmage."

The School Board approved the financing during Tuesday's meeting. The Bank of Grand Lake agreed to lower the interest rate from a proposed 3.73% to a 2% fixed rate to help with the project. Bank President Ben Hampton attended the meeting. The 15-year term includes annual payments of around \$11,000, which is nearly \$20,000 less each year than the original interest rate would have required.

Also approved was a contract for construction manager with Messland Construction at a cost of 4% of the construction cost but not to exceed a basis of \$1.913 million.

According to Dodson, the bleacher renovations will include new chairback seats along with 15 rows of new bleachers. The new Bleacher will provide the bleachers. Dodson also emphasized the trim "will be red not pink!"

Also being upgraded are the bathrooms and the concession stand.

The new video scoreboard will allow students to create advertisements and videos to be shown as well as have replay capabilities.

Board member Jerry Crossley pointed out the bathrooms were constructed when the school district was a "B district" and had about 800 students and now the school district has grown to more than 2,500 students and is ranked as a 5A school.



The press box along with bleachers at Ridgerunner Stadium will be demolished in late spring in order to construct a new press box and replace the bleachers. The \$1.9 million project will include new restrooms and a digital scoreboard.

Bank of Grand Lake makes unsolicited donation to Delaware Sheriff's Office

A few weeks ago, two representatives of the Bank of Grand Lake attended the weekly meeting of the Delaware County Commissioners. During the meeting, there was a discussion about the need for first aid kits for the Sheriff Deputy vehicles. That discussion led to Gary Kirby and Case Hampton deciding to ask their bank to donate to the purchase of the kits.

Kirby approached the bank's Chief Executive Officer Ed Townsend to see if the bank could help provide money to pay

for the kits. Townsend asked how much all the kits would cost and then told Kirby the bank would donate the entire cost.

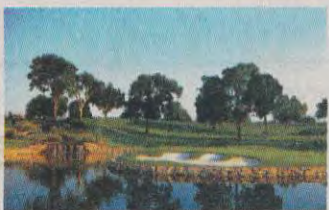
Kirby and Hampton were at the March 1 Commission meeting to present a check for the total cost of the first aid kits to the County Commissioners and the Delaware County Sheriff. Sheriff James Beck said the donation will help deputies provide the basic and immediate medical care to preserve life, prevent the condition from worsening until full medical treatment is available.



Delaware County Commissioners accepted a \$5,000 donation to the Delaware County Sheriff's Office to purchase first aid kits for all vehicles. (Left to right) District 3 Commissioner Conley Chesney, District 2 Commissioner Jake Callihan, Delaware County Sheriff James Beck, Bank of Grand Lake's Gary Kirby, Bank of Grand Lake's Case Hampton, District 1 County Commissioner David Poindexter, and Delaware County Undersheriff, Nick O'Neal.

Grand Lake's ONLY Locally Owned Bank





Grove powerlifters win 5A Regional

PAGE 4

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VOL. 126, ISSUE 21 | 50¢

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Tuesday, March 12, 2024

THE GROVE SUN

REID NEWSPAPER GROUP



Helping to socialize puppies are members of the Afton Interact Club including (left to right, back row) Dennis Mishmash and Jeffery Shandy; (middle row) Curi Fogg, Mckiensie Smith, Gracie Williams, Madi Martins, Peyton Rivette, Zhoie Howry, and Addisyn McElhaney; and (front row) Sid Ruckman and Keilah Dickenson.

AFTON HIGH SCHOOL INTERACT CLUB HELPS SOCIALIZE SHELTER ANIMALS

The Afton High School Interact Club members visited the Second Chance Pet Rescue in Grove on Wednesday afternoon.

The club learned about the shelter and how they care for both the dogs and

cats. They also interacted with dogs and cats, providing the animals with some needed attention.

The nonprofit shelter provides safe

PLEASE SEE **SHELTER** | PG 5

Vinita mayor sets record straight on facility use

Angela Thomason

Vinita Mayor Josh Lee wants to set the record straight on a topic that has resulted in some misinformation floating around the community pertaining to the use of the Craig County Community Center at the fairgrounds by Mansion Entertainment Group last July.

Lee said: "There was a post on Facebook, which has been taken down, insinuating that Mansion owed the County Fair Board for use of the community center and storage of their model. To answer the question does Mansion owe them anything? Absolutely not!

"I personally worked with a fair board member last year

to allow use of the facility at no cost so they could make their big announcement in Vinita. There had been a lot of push to make the announcement in Oklahoma City, which was more convenient for state officials and media to attend, but I didn't want something of this magnitude to be announced in Oklahoma City since the projects were going to be here in Vinita.

"I reached out to the county clerk and she directed me to a fair board member who had to sign an NDA (non-disclosure agreement) to be able to have full disclosure of what was being planned. They agreed that this was a great opportunity for our county to have the announcement made here.

"And as for storage of the model, it was agreed that they could keep it here at no cost for a while, so it could be displayed for viewing by visiting legislators or potential investors.

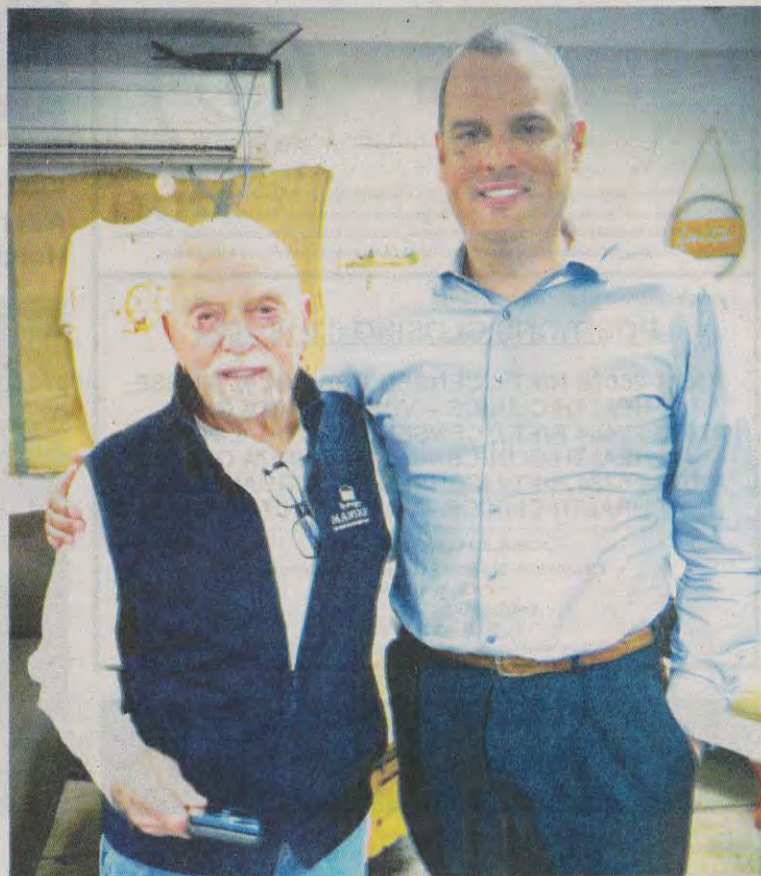
"Also, there was never a time when the storage of the model kept anyone from using any of the rooms, since they could simply move the model to another room, so the fair board did not lose any revenue for the few months the model was stored there.

"This was a good decision having the announcement in Vinita instead of Oklahoma City, and it was wildly successful. It was a great opportunity for Craig County and

PLEASE SEE **FACILITY** | PG 2



Bank of Grand Lake steps up once again with a \$15,000 donation to the Delaware County E911 Trust Authority. Pictured are Case Hampton with Bank of Grand Lake, Grove Chief of Police Mark Morris, Ben Hampton with Bank of Grand Lake, Monkey Island Fire Chief Carl Tesreau and Case Barnwell with Bank of Grand Lake. Ed Townsend, owner of Bank of Grand Lake, was quoted as saying "Improving the safety and quality of life in the communities served by Bank of Grand Lake is an important objective and it requires a state of the art 911 system".



Mansion Entertainment Group's project founder and investor Gene Bicknell (left) made a visit to Vinita this week and had lunch with Mayor Josh Lee to discuss progress on the future developments of the Three Pines RV Park & Campground and the American Heartland Theme Park & Resort.

The transformation of

VINITA MAYOR VERY