



PUBLIC DISCLOSURE

November 30, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Fidelity Bank
RSSD# 106359**

**5100 North Classen Boulevard, Suite 500
Oklahoma City, Oklahoma 73118**

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **SATISFACTORY**

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

| PERFORMANCE LEVELS | PERFORMANCE TESTS | | |
|--|-------------------|-----------------|--------------|
| | Lending Test* | Investment Test | Service Test |
| Outstanding | | | |
| High Satisfactory | | | |
| Low Satisfactory | X | X | X |
| Needs to Improve | | | |
| Substantial Noncompliance | | | |
| * The lending test is weighted more heavily than the investment and service tests in determining the overall rating. | | | |

SUMMARY OF THE MAJOR FACTORS SUPPORTING THE RATING

Lending Test

- Lending levels reflect adequate 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 adequate.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes (borrower distribution) is adequate.
- The bank makes a relatively high level of community development (CD) loans.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants and is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits adequate 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 of branches has not adversely affected the accessibility of its delivery systems, particularly to 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 provides an adequate level of CD services.

INSTITUTION

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* were utilized to evaluate the bank's Community Reinvestment Act (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 Oklahoma City Metropolitan Statistical Area (MSA) and Phoenix Metropolitan AA's using a full-scope review. The Tulsa Metropolitan AA was assessed using a limited-scope review. Due to the relative timing of de novo branch activity in the bank's newly expanded Denver, Colorado market in May 2020 and insufficient lending, investment, and CD data to conduct a meaningful analysis, the current evaluation will only assess performance in the bank's Oklahoma and Arizona AAs. The following data was reviewed:

- The bank's home purchase, home refinance, home improvement, and multifamily mortgage loans reported on the bank's 2018 and 2019 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2018 and 2019 CRA LARs;
- CD loans originated from April 3, 2018 to December 31, 2019;
- Qualified investments that were made from April 3, 2018 to December 31, 2019; qualified investments made prior to, but still outstanding during this period; and qualifying grants, donations, or in-kind contributions of property made during this period; and,
- Retail banking services and CD services from April 3, 2018 to December 31, 2019.

When determining the overall institutional rating, more weight was placed on the rating for the state of Oklahoma, followed by the rating for the state of Arizona. The lending analysis placed more emphasis on small business loans due to the bank's strategic focus on commercial lending. In addition, more consideration was given to the volume of loan originations than the dollar amount, as this represents the number of individuals or entities served. Additional emphasis was 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. Due to lack of volume, home mortgage lending data was evaluated collectively in the Phoenix and the Tulsa Metropolitan AAs, as an analysis of each mortgage loan component would not be meaningful. Additionally, the low volume of small farm lending was not meaningful and was only evaluated under the Lending Activity and AA Concentration lending test components.

Table 1 illustrates the bank's presence in each AA, including the type of performance review analysis applied in this evaluation of each AA (full-scope or limited-scope), the numbers of AA banking offices, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2019 deposit market share, as a percent of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions operating in each AA.

| TABLE 1 REVIEW TYPE AND MARKET SHARE BY AA | | | | | | | | |
|--|-------------|-----------|--|-------|---|-------|-----------------------------|--------------------------------|
| Assessment Area | Review Type | Br. # | Percent of Bank's Lending by \$ ¹ | | Percent of Bank's Deposits by \$ ² | | Deposit Market Share | |
| | | | Bank | State | Bank | State | % Market Share ² | Market Share Rank ³ |
| State of Oklahoma | | 23 | 65.3 | | 70.3 | | | |
| Oklahoma City MSA AA | Full | 22 | 60.7 | 91.5 | 67.6 | 96.1 | 2.8 | 7 of 72 |
| Tulsa Metropolitan AA | Limited | 1 | 4.6 | 8.5 | 2.7 | 3.9 | 0.2 | 39 of 46 |
| State of Arizona | | 6 | 34.7 | | 29.7 | | | |
| Phoenix Metropolitan AA | Full | 6 | 34.7 | 100.0 | 29.7 | 100.0 | 0.4 | 20 of 59 |
| ¹ Based on the bank's outstanding loan balance sheet as of December 31, 2019 ² Based on the June 30, 2020 FDIC's Market Share Report. ³ Based on the bank's ranking among FDIC-insured financial institutions in each AA. | | | | | | | | |

DESCRIPTION OF INSTITUTION

The bank is an interstate financial institution headquartered in Oklahoma City, Oklahoma. Characteristics of the bank include:

- The bank is a wholly owned subsidiary of First Fidelity Bancorp, Inc., a one-bank holding company also located in Oklahoma City.
- As of June 30, 2020, the bank reported total assets of \$2.1 billion.
- The bank operates 30 banking facilities in Oklahoma, Arizona, and through recent expansion into Colorado.
- As illustrated in Table 2, the bank's primary business focus is commercial lending, followed by consumer lending. While residential real estate loans represent the third largest product by dollar volume within the bank's loan portfolio composition, the figure is understated by the portion of bank residential real estate loans sold into the secondary market.

TABLE 2
COMPOSITION OF LOAN PORTFOLIO AS OF JUNE 30, 2020

| Loan Type | \$(000) | % |
|-------------------------|------------------|--------------|
| Commercial | 1,000,099 | 69.9 |
| Consumer | 256,890 | 18.0 |
| Residential Real Estate | 163,343 | 11.4 |
| Other | 8,941 | 0.6 |
| Agricultural | 921 | 0.1 |
| Gross Loans | 1,430,194 | 100.0 |

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

The bank was rated Satisfactory under the CRA at its April 2, 2018 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.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

While conclusions with respect to lending performance were evaluated for both years, only 2019 lending tables for AAs that received a full-scope review are reflected in the body of this report. The bank's 2018 lending data for AAs that received full-scope reviews can be found in Appendix D of this report. Lending data for the AA that received a limited-scope review can be found in Appendix E. The performance evaluation first discusses the bank's overall performance followed by an in-depth analysis of the bank's record of lending, investment, and service activities in each state and specific AAs. As indicated above, performance conclusions will only include the bank's activities in its Oklahoma and Arizona AAs.

LENDING TEST

The bank's overall performance under the lending test is Low Satisfactory. The state ratings for Oklahoma and Arizona are consistent with the overall rating.

Lending Activity

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other performance context. The bank's overall lending activities reflect adequate responsiveness to AA credit needs. Table 3 summarizes the bank's lending activity considered in this performance analysis. The bank's HMDA and CRA loan originations have declined since the previous evaluation. Over a two-year period, HMDA lending declined 53.1 percent by number and 30.8 percent by dollar while small business loans declined by 3.0 percent and 8.3 percent, respectively.

| TABLE 3 SUMMARY OF LENDING ACTIVITY REVIEWED | | | | |
|---|--------------|----------------|--------------|--------------|
| Loan Type | # | \$(000) | #% | \$% |
| Home Purchase | 124 | 25,035 | 10.0 | 10.9 |
| Home Refinance | 188 | 33,053 | 15.1 | 14.4 |
| Home Improvement | 60 | 3,667 | 4.8 | 1.6 |
| Multifamily | 17 | 24,065 | 1.4 | 10.5 |
| Total HMDA Loans | 389 | 85,819 | 31.3 | 37.3 |
| Small Business Loans | 849 | 143,832 | 68.4 | 62.6 |
| Small Farms Loans | 3 | 265 | 0.2 | 0.1 |
| Total Loans | 1,241 | 229,916 | 100.0 | 100.0 |

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank offers flexible programs throughout its AAs, including government guaranteed loans and affordable housing program loans. Such loan programs help borrowers who might not otherwise qualify for credit.

The bank offers a Credit Builder small dollar loan program that assists in building credit for borrowers with derogatory credit or no traditional credit references. During the evaluation period, the bank originated 352 Credit Builder loans for \$637,000. In addition, the bank made an additional 11 lines of credit totaling \$5,500 to borrowers with very limited credit files.

The bank also offers United States Federal Housing Administration (FHA) – insured mortgage loans in its Oklahoma and Arizona AAs. The FHA-insured mortgage product is designed for LMI borrowers requiring lower minimum down payments and credit scores than many conventional loans. According to bank documentation between April 1, 2018 and December 31, 2019, the bank provided 36 FHA-insured loans for \$4.6 million. The bank also provided 11 Veterans Administration loans to qualified military personnel, totaling \$2.0 million, for the same period.

Additionally, the bank offers two programs for first-time homebuyers through the Federal Home Loan Bank of Topeka, Topeka, Kansas (FHLB), Affordable Housing Program and a sponsorship with affordable housing agencies in Cleveland and Oklahoma Counties in the Oklahoma City MSA. During the evaluation period, the bank made eight loans for \$780,000 through the FHLB and five loans for \$696,000 through the Oklahoma and Cleveland Mortgage Credit Program.

Finally, the bank participates in the Small Business Administration (SBA) 7(a) Loan Guarantee Program and the SBA 504 Loan Program to provide further support for small business borrowers. During the evaluation period, the bank originated 13 loans for \$1.7 million through these programs.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. As illustrated in Table 4, a high percentage of the bank's lending, by number and dollar, was originated inside its AAs.

Total small farm loan origination volume was significantly lower than the other evaluated products, and therefore, under this criteria, carried little weight in the overall rating. Additionally, agricultural borrowers and/or properties tend to be located in rural areas further from branch locations situated within metropolitan centers.

**TABLE 4
LENDING INSIDE AND OUTSIDE THE AAs**

| Loan Type | Inside | | | | Outside | | | |
|-----------------------------|--------------|----------------|-------------|-------------|------------|---------------|-------------|-------------|
| | # | \$(000) | #% | \$% | # | \$(000) | #% | \$% |
| Home Purchase | 108 | 19,491 | 87.1 | 77.9 | 16 | 5,544 | 12.9 | 22.1 |
| Home Refinance | 174 | 29,168 | 92.6 | 88.2 | 14 | 3,885 | 7.4 | 11.8 |
| Home Improvement | 58 | 3,537 | 96.7 | 96.5 | 2 | 130 | 3.3 | 3.5 |
| Multifamily | 11 | 15,169 | 64.7 | 63.0 | 6 | 8,896 | 35.3 | 37.0 |
| Total HMDA Loans | 351 | 67,365 | 90.2 | 78.5 | 38 | 18,454 | 9.8 | 21.5 |
| Small Business Loans | 787 | 122,621 | 92.7 | 85.3 | 62 | 21,212 | 7.3 | 14.7 |
| Small Farm Loans | 2 | 165 | 66.7 | 62.3 | 1 | 100 | 33.3 | 37.7 |
| Total Loans | 1,140 | 190,150 | 91.9 | 82.7 | 101 | 39,766 | 8.1 | 17.3 |

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

The remaining loan distribution analyses discussed in this performance evaluation considered only those loans originated within the bank's AAs. As mentioned previously, small farm loans were not evaluated given the low volume of two loans inside 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. The bank's overall geographic distribution of lending reflects adequate penetration throughout the AAs. The geographic distribution in Oklahoma is adequate while distribution for the state of Arizona is good. Additionally, no significant performance gaps or anomalies were noted in the evaluation of the full-scope AAs.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different sizes. The bank's lending has an overall adequate penetration among individuals of different income levels and businesses of different sizes. The borrower distribution of loans is adequate for the state of Oklahoma and poor for the state of Arizona.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank makes a relatively high level of CD loans. Table 5 lists all CD loans originated during the review period. The majority of CD loans by dollar volume, 70.8 percent, were originated within the Phoenix Metropolitan AA in Arizona while 29.2 percent were originated within the two Oklahoma AAs, despite the bank's larger presence in the state of Oklahoma, particularly the Oklahoma City MSA AA.

**TABLE 5
COMMUNITY DEVELOPMENT LOANS
ALL AAs**

| Community Development Purpose | # | \$(000's) |
|----------------------------------|-----------|----------------|
| Affordable Housing | 6 | 18,179 |
| Community Services | 0 | 0 |
| Economic Development | 32 | 80,722 |
| Revitalization and Stabilization | 7 | 15,903 |
| TOTAL LOANS | 45 | 114,804 |

INVESTMENT TEST

This performance criterion evaluates the bank's level of qualifying investments, grants, donations, or in-kind contributions of property made since the last examination that have a primary purpose of CD. The bank's overall performance under the investment test is Low Satisfactory. The state ratings for Oklahoma and Arizona are consistent with the overall rating.

The bank has an adequate level of qualified CD investments and grants and is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits adequate responsiveness to credit and CD needs of its AAs. The majority of qualified investments by dollar volume, 71.8 percent, were generated in the state of Oklahoma with the remainder in Arizona. Table 6 details all of the bank's qualified CD investments, including prior-period and current-period investments, as well as donations and grant activity.

In addition to qualified investments, the bank also made a limited level of qualified donations. The bank's donation activity increased modestly from the previous evaluation and included 44 donations for an approximate total of \$174,800. Overall, 95.9 percent of the donations were made in the state of Oklahoma with the remaining amount made in the state of Arizona.

**TABLE 6
INVESTMENTS, GRANTS, AND DONATIONS**

| Community Development Purpose | Prior Period Investments ¹ | | Current Investments ² | | Donations | | Total | |
|----------------------------------|---------------------------------------|--------------|----------------------------------|------------|-----------|------------|-----------|--------------|
| | # | \$(000s) | # | \$(000s) | # | \$(000s) | # | \$(000s) |
| Affordable Housing | 9 | 5,222 | 0 | 0 | 10 | 9 | 19 | 5,231 |
| Community Services | 2 | 970 | 2 | 518 | 35 | 90 | 39 | 1,578 |
| Economic Development | 0 | 0 | 0 | 0 | 7 | 109 | 7 | 109 |
| Revitalization and Stabilization | 0 | 0 | 0 | 0 | 2 | 3 | 2 | 3 |
| TOTAL | 11 | 6,192 | 2 | 518 | 54 | 211 | 67 | 6,921 |

¹ Book Value of Investment

² Original Market Value of Investment

SERVICE TEST

The bank's overall performance under the service test is Low Satisfactory. The Oklahoma and Arizona state ratings are consistent with the institution's rating.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geography classification. Table 7 illustrates the distribution of the bank's branches and ATMs by income level of geographies, as well as the numbers of branch openings/closings and the numbers 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 29 total branch offices subject to this evaluation, 1 office was located in a low-, 7 in moderate-, 10 in middle-, 10 in upper-, and 1 in an unknown-income census tract(s). These locations generally align with the total percentage of census tracts in the AAs by income level. The bank also maintains automated teller machines (ATMs) at 27 of the 29 branch offices, plus 4 stand-alone cash dispensing ATMs. In addition to bank-owned ATMs, the bank also offers its customer's access to thousands of surcharge-free ATMs across the country and internationally through the Trans Fund network. The bank also offers alternative delivery channels such as online, telephone, and mobile banking services.

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. As discussed, the recent expansion into the Denver, Colorado market was not evaluated at this evaluation, as such, no branch offices were considered to be opened or closed during this evaluation period.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and LMI individuals. The bank's branches generally operate under the same hours of operation in its Oklahoma markets, Monday through Friday from 9:00 a.m. until 5:00 p.m. One branch location in Oklahoma City offers only deposit services with drive-through hours, Monday through Friday from 8:30 a.m. to 5:30 p.m. In the Arizona market, the bank's operations are from 9:00 a.m. until 5:00 p.m. Monday through Thursday, while open on Fridays until 6:00 p.m. Drive-through services, with the exception of the limited service branch, are Monday through Friday from 8:00 a.m. to 6:00 p.m. and on Saturday from 9:00 a.m. to 12:00 p.m. at 21 of 22 branches within the Oklahoma City MSA AA. The lone location in the Tulsa Metropolitan AA is open from 8:00 a.m. to 6:00 p.m., but closed on Saturdays, while three of the six Arizona market locations provide drive-through services that mirror the bank's lobby hours.

**TABLE 7
RETAIL BANKING AND COMMUNITY DEVELOPMENT SERVICES
ALL AAs**

| Branch Accessibility | Location of Branches by Tract (%) | | | | | | Percent of Tracts ¹ (%) | | | | | |
|--------------------------------|-----------------------------------|------|--------------------|------|----------------------|-------|------------------------------------|------|----------------|------|---------------------|-------|
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk | Total |
| | 3.5 | 24.1 | 34.5 | 34.5 | 3.5 | 100.0 | 10.4 | 25.2 | 32.6 | 30.5 | 1.3 | 100.0 |
| Changes in Branch Location | Number of Branches (#) | | | | | | Net Change in Branch Locations (#) | | | | | |
| | Total Branches | | Openings (#) | | Closings (#) | | Low | Mod | Mid | Upp | Unk | Total |
| | 29 | | 0 | | 0 | | 0 | 0 | 0 | 0 | 0 | 0 |
| Community Development Services | Affordable Housing | | Community Services | | Economic Development | | Revitalization & Stabilization | | Total Services | | Total Organizations | |
| | 3 | | 22 | | 3 | | 1 | | 29 | | 22 | |

¹ Based on 2019 FFIEC census tract definitions.
NOTE: Percentages may not add up to 100.0 due to rounding.

Community Development Services

This performance criterion evaluates the bank's level of CD services. The bank provides an adequate level of CD services. Table 7 illustrates the number and types CD services provided. Services provided included serving on boards or committees and providing technical assistance on financial matters, such as budgeting, financial planning, and providing financial education and literacy. The bank's support of CD services largely occurred in the state of Oklahoma, and specifically in the Oklahoma City MSA AA which accounted for 89.7 percent of CD services bank-wide. The level of CD services has declined from the prior CRA evaluation conducted on April 2, 2018.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

STATE OF OKLAHOMA

CRA RATING FOR OKLAHOMA:

The lending test is rated:

The investment test is rated:

The service test is rated:

Satisfactory

Low Satisfactory

Low Satisfactory

Low Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is adequate.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses of different sizes is adequate.
- The bank makes an adequate level of CD loans within its AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants and is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits adequate responsiveness to credit and CD needs throughout its Oklahoma AAs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to 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 individuals.
- The bank provides an adequate level of CD services within its Oklahoma AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Oklahoma was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Oklahoma City MSA AA, and the overall state rating was based predominantly on the bank's performance in this AA since it represents a substantial majority of the bank's branch network, as well as lending and deposit volume. Additionally, small business lending received greater

weight in the product analysis due to a larger volume of originations, consistent with the bank's strategic emphasis on commercial lending.

A limited-scope review was conducted for the Tulsa Metropolitan AA to ascertain if the bank's performance in this area was generally consistent with performance in the overall state evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN OKLAHOMA

The bank delineates two of its three AAs and operates 23 of its 29 branches in the state of Oklahoma. The bank's Oklahoma operations represent 64.0 percent of the bank's lending activity and 70.3 percent of the bank's deposits. Loan and deposit products and services offered in the state mirror those discussed in the overall institution section of this report, with a primary emphasis on commercial lending followed by residential real estate lending. Detailed descriptions of the bank's operations in the full-scope and limited-scope AAs are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's performance under the lending test in the state of Oklahoma is Low Satisfactory.

Lending Activity

The bank's lending activities in the state of Oklahoma reflected adequate responsiveness to AA credit needs. The evaluation of loans in the state includes 482 small business and 319 home mortgage loans. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including the needs LMI borrowers. A discussion of these products is highlighted in the overall institutional section of this evaluation.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within the state of Oklahoma reflects adequate penetration throughout the two AAs. The distribution of home mortgage and small business loans throughout geographies of different income levels reflects adequate penetration in the Oklahoma City MSA AA. Lending in the Tulsa Metropolitan AA reflects performance that is above the overall conclusion for the geographic distribution.

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

The bank's lending within the state of Oklahoma has an overall adequate penetration among individuals of different income levels and businesses of different sizes. The bank's lending performance in the Oklahoma City MSA AA among business and home mortgage products reflects adequate levels of

penetration. Lending in the Tulsa Metropolitan AA reflects penetration levels that are consistent with the overall conclusions for the borrower distribution.

Community Development Lending

In the state of Oklahoma, the bank provides an adequate level of CD loans. The bank originated 15 CD loans totaling \$33.5 million in the Oklahoma AAs. Of those, seven loans in the amount of \$15.9 million were for revitalization and stabilization, six loans for \$14.1 million were for economic development, and two loans totaling \$3.5 million were for affordable housing. The Oklahoma City MSA AA accounted for 85.4 percent of the CD lending in the state while the Tulsa Metropolitan AA accounted for 14.6 percent. Overall, qualified CD lending in Oklahoma accounted for 29.2 percent of bank-wide activity.

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Oklahoma is Low Satisfactory.

The bank has an adequate level of qualified CD investments and grants and is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits adequate responsiveness to credit and CD needs of its AAs. The bank maintains six prior-period government agency-issued Mortgage-Backed Securities (MBS) pools for \$3.3 million that support affordable housing to LMI borrowers, including four investments for \$1.8 million that benefits both the Oklahoma City MSA and Tulsa Metropolitan AAs. Additionally, the bank has two prior period investments for \$969,746 and two current-period investments for \$518,717 that support public education in school districts that primarily serve students from LMI families. The number of donations made in the state of Oklahoma during the examination period was 48 donations for \$202,333 with 94.6 percent made within the Oklahoma City MSA AA.

SERVICE TEST

The bank's performance under the service test in the state of Oklahoma is Low Satisfactory.

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 each Oklahoma AA. The bank's branch distribution in Oklahoma was proportional to the percentage of LMI census tracts in the AAs. There were no branch openings or closings during the evaluation period; accordingly, the bank's record of closing branches has not affected the accessibility of its delivery systems.

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. Lobby hours and additional services did not vary in either market in Oklahoma.

Community Development Services

The bank provides an adequate level of CD services in its Oklahoma AAs. The bank provided 26 services to 19 organizations all of which were located in the Oklahoma City MSA AA with none in the Tulsa Metropolitan AA. CD services included 19 activities supporting community service organizations, 3 services to entities providing affordable housing, 3 services for economic development entities that provide technical assistance for small businesses, and 1 service to a local business improvement district for revitalization and stabilization of LMI geographies.

**OKLAHOMA CITY METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE OKLAHOMA CITY MSA AA

The bank's AA is comprised of the Oklahoma City MSA, which includes Canadian, Cleveland, Grady, Lincoln, Logan, McClain, and Oklahoma Counties in their entirety (see Appendix C for an AA map).

- The composition of the AA includes 29 low-, 106 moderate-, 136 middle-, 83 upper-, and 9 unknown-income census tracts. At the prior examination, the MSA included 32 low-, 97 moderate-, 139 middle-, 91 upper-, and 4 unknown-income census tracts.
- The Oklahoma City MSA AA is the bank's primary market, and the bank operates 22 of its 29 branches including its headquarters in the AA. The bank provides drive-through facilities at 21 of its 22 locations. One of the branches in downtown Oklahoma City offers limited banking services.
- All branches offer on-site ATMs including 10 full-service and 12 cash dispensing ATMs. In addition, the bank operates four stand-alone cash-dispensing ATMs all located in Norman, Oklahoma.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank has a 2.8 percent market share, ranking 7th out of 72 FDIC-insured depository institutions operating in the AA.
- Three previously conducted community contacts prepared by another regulatory agency for other financial institutions in the AA were referenced to supplement this evaluation. These individuals were representatives of an economic development organization, a local chamber of commerce, and an affordable housing organization within the Oklahoma City MSA AA.

**TABLE 8
POPULATION CHANGE**

| Area | 2010 Population | 2015 Population | Percent Change |
|-------------------|------------------------|------------------------|-----------------------|
| Canadian County | 115,541 | 126,193 | 9.2 |
| Cleveland County | 255,755 | 268,614 | 5.0 |
| Grady County | 52,431 | 53,612 | 2.3 |
| Lincoln County | 34,273 | 34,504 | 0.7 |
| Logan County | 41,848 | 44,493 | 6.3 |
| McClain County | 34,506 | 36,512 | 5.8 |
| Oklahoma County | 718,633 | 754,480 | 5.0 |
| Oklahoma City MSA | 1,252,987 | 1,318,408 | 5.2 |
| State of Oklahoma | 3,751,351 | 3,849,733 | 2.6 |

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

- The Oklahoma City MSA AA population represents 34.2 percent of the entire state population.

- Oklahoma County is the most populous county in the AA with 754,480 residents, or 57.2 percent of the total MSA population. Oklahoma County includes the county seat and state capital of Oklahoma City, which is also the largest city in the state.
- Cleveland County has the second largest population in the MSA, with 268,614 residents and is home to the University of Oklahoma, located in Norman, a suburb south of Oklahoma City.

TABLE 9
MEDIAN FAMILY INCOME CHANGE

| Area | 2010 Median Family Income | 2015 Median Family Income | Percent Change |
|-------------------|---------------------------|---------------------------|----------------|
| Canadian County | 67,981 | 72,790 | 7.1 |
| Cleveland County | 65,646 | 70,191 | 6.9 |
| Grady County | 52,889 | 61,472 | 16.2 |
| Lincoln County | 51,586 | 55,258 | 7.1 |
| Logan County | 62,229 | 67,562 | 8.6 |
| McClain County | 63,796 | 69,182 | 8.4 |
| Oklahoma County | 54,724 | 60,346 | 10.3 |
| Oklahoma City MSA | 58,775 | 64,058 | 9.0 |
| State of Oklahoma | 53,607 | 58,029 | 8.2 |

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

- The 2015 median family income for the Oklahoma City MSA AA was 10.4 percent higher than the statewide figure.
- The percent of families in the AA classified as LMI was 38.8 percent, which was similar to the state of Oklahoma figure at 39.1 percent.
- The AA family poverty rate as of 2015 was 11.2 percent compared to 12.4 percent at the state level. When assessed by the income level of census tracts in the MSA, the poverty rates were 17.5 percent in low-, 39.3 percent in moderate-, 32.6 percent in middle-, and 10.3 percent in upper-income census tracts.

TABLE 10
HOUSING COSTS CHANGE

| Area | Median Housing Value | | Percent Change | Median Gross Rent | | Percent Change |
|-------------------|----------------------|---------|----------------|-------------------|------|----------------|
| | 2010 | 2015 | | 2010 | 2015 | |
| Canadian County | 131,600 | 144,600 | 9.9 | 758 | 886 | 16.9 |
| Cleveland County | 131,800 | 146,100 | 10.8 | 725 | 831 | 14.6 |
| Grady County | 104,100 | 111,200 | 6.8 | 581 | 663 | 14.1 |
| Lincoln County | 87,700 | 99,800 | 13.8 | 507 | 620 | 22.3 |
| Logan County | 116,400 | 142,900 | 22.8 | 578 | 695 | 20.2 |
| McClain County | 118,200 | 152,600 | 29.1 | 655 | 688 | 5.0 |
| Oklahoma County | 117,500 | 133,400 | 13.5 | 675 | 780 | 15.6 |
| Oklahoma City MSA | 121,318 | 137,248 | 13.1 | 680 | 784 | 15.3 |
| State of Oklahoma | 104,300 | 117,900 | 13.0 | 633 | 727 | 14.8 |

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

- There are 552,016 total housing units in the Oklahoma City MSA of which 57.5 percent are owner-occupied, 32.1 percent are rentals, and 10.3 percent are vacant.
- The median age of housing stock in the AA was 43 years of age. When broken down by the income level of census tract, the median age was 59 years in low-, 55 years in moderate-, and 42 years in middle-, and 29 years in upper-income census tracts. The older age of homes in LMI census tracts suggests dilapidated homes in need of repair.
- The overall affordability ratio¹ within the AA is 37.6 percent. The lowest affordability ratio in the AA was in Oklahoma County at 35.6 percent while more affordable housing was found in Canadian, Lincoln, and Grady counties with affordability ratios ranging from 44.6 percent to 47.0 percent.
- While home prices appear to be more affordable, rent prices in the AA are costly, with 44.3 percent of renters having rents that exceed 30.0 percent of their monthly income.
- According to community representatives, there is a need for affordable housing and housing program assistance in the AA.

**TABLE 11
UNEMPLOYMENT RATES**

| Region | 2015 | 2016 | 2017 | 2018 | 2019 |
|-------------------|------|------|------|------|------|
| Canadian County | 3.6 | 4.0 | 3.5 | 2.8 | 2.9 |
| Cleveland County | 3.5 | 3.9 | 3.5 | 2.9 | 2.8 |
| Grady County | 4.5 | 5.0 | 4.0 | 3.1 | 3.1 |
| Lincoln County | 4.6 | 5.3 | 4.3 | 3.5 | 3.5 |
| Logan County | 3.8 | 4.1 | 3.7 | 3.0 | 2.9 |
| McClain County | 3.7 | 4.2 | 3.5 | 2.8 | 2.7 |
| Oklahoma County | 3.9 | 4.3 | 4.0 | 3.3 | 3.1 |
| Oklahoma City MSA | 3.8 | 4.2 | 3.8 | 3.1 | 3.0 |
| State of Oklahoma | 4.4 | 4.9 | 4.2 | 3.4 | 3.3 |

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- According to the community representatives, the economy in Oklahoma City was stable and improving during the review period. One contact indicated that unemployment rates were rising due to the downturn in the oil and gas industry.
- The leading industries in the AA are government, education and health services, professional and business services, leisure and hospitality, and retail trade.
- The AAs largest employers are Tinker Air Force Base, The University of Oklahoma, Integris Health, University of Oklahoma Health Sciences Center, Federal Aviation Administration Mike Monroney Aeronautical Center, Mercy Hospital, Amazon, OU Medical Center, and The Boeing Co.
- One community representative stated there is a need for more affordable housing while another representative indicated that the AA needs additional retail businesses and a higher level of job creation for LMI individuals.

¹ The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OKLAHOMA CITY MSA AA

LENDING TEST

The bank's performance under the lending test in the Oklahoma City MSA AA is adequate.

Lending Activity

The bank's lending activities reflected adequate responsiveness to AA credit needs. The evaluation of loans in the AA included 441 small business, 308 home mortgage, and 2 small farm loans originated during a two-year period between January 1, 2018 and December 31, 2019. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including the needs of LMI borrowers. A discussion of these products is highlighted in the overall institutional section of this evaluation.

Geographic Distribution of Loans

The geographic distribution of lending reflects adequate penetration throughout the AA. Home mortgage lending reflects good penetration while small business lending reflects adequate penetration.

Home Mortgage Lending

The geographic distribution of home mortgage lending in 2019 and 2018 reflects good penetration.

As illustrated in Table 12, the 2019 distribution of home mortgage loans in low-income census tracts was above the aggregate lending data by number and dollar, as well as the percentage of owner-occupied housing units in the AA (demographic figure). Lending in moderate-income census tracts was above the aggregate lending data by number and dollar, as well as the demographic figure.

The bank's home mortgage lending in 2018 was below the performance of 2019 lending with penetration that was more comparable to the aggregate lending data and demographic figures. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses.

Home Purchase Loans

The geographic distribution of 2019 and 2018 home purchase lending is good.

The bank only originated one home purchase loan in a low-income tract in 2019; however, the concentration of loans by percentage was comparable to the aggregate lending data by number and dollar, as well as the demographic figure. Lending in moderate-income census tracts was above the aggregate lending data by number and dollar, and was comparable to the demographic figure by number.

The distribution of home purchase loans in 2018 reflected performance below 2019 with penetration levels generally comparable to the aggregate lending data, and below the demographic comparison figures. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses.

Home Refinance Loans

The geographic distribution of 2019 and 2018 home refinance lending is good.

The bank's penetration of home refinance loans in low-income census tracts was above the aggregate lending data and the demographic figure by number and comparable by dollar. Lending in moderate-income census tracts was comparable to aggregate lending data by dollar but was above aggregate by number, and was comparable to the demographic figure by number.

The distribution of home refinance loans in 2018 reflected performance below 2019 with penetration levels generally comparable to the aggregate lending data and demographic comparison figures. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses.

Home Improvement Loans

The geographic distribution of 2019 and 2018 home improvement lending is excellent.

The bank originated one home improvement loan in a low-income tract in 2019, which, by concentration of loans, was comparable to the aggregate lending data and demographic figure by number while above the aggregate lending data by dollar. Lending in moderate-income census tracts was above the aggregate lending data by number and dollar, as well as the demographic figure.

The distribution of home improvement loans in 2018 reflected similar performance to the penetration levels of 2019 lending. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses.

TABLE 12
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
OKLAHOMA CITY MSA AA

| Census Tract Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Owner- Occupied Units |
|------------------------------|------------|---------|------|------|------------------------|------|-------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 9 | 327 | 6.1 | 1.7 | 1.9 | 1.3 | 3.4 |
| Moderate | 34 | 2,631 | 23.0 | 14.0 | 13.3 | 9.8 | 18.4 |
| Middle | 62 | 7,285 | 41.9 | 38.8 | 39.9 | 34.9 | 44.1 |
| Upper | 43 | 8,552 | 29.1 | 45.5 | 44.9 | 53.8 | 34.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.1 | 0.2 | 0.1 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 23 | 2.3 | 0.4 | 1.9 | 1.0 | 3.4 |
| Moderate | 9 | 991 | 20.5 | 15.4 | 13.2 | 8.6 | 18.4 |
| Middle | 17 | 1,963 | 38.6 | 30.6 | 39.7 | 34.4 | 44.1 |
| Upper | 17 | 3,440 | 38.6 | 53.6 | 45.0 | 55.8 | 34.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.1 | 0.2 | 0.1 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Home Refinance Loans | | | | | | | |
| Low | 7 | 224 | 9.5 | 2.9 | 1.6 | 0.8 | 3.4 |
| Moderate | 14 | 717 | 18.9 | 9.4 | 12.2 | 7.2 | 18.4 |
| Middle | 35 | 3,666 | 47.3 | 48.0 | 39.7 | 32.5 | 44.1 |
| Upper | 18 | 3,038 | 24.3 | 39.7 | 46.3 | 59.3 | 34.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.1 | 0.2 | 0.1 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Home Improvement Loans | | | | | | | |
| Low | 1 | 80 | 4.0 | 7.0 | 2.4 | 1.6 | 3.4 |
| Moderate | 8 | 261 | 32.0 | 22.9 | 13.6 | 10.0 | 18.4 |
| Middle | 9 | 377 | 36.0 | 33.0 | 38.0 | 32.4 | 44.1 |
| Upper | 7 | 424 | 28.0 | 37.1 | 45.9 | 55.8 | 34.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.1 | 0.2 | 0.1 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Multifamily Loans | | | | | | | % of Multifamily Units |
| Low | 0 | 0 | 0.0 | 0.0 | 12.3 | 5.8 | 0.0 |
| Moderate | 3 | 663 | 60.0 | 18.5 | 38.7 | 31.3 | 26.7 |
| Middle | 1 | 1,279 | 20.0 | 35.6 | 32.7 | 46.5 | 57.2 |
| Upper | 1 | 1,650 | 20.0 | 45.9 | 15.6 | 16.0 | 16.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.7 | 0.4 | 0.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of 2019 and 2018 small business lending is adequate.

As illustrated in Table 13, the distribution of small business loans was comparable to the aggregate lending data and the percent of businesses located in low-income census tracts by number, but was below the aggregate lending data by dollar. Lending in moderate-income census tracts was comparable to the aggregate lending data, as well as the percent of businesses located in moderate-income census tracts.

The distribution of small business loans in 2018 reflected consistent penetration of lending to that of 2019. Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses.

| TABLE 13 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY OKLAHOMA CITY MSA AA | | | | | | | |
|---|----------------------|---------|------|------|--------------------|------|--------------------|
| Census Tract Income Level | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses |
| | # | \$(000) | #% | \$% | #% | \$% | |
| Low | 5 | 725 | 2.6 | 3.3 | 4.1 | 5.8 | 4.4 |
| Moderate | 37 | 4,934 | 19.2 | 22.3 | 18.4 | 20.2 | 22.3 |
| Middle | 82 | 8,311 | 42.5 | 37.6 | 36.0 | 36.1 | 37.5 |
| Upper | 61 | 6,362 | 31.6 | 28.7 | 36.4 | 33.0 | 32.8 |
| Unknown | 8 | 1,801 | 4.1 | 8.1 | 2.3 | 4.0 | 3.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 2.8 | 0.8 | 0.0 |
| Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding. | | | | | | | |

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

The bank's lending reflects adequate penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of 2019 and 2018 home mortgage lending is adequate.

The distribution of 2019 home mortgage lending to low-income borrowers was comparable to the aggregate lending data by number and dollar, and below the percentage of low-income families (demographic figure). Lending to moderate-income borrowers was above the aggregate lending data and the demographic figure by number while comparable to the aggregate lending by dollar figure.

The distribution of home mortgage loans in 2018 reflected comparable penetration to that of 2019 lending patterns.

Home Purchase Loans

The borrower distribution of 2019 and 2018 home purchase lending is adequate.

The bank originated only one home purchase loan to a low-income borrower in 2019, which, by concentration of loans by percentage was below the aggregate lending data and demographic by number, yet comparable to the aggregate lending data by dollar. Lending to moderate-income borrowers was comparable to the aggregate lending data by number and dollar, and also comparable to the demographic figure.

The distribution of home purchase loans in 2018 reflected comparable penetration to that of 2019 lending patterns.

Home Refinance Loans

The borrower distribution of 2019 and 2018 home refinance lending is good.

The distribution of 2019 home refinance loans to low-income borrowers was comparable to the aggregate lending data by number and dollar, yet below the demographic figure. Lending to moderate-income borrowers was above the aggregate lending data by number and dollar, as well as the demographic figure.

The distribution of home refinance loans in 2018 was below the penetration level of 2019 lending, reflecting performance more comparable to the aggregate lending data and demographic figure.

Home Improvement Loans

The borrower distribution of 2019 and 2018 home improvement lending is excellent.

The distribution of 2019 home improvement loans to low-income borrowers was above the aggregate lending data by number and dollar, but below the demographic figure. Lending to moderate-income borrowers also was above the aggregate lending data by number and dollar, as well as above the demographic figure.

The distribution of home improvement loans in 2018 reflected comparable penetration to that of 2019 lending patterns.

**TABLE 14
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVELS
OKLAHOMA CITY MSA AA**

| Borrower Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Families |
|---------------------------|------------|---------|-------|-------|------------------------|------|---------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 9 | 392 | 6.1 | 2.1 | 6.3 | 3.2 | 21.3 |
| Moderate | 38 | 2,787 | 25.7 | 14.8 | 17.2 | 12.0 | 17.5 |
| Middle | 20 | 2,110 | 13.5 | 11.2 | 19.2 | 16.6 | 20.5 |
| Upper | 39 | 6,052 | 26.4 | 32.2 | 33.7 | 40.8 | 40.7 |
| Unknown | 42 | 7,455 | 28.4 | 39.7 | 23.6 | 27.4 | 0.0 |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 94 | 2.3 | 1.5 | 6.7 | 3.7 | 21.3 |
| Moderate | 8 | 1,095 | 18.2 | 17.1 | 19.8 | 15.2 | 17.5 |
| Middle | 5 | 460 | 11.4 | 7.2 | 20.8 | 20.0 | 20.5 |
| Upper | 15 | 2,979 | 34.1 | 46.4 | 32.8 | 43.7 | 40.7 |
| Unknown | 15 | 1,788 | 34.1 | 27.9 | 19.9 | 17.4 | 0.0 |
| Home Refinance Loans | | | | | | | |
| Low | 4 | 140 | 5.4 | 1.8 | 6.2 | 2.8 | 21.3 |
| Moderate | 21 | 1,214 | 28.4 | 15.9 | 13.0 | 8.1 | 17.5 |
| Middle | 12 | 1,546 | 16.2 | 20.2 | 17.5 | 13.6 | 20.5 |
| Upper | 16 | 2,711 | 21.6 | 35.5 | 37.0 | 45.9 | 40.7 |
| Unknown | 21 | 2,034 | 28.4 | 26.6 | 26.4 | 29.6 | 0.0 |
| Home Improvement Loans | | | | | | | |
| Low | 4 | 157 | 16.0 | 13.7 | 6.4 | 3.6 | 21.3 |
| Moderate | 9 | 477 | 36.0 | 41.7 | 15.7 | 10.3 | 17.5 |
| Middle | 3 | 105 | 12.0 | 9.2 | 17.9 | 14.3 | 20.5 |
| Upper | 8 | 362 | 32.0 | 31.7 | 51.1 | 56.2 | 40.7 |
| Unknown | 1 | 41 | 4.0 | 3.6 | 8.9 | 15.7 | 0.0 |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 0.4 | 0.0 | 21.3 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 0.4 | 0.1 | 17.5 |
| Middle | 0 | 0 | 0.0 | 0.0 | 1.5 | 0.2 | 20.5 |
| Upper | 0 | 0 | 0.0 | 0.0 | 6.3 | 1.4 | 40.7 |
| Unknown | 5 | 3,592 | 100.0 | 100.0 | 91.4 | 98.3 | 0.0 |

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The borrower distribution of 2019 and 2018 small business lending is adequate.

The distribution of 2019 small business loans to businesses with revenues of \$1 million or less in gross annual revenues (small businesses) was comparable to the aggregate lending data, and below the percentage of AA small businesses reporting such revenues.

The performance of lending to small businesses in 2018 reflected similar lending patterns and performance to that of 2019 lending.

| TABLE 15 DISTRIBUTION OF 2019 SMALL BUSINESS LENDING BY REVENUE SIZE OF BUSINESSES OKLAHOMA CITY MSA AA | | | | | | | |
|---|----------------------|---------|------|------|--------------------|------|----------------------------------|
| Business Revenue By Size | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses by Revenue |
| | # | \$(000) | #% | \$% | #% | \$% | |
| \$1 million or less | 89 | 9,895 | 46.1 | 44.7 | 45.5 | 40.4 | 91.4 |
| Over \$1 million | 76 | 11,623 | 39.4 | 52.5 | Not Reported | | 7.6 |
| Unknown | 28 | 614 | 14.5 | 2.8 | | | 1.0 |
| Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding. | | | | | | | |

Community Development Lending

The bank makes an adequate level of CD loans. The bank originated 12 CD loans totaling \$28.6 million in the Oklahoma City MSA AA. Six loans for \$14.8 million were for revitalization and stabilization; five loans for \$12 million were for economic development; and 1 loan totaling \$1.8 million was for affordable housing. The following are examples of CD loans that were responsive to AA credit needs:

- The bank made an \$8 million construction loan to build a movie theatre on a property located in a moderate-income census tract and within an area designated as an enterprise zone by the state of Oklahoma.
- Another loan for \$1.1 million was made to an entity that provided tenant improvements to a multifamily structure located in a moderate-income census tract and within a state-designated enterprise zone.
- A \$2.5 million dollar construction loan was advanced to a religious organization to build a church that will create new jobs for 42 employees earning LMI wages. The church is a small business under the SBA size eligibility guidelines.

INVESTMENT TEST

The bank's performance under the investment test in the Oklahoma City MSA AA is adequate.

The bank has an adequate level of qualified CD investments and grants, but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments, yet exhibits adequate responsiveness to credit and CD needs of its AA. Table 16 details all of the bank's qualified CD investments, including prior period and current period investments, as well as donations and grant activity inside the Oklahoma City MSA AA. The two current investments represent the purchase of local government bonds benefitting a school district in which 97.0 percent of students were eligible for the

federal government's free and reduced lunch program. The proceeds of the bonds were used to renovate, repair, and remodel district-wide facilities and equipment. The prior-period investments consisted of MBS pools with loan originations within the Oklahoma City MSA as well as another local bond that benefitted a local school district serving students from LMI families.

In addition, the bank made 46 donations totaling \$191,333 that were CD activities. The following are examples of donations that were responsive to AA needs:

- During the evaluation period, the bank made monthly donations totaling \$83,332 to a local university for a curriculum that creates a real-world business experience in which students create and manage a small non-profit business enterprise. The bank provides primary sponsorship and provides start-up loans to fund inventory and operations for the new entity. All profits from the business are donated to other CD organizations that provide support to LMI individuals and families.
- The bank provided annual donations totaling \$45,625 to two charitable foundations that provide funding to several other charitable entities committed to improving health, safety, education, and economic well-being to LMI families in the AA.
- The bank's holding company donated \$5,000 to an organization located in a moderate-income census tract that prevents generational poverty and homelessness.

**TABLE 16
INVESTMENTS, GRANTS, AND DONATIONS**

| Community Development Purpose | Prior Period Investments ¹ | | Current Investments ² | | Donations | | Total | |
|--|---------------------------------------|--------------|----------------------------------|------------|-----------|------------|-----------|--------------|
| | # | \$(000s) | # | \$(000s) | # | \$(000s) | # | \$(000s) |
| Affordable Housing | 2 | 1,545 | 0 | 0 | 9 | 8 | 11 | 1,553 |
| Community Services | 1 | 468 | 2 | 518 | 29 | 72 | 32 | 1,058 |
| Economic Development | 0 | 0 | 0 | 0 | 6 | 108 | 6 | 108 |
| Revitalization and Stabilization | 0 | 0 | 0 | 0 | 2 | 3 | 2 | 3 |
| TOTAL | 3 | 2,013 | 2 | 518 | 46 | 191 | 51 | 2,722 |
| ¹ Book Value of Investment | | | | | | | | |
| ² Original Market Value of Investment | | | | | | | | |

SERVICE TEST

The bank's performance under the service test in the Oklahoma City MSA AA is adequate.

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 Oklahoma City MSA AA contains 22 of the bank's 29 branches, including 5 in moderate- 10 in middle-, and 6 in upper-income census tracts, along with 1 location in an unknown-

income census tract. The distribution of branches is generally proportional to the percent of census tracts by income level as well as the area population by tract income.

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 or closed any branches 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. As discussed previously all branch locations, except one location, have hours from 9:00 a.m. to 5:00 p.m. Monday through Friday. The other location, a limited-service drive-through branch, is open from 8:30 a.m. to 5:30 p.m.

| TABLE 17 RETAIL AND COMMUNITY DEVELOPMENT SERVICES OKLAHOMA CITY MSA AA | | | | | | | | | | | | |
|--|-----------------------------------|------|--------------------|------|----------------------|------------------------------------|------------------------------------|------|----------------|------|---------------------|-------|
| Branch Accessibility | Location of Branches by Tract (%) | | | | | | Percent of Tracts ¹ (%) | | | | | |
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk | Total |
| | 0.0 | 22.7 | 45.5 | 27.3 | 4.5 | 100.0 | 8.0 | 29.2 | 37.5 | 22.9 | 2.5 | 100.0 |
| Changes in Branch Location | Number of Branches (#) | | | | | Net Change in Branch Locations (#) | | | | | | |
| | Total Branches | | Openings (#) | | Closings (#) | | Low | Mod | Mid | Upp | Unk | Total |
| | 22 | | 0 | | 0 | | 0 | 0 | 0 | 0 | 0 | 0 |
| Community Development Services | Affordable Housing | | Community Services | | Economic Development | | Revitalization & Stabilization | | Total Services | | Total Organizations | |
| | 3 | | 19 | | 3 | | 1 | | 26 | | 19 | |
| ¹ Based on 2019 FFIEC census tract definitions. NOTE: Percentages may not add up to 100.0 due to rounding. | | | | | | | | | | | | |

Community Development Services

The bank provides an adequate level of CD services. As illustrated in Table 17, the bank provided 26 services to 19 different organizations. The level of CD services has declined since the prior evaluation conducted on April 2, 2018. Examples of CD services include two bank officers who serve on the board of directors for two organizations that provide affordable housing, while another employee is a committee member for an organization providing technical and administrative support for small businesses. Several other employees serve on committees for non-profit entities that provide support for LMI individuals and families. Four bank employees were also involved in presenting financial literacy classes to schools in which a majority of students qualified for the government's free and reduced lunch program. Two other employees provided financial literacy for homeownership while another employee provided financial education to small businesses.

OTHER OKLAHOMA METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LIMITED-SCOPE OKLAHOMA METROPOLITAN AREA

TULSA METROPOLITAN AA

The bank's AA is comprised of Tulsa County, one of seven counties that comprise the Tulsa MSA. (See Appendix C for an AA map).

- The AA is comprised of 17 low-, 54 moderate-, 52 middle-, and 53 upper-income census tracts.
- The bank operates one full-service branch within the AA located in an upper-income census tract. The branch has a cash-dispensing ATM on the premises as well as a drive-through facility.
- According to the 2015 American Community Survey (ACS), the population of the AA was 629,165.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank held a 0.2 percent share of deposits in the AA, ranking 39th of 46 FDIC-insured financial institutions operating from 202 banking offices in the AA.

CONCLUSIONS WITH RESPECT TO THE PERFORMANCE TESTS IN THE TULSA METROPOLITAN AA

The Tulsa Metropolitan AA 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 did not significantly impact the overall state rating and are as follows:

| Assessment Area | Lending Test | Investment Test | Service Test |
|-----------------------|--------------|-----------------|--------------|
| Tulsa Metropolitan AA | consistent | consistent | consistent |

STATE OF ARIZONA

CRA RATING FOR ARIZONA:

The lending test is rated:

The investment test is rated:

The service test is rated:

Satisfactory

Low Satisfactory

Low Satisfactory

Low Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- 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 LMI, and businesses of different sizes (borrower distribution) is poor.
- The bank is a leader in making CD loans within its AA.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants and is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits poor responsiveness to credit and CD needs throughout its Arizona AA.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.
- The bank provides a limited level of CD services within its Arizona AA.

SCOPE OF EXAMINATION

The scope of the review for the state of Arizona was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Phoenix Metropolitan AA, the only AA within the state. The overall state rating in Arizona is based exclusively on the bank's performance in the Phoenix Metropolitan AA and is discussed concurrently with the state performance.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE PHOENIX METROPOLITAN AA

The bank's AA is comprised of 907 of the 916 census tracts in Maricopa County, Arizona, which is one of two counties that comprise the Phoenix-Mesa-Scottsdale MSA. The nine census tracts omitted are located in the southwestern portion of Maricopa County and are predominantly rural (see Appendix C for an AA map). The delineated AA was revised since the prior CRA evaluation to exclude Pinal County (75 census tracts) and the nine census tracts in Maricopa County. This revision was made in consideration of the relative distance of these areas from the bank's six branches and resulting negligible lending activity.

- The AA is comprised of 104 low-, 205 moderate-, 283 middle-, 305 upper-, and 10 unknown-income census tracts. At the prior examination, the AA was comprised of 91 low-, 243 moderate-, 336 middle-, 311 upper-, and 10 unknown-income census tracts.
- Six of the bank's 29 branches are located within the Phoenix Metropolitan AA. All branches have on-site cash-dispensing ATMs while three operate drive-through facilities.
- According to the June 30, 2020 FDIC Deposit Market Share Report, the bank has a 0.4 percent market share, ranking 20th out of 59 FDIC-insured depository institutions operating in the AA.
- To obtain pertinent performance context information about the Phoenix Metropolitan AA, examiners conducted an interview with a member of the community and reviewed a previously conducted interview prepared by another regulatory agency for another financial institution in the AA. The interview was conducted with a representative of a local economic development entity while the previously conducted interview was with a representative of an organization that provides affordable housing.

**TABLE 18
POPULATION CHANGE**

| Area | 2010 Population | 2015 Population | Percent Change |
|---------------------------|------------------------|------------------------|-----------------------|
| Maricopa County | 3,817,117 | 4,018,143 | 5.3 |
| Phoenix-Mesa-Chandler MSA | 4,192,887 | 4,407,915 | 5.1 |
| State of Arizona | 6,392,017 | 6,641,928 | 3.9 |

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

- The Phoenix MSA represents 66.4 percent of the population of the state of Arizona. Maricopa County, with a population of 4,018,143, contains 91.2 percent of the MSA's population.
- Maricopa County is one of the largest counties in the United States, with a land area of 9,224 square miles; 132 miles from west to east, and 103 miles from north to south.
- According to an interview with a community representative, Maricopa County is the fourth largest populated area in the United States and continues to grow.

TABLE 19
MEDIAN FAMILY INCOME CHANGE

| Area | 2010 Median Family Income | 2015 Median Family Income | Percent Change |
|---------------------------|---------------------------|---------------------------|----------------|
| Maricopa County | 65,438 | 64,751 | (1.0) |
| Phoenix-Mesa-Chandler MSA | 64,408 | 63,686 | (1.1) |
| State of Arizona | 59,840 | 59,480 | (0.6) |

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

- The percent of families in the AA considered LMI was 38.7 percent, which was similar to the statewide figure of 39.2 percent.
- The family poverty rate in the AA was 12.6 percent, which was similar to the statewide poverty rate at 13.3 percent. When assessed by income level of census tracts in the county, the poverty rates were 30.6 percent in low-, 34.6 percent in moderate-, 22.6 in middle-, and 12.2 percent in upper-income census tracts.

TABLE 20
HOUSING COSTS CHANGE

| Area | Median Housing Value | | Percent Change | Median Gross Rent | | Percent Change |
|---------------------------|----------------------|---------|----------------|-------------------|------|----------------|
| | 2010 | 2015 | | 2010 | 2015 | |
| Maricopa County | 238,600 | 187,100 | (21.6) | 912 | 962 | 5.5 |
| Phoenix-Mesa-Chandler MSA | 232,295 | 179,148 | (22.9) | 909 | 962 | 5.8 |
| State of Arizona | 215,000 | 167,500 | (22.1) | 856 | 913 | 6.7 |

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

- The county contains 1.7 million total housing units of which 52.4 percent are owner-occupied, 34.2 percent are rentals, and 13.4 percent are vacant. The high vacancy rate along with the Phoenix metropolitan area's reputation as a seasonal retirement community and vacation destination indicates that many of these homes are secondary residences.
- The median age of housing stock in the AA was 32 years of age overall. When broken down by income level of census tract, the median age was 45 years in low-, 42 years in moderate-, and 32 years in middle-, and 25 years in upper-income census tracts.
- The affordability ratio² in the county, at 29.1 percent, is very low, and indicates a housing affordability gap. The AA ratio is comparable to the statewide affordability ratio of 30.0 percent.
- Rent prices in the county are expensive, with 46.5 percent of renters having rents that exceed 30.0 percent of their monthly income. The low affordability of rents and mortgage payments may hinder the ability of LMI individuals and families to afford home ownership absent special loan programs.

² The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

- According to community representatives, the housing inventory is very limited, and the AA has a shortage of affordable housing, both to own and to rent. Both community contacts agreed that affordable housing is a significant need in the community.
- One community contact further commented that more affordable housing units are located on the outskirts of the metropolitan area but are in need of rehabilitation.

| TABLE 21 UNEMPLOYMENT RATES | | | | | |
|---|-------------|-------------|-------------|-------------|-------------|
| Region | 2015 | 2016 | 2017 | 2018 | 2019 |
| Maricopa County | 5.1 | 4.5 | 4.2 | 4.1 | 4.0 |
| Phoenix-Mesa-Chandler MSA | 5.2 | 4.6 | 4.3 | 4.2 | 4.1 |
| State of Arizona | 6.0 | 5.3 | 4.9 | 4.8 | 4.7 |
| <i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i> | | | | | |

- According to one community representative, unemployment rates in Arizona were around historical lows, but have risen substantially since the COVID-19 pandemic (pandemic). Larger businesses headquartered in the community have resources to sustain employment, but many small businesses are challenged.
- According to the community representatives, the overall economy was extraordinarily strong prior to the pandemic but was significantly impacted by pandemic restrictions, especially in the hospitality and tourism industries. One representative further added that the hopes of a rapid recovery from the pandemic have faded, but most economists do not believe the state is heading for a prolonged depression.
- In addition to local governments and the public school districts, the largest private employers in the area include: Banner Health System, Walmart, Inc., Fry's Food Stores, Wells Fargo, Arizona State University, Honor Health, Dignity Healthy, Intel Corp, Bank of America, and JP Morgan Chase & Co.
- Key industries in the Phoenix MSA include professional and business services, education and health services, government, retail trade, and leisure and hospitality services.
- Community representatives further indicated that there is competition among various financial institutions in the area, but there are plenty of opportunities to respond to credit needs in the area, including affordable housing acquisition and rehabilitation home mortgage loans, micro business loans, and small consumer loans. A second area of need is workforce development to fill new positions created by movement of technology jobs from the Silicon Valley in California.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PHOENIX METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the Phoenix Metropolitan AA is Low Satisfactory.

Lending Activity

The bank's lending activities reflected adequate responsiveness to AA credit needs. The evaluation includes 305 small business and 32 home mortgage loans originated during a two-year period from January 1, 2018 to December 31, 2019. The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including the needs of LMI borrowers. A description of the bank's flexible lending programs is discussed in the overall institutional section of this report.

Geographic Distribution of Loans

The geographic distribution of lending reflects good penetration throughout the AA.

Home Mortgage Lending

The geographic distribution of 2019 and 2018 home mortgage lending is adequate.

The bank did not originate any home mortgage loan products in low-income census tracts in 2019, and originated two loans in moderate-income census tracts. The two loans originated in moderate-income census tracts were for multifamily housing purposes, which may be considered responsive to the housing needs of individuals in LMI areas who are potentially unable to obtain homeownership. Additionally, although low in total, the concentration of loans in moderate-income census tracts was comparable to the aggregate lending data by number and dollar, as well as the demographic figure.

The distribution of home mortgage lending in 2018 reflected performance comparable to that of 2019 lending. Furthermore, the bank's loan dispersion among geographies of different income levels revealed a lending gap given the absence of single-family home mortgage loans in LMI census tracts.

**TABLE 22
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
PHOENIX METROPOLITAN AA**

| Census Tract Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Owner- Occupied Units |
|------------------------------|------------|---------|------|------|------------------------|------|-------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 3.6 | 3.1 | 4.5 |
| Moderate | 2 | 2,145 | 15.4 | 12.5 | 14.7 | 11.8 | 18.9 |
| Middle | 3 | 9,333 | 23.1 | 54.5 | 34.6 | 29.6 | 34.5 |
| Upper | 8 | 5,642 | 61.5 | 33.0 | 46.5 | 54.7 | 42.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.6 | 0.8 | 0.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of 2019 and 2018 small business lending is good.

The distribution of 2019 small business loans in low-income census tracts was comparable to the aggregate lending data and percent of businesses by number and below the aggregate lending data by dollar. Lending in moderate-income census tracts was comparable to the aggregate lending data by number and dollar, as well as comparable to the demographic figure. Additionally, the bank's loan dispersion among geographies of different income levels did not reveal any noteworthy gaps or lapses.

The distribution of small business loans in 2018 reflected performance that exceeded 2019 lending patterns, particularly with stronger lending performance in moderate-income census tracts that exceeded both comparison data sets.

**TABLE 23
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
PHOENIX METROPOLITAN AA**

| Census Tract Income Level | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses |
|------------------------------|----------------------|---------|------|------|--------------------|------|--------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Low | 11 | 2,264 | 7.4 | 5.7 | 6.8 | 10.5 | 6.9 |
| Moderate | 28 | 6,558 | 18.8 | 16.6 | 16.5 | 18.6 | 17.0 |
| Middle | 44 | 12,627 | 29.5 | 32.0 | 26.9 | 25.4 | 28.5 |
| Upper | 64 | 17,686 | 43.0 | 44.9 | 49.2 | 44.5 | 47.1 |
| Unknown | 2 | 270 | 1.3 | 0.7 | 0.6 | 1.1 | 0.6 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

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

The bank's lending has a poor penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of 2019 and 2018 home mortgage lending is poor.

The distribution of 2019 home mortgage loans reflects poor penetration to borrowers of different income levels, as the bank did not originate a loan to LMI borrowers during the year with all loans made to upper-income borrowers or to borrowers whose income was unknown.

In 2018, the bank had a slightly larger volume of lending and reflected penetration levels more closely aligned with aggregate lending data and the demographic figure but was below when compared to middle-income borrowers. The majority of loans were made to upper-income borrowers and to borrowers whose income was unknown.

| TABLE 24 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY BORROWER INCOME LEVELS PHOENIX METROPOLITAN AA | | | | | | | |
|---|------------|---------|------|------|------------------------|------|---------------|
| Borrower Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Families |
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 4.7 | 2.4 | 21.8 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 15.2 | 9.9 | 16.9 |
| Middle | 0 | 0 | 0.0 | 0.0 | 20.3 | 16.1 | 19.2 |
| Upper | 8 | 5,642 | 61.5 | 33.0 | 40.0 | 46.1 | 42.2 |
| Unknown | 5 | 11,478 | 38.5 | 67.0 | 19.7 | 25.4 | 0.0 |
| Source: 2019 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding. | | | | | | | |

Small Business Lending

The borrower distribution of 2019 and 2018 small business lending is poor.

As illustrated in Table 25, the distribution of 2019 loans to businesses with revenues of \$1 million or less (small businesses) reflected penetration below the aggregate lending data and the percentage of small businesses in the AA by number, although the bank's lending was comparable to the aggregate lending data by dollar.

The penetration of small business lending in 2018 reflects consistent lending performance to that of 2019 lending patterns.

**TABLE 25
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
PHOENIX METROPOLITAN AA**

| Business Revenue By Size | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses by Revenue |
|---|----------------------|---------|------|------|--------------------|------|----------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| \$1 million or less | 42 | 11,560 | 28.2 | 29.3 | 49.6 | 31.8 | 92.6 |
| Over \$1 million | 96 | 26,996 | 64.4 | 68.5 | Not Reported | | 6.5 |
| Unknown | 11 | 849 | 7.4 | 2.2 | | | 1.0 |
| Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding. | | | | | | | |

Community Development Lending

The bank is a leader in making CD loans. The bank originated 30 CD loans totaling \$81.3 million in the Phoenix Metropolitan AA, which accounts for 70.8 percent of CD lending bank wide. The bulk of CD lending, 26 loans for \$66.5 million, addressed economic development by financing small businesses based on the SBA size standards that ultimately created or retained jobs for LMI individuals. The other four loans, totaling \$14.7 million, were for the purchase or refinancing of multiple 1- to 4-family or multifamily units with rents under 80.0 percent of the Department of Housing and Urban Development's Fair Market Rents in the AA.

INVESTMENT TEST

The bank's rating under the investment test in the state of Arizona market is Low Satisfactory. In the Phoenix Metropolitan AA, the bank has an adequate level of qualified CD investments and grants and is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits poor responsiveness to credit and CD needs of its AA. The bank has three prior period MBS investments totaling \$1.9 million for affordable housing.

In addition, the bank had six donations totaling \$8,700. Five donations in an aggregate amount of \$8,600 were made to community service non-profit organizations, the remaining \$100 went towards affordable housing efforts. Of the total donations, \$8,000 were made to an organization supporting children of LMI families; however, the remaining donations were not particularly responsive.

SERVICE TEST

The bank's rating under the service test in the state of Arizona is Low Satisfactory. The bank's performance under the service test in the Phoenix Metropolitan AA is adequate.

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 Phoenix Metropolitan AA contains 6 of the bank's 29 branches, including 1 located in a low-income, 2 in moderate-, and 3 in upper-income census tracts. The proportion of branches in LMI census tracts exceeds the percentage of LMI census tracts in the AA.

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 or closed any branches 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. As discussed previously all branch locations have hours from 9:00 a.m. to 5:00 p.m. Monday through Thursday with an additional evening hour on Fridays.

| TABLE 26 RETAIL AND COMMUNITY DEVELOPMENT SERVICES PHOENIX METROPOLITAN AA | | | | | | | | | | | | |
|--|-----------------------------------|------|--------------------|------|----------------------|-------|------------------------------------|------|----------------|------|---------------------|-------|
| Branch Accessibility | Location of Branches by Tract (%) | | | | | | Percent of Tracts ¹ (%) | | | | | |
| | Low | Mod | Mid | Upp | Unk | Total | Low | Mod | Mid | Upp | Unk | Total |
| | 16.7 | 33.3 | 0.0 | 50.0 | 0.0 | 100.0 | 11.5 | 22.6 | 31.2 | 33.6 | 1.1 | 100.0 |
| Changes in Branch Location | Number of Branches (#) | | | | | | Net Change in Branch Locations (#) | | | | | |
| | Total Branches | | Openings (#) | | Closings (#) | | Low | Mod | Mid | Upp | Unk | Total |
| | 6 | | 0 | | 0 | | 0 | 0 | 0 | 0 | 0 | 0 |
| Community Development Services | Affordable Housing | | Community Services | | Economic Development | | Revitalization & Stabilization | | Total Services | | Total Organizations | |
| | 0 | | 3 | | 0 | | 0 | | 3 | | 3 | |
| ¹ Based on 2019 FFIEC census tract definitions. NOTE: Percentages may not add up to 100.0 due to rounding. | | | | | | | | | | | | |

Community Development Services

The bank provides a limited level of CD services. During the evaluation period, the bank only had three CD services. Two bank employees served on the board of directors for two community organizations that provide support for LMI individuals and families while another bank employee provided financial literacy education to students who attended a school where the majority of students qualified for the government's free and reduced lunch program.

APPENDIX A

| SCOPE OF EXAMINATION | | | |
|--|-------------------------------|--|--------------------|
| <u>FINANCIAL INSTITUTION</u> First Fidelity Bank Oklahoma City, Oklahoma | | <u>PRODUCTS/SERVICES REVIEWED</u> <ul style="list-style-type: none">• Home Purchase Loans• Home Refinance Loans• Home Improvement Loans• Multifamily Loans• Small Business Loans• Small Farm Loans• Community Development Loans• Qualified Investments and Donations• Community Development Services | |
| <u>TIME PERIODS REVIEWED</u> <u>HMDA LAR and CRA SB and SF Loans:</u> January 1, 2018 to December 31, 2019 <u>Community Development Activities:</u> April 3, 2018 to December 31, 2019 | | | |
| LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION | | | |
| AFFILIATES | | AFFILIATE RELATIONSHIP | PRODUCTS REVIEWED |
| First Fidelity Bancorp, Inc. | | Holding Company | None |
| First Fidelity Bank Statutory Trust II | | Sub of Holding Company | None |
| Apex Statutory Trust 1 | | Sub of Holding Company | None |
| First Fidelity Statutory Trust I | | Sub of Holding Company | None |
| Western Security Capital Trust II | | Sub of Holding Company | None |
| Classen Asset Management, LLC | | Sub of Bank | None |
| FFB Investments, Inc. | | Sub of Bank | None |
| FFB Loan Investment Limited Partnership | | Sub of FFB Investments, Inc. | None |
| FFB Holdings, Inc. | | Sub of FFB Investments, Inc. | None |
| FFB Loan Investment Limited Partnership | | Sub of FFB Holdings, Inc. | None |
| First Fidelity Financial Services, Inc. | | Sub of Bank | None |
| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION | | | |
| ASSESSMENT AREA | TYPE OF EXAM | BRANCHES VISITED | COMMUNITY CONTACTS |
| <u>Oklahoma</u> MSA 36420 (Oklahoma City) MSA 46140 (Tulsa) | Full Review Limited Review | None None | 3 prior None |
| <u>Arizona</u> MSA 38060 (Phoenix) | Full Review | None | 1 current, 1 prior |

APPENDIX B

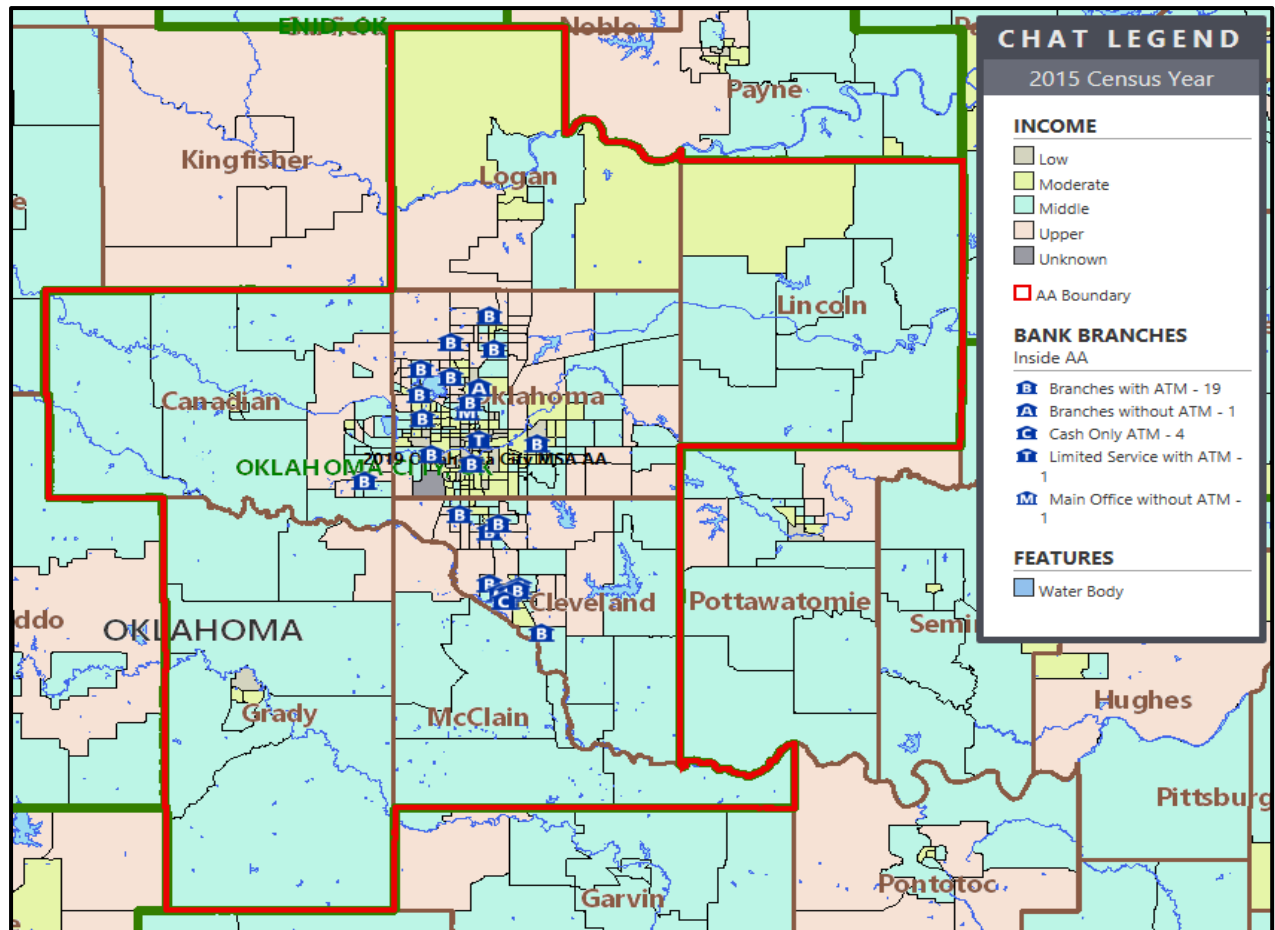
SUMMARY OF STATE RATINGS

| STATE NAME | LENDING TEST RATING | INVESTMENT TEST RATING | SERVICE TEST RATING | OVERALL RATING |
|-------------------|--------------------------------|-----------------------------------|--------------------------------|---------------------------|
| Oklahoma | Low Satisfactory | Low Satisfactory | Low Satisfactory | Satisfactory |
| Arizona | Low Satisfactory | Low Satisfactory | Low Satisfactory | Satisfactory |

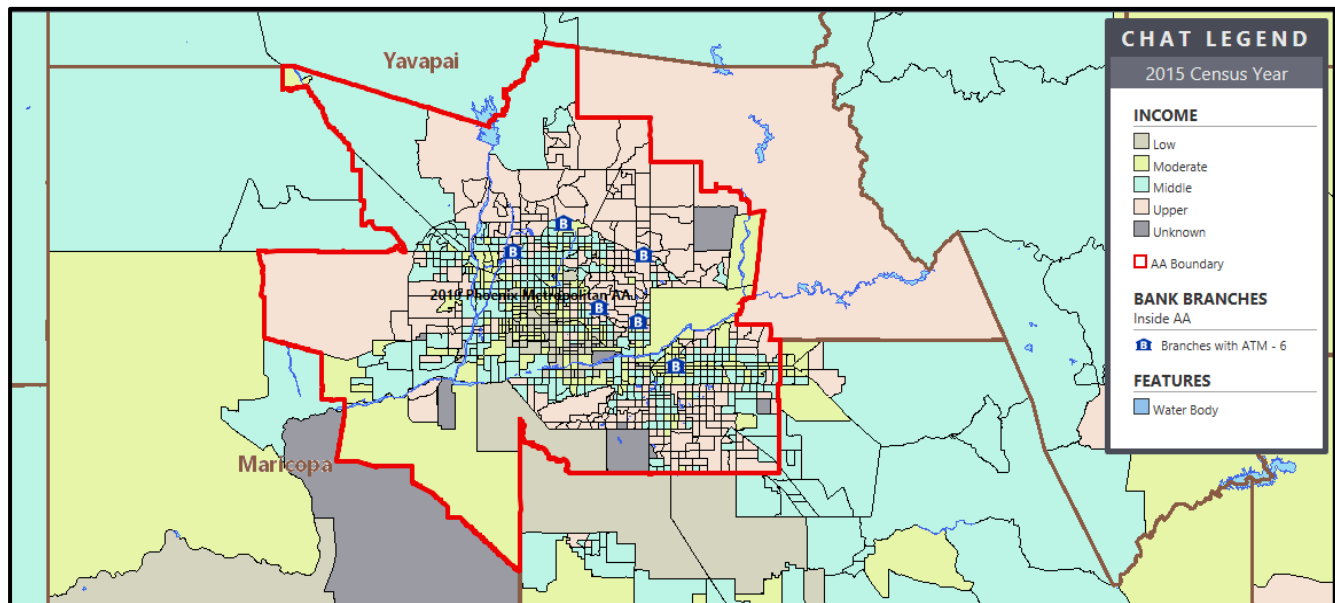
APPENDIX C

MAPS OF THE ASSESSMENT AREAS

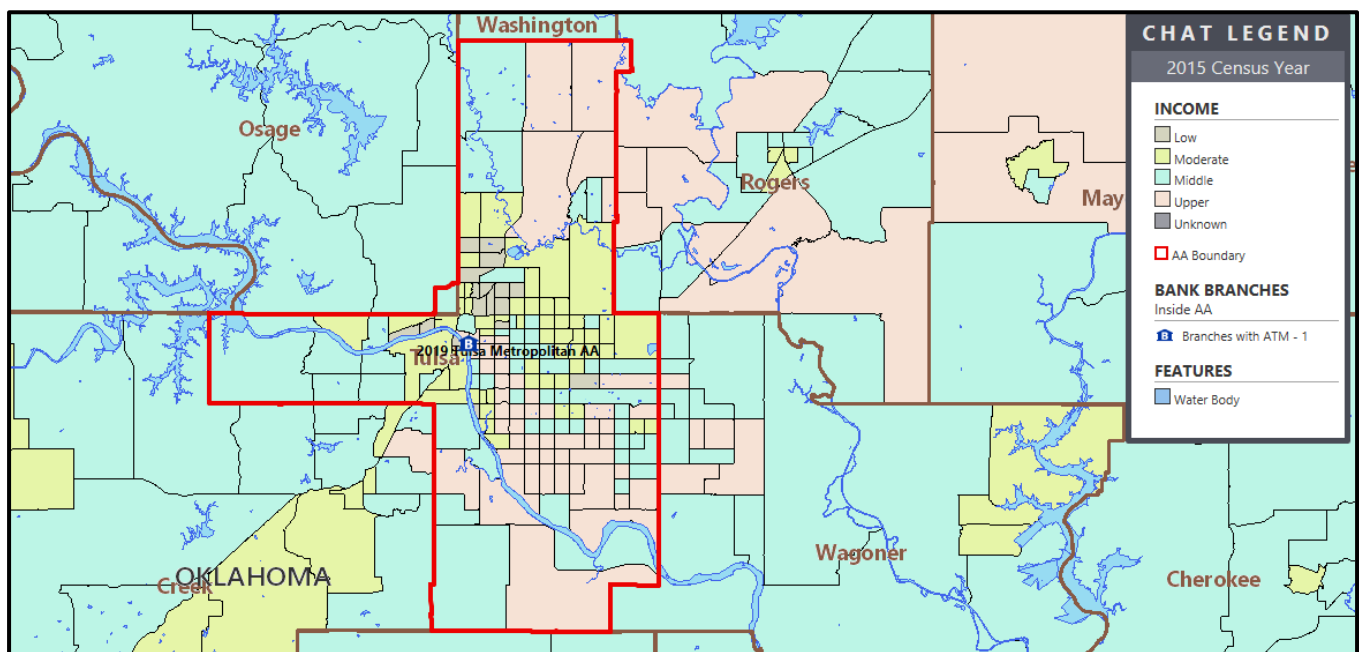
A. Oklahoma City MSA AA



B. Phoenix Metropolitan AA



C. Tulsa Metropolitan AA



APPENDIX D

2018 ANALYSIS TABLES FOR FULL-SCOPE ASSESSMENT AREAS

- A. Oklahoma City MSA AA (Full-Scope Review) – 2018 and 2019 Demographic and 2018 Lending Tables
- B. Phoenix Metropolitan AA (Full-Scope Review) – 2018 and 2019 Demographic and 2018 Lending Tables

Footnotes for all Analysis and Demographics Tables

- 2019 and 2018 FFIEC Census Data
- Business and Farm data based on 2019 and 2018 Dun & Bradstreet Data
- 2011 – 2015 U.S. Census Bureau: American Community Survey
- Note: Percentages may not add up to 100.0 due to rounding.

A. Oklahoma City MSA AA

| TABLE D-1 2018 OKLAHOMA CITY MSA AA DEMOGRAPHICS | | | | | | | | |
|---|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 29 | 8.0 | 17,305 | 5.3 | 6,311 | 36.5 | 68,992 | 21.3 |
| Moderate | 106 | 29.2 | 70,397 | 21.7 | 14,193 | 20.2 | 56,617 | 17.5 |
| Middle | 136 | 37.5 | 135,181 | 41.8 | 11,774 | 8.7 | 66,502 | 20.5 |
| Upper | 83 | 22.9 | 100,538 | 31.1 | 3,708 | 3.7 | 131,650 | 40.7 |
| Unknown | 9 | 2.5 | 340 | 0.1 | 119 | 35.0 | 0 | 0.0 |
| Total AA | 363 | 100.0 | 323,761 | 100.0 | 36,105 | 11.2 | 323,761 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 34,089 | 10,670 | 3.4 | 31.3 | 17,711 | 52.0 | 5,708 | 16.7 |
| Moderate | 143,022 | 58,380 | 18.4 | 40.8 | 64,973 | 45.4 | 19,669 | 13.8 |
| Middle | 225,991 | 140,031 | 44.1 | 62.0 | 64,019 | 28.3 | 21,941 | 9.7 |
| Upper | 147,331 | 108,384 | 34.1 | 73.6 | 29,427 | 20.0 | 9,520 | 6.5 |
| Unknown | 1,583 | 195 | 0.1 | 12.3 | 1,094 | 69.1 | 294 | 18.6 |
| Total AA | 552,016 | 317,660 | 100.0 | 57.5 | 177,224 | 32.1 | 57,132 | 10.3 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 2,805 | 4.4 | 2,366 | 4.1 | 418 | 8.4 | 21 | 2.8 |
| Moderate | 14,101 | 22.2 | 12,619 | 21.8 | 1,303 | 26.3 | 179 | 23.5 |
| Middle | 23,930 | 37.7 | 21,859 | 37.8 | 1,783 | 35.9 | 288 | 37.8 |
| Upper | 20,810 | 32.8 | 19,445 | 33.6 | 1,134 | 22.8 | 231 | 30.3 |
| Unknown | 1,878 | 3.0 | 1,510 | 2.6 | 325 | 6.5 | 43 | 5.6 |
| Total AA | 63,524 | 100.0 | 57,799 | 100.0 | 4,963 | 100.0 | 762 | 100.0 |
| Percentage of Total Businesses: | | | | 91.0 | | 7.8 | | 1.2 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 20 | 1.7 | 18 | 1.6 | 2 | 8.3 | 0 | 0.0 |
| Moderate | 125 | 10.9 | 123 | 11.0 | 2 | 8.3 | 0 | 0.0 |
| Middle | 616 | 53.8 | 602 | 53.7 | 13 | 54.2 | 1 | 100.0 |
| Upper | 380 | 33.2 | 374 | 33.4 | 6 | 25.0 | 0 | 0.0 |
| Unknown | 5 | 0.4 | 4 | 0.4 | 1 | 4.2 | 0 | 0.0 |
| Total AA | 1,146 | 100.0 | 1,121 | 100.0 | 24 | 100.0 | 1 | 100.0 |
| Percentage of Total Farms: | | | | 97.8 | | 2.1 | | 0.1 |

**TABLE D-2
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
OKLAHOMA CITY MSA AA**

| Census Tract Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Owner- Occupied Units |
|------------------------------|------------|---------|-------|-------|---------------------|------|-------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 4 | 201 | 2.5 | 1.0 | 1.8 | 1.3 | 3.4 |
| Moderate | 25 | 2,033 | 15.6 | 9.7 | 14.5 | 10.6 | 18.4 |
| Middle | 68 | 6,185 | 42.5 | 29.5 | 41.5 | 37.0 | 44.1 |
| Upper | 63 | 12,524 | 39.4 | 59.8 | 42.0 | 50.7 | 34.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.1 | 0.4 | 0.1 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 50 | 1.8 | 0.5 | 1.5 | 0.8 | 3.4 |
| Moderate | 6 | 645 | 10.5 | 7.0 | 14.0 | 9.1 | 18.4 |
| Middle | 24 | 2,779 | 42.1 | 30.0 | 41.0 | 35.7 | 44.1 |
| Upper | 26 | 5,783 | 45.6 | 62.5 | 43.3 | 54.1 | 34.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.1 | 0.2 | 0.1 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Home Refinance Loans | | | | | | | |
| Low | 1 | 53 | 1.3 | 0.5 | 2.0 | 0.9 | 3.4 |
| Moderate | 10 | 799 | 13.3 | 7.8 | 14.9 | 9.9 | 18.4 |
| Middle | 31 | 2,730 | 41.3 | 26.8 | 43.1 | 36.1 | 44.1 |
| Upper | 33 | 6,610 | 44.0 | 64.9 | 39.9 | 52.8 | 34.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.1 | 0.3 | 0.1 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Home Improvement Loans | | | | | | | |
| Low | 2 | 98 | 7.4 | 8.1 | 2.6 | 1.9 | 3.4 |
| Moderate | 8 | 301 | 29.6 | 25.0 | 15.5 | 11.7 | 18.4 |
| Middle | 13 | 675 | 48.1 | 56.1 | 39.9 | 34.2 | 44.1 |
| Upper | 4 | 131 | 14.8 | 10.8 | 41.9 | 51.5 | 34.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.2 | 0.7 | 0.1 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Multifamily Loans | | | | | | | % of Multifamily Units |
| Low | 0 | 0 | 0.0 | 0.0 | 9.6 | 6.4 | 8.5 |
| Moderate | 1 | 287 | 100.0 | 100.0 | 40.8 | 25.7 | 39.3 |
| Middle | 0 | 0 | 0.0 | 0.0 | 38.6 | 54.0 | 33.4 |
| Upper | 0 | 0 | 0.0 | 0.0 | 9.2 | 11.4 | 17.5 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 1.8 | 2.4 | 1.3 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

**TABLE D-3
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
OKLAHOMA CITY MSA AA**

| Census Tract Income Level | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses |
|------------------------------|----------------------|---------|------|------|--------------------|------|--------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Low | 9 | 648 | 3.6 | 2.3 | 4.5 | 6.4 | 4.4 |
| Moderate | 59 | 6,096 | 23.8 | 21.2 | 19.6 | 20.5 | 22.2 |
| Middle | 89 | 9,060 | 35.9 | 31.5 | 36.5 | 37.0 | 37.7 |
| Upper | 85 | 11,585 | 34.3 | 40.3 | 35.9 | 31.6 | 32.8 |
| Unknown | 6 | 1,386 | 2.4 | 4.8 | 2.3 | 4.0 | 3.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 1.2 | 0.5 | 0.0 |

**TABLE D-4
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
OKLAHOMA CITY MSA AA**

| Borrower Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Families |
|---------------------------|------------|---------|-------|-------|---------------------|------|---------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 14 | 742 | 8.8 | 3.5 | 6.2 | 3.1 | 21.3 |
| Moderate | 27 | 2,015 | 16.9 | 9.6 | 17.1 | 11.9 | 17.5 |
| Middle | 28 | 2,921 | 17.5 | 13.9 | 19.9 | 17.4 | 20.5 |
| Upper | 59 | 9,863 | 36.9 | 47.1 | 34.2 | 41.5 | 40.7 |
| Unknown | 32 | 5,401 | 20.0 | 25.8 | 22.5 | 26.2 | 0.0 |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 6.0 | 3.2 | 21.3 |
| Moderate | 12 | 1,148 | 21.1 | 12.4 | 18.5 | 13.7 | 17.5 |
| Middle | 7 | 1,147 | 12.3 | 12.4 | 21.2 | 19.9 | 20.5 |
| Upper | 25 | 4,761 | 43.9 | 51.4 | 33.2 | 44.0 | 40.7 |
| Unknown | 13 | 2,202 | 22.8 | 23.8 | 21.0 | 19.1 | 0.0 |
| Home Refinance Loans | | | | | | | |
| Low | 8 | 508 | 10.7 | 5.0 | 7.5 | 3.7 | 21.3 |
| Moderate | 10 | 663 | 13.3 | 6.5 | 16.0 | 10.3 | 17.5 |
| Middle | 13 | 1,464 | 17.3 | 14.4 | 19.4 | 16.0 | 20.5 |
| Upper | 27 | 4,862 | 36.0 | 47.7 | 38.1 | 48.6 | 40.7 |
| Unknown | 17 | 2,696 | 22.7 | 26.5 | 19.1 | 21.4 | 0.0 |
| Home Improvement Loans | | | | | | | |
| Low | 6 | 234 | 22.2 | 19.5 | 6.9 | 4.4 | 21.3 |
| Moderate | 5 | 205 | 18.5 | 17.0 | 14.7 | 10.0 | 17.5 |
| Middle | 8 | 310 | 29.6 | 25.8 | 18.6 | 14.4 | 20.5 |
| Upper | 7 | 240 | 25.9 | 19.9 | 49.0 | 51.1 | 40.7 |
| Unknown | 1 | 215 | 3.7 | 17.8 | 10.8 | 20.2 | 0.0 |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 0.9 | 0.1 | 21.3 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 17.5 |
| Middle | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 20.5 |
| Upper | 0 | 0 | 0.0 | 0.0 | 4.4 | 0.8 | 40.7 |
| Unknown | 1 | 287 | 100.0 | 100.0 | 94.7 | 99.1 | 0.0 |

**TABLE D-5
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
OKLAHOMA CITY MSA AA**

| Business Revenue By Size | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses by Revenue |
|-----------------------------|----------------------|---------|------|------|--------------------|------|----------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| \$1 million or less | 105 | 13,196 | 42.3 | 45.9 | 46.5 | 40.1 | 91.0 |
| Over \$1 million | 94 | 13,200 | 37.9 | 45.9 | Not Reported | | 7.8 |
| Unknown | 49 | 2,379 | 19.8 | 8.3 | | | 1.2 |

TABLE D-6
2019 OKLAHOMA CITY MSA AA DEMOGRAPHICS

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|---------------------------------|---------------------------|-----------------------|------------------------------------|--------------|--|--------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low | 29 | 8.0 | 17,305 | 5.3 | 6,311 | 36.5 | 68,992 | 21.3 |
| Moderate | 106 | 29.2 | 70,397 | 21.7 | 14,193 | 20.2 | 56,617 | 17.5 |
| Middle | 136 | 37.5 | 135,181 | 41.8 | 11,774 | 8.7 | 66,502 | 20.5 |
| Upper | 83 | 22.9 | 100,538 | 31.1 | 3,708 | 3.7 | 131,650 | 40.7 |
| Unknown | 9 | 2.5 | 340 | 0.1 | 119 | 35.0 | 0 | 0.0 |
| Total AA | 363 | 100.0 | 323,761 | 100.0 | 36,105 | 11.2 | 323,761 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 34,089 | 10,670 | 3.4 | 31.3 | 17,711 | 52.0 | 5,708 | 16.7 |
| Moderate | 143,022 | 58,380 | 18.4 | 40.8 | 64,973 | 45.4 | 19,669 | 13.8 |
| Middle | 225,991 | 140,031 | 44.1 | 62.0 | 64,019 | 28.3 | 21,941 | 9.7 |
| Upper | 147,331 | 108,384 | 34.1 | 73.6 | 29,427 | 20.0 | 9,520 | 6.5 |
| Unknown | 1,583 | 195 | 0.1 | 12.3 | 1,094 | 69.1 | 294 | 18.6 |
| Total AA | 552,016 | 317,660 | 100.0 | 57.5 | 177,224 | 32.1 | 57,132 | 10.3 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 2,828 | 4.4 | 2,412 | 4.1 | 403 | 8.3 | 13 | 2.0 |
| Moderate | 14,308 | 22.3 | 12,897 | 22.0 | 1,262 | 26.0 | 149 | 23.2 |
| Middle | 24,008 | 37.5 | 22,009 | 37.6 | 1,756 | 36.2 | 243 | 37.8 |
| Upper | 21,027 | 32.8 | 19,701 | 33.6 | 1,115 | 23.0 | 211 | 32.8 |
| Unknown | 1,916 | 3.0 | 1,570 | 2.7 | 319 | 6.6 | 27 | 4.2 |
| Total AA | 64,087 | 100.0 | 58,589 | 100.0 | 4,855 | 100.0 | 643 | 100.0 |
| Percentage of Total Businesses: | | | | 91.4 | | 7.6 | | 1.0 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 19 | 1.6 | 17 | 1.4 | 2 | 8.3 | 0 | 0.0 |
| Moderate | 142 | 11.7 | 138 | 11.6 | 4 | 16.7 | 0 | 0.0 |
| Middle | 662 | 54.4 | 650 | 54.5 | 11 | 45.8 | 1 | 100.0 |
| Upper | 391 | 32.1 | 384 | 32.2 | 7 | 29.2 | 0 | 0.0 |
| Unknown | 3 | 0.2 | 3 | 0.3 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 1,217 | 100.0 | 1,192 | 100.0 | 24 | 100.0 | 1 | 100.0 |
| Percentage of Total Farms: | | | | 97.9 | | 2.0 | | 0.1 |

B. Phoenix Metropolitan AA

| TABLE D-7 2018 PHOENIX METROPOLITAN AA DEMOGRAPHICS | | | | | | | | |
|--|---------------------------|-----------------------|------------------------------------|-----------|--|-----------|---------------------------|-----------|
| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
| | # | % | # | % | # | % | # | % |
| Low | 104 | 11.5 | 84,543 | 9.0 | 36,093 | 42.7 | 204,365 | 21.8 |
| Moderate | 205 | 22.6 | 195,613 | 20.8 | 40,780 | 20.8 | 158,326 | 16.9 |
| Middle | 283 | 31.2 | 300,519 | 32.0 | 26,728 | 8.9 | 180,094 | 19.2 |
| Upper | 305 | 33.6 | 357,489 | 38.1 | 14,375 | 4.0 | 395,614 | 42.2 |
| Unknown | 10 | 1.1 | 235 | 0.0 | 40 | 17.0 | 0 | 0.0 |
| Total AA | 907 | 100.0 | 938,399 | 100.0 | 118,016 | 12.6 | 938,399 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 162,646 | 39,453 | 4.5 | 24.3 | 96,806 | 59.5 | 26,387 | 16.2 |
| Moderate | 387,718 | 164,006 | 18.9 | 42.3 | 166,454 | 42.9 | 57,258 | 14.8 |
| Middle | 549,592 | 299,595 | 34.5 | 54.5 | 176,624 | 32.1 | 73,373 | 13.4 |
| Upper | 553,876 | 364,867 | 42.0 | 65.9 | 124,259 | 22.4 | 64,750 | 11.7 |
| Unknown | 1,922 | 157 | 0.0 | 8.2 | 1,480 | 77.0 | 285 | 14.8 |
| Total AA | 1,655,754 | 868,078 | 100.0 | 52.4 | 565,623 | 34.2 | 222,053 | 13.4 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 14,529 | 6.8 | 12,369 | 6.3 | 1,932 | 13.7 | 228 | 8.9 |
| Moderate | 35,959 | 16.9 | 32,401 | 16.6 | 3,243 | 23.0 | 315 | 12.2 |
| Middle | 60,240 | 28.4 | 56,110 | 28.7 | 3,535 | 25.1 | 595 | 23.1 |
| Upper | 100,486 | 47.3 | 93,898 | 48.0 | 5,160 | 36.6 | 1,428 | 55.5 |
| Unknown | 1,197 | 0.6 | 955 | 0.5 | 234 | 1.7 | 8 | 0.3 |
| Total AA | 212,411 | 100.0 | 195,733 | 100.0 | 14,104 | 100.0 | 2,574 | 100.0 |
| Percentage of Total Businesses: | | | | 92.1 | | 6.6 | | 1.2 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 52 | 3.2 | 47 | 3.0 | 5 | 7.1 | 0 | 0.0 |
| Moderate | 221 | 13.5 | 205 | 13.1 | 14 | 20.0 | 2 | 100.0 |
| Middle | 463 | 28.4 | 436 | 27.9 | 27 | 38.6 | 0 | 0.0 |
| Upper | 891 | 54.6 | 867 | 55.5 | 24 | 34.3 | 0 | 0.0 |
| Unknown | 6 | 0.4 | 6 | 0.4 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 1,633 | 100.0 | 1,561 | 100.0 | 70 | 100.0 | 2 | 100.0 |
| Percentage of Total Farms: | | | | 95.6 | | 4.3 | | 0.1 |

**TABLE D-8
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
PHOENIX METROPOLITAN AA**

| Census Tract Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Owner- Occupied Units |
|------------------------------|------------|---------|------|------|---------------------|------|-------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 1 | 131 | 5.3 | 1.7 | 4.1 | 3.7 | 4.5 |
| Moderate | 3 | 587 | 15.8 | 7.7 | 15.8 | 12.3 | 18.9 |
| Middle | 8 | 1,506 | 42.1 | 19.7 | 35.2 | 30.2 | 34.5 |
| Upper | 7 | 5,438 | 36.8 | 71.0 | 44.3 | 53.1 | 42.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.6 | 0.7 | 0.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

**TABLE D-9
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
PHOENIX METROPOLITAN AA**

| Census Tract Income Level | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses |
|------------------------------|----------------------|---------|------|------|--------------------|------|--------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Low | 13 | 2,351 | 8.3 | 9.0 | 6.9 | 11.6 | 6.8 |
| Moderate | 42 | 6,255 | 26.9 | 24.0 | 16.5 | 18.7 | 16.9 |
| Middle | 47 | 5,362 | 30.1 | 20.6 | 26.7 | 24.7 | 28.4 |
| Upper | 53 | 12,065 | 34.0 | 46.3 | 49.3 | 43.7 | 47.3 |
| Unknown | 1 | 25 | 0.6 | 0.1 | 0.6 | 1.3 | 0.6 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

**TABLE D-10
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
PHOENIX METROPOLITAN AA**

| Borrower Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Families |
|---------------------------|------------|---------|------|------|---------------------|------|---------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 1 | 33 | 5.3 | 0.4 | 5.1 | 2.5 | 21.8 |
| Moderate | 3 | 316 | 15.8 | 4.1 | 15.9 | 10.3 | 16.9 |
| Middle | 1 | 132 | 5.3 | 1.7 | 20.4 | 16.0 | 19.2 |
| Upper | 8 | 2,393 | 42.1 | 31.2 | 40.8 | 46.8 | 42.2 |
| Unknown | 6 | 4,788 | 31.6 | 62.5 | 17.8 | 24.4 | 0.0 |

**TABLE D-11
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
PHOENIX METROPOLITAN AA**

| Business Revenue By Size | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses by Revenue |
|-----------------------------|----------------------|---------|------|------|--------------------|------|----------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| \$1 million or less | 32 | 5,564 | 20.5 | 21.3 | 46.1 | 30.1 | 92.1 |
| Over \$1 million | 82 | 17,691 | 52.6 | 67.9 | Not Reported | | 6.6 |
| Unknown | 42 | 2,805 | 26.9 | 10.8 | | | 1.2 |

TABLE D-12
2019 PHOENIX METROPOLITAN AA DEMOGRAPHICS

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|---------------------------------|---------------------------|-----------------------|------------------------------------|--------------|--|--------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low | 104 | 11.5 | 84,543 | 9.0 | 36,093 | 42.7 | 204,365 | 21.8 |
| Moderate | 205 | 22.6 | 195,613 | 20.8 | 40,780 | 20.8 | 158,326 | 16.9 |
| Middle | 283 | 31.2 | 300,519 | 32.0 | 26,728 | 8.9 | 180,094 | 19.2 |
| Upper | 305 | 33.6 | 357,489 | 38.1 | 14,375 | 4.0 | 395,614 | 42.2 |
| Unknown | 10 | 1.1 | 235 | 0.0 | 40 | 17.0 | 0 | 0.0 |
| Total AA | 907 | 100.0 | 938,399 | 100.0 | 118,016 | 12.6 | 938,399 | 100.0 |
| | Housing Units by Tract | Housing Type by Tract | | | | | | |
| | | Owner-occupied | | | Rental | | Vacant | |
| | | # | % by tract | % by unit | # | % by unit | # | % by unit |
| Low | 162,646 | 39,453 | 4.5 | 24.3 | 96,806 | 59.5 | 26,387 | 16.2 |
| Moderate | 387,718 | 164,006 | 18.9 | 42.3 | 166,454 | 42.9 | 57,258 | 14.8 |
| Middle | 549,592 | 299,595 | 34.5 | 54.5 | 176,624 | 32.1 | 73,373 | 13.4 |
| Upper | 553,876 | 364,867 | 42.0 | 65.9 | 124,259 | 22.4 | 64,750 | 11.7 |
| Unknown | 1,922 | 157 | 0.0 | 8.2 | 1,480 | 77.0 | 285 | 14.8 |
| Total AA | 1,655,754 | 868,078 | 100.0 | 52.4 | 565,623 | 34.2 | 222,053 | 13.4 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 14,766 | 6.9 | 12,681 | 6.4 | 1,903 | 13.7 | 182 | 8.5 |
| Moderate | 36,655 | 17.0 | 33,257 | 16.7 | 3,161 | 22.8 | 237 | 11.1 |
| Middle | 61,248 | 28.5 | 57,301 | 28.8 | 3,481 | 25.1 | 466 | 21.8 |
| Upper | 101,321 | 47.1 | 94,962 | 47.7 | 5,115 | 36.8 | 1,244 | 58.2 |
| Unknown | 1,230 | 0.6 | 988 | 0.5 | 233 | 1.7 | 9 | 0.4 |
| Total AA | 215,220 | 100.0 | 199,189 | 100.0 | 13,893 | 100.0 | 2,138 | 100.0 |
| Percentage of Total Businesses: | | | | 92.6 | | 6.5 | | 1.0 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 53 | 3.2 | 48 | 3.0 | 5 | 6.9 | 0 | 0.0 |
| Moderate | 229 | 13.7 | 214 | 13.4 | 15 | 20.8 | 0 | 0.0 |
| Middle | 477 | 28.5 | 449 | 28.0 | 28 | 38.9 | 0 | 0.0 |
| Upper | 910 | 54.4 | 886 | 55.3 | 24 | 33.3 | 0 | 0.0 |
| Unknown | 5 | 0.3 | 5 | 0.3 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 1,674 | 100.0 | 1,602 | 100.0 | 72 | 100.0 | 0 | 0.0 |
| Percentage of Total Farms: | | | | 95.7 | | 4.3 | | 0.0 |

APPENDIX E

2019 AND 2018 ANALYSIS TABLES FOR LIMITED-SCOPE ASSESSMENT AREA

A. Tulsa Metropolitan AA (Limited-Scope Review) –Demographic and Lending Tables

Footnotes for all Analysis and Demographics Tables

- 2019 and 2018 FFIEC Census Data
- Business and Farm data based on 2019 and 2018 Dun & Bradstreet Data
- 2011 – 2015 U.S. Census Bureau: American Community Survey
- Note: Percentages may not add up to 100.0 due to rounding.

**TABLE E-1
2018 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 | 9.7 | 10,765 | 6.8 | 4,413 | 41.0 | 34,942 | 22.1 |
| Moderate | 54 | 30.7 | 39,165 | 24.8 | 8,290 | 21.2 | 26,742 | 16.9 |
| Middle | 52 | 29.5 | 50,452 | 31.9 | 4,440 | 8.8 | 31,099 | 19.7 |
| Upper | 53 | 30.1 | 57,640 | 36.5 | 2,300 | 4.0 | 65,239 | 41.3 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 176 | 100.0 | 158,022 | 100.0 | 19,443 | 12.3 | 158,022 | 100.0 |
| | 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 | 4.5 | 29.1 | 12,302 | 53.7 | 3,930 | 17.2 |
| Moderate | 77,468 | 30,109 | 20.3 | 38.9 | 36,618 | 47.3 | 10,741 | 13.9 |
| Middle | 89,953 | 49,646 | 33.5 | 55.2 | 32,248 | 35.8 | 8,059 | 9.0 |
| Upper | 86,986 | 61,760 | 41.7 | 71.0 | 18,945 | 21.8 | 6,281 | 7.2 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 277,310 | 148,186 | 100.0 | 53.4 | 100,113 | 36.1 | 29,011 | 10.5 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 1,542 | 4.0 | 1,311 | 3.7 | 219 | 6.4 | 12 | 3.9 |
| Moderate | 8,515 | 22.0 | 7,405 | 21.1 | 1,056 | 30.7 | 54 | 17.8 |
| Middle | 13,584 | 35.0 | 12,218 | 34.9 | 1,272 | 36.9 | 94 | 30.9 |
| Upper | 15,133 | 39.0 | 14,092 | 40.2 | 897 | 26.0 | 144 | 47.4 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 38,774 | 100.0 | 35,026 | 100.0 | 3,444 | 100.0 | 304 | 100.0 |
| Percentage of Total Businesses: | | | | 90.3 | | 8.9 | | 0.8 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | # | % | # | % | # | % | # | % |
| Low | 4 | 1.3 | 3 | 1.0 | 1 | 16.7 | 0 | 0.0 |
| Moderate | 32 | 10.5 | 32 | 10.8 | 0 | 0.0 | 0 | 0.0 |
| Middle | 106 | 34.8 | 104 | 35.0 | 2 | 33.3 | 0 | 0.0 |
| Upper | 163 | 53.4 | 158 | 53.2 | 3 | 50.0 | 2 | 100.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 305 | 100.0 | 297 | 100.0 | 6 | 100.0 | 2 | 100.0 |
| Percentage of Total Farms: | | | | 97.4 | | 2.0 | | 0.7 |

**TABLE E-2
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
TULSA METROPOLITAN AA**

| Census Tract Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Owner- Occupied Units |
|------------------------------|------------|---------|------|------|---------------------|------|-------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 1.6 | 0.8 | 4.5 |
| Moderate | 1 | 70 | 16.7 | 6.9 | 14.6 | 12.2 | 20.3 |
| Middle | 2 | 256 | 33.3 | 25.2 | 35.0 | 29.9 | 33.5 |
| Upper | 3 | 689 | 50.0 | 67.8 | 48.8 | 57.2 | 41.7 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

**TABLE E-3
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
TULSA METROPOLITAN AA**

| Census Tract Income Level | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses |
|------------------------------|----------------------|---------|------|------|--------------------|------|--------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Low | 0 | 0 | 0.0 | 0.0 | 3.5 | 3.8 | 4.0 |
| Moderate | 19 | 3,360 | 73.1 | 83.4 | 20.9 | 27.1 | 22.0 |
| Middle | 4 | 573 | 15.4 | 14.2 | 33.3 | 33.2 | 35.0 |
| Upper | 3 | 96 | 11.5 | 2.4 | 40.5 | 35.4 | 39.0 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 1.8 | 0.5 | 0.0 |

**TABLE E-4
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
TULSA METROPOLITAN AA**

| Borrower Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Families |
|---------------------------|------------|---------|------|------|---------------------|------|---------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 6.0 | 2.9 | 22.1 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 16.3 | 10.9 | 16.9 |
| Middle | 2 | 166 | 33.3 | 16.4 | 18.4 | 14.8 | 19.7 |
| Upper | 3 | 653 | 50.0 | 64.3 | 37.8 | 44.9 | 41.3 |
| Unknown | 1 | 196 | 16.7 | 19.3 | 21.5 | 26.6 | 0.0 |

**TABLE E-5
DISTRIBUTION OF 2018 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
TULSA METROPOLITAN AA**

| Business Revenue By Size | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses by Revenue |
|-----------------------------|----------------------|---------|------|------|--------------------|------|----------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| \$1 million or less | 9 | 992 | 34.6 | 24.6 | 40.8 | 33.6 | 90.3 |
| Over \$1 million | 16 | 3,029 | 61.5 | 75.2 | Not Reported | | 8.9 |
| Unknown | 1 | 8 | 3.8 | 0.2 | | | 0.8 |

**TABLE E-6
2019 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 | 9.7 | 10,765 | 6.8 | 4,413 | 41.0 | 34,942 | 22.1 |
| Moderate | 54 | 30.7 | 39,165 | 24.8 | 8,290 | 21.2 | 26,742 | 16.9 |
| Middle | 52 | 29.5 | 50,452 | 31.9 | 4,440 | 8.8 | 31,099 | 19.7 |
| Upper | 53 | 30.1 | 57,640 | 36.5 | 2,300 | 4.0 | 65,239 | 41.3 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 176 | 100.0 | 158,022 | 100.0 | 19,443 | 12.3 | 158,022 | 100.0 |
| | 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 | 4.5 | 29.1 | 12,302 | 53.7 | 3,930 | 17.2 |
| Moderate | 77,468 | 30,109 | 20.3 | 38.9 | 36,618 | 47.3 | 10,741 | 13.9 |
| Middle | 89,953 | 49,646 | 33.5 | 55.2 | 32,248 | 35.8 | 8,059 | 9.0 |
| Upper | 86,986 | 61,760 | 41.7 | 71.0 | 18,945 | 21.8 | 6,281 | 7.2 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 277,310 | 148,186 | 100.0 | 53.4 | 100,113 | 36.1 | 29,011 | 10.5 |
| | Total Businesses by Tract | | Businesses by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | | | # | % | # | % | # | % |
| Low | 1,562 | 4.0 | 1,338 | 3.8 | 211 | 6.2 | 13 | 5.2 |
| Moderate | 8,553 | 21.9 | 7,469 | 21.1 | 1,042 | 30.7 | 42 | 16.7 |
| Middle | 13,682 | 35.0 | 12,339 | 34.8 | 1,266 | 37.3 | 77 | 30.6 |
| Upper | 15,288 | 39.1 | 14,289 | 40.3 | 879 | 25.9 | 120 | 47.6 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 39,085 | 100.0 | 35,435 | 100.0 | 3,398 | 100.0 | 252 | 100.0 |
| Percentage of Total Businesses: | | | | 90.7 | | 8.7 | | 0.6 |
| | Total Farms by Tract | | Farms by Tract & Revenue Size | | | | | |
| | | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | |
| | | | # | % | # | % | # | % |
| Low | 3 | 0.9 | 2 | 0.6 | 1 | 16.7 | 0 | 0.0 |
| Moderate | 40 | 11.8 | 40 | 12.0 | 0 | 0.0 | 0 | 0.0 |
| Middle | 122 | 35.9 | 120 | 36.1 | 2 | 33.3 | 0 | 0.0 |
| Upper | 175 | 51.5 | 170 | 51.2 | 3 | 50.0 | 2 | 100.0 |
| Unknown | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 | 0 | 0.0 |
| Total AA | 340 | 100.0 | 332 | 100.0 | 6 | 100.0 | 2 | 100.0 |
| Percentage of Total Farms: | | | | 97.6 | | 1.8 | | 0.6 |

**TABLE E-7
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
TULSA METROPOLITAN AA**

| Census Tract Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Owner- Occupied Units |
|------------------------------|------------|---------|------|------|---------------------|------|-------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 1.2 | 0.9 | 4.5 |
| Moderate | 1 | 155 | 20.0 | 8.5 | 14.4 | 9.5 | 20.3 |
| Middle | 2 | 145 | 40.0 | 7.9 | 34.2 | 34.2 | 33.5 |
| Upper | 2 | 1,531 | 40.0 | 83.6 | 50.2 | 55.4 | 41.7 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |

**TABLE E-8
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
TULSA METROPOLITAN AA**

| Census Tract Income Level | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses |
|------------------------------|----------------------|---------|------|------|--------------------|------|--------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Low | 0 | 0 | 0.0 | 0.0 | 3.3 | 4.5 | 4.0 |
| Moderate | 10 | 1,550 | 66.7 | 69.8 | 20.3 | 23.9 | 21.9 |
| Middle | 1 | 74 | 6.7 | 3.3 | 34.3 | 36.3 | 35.0 |
| Upper | 4 | 596 | 26.7 | 26.9 | 39.8 | 34.7 | 39.1 |
| Unknown | 0 | 0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Not Reported | 0 | 0 | 0.0 | 0.0 | 2.4 | 0.6 | 0.0 |

**TABLE E-9
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
TULSA METROPOLITAN AA**

| Borrower Income Level | Bank Loans | | | | Aggregate HMDA Data | | % of Families |
|---------------------------|------------|---------|------|------|---------------------|------|---------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0 | 0.0 | 0.0 | 6.6 | 3.2 | 22.1 |
| Moderate | 0 | 0 | 0.0 | 0.0 | 17.2 | 10.6 | 16.9 |
| Middle | 1 | 155 | 20.0 | 8.5 | 19.2 | 14.8 | 19.7 |
| Upper | 0 | 0 | 0.0 | 0.0 | 37.9 | 44.2 | 41.3 |
| Unknown | 4 | 1,675 | 80.0 | 91.5 | 19.1 | 27.2 | 0.0 |

**TABLE E-10
DISTRIBUTION OF 2019 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
TULSA METROPOLITAN AA**

| Business Revenue By Size | Small Business Loans | | | | Aggregate CRA Data | | % of Businesses by Revenue |
|-----------------------------|----------------------|---------|------|------|--------------------|------|----------------------------------|
| | # | \$(000) | #% | \$% | #% | \$% | |
| \$1 million or less | 9 | 1,220 | 60.0 | 54.9 | 44.5 | 32.7 | 90.7 |
| Over \$1 million | 6 | 1,001 | 40.0 | 45.1 | Not Reported | | 8.7 |
| Unknown | 0 | 0 | 0.0 | 0.0 | | | 0.6 |

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.

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.