



## **PUBLIC DISCLOSURE**

June 12, 2023

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

Mabrey Bank  
RSSD# 139553

14821 South Memorial Drive  
Bixby, Oklahoma 74008

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 institution. 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**

This institution is rated: Satisfactory

The following table indicates the performance level of Mabrey Bank (the bank) with respect to the lending, investment, and service tests.

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	X	X	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

Major factors supporting the rating include:

**Lending Test**

- Lending levels reflect good responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- A high percentage of the bank’s loans are originated within its delineated AAs.
- The bank’s distribution of loans by income level of geography (geographic distribution) is good.
- The bank’s distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes (borrower distribution) is adequate.
- The bank is a leader in making community development (CD) loans.

**Investment Test**

- The bank makes a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments to support CD initiatives, it exhibits good responsiveness to credit and CD needs.

**Service Test**

- The bank’s delivery systems are accessible to geographies and/or individuals of different income levels in its AAs.

- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- The bank is a leader in providing CD services and is responsive to the available service opportunities.

**INSTITUTION**

**DESCRIPTION OF INSTITUTION**

The bank is an intrastate financial institution headquartered in Bixby, Oklahoma. The bank’s characteristics include:

- The bank is a wholly owned subsidiary of Mabrey Bancorporation, Inc.
- The bank has total assets of \$1.6 billion as of December 31, 2022.
- The bank operates 14 full-service banking facilities and one limited-service branch throughout its three delineated AAs in Oklahoma, which are designated as the Tulsa Metropolitan AA, the Oklahoma City Metropolitan AA, and the Eastern Oklahoma Nonmetropolitan AA.
- The bank’s network of automated teller machines (ATMs) includes cash dispensing-only units at each branch location, as well as five stand-alone ATMs throughout its AA geographic footprint.
- As shown in the table below, the bank’s primary business focus is commercial lending, which comprises 63.2 percent of its lending portfolio by dollar.
- There has been no merger or acquisition activity since the prior evaluation.

**Table 1**

Composition of Loan Portfolio as of December 31, 2022		
Loan Type	\$(000)	%
Construction and Land Development	74,490	6.5
Farmland	40,933	3.6
1-4 Family Residential Real Estate	339,268	29.6
Multifamily Residential Real Estate	13,860	1.2
Non-Farm Non-Residential Real Estate	376,848	32.9
Agricultural	9,454	0.8
Commercial and Industrial	259,148	22.6
Consumer	23,402	2.0
Other	8,229	0.7
<b>Gross Loans</b>	<b>1,145,632</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the Community Reinvestment Act (CRA) at its October 7, 2019 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's three AAs. The Tulsa Metropolitan and Eastern Oklahoma Nonmetropolitan AAs were assessed using a full-scope review, while the Oklahoma City Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2020, 2021, and 2022 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2022 CRA LAR;
- CD loans originated from October 8, 2019 to December 31, 2022;
- Qualified investments, grants, and donations or in-kind contributions that were made from October 8, 2019 to December 31, 2022, as well as qualified investments made prior to but still outstanding during this period; and,
- Retail banking services and CD services from October 8, 2019 to December 31, 2022.

Table 2 illustrates the bank's presence in each AA by number of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2022 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

When determining the overall institutional rating, more weight was placed on the Tulsa Metropolitan AA, based on higher lending and deposit volumes as well as number of branches. With respect to the lending analysis, more emphasis was placed on small business loans due to the bank's strategic focus on commercial lending.

**Table 2**

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank's Lending by \$ <sup>1</sup>		Percent of Bank's Deposits by \$ <sup>2</sup>		Deposit Market Share	
			Bank	State	Bank	State	% Market Share <sup>2</sup>	Market Share Rank <sup>3</sup>
State of Oklahoma		15	85.9	100.0	100.0	100.0	1.1	13 of 204
Tulsa Metropolitan	Full	10	63.9	74.4	84.7	84.7	3.8	4 of 53
Eastern Oklahoma	Full	4	16.5	19.2	11.5	11.5	7.5	5 of 14
Oklahoma City	Limited	1	5.5	6.4	3.8	3.8	0.1	42 of 59
<sup>1</sup> Based on the bank's HMDA, small business, and small farm lending used in the analysis. <sup>2</sup> Based on the June 30, 2022, FDIC's Deposit Market Share Report. <sup>3</sup> Based on the bank's ranking among FDIC-insured financial institutions in each AA.								

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

This performance evaluation first discusses the bank's overall performance, followed by an in-depth analysis of the bank's overall record of lending, investment, and service activities in its specific full-scope AAs. Lending data for the Oklahoma City Metropolitan AA that received a limited-scope review is located in Appendix E.

While conclusions with respect to the lending test for HMDA data was evaluated for three years, only 2022 lending tables for the AAs are reflected in the body of this report. The bank's 2021 and 2020 lending data can be found in Appendix C of this report.

**LENDING TEST**

The bank's overall lending test performance is high satisfactory. The lending test performance for the Tulsa Metropolitan and Eastern Oklahoma AAs are both rated good. The rating for each of these AAs was bolstered by a significant level of CD lending.

More consideration was also given to the volume of originations rather than the dollar amount, as this represents the number of individuals or entities served. Additional emphasis was also placed on the bank's performance in comparison to aggregate lending data, rather than in comparison to relative demographic figures, as aggregate lending data is considered representative of credit demand. However, aggregate data for 2022 HMDA and CRA lending was not available at the time of this evaluation.

Furthermore, in both of the AAs subject to full-scope reviews, the volume of individual HMDA loan products, such as home refinance, home improvement or multifamily loans, was too low to render a meaningful analysis; thus, in some instances, these loan products are only discussed as part of total HMDA lending for the geographic and borrower distribution analyses.

**Lending Activity**

This performance criterion evaluates the bank’s lending volume considering the bank’s resources and business strategy and other information from the performance context. The bank’s overall lending activities reflect good responsiveness to AA credit needs. Table 3 provides a detailed summary of the loan products and volumes evaluated during the review period.

The bank’s overall loan distribution for small business lending has increased significantly since the previous evaluation, driven primarily by the bank’s participation in the U.S. Small Business Administration’s (SBA) Paycheck Protection Program (PPP) in response to the Coronavirus Disease 2019 pandemic (pandemic).

**Table 3**

Summary of Lending Activity Reviewed				
Loan Type	2020 – 2022			
	#	\$(000)	#%	\$%
Home Improvement	68	6,095	6.1	2.2
Home Purchase	702	155,703	63.4	56.3
Multi-Family Housing	41	30,427	3.7	11.0
Refinancing	272	80,682	24.6	29.2
Other Purpose Closed-End	24	3,766	2.2	1.4
<b>Total HMDA related</b>	<b>1,107</b>	<b>276,673</b>	<b>65.0</b>	<b>75.3</b>
<b>Small Business</b>	<b>461</b>	<b>83,869</b>	<b>27.0</b>	<b>22.8</b>
<b>Small Farm</b>	<b>136</b>	<b>6,816</b>	<b>8.0</b>	<b>1.9</b>
<b>TOTAL LOANS</b>	<b>1,704</b>	<b>367,358</b>	<b>100.0</b>	<b>100.0</b>

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in several industry-recognized government-guaranteed lending programs, displaying flexibility in the way the bank serves its communities. The bank offers flexible programs throughout its AAs, including government guaranteed small business loans. The majority of the loan programs are designed to assist small businesses with access to capital.

The bank provides additional support for small business borrowers by participating with the SBA in its SBA 7(a) and Express Loan Programs, which promote business growth and job creation. The SBA 7(a) Loan Program is SBA’s primary program designed to



provide start-up and existing small businesses with increased access to capital through more flexible terms than conventional commercial financing. The loan proceeds can then be used for business acquisition and expansion, equipment and commercial real estate purchases, working capital, or to refinance debt. The Express Loan Program is a small dollar loan program that can be set up either as a term loan or line of credit that offers fixed or variable SBA loan rates as well as an easier SBA application process, quicker approval times, more flexible terms, and lower downpayment requirements than conventional commercial loans. This loan program is ideal for businesses with less established credit and/or start-up businesses and can be secured or unsecured. During the evaluation period, the bank originated eight SBA 7(a) loans totaling \$3.2 million (MM) and 14 Express loans for a total of \$4.1MM.

The bank also participates in a government guaranteed loan program administered by the Bureau of Indian Affairs. The loan program helps American Indian and Alaska Native tribes and individuals overcome barriers to conventional financing and to secure reasonable interest rates, while also reducing the risk to lenders by providing financial backing from the federal government. Loans under the program may be used for a variety of purposes, including operating capital, equipment purchases, acquisition and financing, building, construction, and lines of credit but must benefit the economy of a reservation or tribal service area. During the evaluation period, the bank originated one loan totaling \$458,100 through this program.

Another program implemented during the pandemic that the bank participated in was with the Main Street Lending facility. This program was designed to help credit flow to small and medium-sized for-profit businesses and non-profit organizations that were in sound financial condition before the onset of the COVID-19 crisis but needed loans to help maintain their operations until they recovered from, or adapted to, the impacts of the pandemic. Loans originated under the program offered several features to help borrowers facing challenges, such as five-year loans with floating rates, and deferred principal and interest payments to assist those experiencing temporary cash flow interruptions. During the evaluation period, the bank originated eight loans totaling \$118.9MM through this program.

At the onset of the pandemic in 2020, the regulatory agencies called upon financial institutions to provide flexibility to their customers and borrowers in an effort to avoid a national and international recession. The bank actively participated in this effort by originating loans through the SBA's Paycheck Protection Program (PPP). Mabrey Bank representatives made program availability known to all existing borrowers as it would enable many businesses to conserve financial resources. The bank originated 945 PPP loans totaling \$124.9MM in 2020, and 1,091 PPP loans totaling \$57.5MM in 2021.

**Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the bank’s AAs. The bank originated a high percentage of loans, by number and dollar, inside its three AAs.

The number of small farm loan originations was significantly lower than HMDA and small business lending. However, more weight was placed on the bank’s small business lending performance given the bank’s strategic focus on commercial lending, with secondary emphasis on home mortgage lending.

**Table 4**

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Purchase Conventional	590	84.0	94,478	60.7	112	16.0	61,225	39.3
Home Improvement	52	76.5	3,355	55.0	16	23.5	2,740	39.3
Multi-Family Housing	34	82.9	25,153	82.7	7	17.1	5,274	17.3
Other Purpose Closed-End	19	79.2	2,223	59.0	5	20.8	1,543	30.0
Refinancing	237	87.1	56,438	70.0	35	12.9	24,244	30.0
<b>Total HMDA related</b>	<b>932</b>	<b>84.2</b>	<b>181,647</b>	<b>65.7</b>	<b>175</b>	<b>15.8</b>	<b>95,026</b>	<b>34.3</b>
<b>Small Business</b>	<b>402</b>	<b>87.2</b>	<b>72,379</b>	<b>86.3</b>	<b>59</b>	<b>12.8</b>	<b>11,490</b>	<b>13.7</b>
<b>Small Farm</b>	<b>129</b>	<b>94.9</b>	<b>6,094</b>	<b>89.4</b>	<b>7</b>	<b>5.1</b>	<b>722</b>	<b>10.6</b>
<b>TOTAL LOANS</b>	<b>1,463</b>	<b>85.9</b>	<b>260,120</b>	<b>70.8</b>	<b>241</b>	<b>14.1</b>	<b>107,238</b>	<b>29.2</b>

*Note: Percentages may not total 100.0 percent due to rounding. If applicable, include the following: "Affiliate loans not included."*

The remaining loan distribution analyses discussed in this performance evaluation considered only those loans originated within the bank’s AAs.

**Geographic Distribution of Loans**

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AAs. This conclusion is primarily derived from a good level of penetration noted in both the Tulsa Metropolitan AA and the Eastern Oklahoma AA.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank’s lending has an overall adequate penetration among individuals of different income levels and businesses

and farms of different sizes. Penetration levels in the Tulsa Metropolitan AA were adequate, while good penetration was noted in the Eastern Oklahoma AA.

### **Community Development Lending**

This performance criterion evaluates the bank’s level of CD lending. The bank is a leader in making CD loans in the Tulsa Metropolitan AA and Eastern Oklahoma AA. As illustrated in Table 5, the bank’s CD lending was most responsive to economic development and revitalization and stabilization efforts in its AAs. The bank originated 702 CD loans totaling \$73.3MM during the evaluation period. Of all CD loans made in the AAs, the majority of CD loans by dollar, at 67.7 percent, were originated within the Tulsa Metropolitan AA, while by number, the largest share was originated within the Eastern Oklahoma AA at 47.6 percent. Given the significant volume of CD lending with respect to the bank’s lending, deposits, and branching presence in each AA, this performance resulted in a positive impact to the overall lending test rating. Examples of how the bank was responsive to the needs of the AAs include:

- The bank originated 6 CD loans inside the AAs totaling \$2.9MM that supported various affordable housing initiatives, which is considered an essential need in the bank’s AAs.
- The bank originated 622 CD loans inside the AAs totaling \$57.4MM in support of economic development and revitalization and stabilization purposes, with a majority of these CD loans being part of the PPP loan program.

**Table 5**

<b>Community Development Loans – All</b>		
<b>Community Development Purpose</b>	<b>#</b>	<b>\$(000)</b>
Affordable Housing	6	2,990
Community Services	15	5,139
Economic Development	353	51,019
Revitalization and Stabilization	269	6,395
Outside Activities	59	7,730
<b>Total Loans</b>	<b>702</b>	<b>73,273</b>

In addition to loans made within the bank’s AAs, the bank also received credit for 59 additional CD loans originated outside of its delineated AAs. Most of these CD loans were PPP loans with an economic development purpose. Consideration for these loans took into account the bank’s current performance and responsiveness to the CD needs of its AAs as well as the level of CD opportunities at the time of these activities.

**INVESTMENT TEST**

This performance criterion evaluates the bank’s level of qualified grants, donations, or in-kind contributions of property made since the last examination that have a primary purpose of community development.

The bank’s overall performance under the investment test is high satisfactory. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. While the bank makes rare use of innovative and/or complex investments, it exhibits good responsiveness to the credit and CD needs of its AAs. The rating was derived from a significant level of investments in the Tulsa Metropolitan AA, followed by an adequate level of investments in the Eastern Oklahoma AA. As indicated, the bank’s performance in the Tulsa Metropolitan AA held considerable weight in the overall conclusion. The bank continues to demonstrate support to local schools by investing in bonds for funding the construction and/or renovation of buildings for various school districts in its delineated AAs, which primarily serve the educational needs of LMI students.

In addition to qualified investments within the bank’s three AAs, the bank also made a number of qualified CD donations. The bank’s donation activity increased 49.5 percent by number and 98.2 percent by dollar from the previous evaluation. The bank’s donation activity was particularly responsive to nonprofits that provide community services targeted to LMI individuals and families. Overall, 88.7 percent of the donations by number were made in the Tulsa Metropolitan AA, with the remaining amounts made in the Eastern Oklahoma AA and Oklahoma City Metropolitan AA, respectively.

**Table 6**

Investments, Grants, and Donations – All								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	0	0	4	26	4	26
Community Services	5	371	5	2,410	145	519	155	3,300
Economic Development	0	0	1	1,000	2	15	3	1,015
Revitalization and Stabilization	0	0	2	1,000	0	0	2	1,000
Outside Activities	2	1,023	12	6,170	0	0	14	7,193
<b>Total</b>	<b>7</b>	<b>1,394</b>	<b>20</b>	<b>10,580</b>	<b>151</b>	<b>559</b>	<b>178</b>	<b>12,533</b>

<sup>1</sup> Book Value of Investment  
<sup>2</sup> Original Market Value of Investment

## **SERVICE TEST**

The bank's overall performance under the service test is outstanding. The rating is derived from excellent service test conclusions in the Tulsa Metropolitan AA and Eastern Oklahoma AA.

### **Retail Banking Services**

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic classification. Table 7 illustrates the distribution of bank offices and full-service ATMs by income level of geographies, as well as the number of branch openings/closings, and the volume of CD services provided during the evaluation period.

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. Of the 15 total branch offices subject to this evaluation, three offices were located in low-, three in moderate-, four in middle-, and five in upper-income tracts. The bank also maintains automated teller machines (ATMs) at the 15 branch offices, plus 5 stand-alone cash-dispensing ATMs. In addition to bank-owned ATMs, the bank offers access to the Transfund ATM network with no surcharge, significantly increasing ATM access across its AAs. Bank office and ATM locations generally align with the total percentage of census tracts by income level throughout its AAs.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior examination, the bank opened and closed a branch in the Oklahoma City Metropolitan AA, and both were located in an upper-income census tract. Originally the sole Oklahoma City bank location was a limited-service office located in an office suite that was primarily for loan officer use. The office suite was closed upon the 2020 opening of a new brick and mortar branch. This minor change has not adversely affected the accessibility of any bank products and services.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. The bank's branches generally operate under the same hours of operation in its various Oklahoma markets. Lobby hours at most branches are from 9 a.m. until 4 p.m. Monday through Friday. Drive-through services are generally available Monday through Friday with hours ranging from 7:30 a.m. to 6:00 p.m. and on Saturdays from 9:00 a.m. to 12:00 p.m. at 14 of the 15 locations. The sole location in the Oklahoma City Metropolitan AA is open from 9:00 a.m. to 4:00 p.m. Monday through Friday, but closed on Saturdays.

**Table 7**

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	20.0	20.0	26.7	33.3	0.0	100.0	7.7	30.3	30.9	28.2	2.9	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
14.3	23.8	28.6	33.3	0.0	100.0	7.0	30.3	32.9	28.8	0.9	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches	Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total	
	15	1		1		0	0	0	0	0	0	
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations		
	11	107		13		3		134		34		
<sup>1</sup> Based on 2022 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

**Community Development Services**

This performance criterion evaluates the bank’s level of CD services. The bank is a leader in providing CD services. The bank officers and staff provided 134 qualified services to 34 different organizations. As illustrated in Table 7, the bank performed a mix of services among the varying CD purposes, with a majority of service activities utilizing bank personnel’s financial expertise in key leadership positions, such as board, committee, and treasurer roles for organizations that support area community service needs.

Services provided include serving on boards of affordable housing organizations, non-profit entities that primarily serve LMI individuals and families, and economic development organizations that advise and cater to small business incubation and development. Other staff serve on committees that provide technical assistance on financial matters, provide financial literacy education, or assist with marketing and fundraising efforts for a number of organizations. A substantial portion of CD services was performed in the Tulsa Metropolitan AA, which accounted for 61.9 percent of CD services bank-wide. Although considering its smaller branch presence, the bank provided a favorable volume of services in the Eastern Oklahoma AA, as well as the limited-scope Oklahoma City Metropolitan AA. Further, the level of CD services has increased significantly from the prior CRA evaluation conducted on October 7, 2019.

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

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**TULSA METROPOLITAN ASSESSMENT AREA  
METROPOLITAN AREA  
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE TULSA  
METROPOLITAN AA**

The bank's Tulsa Metropolitan AA is comprised of Tulsa, Okmulgee, and Wagoner Counties in their entirety, along with 13 of the 23 census tracts in Creek County. This AA comprises a portion of the larger Tulsa, Oklahoma Metropolitan Statistical Area (Tulsa MSA). Refer to Appendix B for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA delineation since the prior CRA evaluation.
- As of the 2016-2020 American Community Survey (2020 ACS), the AA is comprised of 257 census tracts, including 15 low-, 76 moderate-, 78 middle-, 87 upper-, and 1 unknown-income census tracts. The census tract designations represent a change from the prior exam where the tract composition consisted of 218 census tracts, of which 17 were low-, 66 were moderate-, 76 were middle-, and 59 were upper-income census tracts.
- The bank operates 10 of its 15 banking offices in this AA, representing the highest number of branches within any of the bank's three AAs. This includes the bank's main office, one limited-service branch (drive-through only), and eight other full-service branches. The bank also maintains cash-only ATMs at all locations as well as five stand-alone ATMs throughout the AA.
- According to the June 30, 2022 FDIC Summary of Deposits Market Share Report, the bank held a 3.8 percent market share of total deposits within the AA, ranking 4<sup>th</sup> of 53 FDIC-insured financial institutions operating from 237 banking offices in the AA. Three of the 53 institutions in the AA have combined market share of 47.7 percent, which demonstrates the high level of competition for deposits in this AA.
- To further augment the evaluation, three community contacts recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. One individual represented a local housing authority and two represented economic development organizations.



**Table 8**

<b>Population Change</b>			
<b>Assessment Area: Tulsa Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Tulsa Metropolitan AA	808,933	858,720	6.2
Creek County, OK	70,761	71,754	1.4
Okmulgee County, OK	39,446	36,706	(6.9)
Tulsa County, OK	623,335	669,279	7.4
Wagoner County, OK	75,391	80,981	7.4
Tulsa, OK MSA	962,676	1,015,331	5.5
Oklahoma	3,849,733	3,959,353	2.8
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- As noted in Table 8, the Tulsa Metropolitan AA population represents 84.6 percent of the MSA's total population and 21.7 percent of the entire state population. The AA's population significantly grew from 2015 to 2020, particularly in Tulsa and Wagoner Counties. Of the AA counties, Okmulgee County was the only county to experience a population decline during this timeframe.
- Tulsa County is the most populous county in the AA with 669,279 residents, or 77.9 percent of the AA population.
- A community member stated that due to Wagoner County being adjacent to Tulsa County, a major metropolitan center, the area has experienced a boom in population and economic activity. Wagoner is the third fastest growing county in the state of Oklahoma.

**Table 9**

<b>Median Family Income Change Assessment Area: Tulsa Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Tulsa Metropolitan AA	66,416	72,315	8.9
Creek County, OK	59,697	66,569	11.5
Okmulgee County, OK	53,473	57,161	6.9
Tulsa County, OK	67,531	73,515	8.9
Wagoner County, OK	70,042	79,407	13.4
Tulsa, OK MSA	66,846	72,203	8.0
Oklahoma	63,401	67,511	6.5
<i>Source: 2011 – 2015 U.S. Census Bureau: American Community Survey 2016 – 2020 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars. All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- Median family income in Wagoner and Creek Counties experienced the highest growth rate from 2015 to 2020, although incomes in Tulsa and Wagoner Counties, the AA’s two most populous geographies, had higher income levels.
- The 2020 median family income for the Tulsa Metropolitan AA is 7.1 percent higher than the statewide figure.
- The percentage of families in the AA classified as LMI is 38.9 percent, which is comparable to the statewide figure of 39.1 percent.
- The AA family poverty rate is 10.7 percent, compared to 11.3 percent at the state level. Okmulgee and Creek Counties have the highest poverty rates in the AA, at 14.5 percent and 12.0 percent, respectively. When assessed by the income level of census tracts in the AA, the poverty rates are 19.9 percent in low-, 44.7 percent in moderate-, 22.7 percent in middle-, and 12.5 percent in upper-income census tracts.

**Table 10**

Housing Cost Burden Assessment Area: Tulsa Metropolitan						
Area	Cost Burden – Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Tulsa Metropolitan AA	73.0	33.4	39.6	55.8	27.2	16.6
Creek County, OK	55.8	24.0	32.0	44.3	15.6	15.6
Okmulgee County, OK	63.2	27.7	34.8	47.2	20.3	15.9
Tulsa County, OK	74.8	34.6	40.5	59.7	29.9	17.1
Wagoner County, OK	72.4	26.6	37.3	50.1	26.7	14.7
Tulsa, OK MSA	72.4	32.8	39.3	54.7	26.8	16.4
Oklahoma	71.1	30.5	37.9	52.5	24.5	16.0

*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*  
*Note: Cost Burden is housing cost that equals 30 percent or more of household income.*  
*All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.*

- As of 2016-2020 American Community Survey (ACS) five-year estimate data, there are 351,337 total housing units in the Tulsa Metropolitan AA, of which 55.7 percent are owner-occupied, 33.3 percent are rentals, and 11.0 percent are vacant.
- The median age of housing stock in the AA is 46 years of age. When broken down by the income level of census tract, the median age is 59 years in low-, 57 years in moderate-, 46 years in middle-, and 36 years in upper-income tracts. The older age of homes in LMI census tracts suggests more dilapidated homes in need of repair.
- The overall housing affordability ratio within the AA is 36.5 percent. The lowest affordability ratio in the AA is in Tulsa County at 35.5 percent, while more affordable housing is found in Okmulgee and Creek Counties with affordability ratios of 52.8 percent and 40.2 percent, respectively.
- While home prices appear to be more affordable, rent prices in the AA are costly, with 40.3 percent of renters having rents that exceed 30.0 percent of their monthly income.
- The percentage of rental units is more pronounced within the LMI tracts of the AA when compared to its middle- and upper-income tracts. Total housing units devoted to rental property in the area’s low-income tracts are 54.9 percent and 44.3 percent in moderate-income tracts. The AA’s middle-income tracts have 31.1 percent of housing in rental units, while the figure for upper-income tracts is 20.4 percent. This factor could impact the bank’s ability to originate owner-occupied home purchase, refinance, or home improvement loans in the LMI tracts.
- Housing affordability for renters and homeowners is constrained throughout the four AA counties, with the greatest cost burden to low-income renters and low-income homeowners in Tulsa County.

- A community member stated there is little to no affordable homes in the Tulsa area. The contact indicated there is an increased need for more affordable housing and single-family homes in the Tulsa area. Further, the contact stated that the limited stock of affordable homes available are being bought by investors or middle-income borrowers with ability to bid more than the LMI borrowers.
- A community member stated there is not much demand from LMI borrowers for home loans as they are being discouraged by the prices of homes in the area, the limited housing stock, as well as not having the credit to qualify for a home loan.

**Table 11**

<b>Unemployment Rates</b>					
<b>Assessment Area: Tulsa Metropolitan</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Tulsa Metropolitan AA	4.2	3.3	3.1	6.6	4.0
Creek County, OK	4.7	3.7	3.5	6.6	4.2
Okmulgee County, OK	6.0	4.8	4.7	7.4	5.2
Tulsa County, OK	4.0	3.2	3.0	6.6	4.0
Wagoner County, OK	4.1	3.2	3.0	5.9	3.5
Tulsa, OK MSA	4.2	3.3	3.1	6.5	4.0
Oklahoma	4.0	3.3	3.1	6.2	3.8

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- During the evaluation period, unemployment rates in the AA counties began to stabilize in 2021 after the notable spikes during 2020 resulting from the pandemic.
- Two of the four AA counties have unemployment rates that closely aligned with the figure for the Tulsa MSA. The sole outlier was Okmulgee County, which reported the highest unemployment rates over the past five years.
- The leading industries in the AA include aerospace, energy, education, healthcare, government, technology, manufacturing, and transportation.
- A community member noted growth over the past decade has accelerated as Tulsa has become more diversified in its industry sectors. Historically, Tulsa’s economy was heavily dependent on oil excavation; however, over the last decade, healthcare has become a dominant industry along with aerospace, professional services, and fulfillment centers. The member indicated all of these industries have magnified Tulsa’s need for workforce housing, training, affordable transportation and childcare options.
- Some of the AA’s largest employers with over 1,000 employees include American Airlines, AT&T, Bank of Oklahoma, Hillcrest Healthcare System, Nordam Group, Oklahoma State University Medical Center, Saint Francis Health System, Tulsa Public Schools, City of Tulsa, and ONEOK. These

- entities are predominantly located in Tulsa and are integral to the Tulsa area's strong economy.
- A community member noted that the Tulsa area is still experiencing impacts from the COVID pandemic. The member indicated that while the area has job openings in the city, businesses continue to report that they cannot find people to fill the positions.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TULSA METROPOLITAN AA**

### **LENDING TEST**

The bank's performance under the lending test in the Tulsa Metropolitan AA is good. Overall, the bank's lending activity responsiveness and geographic distribution of loans is good, while the borrower distribution of loans among individuals of different incomes and businesses and farms of different sizes is adequate. Furthermore, the bank is a leader in making CD loans in the AA.

#### **Lending Activity**

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in this AA included 720 home mortgage loans originated between January 1, 2020 and December 31, 2022, and 288 small business and 81 small farm loans originated between January 1, 2022 and December 31, 2022.

Furthermore, the bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending that was considered particularly innovative; however, the bank participated in numerous government-guaranteed lending programs, as noted previously in the overall institution section, demonstrating flexibility in the way the bank services its communities. A description of the bank's flexible lending products also is discussed in the overall institution description.

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

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. While the geographic distribution of home mortgage lending is excellent, the distribution of small business loans is adequate, and the distribution of small farm loans is good. Home mortgage, home improvement and multifamily loans were not evaluated at the individual product level based on lending levels that were too low to a conduct meaningful analysis.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2022 home mortgage loans among low-income census tracts was significantly above the demographic figure, which represents the percentage of owner-occupied units in each census tract income level. Lending levels in the moderate-income census tracts were also above the demographic figure. The bank's home mortgage lending in 2021 and 2020 reflected penetration levels consistent with 2022 lending patterns.

While the bank's loan dispersion among geographies of different income levels revealed some conspicuous gaps and lapses, this result was based on a relatively low number of home mortgage loans disbursed among an AA consisting of 257 census tracts. However, this did not impact the overall conclusion, as the majority of loans are in close proximity to bank branches.

### Home Purchase Loans

The geographic distribution of home purchase lending is excellent. The bank's 2022 home purchase loan distribution in area low-income census tracts was significantly above the demographic figure. Lending in moderate-income census tracts was also above the demographic figure. Bank performance in 2021 and 2020 was also consistent with the 2022 distribution.

When loan dispersion within the AA was evaluated, conspicuous gaps or lapses were noted based on the relatively low number of home purchase loans originated during the three -year evaluation period with respect to the significant number of tracts in the AA. However, this did not impact the conclusion, as the majority of home purchase loans are in close proximity to bank branches.

### Home Refinance Loans

The geographic distribution of home refinance lending is good. The bank's 2022 home refinance loan distribution in the low-income census tracts was comparable to the demographic figure. Lending in moderate-income census tracts was also comparable to the demographic figure. The volume of home refinance lending in 2021 and 2020 was above the 2022 distribution.

When loan dispersion within the AA was evaluated, conspicuous gaps or lapses were noted based on the relatively low number of home refinance loans originated during the three-year evaluation period disbursed among an AA consisting of a significant number of tracts. However, this did not impact the conclusion, as the majority of home refinance loans are in close proximity to bank branches.

**Table 12**

<b>Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Tulsa Metropolitan</b>					
<b>Geographic Income Level</b>	<b>Bank Loans*</b>				<b>Owner Occupied Units %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Home Purchase Loans</b>					
<b>Low</b>	10	9.2	770	3.9	3.4
<b>Moderate</b>	32	29.4	3,465	17.7	21.9
<b>Middle</b>	48	44.0	9,770	50.0	33.1
<b>Upper</b>	19	17.4	5,549	28.4	41.5
<b>Unknown</b>	0	0.0	0	0.0	0.1
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	109	100.0	19,554	100.0	100.0
<b>Refinance Loans</b>					
<b>Low</b>	1	3.0	80	0.8	3.4
<b>Moderate</b>	8	24.2	812	8.1	21.9
<b>Middle</b>	13	39.4	2,292	22.8	33.1
<b>Upper</b>	11	33.3	6,876	68.3	41.5
<b>Unknown</b>	0	0.0	0	0.0	0.1
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	33	100.0	10,060	100.0	100.0
<b>Home Improvement Loans</b>					
<b>Low</b>	1	12.5	22	3.5	3.4
<b>Moderate</b>	2	25.0	162	26.0	21.9
<b>Middle</b>	4	50.0	285	45.8	33.1
<b>Upper</b>	1	12.5	153	24.6	41.5
<b>Unknown</b>	0	0.0	0	0.0	0.1
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	8	100.0	622	100.0	100.0
<b>Multifamily Loans</b>					<b>Multi-family Units %</b>
<b>Low</b>	2	18.2	898	8.6	12.2
<b>Moderate</b>	5	45.5	3,862	37.2	37.3
<b>Middle</b>	2	18.2	1,406	13.5	27.7
<b>Upper</b>	2	18.2	4,225	40.7	21.4
<b>Unknown</b>	0	0.0	0	0.0	1.3
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	11	100.0	10,391	100.0	100.0
<b>Total Home Mortgage Loans</b>					<b>Owner Occupied Units %</b>
<b>Low</b>	14	8.2	1,770	4.3	3.4
<b>Moderate</b>	48	28.2	8,355	20.1	21.9
<b>Middle</b>	70	41.2	13,897	33.5	33.1
<b>Upper</b>	38	22.4	17,490	42.1	41.5
<b>Unknown</b>	0	0.0	0	0.0	0.1
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	170	100.0	41,512	100.0	100.0

Source: 2022 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding. \*Aggregate data is not currently available.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of small business loans in 2022 among low-income census tracts was significantly above the demographic figure, while the distribution of small business loans in the moderate-income census tracts was comparable to the demographic figure.

Additionally, the dispersion of loans among the various geographic income levels revealed some conspicuous gaps or lapses. However, this had no impact on the overall conclusion, as the overall volume of loans was low and concentrated near the bank's branches.

**Table 13**

<b>Distribution of 2022 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Tulsa Metropolitan</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	25	8.7	2,483	4.2	4.3
<b>Moderate</b>	59	20.5	16,665	28.1	25.5
<b>Middle</b>	87	30.2	17,631	29.7	31.8
<b>Upper</b>	117	40.6	22,601	38.1	38.3
<b>Unknown</b>	0	0.0	0	0.0	0.1
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	288	100.0	59,380	100.0	100.0

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

Small Farm Lending

The geographic distribution of small farm lending is good. The distribution of small farm loans in 2022 among the low- and moderate-income census tracts was comparable to the demographic figure.

Additionally, the dispersion of loans among the various geographic income levels revealed some conspicuous gaps or lapses based on the relatively low volume of small farm loans disbursed over a large geographic area, although this did not impact the conclusion.



**Table 14**

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Tulsa Metropolitan					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	1	1.2	23	0.6	1.2
Moderate	12	14.8	617	15.8	11.9
Middle	63	77.8	3,028	77.6	42.1
Upper	5	6.2	234	6.0	44.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>81</b>	<b>100.0</b>	<b>3,902</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

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

The bank’s lending has an adequate distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of home mortgage lending and small business lending reflects adequate penetration levels, while small farm lending reflects good penetration. Home improvement loans were not evaluated at the individual product level based on lending levels that were too low to render a meaningful analysis.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2022 home mortgage lending to low-income borrowers was significantly below the demographic figure. Lending to moderate-income borrowers also reflected penetration below the demographic figure. The borrower distribution of home mortgage lending in 2021 was consistent, while the bank’s lending in 2020 was above the levels noted in 2022 and 2021.

Additional performance context was considered in the overall rating for this product. Lower performance was primarily attributed to the high number of loans to borrowers with unknown incomes, the bank’s strategic focus on commercial lending, and the lack of products specifically tailored to LMI individuals, such as Federal Housing Administration loans with low down payment requirements and first-time home buyer programs. A review of the bank’s 2022 HMDA data revealed that 33.1 percent of total HMDA loans evaluated were originated to borrowers with unknown incomes, in which all had an occupancy status of investment property and were primarily for business or commercial purpose. Further,

when evaluating only those loans with known borrower incomes, the bank's lending to LMI borrowers was higher at 21.5 percent for 2022; 27.3 percent for 2021; and 39.0 percent for 2020 HMDA lending data. The bank's 2021 and 2020 total HMDA lending performance by number of originations, excluding the loans to borrowers with unknown revenue, was also more comparable to aggregate lenders, who reported a smaller percentage of loans than the bank to borrowers with unknown incomes.

### Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of home purchase loans originated to low-income borrowers in 2022 was significantly below the demographic figure. Lending to moderate-income borrowers also reflected penetration below the demographic figure. The distribution of home purchase loans in 2021 was consistent with the level noted in 2022 lending; however, the bank's lending in 2020 was above both the 2022 and 2021 performance.

In 2022, a high percentage (56 loans or 51.4 percent) of the bank's home purchase loan originations were to borrowers with unknown incomes. A substantial majority of these are loans for a business purpose or to purchase investment properties. When evaluating only those loans with known incomes, the bank's lending performance to LMI borrowers was 20.8 percent in 2022. In addition, the bank's performance in 2021 when excluding borrowers with unknown incomes, was even stronger at 31.5 percent, which was above aggregate lenders performance at 24.1 percent. The bank's lending performance in 2020 was even stronger at 47.7 percent when excluding borrowers with unknown incomes and was significantly above aggregate lenders performance and the demographic figure.

### Home Refinance Loans

The borrower distribution of home refinance lending is adequate. The distribution of home refinance loans originated to both low-income and moderate-income borrowers in 2022 was below the demographic figure. The distribution of home refinance loans in 2021 and 2020 were consistent with the level noted in 2022 lending; however, performance by number of originations to LMI borrowers was comparable to aggregate lenders.

A high percentage (7 loans or 21.2 percent) of the bank's home refinance loan originations were to borrowers with unknown incomes. These were loans for a business purpose or to purchase investment properties. When evaluating only loans with known incomes, the bank's lending performance to LMI borrowers was 23.0 percent in 2022. This was still below the demographic figure. However, the bank's lending to LMI borrowers in 2021 and 2020, at 20.0 percent and 15.7 percent respectively, was comparable to aggregate lenders, at 19.8 percent and 13.6 percent respectively, after excluding loans to borrowers with unknown incomes.

**Table 15**

<b>Distribution of 2022 Home Mortgage Lending By Borrower Income Level</b>					
<b>Assessment Area: Tulsa Metropolitan</b>					
<b>Borrower Income Level</b>	<b>Bank Loans*</b>				<b>Families by Family Income %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Home Purchase Loans</b>					
<b>Low</b>	3	2.8	274	1.4	21.5
<b>Moderate</b>	8	7.3	1,344	6.9	17.4
<b>Middle</b>	12	11.0	1,868	9.6	19.4
<b>Upper</b>	30	27.5	7,797	39.9	41.7
<b>Unknown</b>	56	51.4	8,271	42.3	0.0
<b>Total</b>	109	100.0	19,554	100.0	100.0
<b>Refinance Loans</b>					
<b>Low</b>	3	9.1	171	1.7	21.5
<b>Moderate</b>	3	9.1	311	3.1	17.4
<b>Middle</b>	4	12.1	580	5.8	19.4
<b>Upper</b>	16	48.5	8,084	80.4	41.7
<b>Unknown</b>	7	21.2	914	9.1	0.0
<b>Total</b>	33	100.0	10,060	100.0	100.0
<b>Home Improvement Loans</b>					
<b>Low</b>	0	0.0	0	0.0	21.5
<b>Moderate</b>	1	12.5	22	3.5	17.4
<b>Middle</b>	2	25.0	64	10.3	19.4
<b>Upper</b>	4	50.0	434	69.8	41.7
<b>Unknown</b>	1	12.5	102	16.4	0.0
<b>Total</b>	8	100.0	622	100.0	100.0
<b>Total Home Mortgage Loans</b>					
<b>Low</b>	8	5.0	576	1.9	21.5
<b>Moderate</b>	12	7.5	1,677	5.4	17.4
<b>Middle</b>	19	11.9	2,595	8.3	19.4
<b>Upper</b>	54	34.0	16,805	54.0	41.7
<b>Unknown</b>	66	41.5	9,468	30.4	0.0
<b>Total</b>	159	100.0	31,121	100.0	100.0
<p>Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>					

**Small Business Lending**

The borrower distribution of small business lending is adequate. The distribution of loans originated in 2022 to businesses with annual revenues of \$1MM or less (small businesses) at 38.5 percent was below the demographic figure. However, when reviewing the three-year average aggregate lending data of CRA reporters as a proxy for actual loan demand, the bank’s lending data indicated comparable performance. A review of

aggregate lending data submitted by CRA reporters with loan originations in the bank’s AA noted a three-year average aggregate loan distribution of 39.6 percent by number and 27.5 percent by dollar to small businesses.

In addition, 93 of the total 288 loans (32.3 percent) originated had unknown revenues. After reviewing these loans with the bank, it was determined that revenues were not relied upon in the credit decision due to a majority of these loans being renewals of a previous loan. Also, 14 loans were to start-up businesses who had no revenue to report. Therefore, after reviewing just the business loans with known revenues, the bank’s lending to small businesses was 56.9 percent in 2022. This was still below the demographic figure of 91.1 percent but was significantly above the three-year aggregate lending performance of 39.6 percent.

Furthermore, based on loan size, 54.2 percent of the bank’s loans were originated in amounts of \$100,000 or less, which indicates the bank is able to meet the needs of smaller business entities operating in the AA. While this percentage appears relatively low when compared to the demographic figure, it does demonstrate the bank’s support of small businesses that may not have the repayment capacity or need to borrow larger loan amounts.

**Table 16**

<b>Distribution of 2022 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Tulsa Metropolitan</b>					
	<b>Bank Loans</b>				<b>Total Businesses</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	111	38.5	17,412	29.3	91.1
<b>Over \$1 Million</b>	84	29.2	30,777	51.8	8.0
<b>Revenue Unknown</b>	93	32.3	11,191	18.8	0.9
<b>Total</b>	288	100.0	59,380	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	156	54.2	6,619	11.1	
<b>\$100,001 - \$250,000</b>	55	19.1	10,025	16.9	
<b>\$250,001 - \$1 Million</b>	77	26.7	42,736	72.0	
<b>Total</b>	288	100.0	59,380	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	71	64.0	3,255	18.7	
<b>\$100,001 - \$250,000</b>	22	19.8	3,919	22.5	
<b>\$250,001 - \$1 Million</b>	18	16.2	10,238	58.8	
<b>Total</b>	111	100.0	17,412	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

### Small Farm Lending

The borrower distribution of small farm lending is good. The distribution of loans originated in 2022 to farms with annual revenues of \$1MM or less (small farms) was below the demographic figure. However, when reviewing the three-year average aggregate lending data of CRA reporters as a proxy for actual loan demand, the bank's lending data indicated comparable performance. A review of aggregate lending data submitted by CRA reporters with loan originations in the bank's AA noted a three-year average aggregate loan distribution of 69.4 percent by number and 79.3 percent by dollar to small farms.

In addition, 32 of the 81 loans originated (39.5 percent) had unknown revenues. After reviewing these loans with the bank, it was determined that revenues were not relied upon in the credit decision due to a majority of the loans being renewals of a previous loan. Therefore, after reviewing just the farm loans with known revenues, the bank's lending to small farms was 98.0 percent in 2022. This was comparable to the demographic figure of 98.4 percent and also significantly above the three-year aggregate figure of 69.4 percent.

Furthermore, based on loan size, 88.9 percent of the bank's loans were originated in amounts of \$100,000 or less, which demonstrates the bank's ability to serve small farms that may not have the repayment capacity or need to borrow larger loan amounts.

**Table 17**

<b>Distribution of 2022 Small Farm Lending By Revenue Size of Farms</b>					
<b>Assessment Area: Tulsa Metropolitan</b>					
	<b>Bank Loans</b>				<b>Total Farms</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>%</b>
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	48	59.3	2,480	63.6	98.4
<b>Over \$1 Million</b>	1	1.2	161	4.1	1.2
<b>Revenue Unknown</b>	32	39.5	1,261	32.3	0.4
<b>Total</b>	81	100.0	3,902	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	72	88.9	2,017	51.7	
<b>\$100,001 - \$250,000</b>	7	8.6	1,085	27.8	
<b>\$250,001 - \$500,000</b>	2	2.5	800	20.5	
<b>Total</b>	81	100.0	3,902	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	43	89.6	1,115	45.0	
<b>\$100,001 - \$250,000</b>	3	6.3	565	22.8	
<b>\$250,001 - \$500,000</b>	2	4.2	800	32.3	
<b>Total</b>	48	100.0	2,480	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**Community Development Lending**

The bank is a leader in providing CD loans. The bank originated 301 CD loans totaling \$49.6MM in this AA. In addition, the bank’s performance reflects a notable increase from the prior examination where the bank originated 10 CD loans for \$14.3MM. The majority of the bank’s CD loans in this AA were for economic development and included PPP loans, which were highly responsive to the economic development needs in the AA. Other examples of CD lending activities include:

- Two CD loans for \$798,000 were originated for affordable housing purposes. One loan was to purchase a 6-unit apartment complex in a moderate-income tract that offers affordable rent.
- A community service loan for \$650,000 was originated to one of the largest non-profit mental health and substance abuse providers in Oklahoma. The organization serves individuals and families in approximately 45 counties and over 300 communities in Eastern Oklahoma. This CD loan will allow the organization to continue providing mental health services for low-income individuals and maintain their current employment levels with no interruption in service.

**Table 18**

<b>Community Development Loans – Tulsa Metropolitan AA</b>		
<b>Community Development Purpose</b>	<b>#</b>	<b>\$(000)</b>
Affordable Housing	2	798
Community Services	8	2,367
Economic Development	254	44,450
Revitalization and Stabilization	37	2,002
<b>Total Loans</b>	<b>301</b>	<b>49,617</b>

**INVESTMENT TEST**

The bank’s performance under the investment test in the Tulsa Metropolitan AA is good. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits good responsiveness to the credit and CD needs of its AA. Examples on investment activity in the AA include:

- The majority of the prior- and current-period investments consist of bonds that provided funding for improvements to schools in which a majority of students qualified for the national free or reduced lunch program.
- Two investments were for a development that includes two specific areas that are designated as Federal Opportunity Zones and Enterprise Zones. The development will include many aspects that will help attract new and/or retain existing businesses and residents, including affordable housing and a grocery store.
- A \$3,000 donation was given to an organization where its mission is to break the cycle of poverty and empower low-income students to become agents of change.
- Seventeen donations totaling approximately \$167,000 were to organizations that invest in many non-profit charitable organizations that help people in need. It unites people in need, typically LMI people, with different services to strengthen local communities.
- Four donations totaling \$20,000 were to an organization that shelters and feeds Tulsa’s homeless population. The organization offers support for basic needs such as food, shelter and toiletries, but also provides health care, personalized case management, computer access and other support services.

**Table 19**

Investments, Grants, and Donations – Tulsa Metropolitan AA								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	0	0	4	26	4	26
Community Services	5	371	3	1,330	128	506	136	2,207
Economic Development	0	0	0	0	2	15	2	15
Revitalization and Stabilization	0	0	2	1,000	0	0	2	1,000
<b>Total</b>	5	371	5	2,330	134	546	144	3,247
<sup>1</sup> Book Value of Investment <sup>2</sup> Original Market Value of Investment								

**SERVICE TEST**

The bank’s performance under the service test in the Tulsa Metropolitan AA is excellent.

**Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates two branches in low-income census tracts, one branch in a moderate-income tract, three in middle-income tracts, and four in upper-income tracts. Branch locations generally align with the total percentage of census tracts in the AAs by income level and remain similar to the branch locations noted in prior evaluations. The bank’s network of ATMs also generally aligns with the total percentage of census tracts in the AAs by income level, with two ATMs in low-, three in moderate-, five in middle-, and five in upper-income tracts. In addition to bank-owned ATMs, the bank also offers customers access to surcharge-free ATMs across the country.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened and/or closed any branches in this AA since the prior CRA evaluation.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. A majority of the branches offer hours from 9:00 a.m. to 4:00 p.m., Monday through Friday, drive-through hours ranging from 7:30 a.m. to 6:00 p.m., and Saturday hours from 9:00 a.m. to 12:00 p.m.



**Table 20**

Retail Banking and Community Development Services – Tulsa Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	20.0	10.0	30.0	40.0	0.0	100.0	5.8	29.6	30.4	33.9	0.4	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
13.3	20.0	33.3	33.3	0.0	100.0	6.1	28.6	31.8	33.3	0.3	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	10		0	0			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	7	64	10	2	83	19						

<sup>1</sup> Based on 2022 FFIEC census tract definitions.  
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

**Community Development Services**

The bank is a leader in providing CD services. Bank staff provided a total of 83 services to 19 organizations during the evaluation period which reflected a significant increase from the prior evaluation. The following service activities were considered particularly responsive to CD needs in the AA:

- A bank officer served on the Loan Committee of an organization focused on providing economic development loans to small businesses.
- A bank officer served on the board of a community service organization whose mission is to prevent child abuse and neglect through education, treatment, and advocacy.
- Several bank employees participated in fundraising for a community service organization that provides multiple services to LMI individuals and families, including meal giving and fundraising for area food pantries.
- Many employees taught financial education courses to students at schools where a majority of students qualified for the national free or reduced lunch program.
- A bank officer serves as a Board Member for an area housing agency that provides affordable housing to income-eligible families throughout its operating area.
- A bank officer serves as Chair of an organization that provides free healthcare to women who have no private health insurance, Medicaid, or that are living below poverty.
- A bank officer served on a fundraising panel that approves funding requests from non-profit agencies.

**OKLAHOMA CITY METROPOLITAN ASSESSMENT AREA  
METROPOLITAN AREA  
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN OKLAHOMA CITY  
METROPOLITAN AA**

The bank's delineated AA is comprised of Oklahoma County in its entirety (see Appendix B for an AA map). This AA is one of seven counties that comprise the Oklahoma City, Oklahoma MSA. The AA is in the most densely populated area in the state and includes 55.9 percent of the total Oklahoma City MSA population. Further characteristics include:

- The AA remains unchanged since the prior evaluation.
- The AA is comprised of 266 census tracts, including 26 low-, 85 moderate-, 73 middle-, 67 upper-, and 15 unknown-income census tracts. This represents a change from the prior exam where the bank's AA was comprised of 241 tracts, including 28 low-, 85 moderate-, 70 middle-, 50 upper-, and 8 unknown-income census tracts.
- Of the bank's 15 branch locations, this AA includes one full-service branch located in Oklahoma City in an upper-income tract that offers lobby and drive-through services and an ATM.
- Based on 2020 ACS estimate data, the AA population was 796,292, which reflects a 5.5 percent increase from 2015 Census data.
- According to the June 30, 2022 FDIC Summary of Deposits Market Share Report, the bank held a 0.1 percent market share of total deposits within the AA, ranking 42nd of 59 FDIC-insured financial institutions operating from 233 banking offices in the AA.
- Since the prior examination, the bank opened and closed a branch in the AA, and both were located in an upper-income census tract.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA CITY  
METROPOLITAN AA**

The AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in this area did not significantly impact the overall rating.

**Table 21**

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Oklahoma City Metropolitan	Below	Exceeds	Consistent

**EASTERN OKLAHOMA ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE EASTERN  
OKLAHOMA AA**

The bank's delineated AA is comprised of Hughes, McIntosh, and Muskogee Counties in their entireties, along with the eastern half of Okfuskee County. Refer to Appendix B for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA delineation since the prior CRA evaluation.
- The AA is comprised of 34 census tracts, including 2 low-, 8 moderate-, 21 middle-, and 3 upper-income census tracts. This represents a change in tract composition since the prior evaluation where there was a total of 28 census tracts, including 2 low-, 8 moderate-, 14 middle-, and 4 upper-income census tracts. This AA also consisted of three tracts in Hughes County and six tracts in McIntosh County that were considered distressed middle-income tracts in 2022 due to the poverty levels.
- As of the June 30, 2022 FDIC Summary of Deposits Market Share Report, the bank held a 7.5 percent market share of total deposits within the AA, ranking 5th of 14 FDIC-insured financial institutions operating from 34 banking offices in the AA. Three of the 14 institutions in the AA have combined market share of 48.1 percent, which demonstrates the high level of competition for deposits in this AA.
- To further augment the evaluation, an interview with a member of the community recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA was conducted to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The individual was a representative of an economic development organization.

**Table 22**

<b>Population Change</b>			
<b>Assessment Area: Eastern Oklahoma</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Eastern Oklahoma	116,537	109,957	(5.6)
Hughes County, OK	13,785	13,367	(3.0)
McIntosh County, OK	20,280	18,941	(6.6)
Muskogee County, OK	70,224	66,339	(5.5)
Okfuskee County, OK	12,248	11,310	(7.7)
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
Oklahoma	3,849,733	3,959,353	2.8
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- As noted in Table 22, the Eastern Oklahoma AA population represents 8.5 percent of the nonmetropolitan statewide area and 2.8 percent of the entire state population.
- Population growth in the four AA counties from 2015 to 2020 has been declining, with losses in all four counties in the AA.
- Muskogee County is the most populous county in the AA with 66,339 residents, or 60.3 percent of the AA population.
- A community member stated that McIntosh County has seen a gradual decline in population over the last 20 years, and it also has an aging population. The member indicated a lot of retirees move to the area to take advantage of Lake Eufaula, and a large majority of younger people leave after graduation and move to more urban areas such as Tulsa or Oklahoma City.

**Table 23**

<b>Median Family Income Change Assessment Area: Eastern Oklahoma</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Eastern Oklahoma	52,560	52,456	(0.2)
Hughes County, OK	52,104	47,059	(9.7)
McIntosh County, OK	50,651	49,827	(1.6)
Muskogee County, OK	54,281	55,555	2.3
Okfuskee County, OK	49,903	47,415	(5.0)
NonMSA Oklahoma	56,258	58,565	4.1
Oklahoma	63,401	67,511	6.5
<p><i>Source: 2011 – 2015 U.S. Census Bureau: American Community Survey 2016 – 2020 U.S. Census Bureau: American Community Survey</i></p> <p><i>Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars. All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i></p>			

- Median family incomes (MFIs) did not vary significantly among the four counties, ranging from \$47,059 to \$55,555.
- Muskogee County experienced a small increase in median family income from 2015 to 2020, while all other counties experienced a decline in MFI.
- The 2020 median family income for the Eastern Oklahoma AA is 11.6 percent lower than the nonmetropolitan statewide area and 28.7 percent lower than the statewide figure.
- The percent of families in the AA classified as LMI is 44.1 percent, which is higher than the state of Oklahoma figure at 39.1 percent.
- The AA family poverty rate is 15.9 percent, compared to 11.3 percent at the state level. McIntosh and Okfuskee Counties have the highest poverty rates in the AA, at 17.5 percent and 20.5 percent, respectively. When assessed by the income level of census tracts in the AA, the poverty rates are 5.5 percent in low-, 34.2 percent in moderate-, 53.9 percent in middle-, and 6.4 percent in upper-income census tracts.
- A community member indicated that the per capita income for McIntosh County is lower than both the state and national average.

**Table 24**

Housing Cost Burden Assessment Area: Eastern Oklahoma						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Eastern Oklahoma	65.2	22.6	37.7	46.8	22.1	15.9
Hughes County, OK	41.6	10.0	21.2	28.9	20.2	11.5
McIntosh County, OK	51.6	17.6	29.7	39.3	17.8	15.4
Muskogee County, OK	71.0	28.7	42.0	54.0	25.4	16.5
Okfuskee County, OK	61.3	2.0	32.2	49.7	16.3	18.3
NonMSA Oklahoma	64.4	27.6	34.5	48.4	21.4	15.5
Oklahoma	71.1	30.5	37.9	52.5	24.5	16.0

*Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*  
*Note: Cost Burden is housing cost that equals 30 percent or more of household income.*  
*All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.*

- There are 52,120 total housing units in the Eastern Oklahoma AA of which 52.2 percent are owner occupied, 23.7 percent are rentals, and 24.1 percent are vacant.
- The median age of housing stock in the AA is 48 years of age, compared to 39 years in rural areas statewide, and 41 years in the state of Oklahoma. When broken down by the income level of census tract, the median age is 60 years in low-, 61 years in moderate-, 45 years in middle-, and 42 years in upper-income census tracts. The older age of homes in LMI census tracts suggests more dilapidated homes in need of repair and a need for home improvement loans in the AA.
- The overall affordability ratio within the AA is 39.0 percent. The lowest affordability ratio in the AA is in McIntosh County at 34.2 percent while more affordable housing is found in Hughes and Okfuskee Counties with affordability ratios of 51.2 percent and 46.6 percent, respectively.
- While home prices appear to be more affordable, rent prices in the AA are costly, with 41.5 percent of renters having rents that exceed 30.0 percent of their monthly income.
- The percentage of rental units is higher in the AA's LMI tracts when compared to its middle- and upper-income tracts. The percentage of rental units in the AA's LMI tracts is 43.9 percent and 32.9 percent, respectively. The AA's middle-income tracts have 20.1 percent of housing in rental units, while the figure for upper-income tracts is 16.3 percent. This factor could impact the bank's ability to originate owner-occupied home purchase, refinance, or home improvement loans in the AA's LMI census tracts, and particularly in the low-income census tracts.
- Housing affordability for renters and homeowners is constrained throughout the four AA counties, with the greatest cost burden to low-income renters and low-

income homeowners in Muskogee County.

- A community member stated that the low interest rate environment during this time period created a demand for both primary and secondary homes, as well as an increase in overall home prices.

**Table 25**

<b>Unemployment Rates</b>					
<b>Assessment Area: Eastern Oklahoma</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Eastern Oklahoma	5.3	4.2	4.1	6.8	4.8
Hughes County, OK	5.3	4.0	4.6	7.6	5.2
McIntosh County, OK	7.3	5.7	5.5	8.6	6.1
Muskogee County, OK	4.8	3.8	3.7	6.2	4.3
Okfuskee County, OK	5.7	4.5	4.3	6.8	4.9
NonMSA Oklahoma	4.3	3.5	3.4	6.0	3.8
Oklahoma	4.0	3.3	3.1	6.2	3.8

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

- During the evaluation period, unemployment rates in the AA counties began to stabilize in 2021 after the notable spikes during 2020 resulting from the pandemic.
- From 2015 to 2020, unemployment rates in all four of the AA counties trended above the rate for the nonmetropolitan statewide area and the state of Oklahoma.
- A significant portion of the AA economy revolves around recreational areas, with Lake Eufaula comprising a significant portion of McIntosh County, and to a lesser degree the presence of Star Lake, Greenleaf Lake, and Webbers Falls Reservoir in Muskogee County.
- The leading industries in the AA are government, healthcare and social assistance, manufacturing, construction, crop and animal production, and transportation and warehousing.
- The AAs largest employers include the Department of Veterans Affairs Regional Office, the Jack C. Montgomery VA Medical Center, Georgia Pacific, Dal-Tile, Epic Medical Center, Eufaula Indian Health-Muskogee Creek Nation, and Refresko US, Incorporated. Commerce in Eastern Oklahoma is not primarily concentrated in any one area; however, there are a significant number of manufacturing, education, and health and social service employers in the area.
- A community member stated that unemployment grew during the pandemic, specifically affecting jobs in the tourism and food service industry.

- Also, a community member noted that a large percentage of people who commute for work will select a financial institution within the city they work in for their banking and credit needs. This creates significant competition for banks located in the Eastern Oklahoma AA, as banking demand is leaving the AA for cities located outside of the AA.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN EASTERN OKLAHOMA AA**

### **LENDING TEST**

The bank's performance under the lending test in the Eastern Oklahoma AA is good.

#### **Lending Activity**

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in this AA included 134 home mortgage loans originated between January 1, 2020 and December 31, 2022, and 99 small business and 48 small farm loans originated between January 1, 2022 and December 31, 2022.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of various flexible lending programs is discussed in the overall institution section.

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

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. While the geographic distribution of home mortgage and small farm loans is good, the distribution of small business loans is adequate. Home refinance, home improvement and multifamily loans were not evaluated at the individual product level based on lending levels that were too low to conduct a meaningful analysis.

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is good. In 2022, although the bank did not originate any home mortgage loans in the low-income census tracts, the percentage of owner-occupied units in the low-income tracts (demographic figure) is only 1.8 percent and presents minimal home mortgage lending opportunities. The bank's distribution of home mortgage loans in the moderate-income census tracts was comparable to the demographic figure. The bank's home mortgage lending in 2021 and 2020 reflected penetration levels above 2022 lending patterns.



While the bank's loan dispersion among geographies of different income levels revealed conspicuous gaps and lapses, this result was based on a relatively low number of home mortgage loans disbursed among an AA consisting of 34 census tracts. However, this did not impact the overall conclusion.

#### Home Purchase Loans

The geographic distribution of home purchase lending is good. In 2022, although the bank did not originate any home purchase loans in the low-income tracts, the tracts present very little opportunities for banks to lend based on the demographic figure of 1.8 percent. However, the bank's home purchase loan distribution in the moderate-income tracts was comparable to the demographic figure. The bank's distribution of home purchase lending in 2021 was above 2022 performance, and 2020 performance was below 2022 performance.

When loan dispersion within the AA was evaluated, conspicuous gaps or lapses were noted based on the relatively low number of home purchase loans originated during the three-year evaluation period with respect to the number of tracts in the AA, although this did not impact the conclusion.

**Table 26**

<b>Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Eastern Oklahoma</b>					
<b>Geographic Income Level</b>	<b>Bank Loans*</b>				<b>Owner Occupied Units %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Home Purchase Loans</b>					
<b>Low</b>	0	0.0	0	0.0	1.8
<b>Moderate</b>	8	25.0	549	18.0	20.8
<b>Middle</b>	18	56.3	1,482	48.5	67.4
<b>Upper</b>	6	18.8	1,022	33.5	10.1
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	32	100.0	3,053	100.0	100.0
<b>Refinance Loans</b>					
<b>Low</b>	0	0.0	0	0.0	1.8
<b>Moderate</b>	3	18.8	110	7.7	20.8
<b>Middle</b>	11	68.8	1,102	77.1	67.4
<b>Upper</b>	2	12.5	217	15.2	10.1
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	16	100.0	1,429	100.0	100.0
<b>Home Improvement Loans</b>					
<b>Low</b>	0	0.0	0	0.0	1.8
<b>Moderate</b>	4	44.4	181	50.4	20.8
<b>Middle</b>	5	55.6	178	49.6	67.4
<b>Upper</b>	0	0.0	0	0.0	10.1
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	9	100.0	359	100.0	100.0
<b>Multifamily Loans</b>					<b>Multi-family Units %</b>
<b>Low</b>	0	0.0	0	0.0	8.1
<b>Moderate</b>	0	0.0	0	0.0	34.5
<b>Middle</b>	1	100.0	420	100.0	50.4
<b>Upper</b>	0	0.0	0	0.0	7.0
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	1	100.0	420	100.0	100.0
<b>Total Home Mortgage Loans</b>					<b>Owner Occupied Units %</b>
<b>Low</b>	0	0.0	0	0.0	1.8
<b>Moderate</b>	15	25.9	840	16.0	20.8
<b>Middle</b>	35	60.3	3,182	60.5	67.4
<b>Upper</b>	8	13.8	1,239	23.6	10.1
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	58	100.0	5,261	100.0	100.0
<i>Source: 2022 FFIEC Census Data</i>					
<i>2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.</i>					
<i>Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</i>					

Small Business Lending

The geographic distribution of small business lending is adequate. The bank’s small business lending in the low-income tracts was below the demographic figure, while its lending in the moderate-income tracts was comparable to the demographic figure.

Additionally, the dispersion of loans among the various geographic income levels revealed some conspicuous gaps or lapses, although they did not impact the overall conclusion.

**Table 27**

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Eastern Oklahoma					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	8	8.1	588	10.2	14.3
Moderate	19	19.2	660	11.5	24.3
Middle	67	67.7	4,292	74.7	53.2
Upper	5	5.1	204	3.6	8.2
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	99	100.0	5,744	100.0	100.0

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

Small Farm Lending

The geographic distribution of small farm lending is good. Although the bank did not originate any small farm loans in the low-income tracts, the percentage of farms located in the low-income tracts reflected minimal lending opportunities at 1.5 percent. Additionally, the bank’s lending in moderate-income tracts was above the demographic figure.

Additionally, the dispersion of loans among the various geographic income levels revealed some conspicuous gaps or lapses, although they did not impact the overall conclusion.

**Table 28**

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Eastern Oklahoma					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	1.5
Moderate	13	27.1	561	25.6	21.2
Middle	33	68.8	1,570	71.6	73.0
Upper	2	4.2	61	2.8	4.4
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>48</b>	<b>100.0</b>	<b>2,192</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

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

The bank’s lending has a good distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of home mortgage lending reflects adequate penetration levels, while small business and small farm lending reflects good penetration. Home refinance, home improvement, and multifamily loans were not evaluated at the individual product level based on lending levels that were too low to render a meaningful analysis.

Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2022 home mortgage lending to both low-income and moderate-income borrowers was significantly below the demographic figure. However, the borrower distribution of home mortgage lending in 2021 was above 2022 performance, while 2020 was consistent with 2022 performance.

As previously noted, the overall conclusion considers the number of loans to individuals with unknown incomes, the bank’s strategic focus on commercial lending, and the lack of bank products specifically tailored to LMI individuals, such as FHA loans with low down payment requirements and first-time home buyer programs.

In 2022, there were 32, or 56.1 percent, home mortgage loans with unknown borrower incomes, which are typically associated with rental/investment properties. A review of the bank’s 2022 HMDA data revealed that 100.0 percent of the loans reported with unknown incomes had an occupancy status of investment property and were primarily for business

or commercial purpose. Further, when evaluating only those loans with known incomes, the bank's lending to LMI borrowers was higher at 20.0 percent for 2022 and 28.5 percent for 2021. While these figures were still below the demographic figure, the bank's 2021 performance was above aggregate lenders. The bank's lending to LMI borrowers in 2020 was below the other two years and below the demographic figure but was comparable to aggregate lending performance.

#### Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of home purchase loans originated to low-income borrowers in 2022 was significantly below the demographic figure. Lending to moderate-income borrowers also reflected penetration significantly below the demographic figure. The distribution of home purchase loans in 2021 and 2020 was consistent with 2022 lending performance.

In 2022, the bank had an extremely high percentage (20 loans or 62.5 percent) of its home purchase loan originations to borrowers with unknown incomes. A substantial majority of these are loans for a business purpose or to purchase investment properties. When evaluating only loans with known incomes, the bank's performance to LMI borrowers was 16.6 percent, which is below the demographic figure. However, for 2021, excluding borrowers with unknown incomes, the bank's lending to LMI borrowers was 35.7 percent, which was comparable to the demographic figures and above the aggregate lending performance. The bank's lending to LMI borrowers in 2020 was lower than 2021 performance and the demographic figure, but was comparable to aggregate performance.

**Table 29**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Eastern Oklahoma					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	#%	\$(000)	%	
<b>Home Purchase Loans</b>					
Low	1	3.1	36	1.2	25.0
Moderate	1	3.1	40	1.3	19.1
Middle	5	15.6	505	16.5	20.3
Upper	5	15.6	580	19.0	35.6
Unknown	20	62.5	1,892	62.0	0.0
<b>Total</b>	<b>32</b>	<b>100.0</b>	<b>3,053</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>					
Low	0	0.0	0	0.0	25.0
Moderate	1	6.3	60	4.2	19.1
Middle	1	6.3	67	4.7	20.3
Upper	2	12.5	171	12.0	35.6
Unknown	12	75.0	1,131	79.1	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>1,429</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>					
Low	1	11.1	11	3.1	25.0
Moderate	1	11.1	49	13.6	19.1
Middle	2	22.2	91	25.3	20.3
Upper	5	55.6	208	57.9	35.6
Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>359</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>					
Low	2	3.5	47	1.0	25.0
Moderate	3	5.3	149	3.1	19.1
Middle	8	14.0	663	13.7	20.3
Upper	12	21.1	959	19.8	35.6
Unknown	32	56.1	3,023	62.4	0.0
<b>Total</b>	<b>57</b>	<b>100.0</b>	<b>4,841</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					
Multifamily loans are not included in the borrower distribution analysis.					
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.					

**Small Business Lending**

The borrower distribution of small business lending is good. The distribution of loans originated in 2022 to businesses with annual revenues of \$1MM (small businesses) or less was below the demographic figure. However, when reviewing the three-year average aggregate lending data of CRA reporters as a proxy for actual loan demand, the bank's lending data indicated stronger performance. A review of aggregate lending data

submitted by CRA reporters with loan originations in the bank’s AA noted a three-year average aggregate loan distribution of 43.8 percent by number and 38.3 percent by dollar to small businesses. The bank’s record of lending to small businesses in the AA was 50.5 percent compared to lending data reported by aggregate CRA reporters at 43.8 percent.

In addition, 30 of the total 90 loans (30.3 percent) originated had unknown revenues. After reviewing these loans with the bank, it was determined that revenues were not relied upon in the credit decision due to a majority of the loans being renewals of a previous loan. Also, several loans were to start-up businesses who currently have no revenues to report. Therefore, after reviewing only the loans with known revenues, the bank’s lending to small businesses was 72.5 percent. This was significantly above the three-year average aggregate figure of 43.8 percent.

Further, based on loan size, 88.9 percent of the bank’s loans were originated in amounts of \$100,000 or less, which indicates the bank is able to meet the needs of smaller business entities operating in the AA. This demonstrates the bank’s support of small businesses that may not have the repayment capacity or need to borrow larger loan amounts.

**Table 30**

<b>Distribution of 2022 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Eastern Oklahoma</b>					
	<b>Bank Loans</b>				<b>Total Businesses</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	50	50.5	3,152	54.9	89.0
<b>Over \$1 Million</b>	19	19.2	1,097	19.1	8.7
<b>Revenue Unknown</b>	30	30.3	1,495	26.0	2.3
<b>Total</b>	99	100.0	5,744	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	88	88.9	3,079	53.6	
<b>\$100,001 - \$250,000</b>	8	8.1	1,185	20.6	
<b>\$250,001 - \$1 Million</b>	3	3.0	1,480	25.8	
<b>Total</b>	99	100.0	5,744	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	44	88.0	1,342	42.6	
<b>\$100,001 - \$250,000</b>	4	8.0	594	18.8	
<b>\$250,001 - \$1 Million</b>	2	4.0	1,216	38.6	
<b>Total</b>	50	100.0	3,152	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

### Small Farm Lending

The borrower distribution of small farm lending is good. The distribution of loans originated in 2022 to farms with annual revenues of \$1MM or less (small farms) was below the demographic figure. However, when reviewing the three-year average aggregate lending data of CRA reporters as a proxy for actual loan demand, the bank's lending data indicated comparable performance. A review of aggregate lending data submitted by CRA reporters with loan originations in the bank's AA noted a three-year average aggregate loan distribution of 78.3 percent by number and 89.8 percent by dollar to small farms. The bank's record of lending to small farms in the AA was 62.5 percent compared to lending data reported by aggregate CRA reporters at 78.3 percent.

In addition, the table reflects that 18 of the total 48 loans (37.5 percent) originated had unknown revenues. After reviewing these loans with the bank, it was determined that revenues were not relied upon in the credit decision due to a majority of the loans being renewals of a previous loan. Therefore, after only reviewing loans with known revenues, the bank's farm lending was 100.0 percent to small farms. This was comparable to the demographic figure of 99.3 percent and significantly above the aggregate figure of 78.3 percent.

Further, based on loan size, 89.6 percent of the bank's loans were originated in amounts of \$100,000 or less, which indicates the bank is able to meet the needs of smaller farms operating in the AA. This demonstrates the bank's support of small farms that may not have the repayment capacity or need to borrow larger loan amounts.



**Table 31**

<b>Distribution of 2022 Small Farm Lending By Revenue Size of Farms</b>					
<b>Assessment Area: Eastern Oklahoma</b>					
	<b>Bank Loans</b>				<b>Total Farms</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>%</b>
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	30	62.5	1,450	66.1	99.3
<b>Over \$1 Million</b>	0	0.0	0	0.0	0.0
<b>Revenue Unknown</b>	18	37.5	742	33.9	0.7
<b>Total</b>	48	100.0	2,192	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	43	89.6	1,306	59.6	
<b>\$100,001 - \$250,000</b>	4	8.3	526	24.0	
<b>\$250,001 - \$500,000</b>	1	2.1	360	16.4	
<b>Total</b>	48	100.0	2,192	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	27	90.0	810	55.9	
<b>\$100,001 - \$250,000</b>	2	6.7	280	19.3	
<b>\$250,001 - \$500,000</b>	1	3.3	360	24.8	
<b>Total</b>	30	100.0	1,450	100.0	
<i>Source: 2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**Community Development Lending**

The bank is a leader in providing CD loans. The bank originated 334 CD loans totaling \$11.8MM in this AA. This represents a significant increase by number since the prior evaluation. The majority of the bank’s CD loans in this AA were for revitalization and stabilization efforts as well as economic development and consisted primarily of PPP loans, which were highly responsive to the credit needs in this AA during the evaluation period. Other examples of CD lending activities include:

- Three CD loans for \$1.2MM that supported affordable housing initiatives, which is a significant credit need within the bank’s AA.
- Two CD loans for \$483,700 were originated to an organization that provides services that benefit and improve access to critical health care services for LMI individuals. Approximately 91.0 percent of the organization’s clients are at or below the poverty level.

- Several CD loans were responsive to area revitalization and stabilization needs. A few of the communities in the bank’s AA are sparsely populated and have distressed census tracts. The impact of the bank’s CD lending has a notable impact on a predominantly LMI population and supports these areas by meeting the essential credit needs of these particular communities.

**Table 32**

Community Development Loans – Eastern Oklahoma AA		
Community Development Purpose	#	\$(000)
Affordable Housing	3	1,157
Community Services	7	2,772
Economic Development	94	4,095
Revitalization and Stabilization	230	3,789
<b>Total Loans</b>	<b>334</b>	<b>11,813</b>

**INVESTMENT TEST**

The bank’s performance under the investment test in the Eastern Oklahoma AA is adequate. The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. The bank also makes rare use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA. The bank originated one new investment for \$330,000 and made 10 qualified community service donations for \$6,000 in this AA during the evaluation period. The investment was a school bond for repairs and improvements to schools within a district where a majority of the student population is eligible for the free and reduced lunch program. Further, the majority of the donations were to community service organizations that serve various non-profit agencies that primarily serve LMI individuals and families.

**Table 33**

Investments, Grants, and Donations – Eastern Oklahoma AA								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	0	0	0	0	0	0
Community Services	0	0	1	330	10	6	11	336
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>330</b>	<b>10</b>	<b>6</b>	<b>11</b>	<b>336</b>

<sup>1</sup> Book Value of Investment  
<sup>2</sup> Original Market Value of Investment

## **SERVICE TEST**

The bank's performance under the service test in the Eastern Oklahoma AA is excellent.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are readily accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates one branch in a low-income census tract, two in moderate-income tracts, and one in a middle-income census tract. The distribution of branch locations exceeds the total percentage of census tracts in the AA by income level and remains similar to the branch locations noted in prior evaluations. The bank's network of ATMs also exceeds the total percentage of census tracts in the AAs by income level with one in low-, two in moderate-, one in middle-, and one in an upper-income census tract. In addition to bank-owned ATMs, the bank also offers customers access to surcharge-free ATMs across the country.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. There were no branch openings or closings in this AA during the evaluation period.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and services in the AA are generally consistent with lobby hours from 9:00 a.m. to 4:00 p.m. Monday through Friday, drive-through hours of 8:00 a.m. to 6:00 p.m. in Haskell and Muskogee and 7:30 a.m. to 4:00 p.m. in Weleetka and Wetumka, and Saturday hours at all locations from 9:00 a.m. to 12:00 p.m.

**Table 34**

Retail Banking and Community Development Services – Eastern Oklahoma AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	25.0	50.0	25.0	0.0	0.0	100.0	5.9	23.5	61.8	8.8	0.0	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
20.0	40.0	20.0	20.0	0.0	100.0	3.0	25.0	63.6	8.4	0.0	100.0	
Changes in Branch Location	Number of Branches (#)					Net Change in Branch Locations (#)						
	Total Branches	Openings (#)	Closings (#)	Low	Mod	Mid	Upp	Unk	Total			
	4	0	0	0	0	0	0	0	0			
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	0	21	0	1	22	7						

<sup>1</sup> Based on 2022 FFIEC census tract definitions.  
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

**Community Development Services**

The bank is a leader in providing CD services. Bank staff provided a total of 22 services to 7 organizations during the evaluation period, which reflected an increase from the prior evaluation. The following service activities were considered particularly responsive to CD needs in the AA:

- A bank officer served as a Board member for an organization that helped to revitalize and stabilize a downtown area under the Main Street program.
- A bank officer taught a financial education class regarding credit reports and financial services to students who are in the program. The program targets those who are at 200% below the Federal poverty level.
- A bank officer served as Co-Chair for a community service organization and in this capacity, makes decisions regarding the distribution of funds to various non-profit agencies.
- A bank officer serves on a committee that helps find solutions for homeless individuals pertaining to financial, legal, housing, and employment issues.

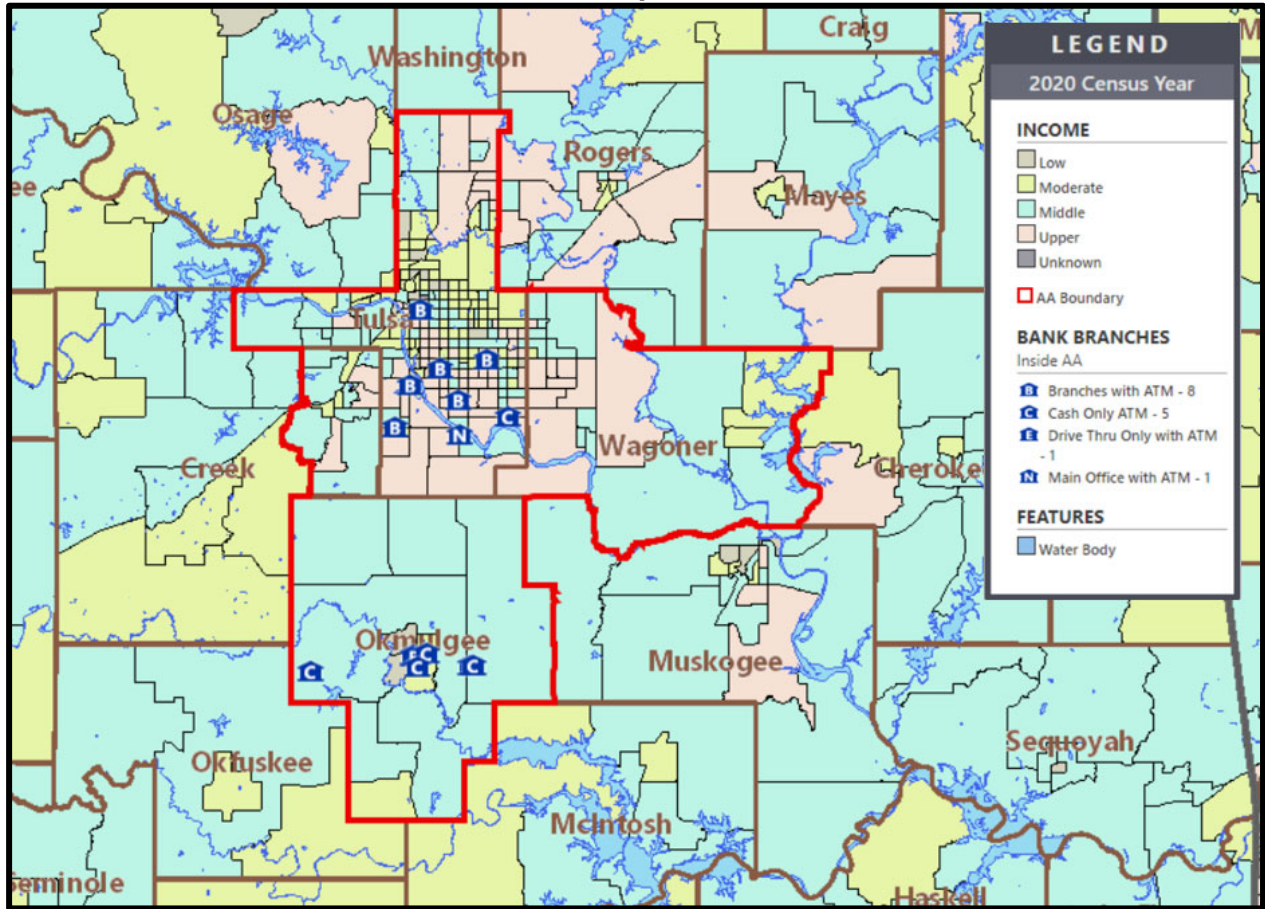
**APPENDIX A – SCOPE OF EXAMINATION**

**Table A-1**

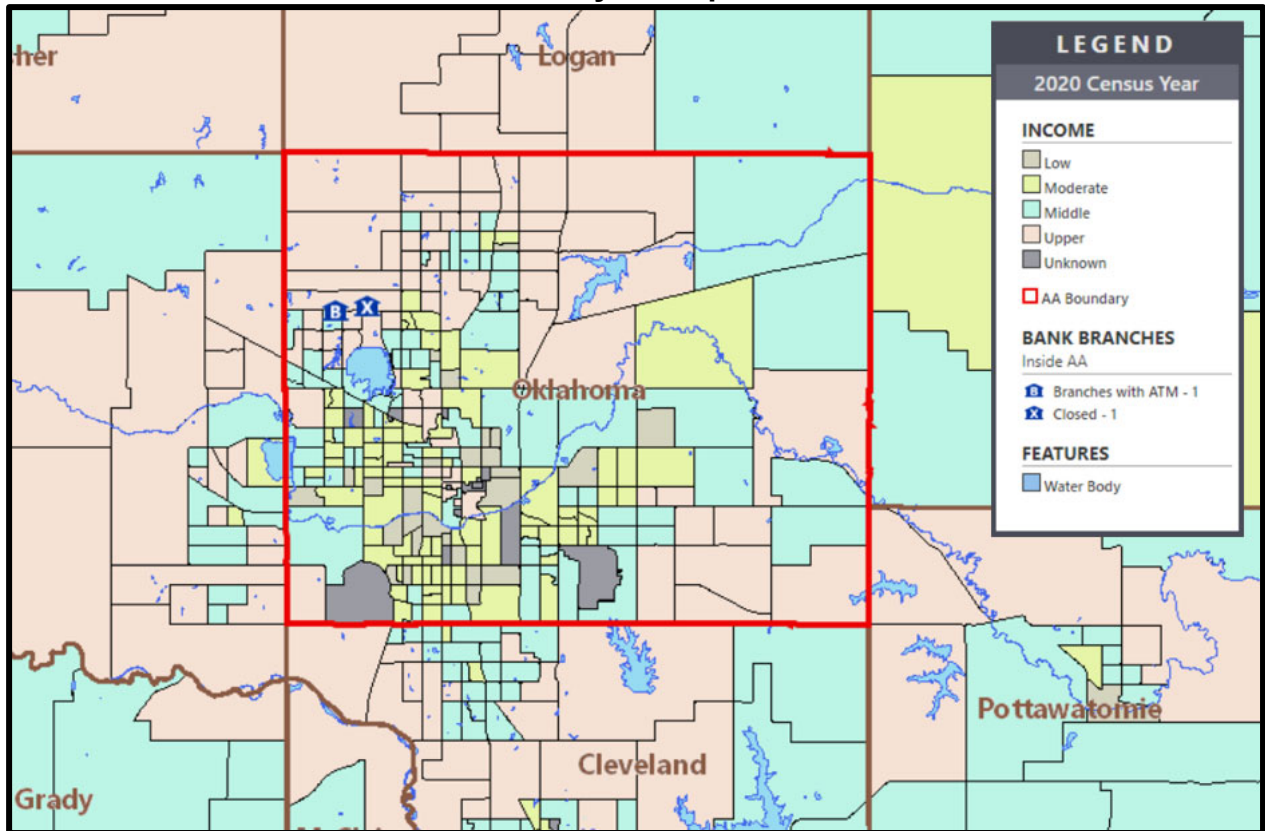
Scope of Examination			
<b><u>Financial Institution</u></b> Mabrey Bank Bixby, Oklahoma	<b><u>Products/Services Reviewed</u></b> <ul style="list-style-type: none"> <li>• Home Purchase Loans</li> <li>• Home Refinance Loans</li> <li>• Home Improvement Loans</li> <li>• Multifamily Loans</li> <li>• Small Business Loans</li> <li>• Small Farm Loans</li> <li>• Community Development Loans</li> <li>• Qualified Investments and Donations</li> <li>• Community Development Services</li> </ul>		
<b><u>Time Period</u></b>			
<u>HMDA LAR:</u>		January 1, 2020 to December 31, 2022	
<u>CRA Small Business and Farm Loans:</u>		January 1, 2022 to December 31, 2022	
<u>Community Development Activities:</u>		October 8, 2019 to December 31, 2022	
List of Affiliates Considered in this Evaluation			
Affiliates	Affiliate Relationship	Products Reviewed	
None	None	None	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
<u>Oklahoma</u>			
MSA 46140 Tulsa Metropolitan	Full Review		
MSA 36420 Oklahoma City Metropolitan	Limited Review	None	3 prior
	Full Review	None	none
MSA 99999 Eastern Oklahoma		None	1 prior

APPENDIX B – MAPS OF THE ASSESSMENT AREAS

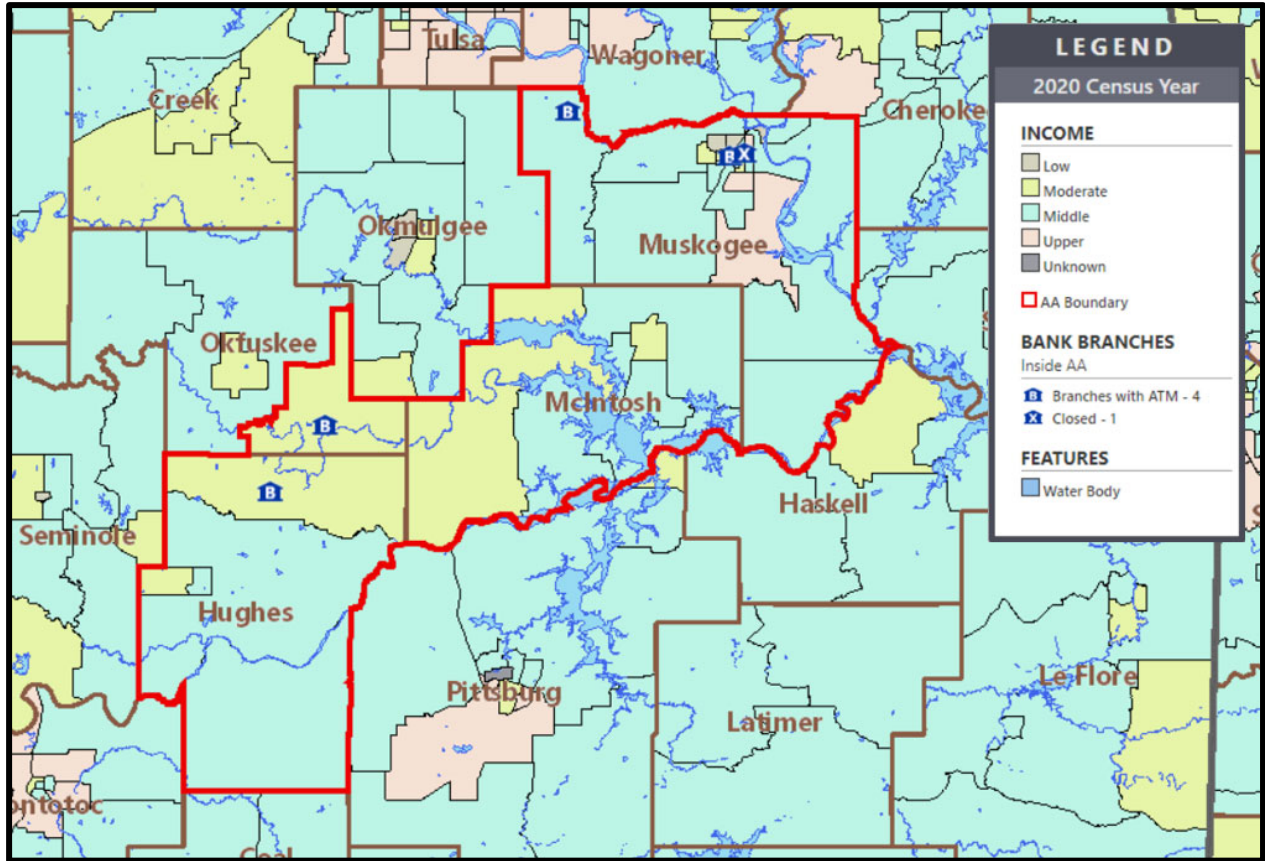
Tulsa Metropolitan AA



Oklahoma City Metropolitan AA



Eastern Oklahoma AA





**APPENDIX C – 2020 and 2021 HMDA TABLES**  
**Table C-1**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Tulsa Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$(000)	%	%	#	%	#	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	16	6.6	1.1	1,279	3.3	0.4	3	2.3	1.2	242	1.1	0.5	3.5
Moderate	84	34.9	13.5	6,847	17.5	8.4	35	26.3	14.9	2,848	12.7	9.5	21.1
Middle	89	36.9	39.5	14,621	37.3	35.4	64	48.1	39.3	8,186	36.4	35.6	39.5
Upper	52	21.6	45.8	16,425	41.9	55.8	31	23.3	44.5	11,226	49.9	54.3	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>241</b>	<b>100.0</b>	<b>100.0</b>	<b>39,172</b>	<b>100.0</b>	<b>100.0</b>	<b>133</b>	<b>100.0</b>	<b>100.0</b>	<b>22,502</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	2	2.4	0.4	55	0.2	0.2	1	2.0	0.6	83	0.8	0.3	3.5
Moderate	12	14.1	8.8	1,279	5.1	5.5	9	18.0	10.6	1,204	11.0	6.8	21.1
Middle	37	43.5	34.9	5,984	23.8	30.3	29	58.0	38.3	5,359	48.9	33.7	39.5
Upper	34	40.0	55.9	17,798	70.9	64.0	11	22.0	50.4	4,315	39.4	59.2	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>85</b>	<b>100.0</b>	<b>100.0</b>	<b>25,116</b>	<b>100.0</b>	<b>100.0</b>	<b>50</b>	<b>100.0</b>	<b>100.0</b>	<b>10,961</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.2	0	0.0	0.6	0	0.0	2.2	0	0.0	1.5	3.5
Moderate	2	40.0	15.2	56	15.8	12.0	1	10.0	14.7	59	7.5	11.7	21.1
Middle	0	0.0	33.8	0	0.0	29.5	8	80.0	37.5	670	84.8	34.2	39.5
Upper	3	60.0	49.8	298	84.2	57.9	1	10.0	45.5	61	7.7	52.6	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>354</b>	<b>100.0</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>790</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	14.3	0	0.0	4.5	0	0.0	5.1	0	0.0	3.1	
Moderate	5	50.0	44.4	1,698	32.2	49.4	2	28.6	46.4	950	28.5	46.2	36.2
Middle	5	50.0	31.6	3,573	67.8	37.9	5	71.4	36.2	2,384	71.5	30.2	32.2
Upper	0	0.0	9.8	0	0.0	8.2	0	0.0	12.3	0	0.0	20.6	21.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>5,271</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>3,334</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	18	5.2	0.8	1,334	1.9	0.5	4	1.9	1.0	325	0.8	0.6	
Moderate	103	29.9	11.9	9,880	14.1	8.7	47	22.8	13.3	5,061	13.1	10.3	21.1
Middle	134	39.0	37.4	24,442	34.8	33.1	111	53.9	38.9	17,530	45.4	34.6	39.5
Upper	89	25.9	49.8	34,521	49.2	57.7	44	21.4	46.8	15,672	40.6	54.5	36.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>344</b>	<b>100.0</b>	<b>100.0</b>	<b>70,177</b>	<b>100.0</b>	<b>100.0</b>	<b>206</b>	<b>100.0</b>	<b>100.0</b>	<b>38,588</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.  
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

**Table C-2**

<b>Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Tulsa Metropolitan</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2020</b>						<b>2021</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>													
<b>Low</b>	35	14.5	5.3	3,156	8.1	2.9	7	5.3	6.1	908	4.0	3.5	21.9
<b>Moderate</b>	60	24.9	19.7	6,195	15.8	14.4	21	15.8	18.0	2,449	10.9	13.5	17.3
<b>Middle</b>	46	19.1	20.9	5,893	15.0	19.2	21	15.8	19.3	2,542	11.3	18.2	20.1
<b>Upper</b>	58	24.1	37.2	17,264	44.1	48.5	40	30.1	30.6	9,614	42.7	40.0	40.7
<b>Unknown</b>	42	17.4	16.9	6,664	17.0	15.0	44	33.1	26.1	6,989	31.1	24.8	0.0
<b>Total</b>	241	100.0	100.0	39,172	100.0	100.0	133	100.0	100.0	22,502	100.0	100.0	100.0
<b>Refinance Loans</b>													
<b>Low</b>	4	4.7	3.0	141	0.6	1.4	1	2.0	5.3	108	1.0	2.8	21.9
<b>Moderate</b>	6	7.1	10.7	387	1.5	6.5	6	12.0	14.5	688	6.3	9.8	17.3
<b>Middle</b>	5	5.9	16.5	585	2.3	12.3	7	14.0	18.0	813	7.4	14.9	20.1
<b>Upper</b>	49	57.6	48.4	18,575	74.0	58.4	21	42.0	36.6	6,779	61.8	45.6	40.7
<b>Unknown</b>	21	24.7	21.4	5,428	21.6	21.4	15	30.0	25.6	2,573	23.5	26.8	0.0
<b>Total</b>	85	100.0	100.0	25,116	100.0	100.0	50	100.0	100.0	10,961	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	0	0.0	5.4	0	0.0	3.4	0	0.0	5.6	0	0.0	3.0	21.9
<b>Moderate</b>	0	0.0	13.5	0	0.0	10.5	0	0.0	14.2	0	0.0	10.6	17.3
<b>Middle</b>	1	20.0	18.5	36	10.2	15.0	1	10.0	17.9	64	8.1	14.8	20.1
<b>Upper</b>	3	60.0	53.7	246	69.5	60.4	8	80.0	51.1	594	75.2	60.2	40.7
<b>Unknown</b>	1	20.0	8.9	72	20.3	10.7	1	10.0	11.2	132	16.7	11.2	0.0
<b>Total</b>	5	100.0	100.0	354	100.0	100.0	10	100.0	100.0	790	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	39	11.7	4.1	3,297	5.1	2.2	10	5.0	5.7	1,127	3.2	3.2	21.9
<b>Moderate</b>	66	19.8	15.0	6,582	10.1	10.5	28	14.1	16.2	3,173	9.0	11.9	17.3
<b>Middle</b>	53	15.9	18.3	6,675	10.3	15.6	30	15.1	18.4	3,644	10.3	16.7	20.1
<b>Upper</b>	111	33.2	41.4	36,146	55.7	52.2	71	35.7	33.7	17,616	50.0	42.5	40.7
<b>Unknown</b>	65	19.5	21.1	12,206	18.8	19.5	60	30.2	26.0	9,694	27.5	25.7	0.0
<b>Total</b>	334	100.0	100.0	64,906	100.0	100.0	199	100.0	100.0	35,254	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>													

**Table C-3**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Eastern Oklahoma													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.7	0	0.0	0.7	0	0.0	0.9	0	0.0	0.9	1.5
Moderate	3	14.3	15.9	147	7.6	13.5	8	40.0	16.8	612	35.1	14.9	22.2
Middle	15	71.4	53.7	1,494	77.6	52.3	10	50.0	53.7	1,011	57.9	53.8	55.3
Upper	3	14.3	29.6	284	14.8	33.4	2	10.0	28.6	123	7.0	30.4	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>1,925</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>1,746</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	14.3	0.6	226	16.4	0.6	0	0.0	0.8	0	0.0	0.5	1.5
Moderate	2	28.6	14.1	635	45.9	12.0	2	25.0	12.7	230	16.1	11.8	22.2
Middle	3	42.9	51.4	480	34.7	52.6	6	75.0	53.6	1,200	83.9	53.9	55.3
Upper	1	14.3	33.9	41	3.0	34.9	0	0.0	32.8	0	0.0	33.8	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,382</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,430</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	3.3	0	0.0	1.0	0	0.0	0.0	0	0.0	0.0	1.5
Moderate	4	36.4	18.5	120	22.4	18.8	1	14.3	17.0	15	3.7	12.2	22.2
Middle	4	36.4	42.4	206	38.5	40.5	3	42.9	53.4	251	61.4	58.6	55.3
Upper	3	27.3	35.9	209	39.1	39.7	3	42.9	29.5	143	35.0	29.2	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>535</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>409</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	16.7	0	0.0	46.7	0	0.0	12.5	0	0.0	25.8	10.3
Moderate	1	100.0	58.3	641	100.0	37.9	1	100.0	50.0	385	100.0	45.5	28.7
Middle	0	0.0	25.0	0	0.0	15.5	0	0.0	18.8	0	0.0	10.2	29.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	18.8	0	0.0	18.4	31.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>641</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>385</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	1	2.5	0.8	226	5.0	1.2	0	0.0	0.9	0	0.0	1.5	1.5
Moderate	10	25.0	15.9	1,543	34.4	13.3	12	33.3	15.4	1,242	31.3	14.6	22.2
Middle	22	55.0	52.1	2,180	48.6	51.8	19	52.8	54.0	2,462	62.0	52.9	55.3
Upper	7	17.5	31.1	534	11.9	33.7	5	13.9	29.7	266	6.7	31.1	21.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>4,483</b>	<b>100.0</b>	<b>100.0</b>	<b>36</b>	<b>100.0</b>	<b>100.0</b>	<b>3,970</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.  
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

**Table C-4**

<b>Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Eastern Oklahoma</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2020</b>						<b>2021</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Home Purchase Loans</b>													
<b>Low</b>	2	9.5	6.1	90	4.7	3.3	1	5.0	4.4	60	3.4	2.4	24.8
<b>Moderate</b>	2	9.5	17.6	71	3.7	13.1	4	20.0	15.8	219	12.5	11.5	17.3
<b>Middle</b>	3	14.3	17.8	393	20.4	17.3	2	10.0	17.9	275	15.8	16.7	20.7
<b>Upper</b>	13	61.9	38.7	1,327	68.9	48.6	7	35.0	32.7	787	45.1	41.5	37.1
<b>Unknown</b>	1	4.8	19.9	44	2.3	17.7	6	30.0	29.1	405	23.2	27.9	0.0
<b>Total</b>	21	100.0	100.0	1,925	100.0	100.0	20	100.0	100.0	1,746	100.0	100.0	100.0
<b>Refinance Loans</b>													
<b>Low</b>	0	0.0	3.0	0	0.0	1.2	1	12.5	3.8	45	3.1	2.0	24.8
<b>Moderate</b>	0	0.0	7.8	0	0.0	4.3	1	12.5	9.5	49	3.4	6.2	17.3
<b>Middle</b>	1	14.3	16.4	41	3.0	13.3	0	0.0	17.9	0	0.0	15.3	20.7
<b>Upper</b>	6	85.7	47.2	1,341	97.0	52.4	5	62.5	40.0	1,167	81.6	47.2	37.1
<b>Unknown</b>	0	0.0	25.5	0	0.0	28.8	1	12.5	28.8	169	11.8	29.3	0.0
<b>Total</b>	7	100.0	100.0	1,382	100.0	100.0	8	100.0	100.0	1,430	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	1	9.1	2.2	23	4.3	1.1	0	0.0	1.1	0	0.0	0.7	24.8
<b>Moderate</b>	1	9.1	16.3	52	9.7	15.3	1	14.3	17.0	15	3.7	11.9	17.3
<b>Middle</b>	2	18.2	15.2	53	9.9	7.7	3	42.9	25.0	251	61.4	30.1	20.7
<b>Upper</b>	5	45.5	57.6	281	52.5	65.5	3	42.9	44.3	143	35.0	47.7	37.1
<b>Unknown</b>	2	18.2	8.7	126	23.6	10.2	0	0.0	12.5	0	0.0	9.6	0.0
<b>Total</b>	11	100.0	100.0	535	100.0	100.0	7	100.0	100.0	409	100.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	3	7.7	4.7	113	2.9	2.4	2	5.7	4.0	105	2.9	2.2	24.8
<b>Moderate</b>	3	7.7	13.2	123	3.2	9.2	6	17.1	13.3	283	7.9	9.4	17.3
<b>Middle</b>	6	15.4	16.6	487	12.7	15.1	5	14.3	18.0	526	14.7	16.3	20.7
<b>Upper</b>	24	61.5	41.2	2,949	76.8	49.6	15	42.9	35.6	2,097	58.5	43.7	37.1
<b>Unknown</b>	3	7.7	24.3	170	4.4	23.7	7	20.0	29.1	574	16.0	28.4	0.0
<b>Total</b>	39	100.0	100.0	3,842	100.0	100.0	35	100.0	100.0	3,585	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.</p>													

**APPENDIX D – DEMOGRAPHIC INFORMATION**  
**Table D-1**

2022 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	15	5.8	10,618	5.3	4,248	40.0	42,962	21.5
Moderate	76	29.6	52,746	26.3	9,532	18.1	34,826	17.4
Middle	78	30.4	62,185	31.1	4,849	7.8	38,847	19.4
Upper	87	33.9	74,532	37.2	2,671	3.6	83,581	41.7
Unknown	1	0.4	135	0.1	26	19.3	0	0.0
<b>Total AA</b>	<b>257</b>	<b>100.0</b>	<b>200,216</b>	<b>100.0</b>	<b>21,326</b>	<b>10.7</b>	<b>200,216</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	22,505	6,579	3.4	29.2	12,362	54.9	3,564	15.8
Moderate	105,006	42,954	21.9	40.9	46,491	44.3	15,561	14.8
Middle	110,867	64,832	33.1	58.5	34,474	31.1	11,561	10.4
Upper	111,774	81,277	41.5	72.7	22,768	20.4	7,729	6.9
Unknown	1,185	104	0.1	8.8	796	67.2	285	24.1
<b>Total AA</b>	<b>351,337</b>	<b>195,746</b>	<b>100.0</b>	<b>55.7</b>	<b>116,891</b>	<b>33.3</b>	<b>38,700</b>	<b>11.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,838	4.3	1,590	4.1	233	6.8	15	3.7
Moderate	10,958	25.5	9,729	24.9	1,137	33.2	92	22.5
Middle	13,672	31.8	12,342	31.5	1,189	34.7	141	34.6
Upper	16,446	38.3	15,426	39.4	861	25.1	159	39.0
Unknown	56	0.1	46	0.1	9	0.3	1	0.2
<b>Total AA</b>	<b>42,970</b>	<b>100.0</b>	<b>39,133</b>	<b>100.0</b>	<b>3,429</b>	<b>100.0</b>	<b>408</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.1</b>		<b>8.0</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6	1.2	6	1.2	0	0.0	0	0.0
Moderate	58	11.9	57	11.9	1	16.7	0	0.0
Middle	206	42.1	204	42.4	2	33.3	0	0.0
Upper	219	44.8	214	44.5	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>489</b>	<b>100.0</b>	<b>481</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.4</b>		<b>1.2</b>		<b>0.4</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-2**

2021 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	7.8	10,765	5.5	4,413	41.0	43,214	21.9
Moderate	66	30.3	49,327	25.0	10,139	20.6	34,164	17.3
Middle	76	34.9	73,436	37.3	6,434	8.8	39,538	20.1
Upper	59	27.1	63,562	32.3	2,534	4.0	80,174	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>218</b>	<b>100.0</b>	<b>197,090</b>	<b>100.0</b>	<b>23,520</b>	<b>11.9</b>	<b>197,090</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	22,903	6,671	3.5	29.1	12,302	53.7	3,930	17.2
Moderate	96,631	39,937	21.1	41.3	42,443	43.9	14,251	14.7
Middle	125,090	74,796	39.5	59.8	38,783	31.0	11,511	9.2
Upper	94,625	68,186	36.0	72.1	19,746	20.9	6,693	7.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>339,249</b>	<b>189,590</b>	<b>100.0</b>	<b>55.9</b>	<b>113,274</b>	<b>33.4</b>	<b>36,385</b>	<b>10.7</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,578	3.6	1,364	3.4	202	5.7	12	3.5
Moderate	10,100	23.0	8,902	22.2	1,121	31.8	77	22.2
Middle	16,527	37.6	15,052	37.5	1,354	38.4	121	34.9
Upper	15,803	35.9	14,816	36.9	850	24.1	137	39.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>44,008</b>	<b>100.0</b>	<b>40,134</b>	<b>100.0</b>	<b>3,527</b>	<b>100.0</b>	<b>347</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.2</b>		<b>8.0</b>		<b>0.8</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	1.6	7	1.4	1	14.3	0	0.0
Moderate	64	12.5	63	12.5	1	14.3	0	0.0
Middle	264	51.6	260	51.7	4	57.1	0	0.0
Upper	176	34.4	173	34.4	1	14.3	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>512</b>	<b>100.0</b>	<b>503</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.2</b>		<b>1.4</b>		<b>0.4</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-3**

2020 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	7.8	10,765	5.5	4,413	41.0	43,214	21.9
Moderate	66	30.3	49,327	25.0	10,139	20.6	34,164	17.3
Middle	76	34.9	73,436	37.3	6,434	8.8	39,538	20.1
Upper	59	27.1	63,562	32.3	2,534	4.0	80,174	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>218</b>	<b>100.0</b>	<b>197,090</b>	<b>100.0</b>	<b>23,520</b>	<b>11.9</b>	<b>197,090</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	22,903	6,671	3.5	29.1	12,302	53.7	3,930	17.2
Moderate	96,631	39,937	21.1	41.3	42,443	43.9	14,251	14.7
Middle	125,090	74,796	39.5	59.8	38,783	31.0	11,511	9.2
Upper	94,625	68,186	36.0	72.1	19,746	20.9	6,693	7.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>339,249</b>	<b>189,590</b>	<b>100.0</b>	<b>55.9</b>	<b>113,274</b>	<b>33.4</b>	<b>36,385</b>	<b>10.7</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,572	3.5	1,357	3.3	202	5.5	13	3.9
Moderate	10,275	22.8	9,044	22.1	1,158	31.6	73	21.8
Middle	16,812	37.4	15,278	37.3	1,421	38.7	113	33.7
Upper	16,327	36.3	15,304	37.3	887	24.2	136	40.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>44,986</b>	<b>100.0</b>	<b>40,983</b>	<b>100.0</b>	<b>3,668</b>	<b>100.0</b>	<b>335</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.1</b>		<b>8.2</b>		<b>0.7</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8	1.5	7	1.3	1	14.3	0	0.0
Moderate	66	12.4	66	12.6	0	0.0	0	0.0
Middle	268	50.2	265	50.5	3	42.9	0	0.0
Upper	192	36.0	187	35.6	3	42.9	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>534</b>	<b>100.0</b>	<b>525</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.3</b>		<b>0.4</b>
<i>Source: 2020 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Table D-4**

2022 Eastern Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	5.9	566	2.2	224	39.6	6,457	25.0
Moderate	8	23.5	6,325	24.5	1,406	22.2	4,950	19.1
Middle	21	61.8	16,420	63.5	2,214	13.5	5,240	20.3
Upper	3	8.8	2,545	9.8	263	10.3	9,209	35.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>34</b>	<b>100.0</b>	<b>25,856</b>	<b>100.0</b>	<b>4,107</b>	<b>15.9</b>	<b>25,856</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	1,529	501	1.8	32.8	671	43.9	357	23.3
Moderate	12,942	5,648	20.8	43.6	4,254	32.9	3,040	23.5
Middle	33,979	18,332	67.4	54.0	6,826	20.1	8,821	26.0
Upper	3,670	2,737	10.1	74.6	599	16.3	334	9.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>52,120</b>	<b>27,218</b>	<b>100.0</b>	<b>52.2</b>	<b>12,350</b>	<b>23.7</b>	<b>12,552</b>	<b>24.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	451	14.3	393	14.0	54	19.6	4	5.5
Moderate	767	24.3	683	24.4	65	23.6	19	26.0
Middle	1,676	53.2	1,494	53.3	136	49.5	46	63.0
Upper	257	8.2	233	8.3	20	7.3	4	5.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,151</b>	<b>100.0</b>	<b>2,803</b>	<b>100.0</b>	<b>275</b>	<b>100.0</b>	<b>73</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.0</b>		<b>8.7</b>		<b>2.3</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.5	2	1.5	0	0.0	0	0.0
Moderate	29	21.2	29	21.3	0	0.0	0	0.0
Middle	100	73.0	99	72.8	0	0.0	1	100.0
Upper	6	4.4	6	4.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>137</b>	<b>100.0</b>	<b>136</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>99.3</b>		<b>0.0</b>		<b>0.7</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.



**Table D-5**

2021 Eastern Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	7.1	750	2.8	295	39.3	6,697	24.8
Moderate	8	28.6	6,694	24.8	1,672	25.0	4,673	17.3
Middle	13	46.4	14,075	52.2	1,976	14.0	5,596	20.7
Upper	5	17.9	5,468	20.3	587	10.7	10,021	37.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>28</b>	<b>100.0</b>	<b>26,987</b>	<b>100.0</b>	<b>4,530</b>	<b>16.8</b>	<b>26,987</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	1,578	431	1.5	27.3	809	51.3	338	21.4
Moderate	13,721	6,264	22.2	45.7	4,130	30.1	3,327	24.2
Middle	27,284	15,585	55.3	57.1	4,787	17.5	6,912	25.3
Upper	9,127	5,912	21.0	64.8	2,099	23.0	1,116	12.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>51,710</b>	<b>28,192</b>	<b>100.0</b>	<b>54.5</b>	<b>11,825</b>	<b>22.9</b>	<b>11,693</b>	<b>22.6</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	469	15.1	407	14.8	58	21.1	4	5.8
Moderate	967	31.2	863	31.3	81	29.5	23	33.3
Middle	1,134	36.6	1,000	36.3	104	37.8	30	43.5
Upper	528	17.0	484	17.6	32	11.6	12	17.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,098</b>	<b>100.0</b>	<b>2,754</b>	<b>100.0</b>	<b>275</b>	<b>100.0</b>	<b>69</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.9</b>		<b>8.9</b>		<b>2.2</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	2	1.5	2	1.5	0	0.0	0	0.0
Moderate	33	25.0	33	25.4	0	0.0	0	0.0
Middle	78	59.1	77	59.2	0	0.0	1	100.0
Upper	19	14.4	18	13.8	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>132</b>	<b>100.0</b>	<b>130</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.5</b>		<b>0.8</b>		<b>0.8</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-6**

2020 Eastern Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	7.1	750	2.8	295	39.3	6,697	24.8
Moderate	8	28.6	6,694	24.8	1,672	25.0	4,673	17.3
Middle	13	46.4	14,075	52.2	1,976	14.0	5,596	20.7
Upper	5	17.9	5,468	20.3	587	10.7	10,021	37.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>28</b>	<b>100.0</b>	<b>26,987</b>	<b>100.0</b>	<b>4,530</b>	<b>16.8</b>	<b>26,987</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	1,578	431	1.5	27.3	809	51.3	338	21.4
Moderate	13,721	6,264	22.2	45.7	4,130	30.1	3,327	24.2
Middle	27,284	15,585	55.3	57.1	4,787	17.5	6,912	25.3
Upper	9,127	5,912	21.0	64.8	2,099	23.0	1,116	12.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>51,710</b>	<b>28,192</b>	<b>100.0</b>	<b>54.5</b>	<b>11,825</b>	<b>22.9</b>	<b>11,693</b>	<b>22.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	474	14.9	408	14.4	62	21.6	4	6.1
Moderate	983	30.9	879	31.1	84	29.3	20	30.3
Middle	1,166	36.7	1,030	36.5	106	36.9	30	45.5
Upper	555	17.5	508	18.0	35	12.2	12	18.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,178</b>	<b>100.0</b>	<b>2,825</b>	<b>100.0</b>	<b>287</b>	<b>100.0</b>	<b>66</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>88.9</b>	<b>9.0</b>	<b>2.1</b>		
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2	1.5	2	1.5	0	0.0	0	0.0
Moderate	30	22.7	30	23.1	0	0.0	0	0.0
Middle	77	58.3	76	58.5	0	0.0	1	100.0
Upper	23	17.4	22	16.9	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>132</b>	<b>100.0</b>	<b>130</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.5</b>	<b>0.8</b>	<b>0.8</b>		
<i>Source: 2020 FFIEC Census Data 2020 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

**APPENDIX E – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES  
Table E-1**

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Oklahoma City Metropolitan					
Geographic Income Level	Bank Loans*				Owner Occupied Units %
	#	#%	\$(000)	%	
<b>Home Purchase Loans</b>					
Low	1	6.3	120	4.2	5.9
Moderate	4	25.0	580	20.2	26.4
Middle	8	50.0	1,682	58.6	31.8
Upper	3	18.8	490	17.1	34.7
Unknown	0	0.0	0	0.0	1.3
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>2,872</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>					
Low	1	12.5	116	6.5	5.9
Moderate	1	12.5	86	4.8	26.4
Middle	3	37.5	497	28.0	31.8
Upper	3	37.5	1,075	60.6	34.7
Unknown	0	0.0	0	0.0	1.3
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>1,774</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>					
Low	0	0.0	0	0.0	5.9
Moderate	1	50.0	158	55.2	26.4
Middle	1	50.0	128	44.8	31.8
Upper	0	0.0	0	0.0	34.7
Unknown	0	0.0	0	0.0	1.3
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>286</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>					<b>Multi-family Units %</b>
Low	0	0.0	0	0.0	8.1
Moderate	0	0.0	0	0.0	41.3
Middle	2	100.0	3,691	100.0	27.9
Upper	0	0.0	0	0.0	18.6
Unknown	0	0.0	0	0.0	4.1
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>3,691</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>					<b>Owner Occupied Units %</b>
Low	2	6.9	236	2.7	5.9
Moderate	6	20.7	824	9.5	26.4
Middle	14	48.3	5,998	69.0	31.8
Upper	7	24.1	1,638	18.8	34.7
Unknown	0	0.0	0	0.0	1.3
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>29</b>	<b>100.0</b>	<b>8,696</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.					

**Table E-2**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Oklahoma City Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	%	\$(000)	%	#	%	#	%	\$(000)	%	
<b>Home Purchase Loans</b>													
Low	1	8.3	3.6	210	12.2	2.0	1	16.7	4.2	396	20.4	2.4	6.1
Moderate	3	25.0	18.9	351	20.4	12.0	0	0.0	19.5	0	0.0	12.4	25.8
Middle	5	41.7	28.8	673	39.2	23.8	2	33.3	28.8	187	9.7	23.5	32.5
Upper	3	25.0	48.6	483	28.1	61.9	3	50.0	47.3	1,354	69.9	61.3	35.4
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	0	0.0	0.4	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>1,717</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,937</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	6	31.6	1.8	435	17.4	0.8	2	18.2	2.2	426	23.8	1.3	6.1
Moderate	8	42.1	12.0	637	25.6	6.9	6	54.5	15.2	803	44.8	9.5	25.8
Middle	2	10.5	26.2	718	28.8	19.6	2	18.2	29.9	215	12.0	23.2	32.5
Upper	3	15.8	59.8	703	28.2	72.2	1	9.1	52.6	349	19.5	65.8	35.4
Unknown	0	0.0	0.3	0	0.0	0.4	0	0.0	0.2	0	0.0	0.3	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>2,493</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,793</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	5.1	0	0.0	3.6	0	0.0	4.6	0	0.0	2.9	6.1
Moderate	0	0.0	16.7	0	0.0	11.9	0	0.0	17.5	0	0.0	12.8	25.8
Middle	0	0.0	33.1	0	0.0	24.4	0	0.0	28.8	0	0.0	21.9	32.5
Upper	0	0.0	44.9	0	0.0	59.4	0	0.0	49.0	0	0.0	62.3	35.4
Unknown	0	0.0	0.2	0	0.0	0.7	0	0.0	0.2	0	0.0	0.2	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	13.8	0	0.0	5.7	0	0.0	17.4	0	0.0	6.4	11.4
Moderate	0	0.0	50.0	0	0.0	32.1	0	0.0	47.5	0	0.0	46.3	43.7
Middle	0	0.0	20.5	0	0.0	29.4	0	0.0	22.4	0	0.0	18.6	28.7
Upper	0	0.0	14.7	0	0.0	32.0	1	100.0	12.4	1,020	100.0	23.6	14.4
Unknown	0	0.0	0.9	0	0.0	0.8	0	0.0	0.4	0	0.0	5.2	1.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,020</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	7	22.6	3.0	645	15.3	1.8	3	16.7	3.4	822	17.3	2.3	6.1
Moderate	11	35.5	16.4	988	23.5	11.4	6	33.3	17.9	803	16.9	13.9	25.8
Middle	7	22.6	27.9	1,391	33.0	22.6	4	22.2	29.4	402	8.5	23.1	32.5
Upper	6	19.4	52.5	1,186	28.2	63.9	5	27.8	49.0	2,723	57.3	60.1	35.4
Unknown	0	0.0	0.2	0	0.0	0.4	0	0.0	0.2	0	0.0	0.7	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>4,210</b>	<b>100.0</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>4,750</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.  
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

**Table E-3**

Distribution of 2022 Small Business Lending By Income Level of Geography					
Assessment Area: Oklahoma City Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	6.5
Moderate	2	13.3	1,850	25.5	27.3
Middle	2	13.3	1,830	25.2	28.6
Upper	11	73.3	3,575	49.3	34.4
Unknown	0	0.0	0	0.0	3.2
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>7,255</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table E-4**

Distribution of 2022 Small Farm Lending By Income Level of Geography					
Assessment Area: Oklahoma City Metropolitan					
Geographic Income Level	Bank Loans				Total Farms %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	4.3
Moderate	0	0.0	0	0.0	20.9
Middle	0	0.0	0	0.0	26.0
Upper	0	0.0	0	0.0	48.5
Unknown	0	0.0	0	0.0	0.3
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table E-5**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level Assessment Area: Oklahoma City Metropolitan					
Borrower Income Level	Bank Loans*				Families by Family Income %
	#	#%	\$(000)	%	
<b>Home Purchase Loans</b>					
Low	0	0.0	0	0.0	24.1
Moderate	0	0.0	0	0.0	18.7
Middle	0	0.0	0	0.0	18.8
Upper	1	6.3	547	19.0	38.4
Unknown	15	93.8	2,325	81.0	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>2,872</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>					
Low	0	0.0	0	0.0	24.1
Moderate	0	0.0	0	0.0	18.7
Middle	1	12.5	98	5.5	18.8
Upper	2	25.0	977	55.1	38.4
Unknown	5	62.5	699	39.4	0.0
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>1,774</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>					
Low	0	0.0	0	0.0	24.1
Moderate	0	0.0	0	0.0	18.7
Middle	0	0.0	0	0.0	18.8
Upper	0	0.0	0	0.0	38.4
Unknown	2	100.0	286	100.0	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>286</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>					
Low	0	0.0	0	0.0	24.1
Moderate	0	0.0	0	0.0	18.7
Middle	1	3.7	98	2.0	18.8
Upper	4	14.8	1,597	31.9	38.4
Unknown	22	81.5	3,310	66.1	0.0
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>5,005</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding. *Aggregate data is not currently available.					
Multifamily loans are not included in the borrower distribution analysis.					
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.					

**Table E-6**

**Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level**  
**Assessment Area: Oklahoma City Metropolitan**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	6.8	0	0.0	3.8	0	0.0	5.7	0	0.0	3.1	24.7
Moderate	6	50.0	18.7	695	40.5	13.9	0	0.0	15.4	0	0.0	11.1	17.9
Middle	2	16.7	18.2	193	11.2	17.3	0	0.0	15.5	0	0.0	14.4	19.1
Upper	4	33.3	33.7	829	48.3	45.9	6	100.0	31.6	1,937	100.0	42.7	38.3
Unknown	0	0.0	22.5	0	0.0	19.2	0	0.0	31.8	0	0.0	28.8	0.0
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>1,717</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,937</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	3.7	0	0.0	1.5	0	0.0	4.5	0	0.0	2.1	24.7
Moderate	0	0.0	10.6	0	0.0	6.1	0	0.0	12.4	0	0.0	7.7	17.9
Middle	0	0.0	14.7	0	0.0	11.0	0	0.0	16.6	0	0.0	12.9	19.1
Upper	6	31.6	43.1	1,502	60.2	53.3	1	9.1	36.2	349	19.5	45.7	38.3
Unknown	13	68.4	27.9	991	39.8	28.1	10	90.9	30.4	1,444	80.5	31.7	0.0
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>2,493</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>1,793</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	7.3	0	0.0	3.6	0	0.0	6.8	0	0.0	3.4	24.7
Moderate	0	0.0	13.6	0	0.0	9.7	0	0.0	12.0	0	0.0	8.0	17.9
Middle	0	0.0	19.8	0	0.0	13.2	0	0.0	19.6	0	0.0	14.4	19.1
Upper	0	0.0	46.1	0	0.0	58.8	0	0.0	50.2	0	0.0	58.1	38.3
Unknown	0	0.0	13.2	0	0.0	14.7	0	0.0	11.4	0	0.0	16.1	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	5.3	0	0.0	2.6	0	0.0	5.2	0	0.0	2.7	24.7
Moderate	6	19.4	14.5	695	16.5	10.0	0	0.0	13.8	0	0.0	9.6	17.9
Middle	2	6.5	16.1	193	4.6	14.0	0	0.0	15.9	0	0.0	13.7	19.1
Upper	10	32.3	36.9	2,331	55.4	48.5	7	41.2	33.8	2,286	61.3	43.9	38.3
Unknown	13	41.9	27.3	991	23.5	24.9	10	58.8	31.3	1,444	38.7	30.2	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>4,210</b>	<b>100.0</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>3,730</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

Multifamily loans are not included in the borrower distribution analysis.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

**Table E-7**

Distribution of 2022 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Oklahoma City Metropolitan					
	Bank Loans				Total Businesses
	#	%	\$(000)	%	
<b>By Revenue</b>					
\$1 Million or Less	3	20.0	629	8.7	90.3
Over \$1 Million	10	66.7	5,671	78.2	8.4
Revenue Unknown	2	13.3	955	13.2	1.3
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>7,255</b>	<b>100.0</b>	<b>100.0</b>
<b>By Loan Size</b>					
\$100,000 or Less	2	13.3	79	1.1	
\$100,001 - \$250,000	5	33.3	786	10.8	
\$250,001 - \$1 Million	8	53.3	6,390	88.1	
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>7,255</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	2	66.7	329	52.3	
\$250,001 - \$1 Million	1	33.3	300	47.7	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>629</b>	<b>100.0</b>	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

**Table E-8**

Distribution of 2022 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Oklahoma City Metropolitan					
	Bank Loans				Total Farms %
	#	%	\$(000)	%	
<b>By Revenue</b>					
\$1 Million or Less	0	0.0	0	0.0	97.7
Over \$1 Million	0	0.0	0	0.0	2.3
Revenue Unknown	0	0.0	0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>
<b>By Loan Size</b>					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0	0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					



**Table E-9**

2022 Oklahoma City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	26	9.8	15,253	8.1	4,903	32.1	45,154	24.1
Moderate	85	32.0	55,307	29.5	9,430	17.1	34,969	18.7
Middle	73	27.4	55,451	29.6	4,480	8.1	35,206	18.8
Upper	67	25.2	58,427	31.2	1,893	3.2	71,957	38.4
Unknown	15	5.6	2,848	1.5	1,186	41.6	0	0.0
<b>Total AA</b>	<b>266</b>	<b>100.0</b>	<b>187,286</b>	<b>100.0</b>	<b>21,892</b>	<b>11.7</b>	<b>187,286</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	30,957	10,791	5.9	34.9	15,261	49.3	4,905	15.8
Moderate	114,338	47,927	26.4	41.9	52,374	45.8	14,037	12.3
Middle	102,338	57,794	31.8	56.5	34,499	33.7	10,045	9.8
Upper	87,846	63,042	34.7	71.8	18,979	21.6	5,825	6.6
Unknown	6,033	2,320	1.3	38.5	2,793	46.3	920	15.2
<b>Total AA</b>	<b>341,512</b>	<b>181,874</b>	<b>100.0</b>	<b>53.3</b>	<b>123,906</b>	<b>36.3</b>	<b>35,732</b>	<b>10.5</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,630	6.5	2,294	6.2	304	8.9	32	6.1
Moderate	11,107	27.3	9,935	27.1	1,045	30.6	127	24.1
Middle	11,625	28.6	10,537	28.7	958	28.1	130	24.6
Upper	13,997	34.4	12,830	34.9	947	27.8	220	41.7
Unknown	1,299	3.2	1,122	3.1	158	4.6	19	3.6
<b>Total AA</b>	<b>40,658</b>	<b>100.0</b>	<b>36,718</b>	<b>100.0</b>	<b>3,412</b>	<b>100.0</b>	<b>528</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.3</b>		<b>8.4</b>		<b>1.3</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	17	4.3	14	3.7	3	33.3	0	0.0
Moderate	82	20.9	79	20.6	3	33.3	0	0.0
Middle	102	26.0	101	26.4	1	11.1	0	0.0
Upper	190	48.5	188	49.1	2	22.2	0	0.0
Unknown	1	0.3	1	0.3	0	0.0	0	0.0
<b>Total AA</b>	<b>392</b>	<b>100.0</b>	<b>383</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.7</b>		<b>2.3</b>		<b>0.0</b>
<i>Source: 2022 FFIEC Census Data                  2022 Dun &amp; Bradstreet Data                  2016-2020 U.S. Census Bureau; American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Table E-10**

2021 Oklahoma City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	28	11.6	17,042	9.4	6,224	36.5	44,754	24.7
Moderate	85	35.3	54,259	29.9	11,442	21.1	32,453	17.9
Middle	70	29.0	54,266	29.9	5,243	9.7	34,687	19.1
Upper	50	20.7	55,524	30.6	1,982	3.6	69,537	38.3
Unknown	8	3.3	340	0.2	119	35.0	0	0.0
<b>Total AA</b>	<b>241</b>	<b>100.0</b>	<b>181,431</b>	<b>100.0</b>	<b>25,010</b>	<b>13.8</b>	<b>181,431</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	33,484	10,466	6.1	31.3	17,502	52.3	5,516	16.5
Moderate	111,111	44,169	25.8	39.8	51,942	46.7	15,000	13.5
Middle	97,850	55,577	32.5	56.8	32,775	33.5	9,498	9.7
Upper	82,988	60,607	35.4	73.0	17,094	20.6	5,287	6.4
Unknown	1,552	195	0.1	12.6	1,063	68.5	294	18.9
<b>Total AA</b>	<b>326,985</b>	<b>171,014</b>	<b>100.0</b>	<b>52.3</b>	<b>120,376</b>	<b>36.8</b>	<b>35,595</b>	<b>10.9</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,746	6.7	2,359	6.4	370	10.7	17	3.6
Moderate	11,054	27.0	9,937	26.8	1,007	29.3	110	23.3
Middle	12,387	30.2	11,197	30.2	1,049	30.5	141	29.9
Upper	12,851	31.4	11,976	32.3	708	20.6	167	35.4
Unknown	1,954	4.8	1,609	4.3	308	8.9	37	7.8
<b>Total AA</b>	<b>40,992</b>	<b>100.0</b>	<b>37,078</b>	<b>100.0</b>	<b>3,442</b>	<b>100.0</b>	<b>472</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.5</b>		<b>8.4</b>		<b>1.2</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	15	3.9	14	3.7	1	11.1	0	0.0
Moderate	62	16.2	57	15.2	5	55.6	0	0.0
Middle	108	28.2	107	28.6	1	11.1	0	0.0
Upper	194	50.7	192	51.3	2	22.2	0	0.0
Unknown	4	1.0	4	1.1	0	0.0	0	0.0
<b>Total AA</b>	<b>383</b>	<b>100.0</b>	<b>374</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.7</b>		<b>2.3</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table E-11**

2020 Oklahoma City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	28	11.6	17,042	9.4	6,224	36.5	44,754	24.7
Moderate	85	35.3	54,259	29.9	11,442	21.1	32,453	17.9
Middle	70	29.0	54,266	29.9	5,243	9.7	34,687	19.1
Upper	50	20.7	55,524	30.6	1,982	3.6	69,537	38.3
Unknown	8	3.3	340	0.2	119	35.0	0	0.0
<b>Total AA</b>	<b>241</b>	<b>100.0</b>	<b>181,431</b>	<b>100.0</b>	<b>25,010</b>	<b>13.8</b>	<b>181,431</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	33,484	10,466	6.1	31.3	17,502	52.3	5,516	16.5
Moderate	111,111	44,169	25.8	39.8	51,942	46.7	15,000	13.5
Middle	97,850	55,577	32.5	56.8	32,775	33.5	9,498	9.7
Upper	82,988	60,607	35.4	73.0	17,094	20.6	5,287	6.4
Unknown	1,552	195	0.1	12.6	1,063	68.5	294	18.9
<b>Total AA</b>	<b>326,985</b>	<b>171,014</b>	<b>100.0</b>	<b>52.3</b>	<b>120,376</b>	<b>36.8</b>	<b>35,595</b>	<b>10.9</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,806	6.7	2,404	6.4	386	10.9	16	3.6
Moderate	11,251	26.9	10,095	26.7	1,050	29.6	106	24.1
Middle	12,690	30.4	11,501	30.4	1,066	30.1	123	28.0
Upper	13,125	31.4	12,224	32.3	736	20.7	165	37.6
Unknown	1,939	4.6	1,601	4.2	309	8.7	29	6.6
<b>Total AA</b>	<b>41,811</b>	<b>100.0</b>	<b>37,825</b>	<b>100.0</b>	<b>3,547</b>	<b>100.0</b>	<b>439</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.5</b>	<b>8.5</b>		<b>1.0</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	16	4.1	15	3.9	1	10.0	0	0.0
Moderate	59	15.0	55	14.4	4	40.0	0	0.0
Middle	103	26.2	102	26.6	1	10.0	0	0.0
Upper	212	53.9	208	54.3	4	40.0	0	0.0
Unknown	3	0.8	3	0.8	0	0.0	0	0.0
<b>Total AA</b>	<b>393</b>	<b>100.0</b>	<b>383</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.5</b>	<b>2.5</b>		<b>0.0</b>	
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## APPENDIX F – 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:** 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**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 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 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.

**Nonmetropolitan area (NonMSA):** Any area that is not located within an MSA.

**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). 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 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.