

PUBLIC DISCLOSURE

August 14, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Heritage Bank RSSD# 311050

2 South Main Street Sapulpa, Oklahoma 74066

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

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated:	Satisfactory.
The Lending Test is rated:	Satisfactory.
The Community Development Test is rated:	Outstanding.

American Heritage Bank (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas (AAs) credit needs.
- A substantial majority of the bank's loans are originated inside the bank's AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects an excellent distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.
- Community development (CD) activity reflects excellent responsiveness to CD needs of the bank's AAs.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* (ISBs) to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs.

Performance was assessed within the bank's three AAs. The Tulsa Metropolitan AA, where a substantial majority of the bank's lending and deposit activities occurs, was assessed using a full-scope review. The bank's remaining two nonmetropolitan AAs, the Payne County AA and the Washington County AA, were assessed using limited-scope reviews. Examiners reviewed the following data:

- The bank's eight-quarter average NLTD ratio;
- The universe of 524 home mortgage loans reported on the bank's 2021 and 2022 HMDA Loan/Application Registers (LARs);
- A statistical sample of 168 small business loans selected from a universe of 969 loans originated between January 1, 2021 and December 31, 2021;

- The universe of 397 small business loans reported on the bank's 2022 CRA LAR;
- and,
- CD loans, qualified investments, and CD services from May 4, 2021 through December 31, 2022.

For this evaluation, more weight was placed on small business lending based on the bank's strategic focus on extending commercial credit, as well as the higher number of commercial loan originations during the evaluation period, when compared to residential real estate lending.

Aggregate lending data for 2021 and 2022 was referenced for additional perspective to gauge home mortgage demand within the bank's AAs for the bank's HMDA lending performance. The evaluation of small business lending performance included loan data reported on the bank's 2022 CRA LAR and a sample of small business loans originated during 2021. The bank was not required to report 2021 CRA data based on its total assets and the annually prescribed reporting thresholds.

For the evaluation of small business lending, available CRA aggregate data for the most recent three years (2019, 2020, and 2021) was averaged and referenced for additional performance context. Overall, additional emphasis was placed on the bank's performance in comparison to available aggregate lending data rather than comparisons to relative demographic figures, particularly for the bank's HMDA lending, as aggregate lending data is considered representative of credit demand within a defined geographic area.

DESCRIPTION OF INSTITUTION

The bank is a community bank headquartered in Sapulpa, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of American Bancorporation, Inc., a onebank holding company located in Sapulpa, Oklahoma.
- The bank has two affiliates: American National Insurance Agency, Beggs, Oklahoma, which engages in the sale of general insurance as the agent of several underwriters; and American National Development Corporation, Sapulpa, Oklahoma (ANDC), which is a non-profit corporation that engages in CD activities. ANDC's goals are to improve housing conditions, increase home ownership, and promote economic revitalization in LMI areas of Sapulpa. The bank contributes operating funds to ANDC based on the funding needs of specific projects.
- The bank has total assets of \$1.5 billion as of March 31, 2023.
- In addition to its main office in Sapulpa, the bank operates 22 additional branch locations across its AAs as well as 21 onsite automated teller machines

(ATMs). Since the last evaluation, the bank closed one branch in the Tulsa Metropolitan AA.

• As shown in the table below, the bank's primary business focus is commercial and residential real estate lending, of which the latter is not fully captured, as a portion of the bank's home mortgage loans are sold on the secondary market.

	Table 1						
Composition of Loan Portfoli							
Loan Type	\$(000)	%					
Construction and Land Development	18,466	3.7					
Farmland	6,431	1.3					
1-4 Family Residential Real Estate	195,844	39.0					
Multifamily Residential Real Estate	6,470	1.3					
Non-Farm Non-Residential Real Estate	161,742	32.2					
Agricultural	1,511	0.3					
Commercial and Industrial	59,784	11.9					
Consumer	29,779	5.9					
Other	21,950	4.4					
Gross Loans	501,977	100.0					
Note: Percentages may not total 100.0 percent due to rounding.							

Table 4

The bank was rated Satisfactory under the CRA at its July 12, 2021 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 CRITERIA¹

LENDING TEST

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Tulsa Metropolitan AA (full scope review), then concluding with a brief discussion of performance in the Payne County and Washington County AAs (limited scope reviews).

The bank's overall lending test performance is Satisfactory. The bank's performance in the Tulsa Metropolitan AA was considered reasonable, whereas lending performance in the Payne County AA exceeded performance at the institutional level, and lending performance in the Washington County AA was consistent with performance at the institutional level.

¹ The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and area of operations in proximity to the bank's three AAs.

The bank's eight-quarter average NLTD ratio fell within the range of average NLTD ratios for four similarly situated institutions with ratios ranging from 37.2 percent to 82.4 percent. Although the bank's ratio is on the lower range of the four comparators, the bank's strategy is to maintain public deposits from all the communities where it has a branch presence. As a result, the bank's total deposits consist of large amounts of pledged public deposit funds, which are not available for lending. A review of the comparator banks in Table 2 noted that three of the four also held public funds on deposit, although American Heritage Bank held the highest percentage of these funds as a portion of its total deposits.

Other factors have also contributed to the bank's lower NLTD ratio, a significant portion of the bank's loan portfolio is dedicated to unfunded loan commitments that require reserves to be set aside for future funding, thereby impacting the bank's NLTD ratio. Furthermore, COVID stimulus payments increased the bank's level of deposits, while loan demand has experienced a sharp decline based on the recent rising interest rate environment. Based on the aforementioned performance context factors, the bank's NLTD ratio is reasonable.

l'able 2									
Comparative NLTD Ratios June 30, 2021 – March 31, 2023									
			NLTD Ratio (%)						
Institution	Location	Asset Size \$(000)	8-Quarter						
			Average						
American Heritage Bank	Sapulpa, Oklahoma	1,513,010	39.9						
Similarly Situated Institutions									
Fort Sill National Bank	Lawton, Oklahoma	500,480	37.2						
Quail Creek Bank	Oklahoma City, Oklahoma	785,942	67.7						
F&M Bank	Edmond, Oklahoma	674,410	68.7						
First National Bank of Oklahoma	Oklahoma City, Oklahoma	767,028	82.4						

Table 2

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The bank originated a substantial majority of loans, by number and dollar volume, inside the three AAs.

I able 5										
Lendin	Lending Inside and Outside the Assessment Area									
Loan Type		Ins	side			Out	side			
Loan Type	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%		
Home Purchase – Conventional	243	91.4	46,208	90.4	23	8.6	4,885	9.6		
Home Improvement	41	95.3	4,152	93.1	2	4.7	308	6.9		
Other Purpose Closed-End	17	81.0	2,786	82.8	4	19.0	580	17.2		
Refinancing	178	91.8	30,501	88.0	16	8.2	4,175	12.0		
Total HMDA related	479	91.4	83,647	89.4	45	8.6	9,948	10.6		
Total Small Business related 529 93.6 37,466 89.8 36 6.4 4,268 10.2								10.2		
TOTAL LOANS 1,008 92.6 121,113 89.5 81 7.4 14,216 10.5										
Note: Percentages may not total 100.0 pe	rcent due to	rounding.								

Table 3

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

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the Tulsa Metropolitan AA. Lending performance for the geographic distribution in Payne County AA and Washington County AA was consistent with performance in the Tulsa Metropolitan AA, although both of these areas had very limited small business and home mortgage lending volume when compared to the Tulsa Metropolitan AA.

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 revenue sizes. The bank's lending has an overall excellent distribution among individuals of different income levels and businesses of different sizes in the Tulsa Metropolitan AA. Lending performance for the borrower distribution in Payne County AA was consistent with performance in the Tulsa Metropolitan AA, while performance in Washington County was below the level noted in the Tulsa Metropolitan AA.

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank's responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of such opportunities in the bank's AAs.

The bank's overall CD test performance is outstanding and demonstrates excellent responsiveness. The bank's CD activity reflected adequate responsiveness in the Tulsa Metropolitan AA. The CD activity in the limited-scope Payne County AA was consistent with the institution's performance while the limited-scope Washington County AA was below that of the institution, although this did not impact the overall rating.

In addition to CD activities noted below, the bank continues to contribute to ANDC, although recent activity has been lower than levels noted in previous years. Bank expenditures devoted to LMI housing initiatives through ANDC totaled \$14M in 2022 alone. The bank also received credit for 14 additional qualified investments that were purchased outside of its delineated AAs in the broader statewide area of Oklahoma, which bolstered the overall rating. These investments qualified under the community services purpose and totaled \$27.2MM. Consideration for these investments included a review of the bank's current performance and responsiveness to the CD needs of its AAs as well as the level of available CD opportunities during the evaluation period.

	Table 4									
Community Development Activity										
Assessment Area: Institution										
Community	Comr	nunity		Qu	alified l	Investme	nts		Community	
Community	Devel	opment	T		Dan	ations	Тс	otal	Development	
Development	Lo	ans	inves	tments	Dona	ations	Inves	tments	Services	
Purpose	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	
Affordable	0	0	0	0	0	0	0	0	0	
Housing	0	0	0	0	0	0	0	0	0	
Community	7	16,428	11	12,671	94	108	105	12,779	34	
Services	1	10,420	11	12,071	94	108	105	12,779	- 34	
Economic	0	0	0	0	5	7	5	7	3	
Development	0	0	0	0	5	/	5	/	5	
Revitalization	0	0	0	0	0	0	0	0	0	
and Stabilization	0	0	0	0	0	0	0	0	0	
Totals	7	16,428	11	12,671	99	115	110	12,786	37	

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

TULSA METROPOLITAN ASSESSMENT AREA METROPOLITAN AREA

(Full Scope Review)

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

The bank's AA is comprised of five of seven counties within the Tulsa-Broken Arrow-Owasso, Oklahoma Metropolitan Statistical Area (Tulsa MSA), including Creek, Okmulgee, Osage, Pawnee, and Tulsa Counties in their entirety. Refer to Appendix A for a map of the AA and Appendix B for additional demographic data.

- The composition of the 2021 AA was comprised of 222 census tracts, including 17 low-, 69 moderate-, 82 middle-, and 54 upper-income census tracts based on 2011-2015 American Community Survey (ACS) data.
- The 2022 AA remains unchanged from the 2021 AA, although it is currently subdivided into 260 census tracts, including 16 low-, 84 moderate-, 80 middle-, 79 upper-, and 1 unknown-income census tract(s) based on the most recent 2016-2020 ACS data.
- The bank operates 21 branch locations in the AA, including its home office in Sapulpa. Of the 21 locations, 6 are limited-service drive-thru facilities.
- The bank maintains 20 ATMs located on branch premises, including 13 fullservice ATMs that accept deposits and seven cash-dispensing only ATMs.
- According to the June 30, 2022 Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Market Share Report, the bank ranked 7th of 55 FDIC-insured depository institutions operating from 242 locations in the AA, with a total deposit market share of 3.5 percent.
- Two interviews with community members that were recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA were reviewed for meaningful performance context related to perspectives on area economic conditions and area credit needs. One community member represents an economic development organization that serves the local area, and the other community member is affiliated with an organization that provides affordable housing to LMI individuals and families.

Population Change										
Assessment Area: Tulsa Metropolitan										
Area 2015 Population 2020 Population Percent Change										
Tulsa Metropolitan	798,095	839,110	5.1							
Creek County, OK	70,761	71,754	1.4							
Okmulgee County, OK	39,446	36,706	(6.9)							
Osage County, OK	48,054	45,818	(4.7)							
Pawnee County, OK	16,499	15,553	(5.7)							
Tulsa County, OK	623,335	669,279	7.4							
Tulsa, OK MSA	962,676	1,015,331	5.5							
Oklahoma	3,849,733	3,959,353	2.8							
Source: 2020 U.S. Census Bureau: Decen 2011 – 2015 U.S. Census Bureau	inial Census	0,707,000	2							

Table 5

• The AA's 2020 population accounts for 82.6 percent of the Tulsa MSA and 21.2 percent of the Oklahoma statewide population.

- Population growth in the AA was driven primarily by a large increase in the population of Tulsa County, which offset losses in the sparsely populated counties of Okmulgee, Pawnee, and Osage.
- Population growth in the AA aligns with growth in the Tulsa MSA and is significantly greater than the population increase in the state of Oklahoma.
- The town of Sapulpa, in Creek County and where the bank is headquartered, had a population of 21,929 in 2020.

Table 6								
Median Family Income Change								
As	sessment Area: Tulsa N	Ietropolitan						
Area	2015 Median	2020 Median	Percent Change					
Alea	Family Income	Family Income	I elcent Change					
Tulsa Metropolitan	65,752	70,460	7.2					
Creek County, OK	59,697	66,569	11.5					
Okmulgee County, OK	53,473	57,161	6.9					
Osage County, OK	62,463	62,130	(0.5)					
Pawnee County, OK	59,434	61,250	3.1					
Tulsa County, OK	67,531	73,515	8.9					
Tulsa, OK MSA	66,846	72,203	8.0					
Oklahoma	63,401	67,511	6.5					
Source: 2011 – 2015 U.S. Census Bureau: American Community Survey 2016 – 2020 U.S. Census Bureau: American Community Survey								
Note: Median family incomes have been inf	0 0	d in 2020 dollars.						

Table 6

- Median family income growth in the AA was led by the significant increases in • Tulsa and Creek Counties, although median family income growth in the AA was slightly outpaced by the broader Tulsa MSA.
- Based on 2020 ACS data, the portion of AA families living below the poverty level, at 11.1 percent, was slightly above the Tulsa MSA figure of 10.4 percent and similar to the state of Oklahoma figure of 11.3 percent. The portion of AA families living below the poverty level ranged from 10.5 percent in Osage County to 14.5 percent in Okmulgee County.

Table 7									
Housing Cost Burden									
	Asses	sment Area:	Гulsa Metrop	olitan					
	Cost	Burden – Re	nters	Cost	Burden – Ow	ners			
Area	Low	Moderate	All	Low	Moderate	All			
	Income	Income	Renters	Income	Income	Owners			
Tulsa Metropolitan	72.5	33.3	39.6	54.9	26.3	16.7			
Creek County, OK	55.8	24.0	32.0	44.3	15.6	15.6			
Okmulgee County, OK	63.2	27.7	34.8	47.2	20.3	15.9			
Osage County, OK	63.4	20.3	38.2	43.2	17.3	15.6			
Pawnee County, OK	61.8	32.5	29.4	46.1	24.0	15.0			
Tulsa County, OK	74.8	34.6	40.5	59.7	29.9	17.1			
Tulsa, OK MSA	72.4	32.8	39.3	54.7	26.8	16.4			
Oklahoma	71.1	30.5	37.9	52.5	24.5	16.0			
Cost Burden is housing cost that equals 30 percent or more of household income.									

T	h		7
	an	le	1

Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy

- The housing affordability ratio² in the AA, at 36.5 percent, was consistent with figures for the Tulsa MSA and the state of Oklahoma, at 37.0 percent and 37.8 percent, respectively. Housing affordability ratios for the five AA counties ranged from 35.5 percent in Tulsa County to 52.8 percent in Okmulgee County.
- The housing cost burden for low-income renters in the AA was similar to the respective figures for the Tulsa MSA and the state of Oklahoma. The AA figure was skewed slightly lower by the ratios for low-income renters in Creek. Okmulgee, Osage, and Pawnee Counties. Pawnee County had the lowest figure for all renters as well as all homeowners.
- The median housing value in the AA of \$151,536 was similar to the Tulsa MSA and above the state of Oklahoma, with respective figures of \$155,020 and \$142,400. The median housing values in the five AA counties ranged from \$85,900 in Okmulgee County to \$160,700 in Tulsa County.

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

 A community member stated that affordable housing is a concern. Low-income housing is not abundant and most low-cost housing consists of existing structures in need of repair and maintenance and is either not in demand or requires additional funding for rehabilitation.

labi	<u> </u>							
Unemployment Rates								
sessment Area: T	ulsa Metropo	olitan						
2017	2018	2019	2020	2021				
4.2	3.4	3.2	6.7	4.1				
4.7	3.7	3.5	6.6	4.2				
6.0	4.8	4.7	7.4	5.2				
4.9	4.1	3.6	6.6	4.2				
5.1	4.0	3.7	6.7	4.1				
4.0	3.2	3.0	6.6	4.0				
4.2	3.3	3.1	6.5	4.0				
4.0	3.3	3.1	6.2	3.8				
	Unemployn sessment Area: T 2017 4.2 4.7 6.0 4.9 5.1 4.0 4.2	Unemployment Rates Sessment Area: Tulsa Metropo 2017 2018 4.2 3.4 4.7 3.7 6.0 4.8 4.9 4.1 5.1 4.0 4.2 3.3	Unemployment Rates Sessment Area: Tulsa Metropolitan 2017 2018 2019 4.2 3.4 3.2 4.7 3.7 3.5 6.0 4.8 4.7 4.9 4.1 3.6 5.1 4.0 3.7 4.0 3.2 3.0 4.2 3.3 3.1	Unemployment Rates Sessment Area: Tulsa Metropolitan 2017 2018 2019 2020 4.2 3.4 3.2 6.7 4.7 3.7 3.5 6.6 6.0 4.8 4.7 7.4 4.9 4.1 3.6 6.6 5.1 4.0 3.7 6.7 4.0 3.2 3.0 6.6 4.2 3.3 3.1 6.5				

Table 0

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The unemployment rates in 2021 have decreased but remain higher than those noted in 2019, immediately prior to the onset of the global pandemic in early 2020.
- A community member stated the economy is still recovering from the pandemic; there are job openings, but businesses report that they cannot find employees to fill vacant positions. As the city continues to expand beyond the city center, it has created an economic gap around the downtown areas of Tulsa.
- The community member also stated that petroleum, aerospace, education, and manufacturing are all major economic sectors in the Tulsa area.
- The largest employers in the area include American Airlines, Ascension St. John (healthcare), Hillcrest Healthcare System, Saint Francis Health System, Tulsa Public Schools, and the City of Tulsa.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA METROPOLITAN AA

LENDING TEST

The bank's performance in Tulsa Metropolitan AA is reasonable. Overall, the bank's geographic distribution of loans is reasonable, while the borrower distribution of loans among individuals of different income levels and business of different sizes is excellent. The evaluation in the Tulsa Metropolitan AA included a review of 437 home mortgage loans and 491 small business loans originated between January 1, 2021 and

December 31, 2022. As previously noted, more weight was attributed to small business lending based on higher loan volume by number and portfolio composition by dollar volume.

With regard to the evaluation of home mortgage lending, home improvement and multifamily loans were not evaluated at the individual product level based on lending volumes too low to conduct meaningful analyses. Greater consideration was also given to the volume of loan originations rather than the dollar amount, as volume is more representative of the number of individuals and entities served.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. The geographic distribution of home mortgage lending was excellent, while the geographic distribution for small business lending was reasonable.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2021 home mortgage loans among low-income census tracts was above aggregate lending data by number and dollar volume, as well as the demographic figure. Lending levels in moderate-income census tracts was also above aggregate lending data by number and dollar volume, and comparable to the demographic figure.

The geographic distribution of home mortgage loans in 2022 reflected penetration levels consistent with 2021 lending patterns.

An evaluation of the dispersion of home mortgage loans identified gaps and lapses that included LMI census tracts. The gaps and lapses also included middle- and upper-income census tracts. A review of the bank's lending patterns over the two-year evaluation period revealed concentrations of lending in and around areas where the bank's branches are located, with gaps often noted in areas extending beyond where the bank could reasonably be expected to serve.

In 2021, 63 of the AA's 86 LMI tracts, or 73.3 percent, had no home mortgage loan originations, compared to 79 of the AA's 136 middle- and upper-income tracts with no loans, comprising 58.1 percent. Although the disparity was higher in the AA's LMI census tracts, the overall conclusion was not impacted given the aforementioned factors.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. The distribution of 2021 home mortgage loans among low-income census tracts was comparable to aggregate lending data by number and dollar volume, and below the demographic figure.

Lending levels in moderate-income census tracts was above aggregate lending data by number and dollar volume, and comparable to the demographic figure.

The geographic distribution of home purchase loans in 2022 reflected penetration levels consistent with 2021 lending patterns.

Home Refinance Lending

The geographic distribution of home refinance lending is excellent. The distribution of 2021 home mortgage loans among low-income census tracts was above aggregate lending data by number, comparable by dollar volume, and below the demographic figure. Lending in moderate-income census tracts was above aggregate lending data by number and dollar volume and below the demographic figure.

The geographic distribution of home refinance loans in 2022 reflected penetration levels below 2021 lending patterns, although the higher volume of home refinance originations in 2021 supported the overall rating.

Income LevelRB ark # 2%App \$000S%App \$000Units %12%5% <th> </th> <th></th> <th></th> <th></th> <th>Tulsa Metropo</th> <th>ullian</th> <th></th> <th>1</th>					Tulsa Metropo	ullian		1
Income Level i <t< th=""><th>Geographic</th><th>Bank</th><th></th><th></th><th>-</th><th></th><th>Agg</th><th>Owner Occupied</th></t<>	Geographic	Bank			-		Agg	Owner Occupied
Hone Purchase Loars Low 1 0.8 1.3 124 0.6 0.6 3 Moderate 34 28.6 15.8 4,155 19.4 10.2 21 Middle 72 60.5 41.0 13,839 64.7 36.6 43 Upper 12 10.1 41.9 3.274 15.3 52.5 33 Unknown 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Tract-Unk 0 0.0 10.0 21.392 100.0 100.0 100.0 Total 119 100.0 10.2 2.256 12.4 7.3 21 Middle 68 68.0 39.9 13.387 73.7 35.1 44 Upper 9 9.0 48.2 2.469 13.5 57.3 323 Unknown 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 </th <th>Income Level</th> <th></th> <th></th> <th></th> <th></th> <th></th> <th></th> <th>Units %</th>	Income Level							Units %
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Total 240 100.0 100.0 41,816 100.0 100.0 100.0								0.0
					~			100.0
Source: 2021 FFIEC Census Data			100.0	100.0	41,816	100.0	100.0	100.0

Table 9

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of 2021 small business loans among low-income census tracts was significantly below the demographic figure, while lending levels in moderate-income census tracts was comparable to the demographic figure. Moreover, a review of the three-year aggregate average distribution by aggregate lenders in the AA revealed a distribution of 24.5 percent in the AA's LMI census tracts, indicating limited credit demand for small business loans in these geographies of the AA.

The geographic distribution of 2022 small business lending was consistent with 2021 lending patterns.

An analysis of loan dispersion revealed conspicuous gaps and lapses that included a number of LMI tract(s). Similar to home mortgage lending, the bank's loans were generally concentrated near its branch locations, and the gaps noted throughout the AA were comprised not only LMI census tracts, but also a substantial number of middle- and upper-income tracts. Based on these factors, the dispersion of lending in the AA had no impact on the overall rating.

Distribution of 2021 Small Business Lending By Income Level of Geography											
Assessment Area: Tulsa Metropolitan											
Geographic		Bank	Loans		Total						
Income Level	e Level # #% \$(000) \$%										
Low	1	0.7	16	0.2	3.5						
Moderate	37	24.7	3,820	41.4	23.4						
Middle	105	70.0	4,825	52.3	38.8						
Upper	7	4.7	560	6.1	34.2						
Unknown	0	0.0	0	0.0	0.0						
Tract-Unk	0	0.0	0	0.0							
Total	150	100.0	9,221	100.0	100.0						
Source: 2021 FFIEC	Census Da ta	-									
2021 Dun &	Bradstreet Data										
2011-2015 U	.S. Census Bureau: Americ	can Community Surve	y								
Note: Percentages n	1ay not total 100.0 percent	due to rounding.									

Table 10

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

The bank's lending has an excellent distribution among individuals of different income levels and businesses of different sizes. The borrower distribution of home mortgage lending was reasonable, while the borrower distribution for small business lending was excellent.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2021 home mortgage lending to low-income borrowers was comparable to aggregate lending data by number and dollar volume, but significantly below the demographic figure. The distribution among moderate-income borrowers was comparable to aggregate lending data by number and dollar volume, as well as the demographic figure.

The borrower distribution of 2022 home mortgage loans reflected performance that was consistent with 2021 lending patterns.

Home Purchase Loans

The borrower distribution of home purchase lending is reasonable. The distribution of 2021 home purchase loans among low-income borrowers was comparable to aggregate lending data by number and dollar volume, but significantly below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate lending data by number and dollar volume and comparable to the demographic figure.

The borrower distribution of 2022 home purchase loans was consistent with 2021 lending patterns.

Home Refinance Loans

The borrower distribution of home refinance lending is reasonable. The distribution of 2021 home refinance loans among low-income borrowers was below aggregate lending data by number, comparable to aggregate data by dollar volume, and significantly below the demographic figure. The distribution of lending among moderate-income borrowers was comparable to aggregate lending data by number and dollar volume, as well as the demographic figure.

The borrower distribution of 2022 home refinance loans was consistent with 2021 lending patterns.

Di	stribution o		ne Mortgag	, 0	By Borrowe	r Income I	Level
Borrower				Tulsa Metr gregate Loans	-		Families by
Income	Ba		Agg	Bai		Agg	Family Income
Level	#	#%	#%	\$(000)	\$%	\$%	%
Lever	"	<i>"</i> 7 0		chase Loans	φ /0	φ /0	,0
Low	7	5.9	6.6	529	2.5	3.7	22.7
Moderate	17	14.3	18.2	2,187	10.2	13.5	17.6
Middle	18	15.1	18.3	3,120	14.6	17.2	19.9
Upper	49	41.2	30.8	12,041	56.3	40.8	39.8
Unknown	28	23.5	26.1	3,515	16.4	24.8	0.0
Total	119	100.0	100.0	21,392	100.0	100.0	100.0
			Refina	nce Loans	•		•
Low	4	4.0	5.4	390	2.1	2.9	22.7
Moderate	11	11.0	14.4	1,291	7.1	9.7	17.6
Middle	25	25.0	17.7	3,177	17.5	14.7	19.9
Upper	47	47.0	37.0	11,899	65.5	46.2	39.8
Unknown	13	13.0	25.5	1,407	7.7	26.6	0.0
Total	100	100.0	100.0	18,164	100.0	100.0	100.0
			Home Impro	ovement Loan	5		
Low	1	6.7	6.0	77	6.6	3.2	22.7
Moderate	0	0.0	14.3	0	0.0	11.2	17.6
Middle	3	20.0	18.8	149	12.8	15.6	19.9
Upper	3	20.0	49.7	247	21.3	58.2	39.8
Unknown	8	53.3	11.3	689	59.3	11.7	0.0
Total	15	100.0	100.0	1,162	100.0	100.0	100.0
			Total Home I	Mortgage Loa			
Low	12	5.0	6.1	996	2.4	3.3	22.7
Moderate	30	12.5	16.2	3,664	8.8	11.8	17.6
Middle	47	19.6	17.8	6,536	15.6	16.0	19.9
Upper	102	42.5	34.0	25,009	59.8	43.2	
Unknown	49	20.4	26.0	5,611	13.4	25.6	0.0
Total	240	100.0	100.0	41,816	100.0	100.0	100.0
2011 Note: Perce	FFIEC Census -2015 U.S. Cer ntages may no ifamily loans a	1sus Bureau: A t total 100.0 pe	rcent due to roi	ınding.	nalysis.		

Table 11

Small Business Lending

The borrower distribution of small business lending is excellent. The distribution of loans originated in 2021 to businesses with annual revenues of \$1MM or less (small businesses) reflected penetration levels comparable to the demographic figure. In addition, 98.4 percent of all loans made to businesses with gross annual revenues of \$1 million or less were in amounts of \$250,000 or less, which demonstrates a willingness to meet the credit demands of smaller business operations. Finally, a review of the three-year aggregate data submitted by all CRA reporters in the AA noted a lending distribution of 39.6 percent to business entities with gross annual revenues less than or equal to \$1MM, which reflects limited credit demand for small business loans and supports the bank's excellent rating.

The borrower distribution of 2022 small business loans reflected consistent performance with that of 2021 lending.

Distribut	ion of 2021 Small	Business Lendir	ng By Revenue Si	ze of Businesses	6							
	Assessi	ment Area: Tulsa	n Metropolitan									
		Bank I	Loans		Total							
	#	#%o	\$(000)	\$%	Businesses %							
	By Revenue											
\$1 Million or Less	124	82.7	5,472	59.3	91.0							
Over \$1 Million	21	14.0	3,608	39.1	8.2							
Revenue Unknown	5	3.3	141	1.5	0.9							
Total	150	100.0	9,221	100.0	100.0							
		By Loan Siz	ze									
\$100,000 or Less	126	84.0	3,168	34.4								
\$100,001 - \$250,000	17	11.3	2,797	30.3								
\$250,001 - \$1 Million	7	4.7	3,256	35.3								
Total	150	100.0	9,221	100.0								
	By Loan Siz	ze and Revenues	\$1 Million or Le	55								
\$100,000 or Less	110	88.7	2,588	47.3								
\$100,001 - \$250,000	12	9.7	1,891	34.6								
\$250,001 - \$1 Million	2	1.6	993	18.1								
Total	124	100.0	5,472	100.0								
Source: 2021 FFIEC Census D 2021 Dun & Bradstree												
	s Bureau: American Cos	mmunity Survev										
	tal 100.0 percent due to	0 0										

Table 12

COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates adequate responsiveness to credit needs in the AA. As noted in Table 13, with limited exceptions, the overwhelming majority of the bank's CD activity was focused on community services activities.

Table 13												
	Community Development Activity											
Assessment Area: Tulsa Metropolitan												
Community	Comr	nunity		Qu	alified l	Investme	nts		Community			
Community Development	Devel	opment	Invos	tments	Don	ations	To	otal	Development			
-	Lo	ans	mves	intentis	Dona	at10115	Inves	tments	Services			
Purpose	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#			
Affordable	0	0	0	0	0	0	0	0	0			
Housing	0	0	0	0	0	0	0	0	0			
Community	7	16,428	9	7,531	86	100	95	7,631	33			
Services	/	10,420	2	7,331	80	100	95	7,031				
Economic	0	0	0	0	5	7	5	7	3			
Development	0	0	0	0	5	/	5		3			
Revitalization	0	0	0	0	0	0	0	0	0			
and Stabilization	0	0	0	0	0	0	0	0	0			
Totals	7	16,428	9	7,531	91	107	100	7,638	36			

PAYNE COUNTY ASSESSMENT AREA NONMETROPOLITAN AREA

(Limited Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE PAYNE COUNTY NONMETROPOLITAN AA

The bank's delineated AA is comprised of four of 19 census tracts in the eastern portion of Payne County and is contiguous to the west side of the Tulsa Metropolitan AA. Refer to Appendix A for AA maps, Appendix B for demographic data, and Appendix C for lending data.

- The bank's AA has changed since the prior evaluation, when it formerly encompassed over half the land area of eastern Payne County and consisted of one moderate- and five middle-income census tracts.
- The composition of the AA in 2021 was comprised of approximately one third of the far eastern portion of Payne County and was comprised of four census tracts, including one moderate- and three middle-income census tracts based on 2011-2015 ACS data.
- The 2022 AA remains unchanged from the 2021 AA, although it is currently comprised of four census tracts, including two moderate- and two middle-income census tracts based on the most recent 2016-2020 ACS data.
- The AA's composition of families by income level includes 27.4 percent low-, 18.2 percent moderate-, 17.2 percent middle-, and 37.2 percent upper-income families.
- This AA includes one full-service branch in Yale, Oklahoma, with a cashdispensing only ATM.
- According to the June 30, 2022 FDIC Summary of Deposits Market Share Report, the bank ranked 9th of 17 FDIC-insured depository institutions operating from 29 locations in Payne County, with a total deposit market share of 2.3 percent.
- According to the 2020 ACS, the AA population was 14,270, which accounts for 17.5 percent of residents in the entire county.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PAYNE COUNTY NONMETROPOLITAN AA

The conclusions regarding the bank's performance in each of the following two areas do not change the rating for the institution. The institution's lending performance in the Payne County AA exceeds the institution's overall performance, and the AA's community development performance was consistent with the institution's performance.

WASHINGTON COUNTY ASSESSMENT AREA NONMETROPOLITAN AREA

(Limited Scope Review)

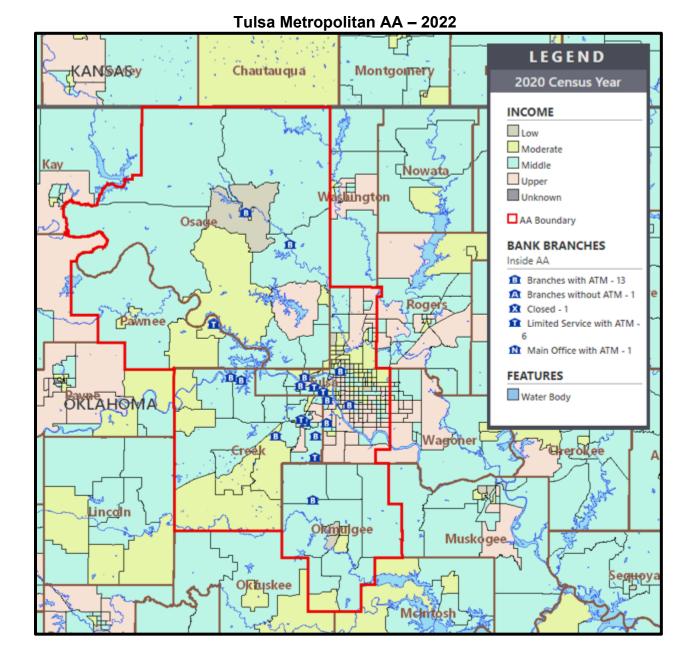
DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE WASHINGTON COUNTY NONMETROPOLITAN AA

The bank's delineated AA is comprised of Washington County in its entirety, which abuts the northwest portion of the bank's Tulsa Metropolitan AA. Refer to Appendix A for AA maps, Appendix B for demographic data, and Appendix C for lending data.

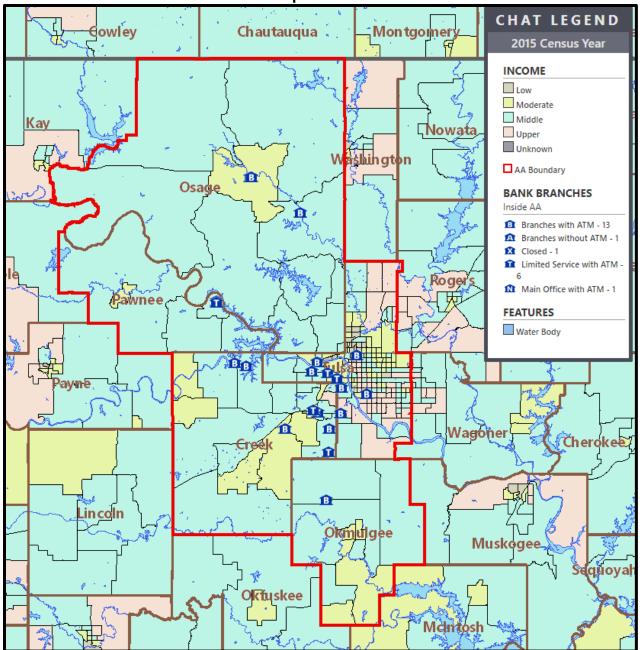
- The 2021 AA was comprised of 13 census tracts, including one low-, two moderate-, five middle-, and five upper-income census tracts based on 2011-2015 ACS data.
- The 2022 AA remains unchanged from the 2021 AA, although it is currently comprised 14 census tracts, including three moderate-, seven middle- and four upper-income tracts based on the most recent 2016-2020 ACS data.
- The AA's composition of families by income level includes 17.0 percent low-, 15.6 percent moderate-, 18.0 percent middle-, and 49.4 percent upper-income families.
- This AA includes one full-service branch in Bartlesville, Oklahoma, with a cashdispensing only ATM.
- According to the June 30, 2022 FDIC Summary of Deposits Market Share Report, the bank ranked 6th of 11 FDIC-insured depository institutions operating from 17 locations in the AA, with a total deposit market share of 3.1 percent.
- According to the 2020 ACS, the AA population was 52,455, which represents a 1.3 percent increase since the previous CRA evaluation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WASHINGTON COUNTY NONMETROPOLITAN AA

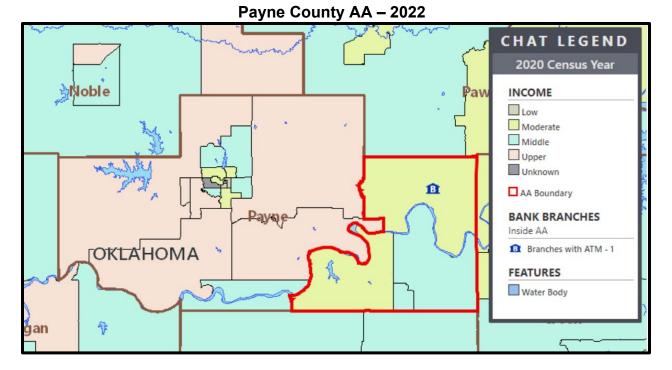
The conclusions regarding the bank's performance for each of the following two performance tests do not change the rating for the institution. The institution's lending performance in the Washington County AA is consistent with the institution's overall lending performance, while the community development performance in the AA is below the institution's level of performance.



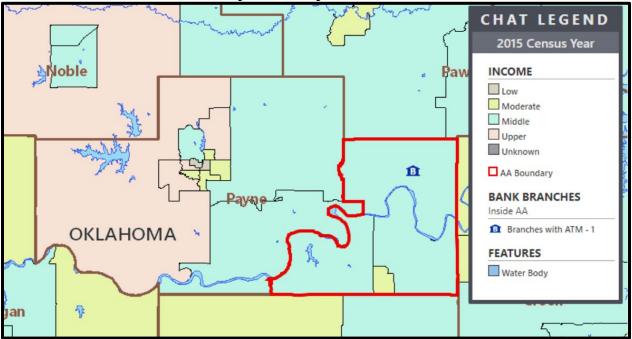
APPENDIX A – MAP OF THE ASSESSMENT AREA

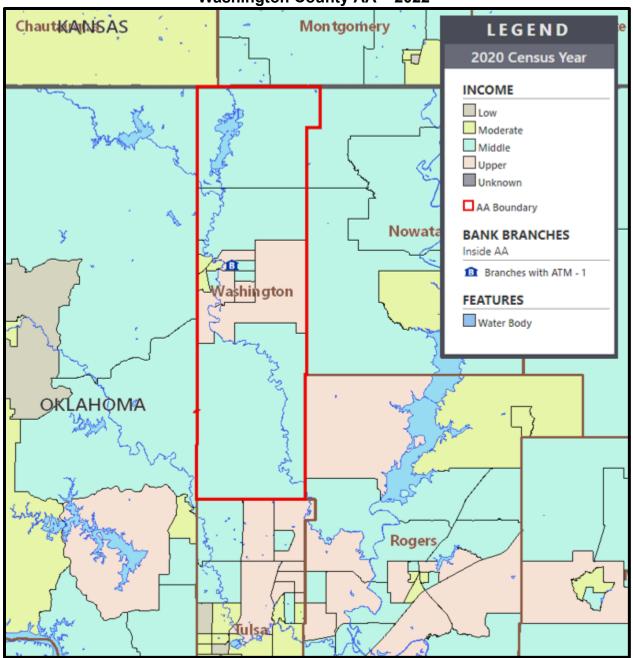


Tulsa Metropolitan AA – 2021

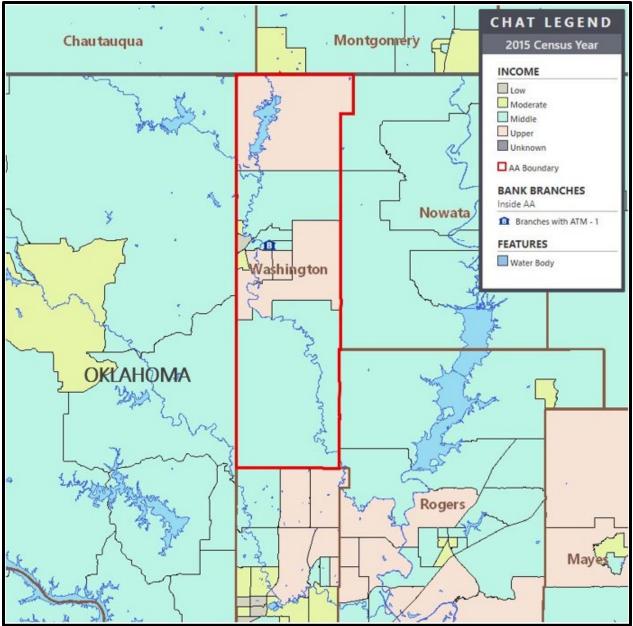


Payne County AA – 2021





Washington County AA – 2022



Washington County AA – 2021

APPENDIX B – LENDING AND DEMOGRAPHIC TABLES FOR FULL SCOPE AA

D) istribution o	f 2022 Hom		le B-1 Lending By I	ncome Level	of Geograp	hy
				Tulsa Metro		01	5
Geographic			Bank And Agg	gregate Loans			Owner Occupied
Income Level	Banl	κ .	Agg	Ba	nk	Agg	Units %
Income Lever	#	#%o	#%o	\$(000)	\$%	\$%	Cliffs 70
			Home P u	chase Loans			
Low	5	4.8	2.1	435	2.0	1.2	3.6
Moderate	33	31.7	20.5	4,798	21.6	13.6	25.3
Middle	49	47.1	33.6	11,620	52.4	29.1	35.0
Upper	17	16.3	43.8	5,330	24.0	56.1	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	104	100.0	100.0	22,183	100.0	100.0	100.0
•		•	Refina	nce Loans			
Low	2	3.2	1.4	718	7.1	0.8	3.6
Moderate	17	27.4	21.2	1,909	19.0	13.6	25.1
Middle	30	48.4	35.2	4,961	49.3	31.7	35.0
Upper	13	21.0	42.1	2,472	24.6	53.9	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	62	100.0	100.0	10,060	100.0	100.0	100.0
		•	Home Impro	ovement Loans	ł		
Low	7	33.3	1.7	597	27.0	1.4	3.6
Moderate	3	14.3	17.7	278	12.6	13.9	25.1
Middle	9	42.9	29.7	1,226	55.4	26.9	35.0
Upper	2	9.5	50.9	111	5.0	57.8	36.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	2,212	100.0	100.0	100.0
ł	•	Į	Multifam	ily Loans	+		Multi-family
Low	0	0.0	13.8	0	0.0	9.1	Units % 12.3
Moderate	0	0.0	44.1	0	0.0	30.1	38.2
Middle	0	0.0	25.7	0	0.0	35.3	26.8
Upper	0	0.0	14.5	0	0.0	24.9	21.3
Unknown	0	0.0	2.0	0	0.0	0.6	1.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
	Į		Total Home M				Owner Occupied Units %
Low	14	7.1	2.0	1,750	4.8	2.1	3.6
Moderate	55	27.9	20.5	7,123	19.7	15.6	25.1
Middle	93	47.2	33.5	18,132	50.2	30.3	35.0
Upper	35	17.8	44.0	9,088	25.2	51.9	36.2
Unknown	0	0.0	0.0	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	197	100.0	100.0	36,093	100.0	100.0	100.0
	EC Census Data 0 U.S. Census B es may not total	ureau: America		urvey			

Table B-1

	Distributio	n of 2022 Ho		e Lending B	y Borrower Ir	icome Level	
				Tulsa Metro	•		
Borrower			Bank And Agg				Families by
Income Level	Ban	k	Agg	Ba	nk	Agg	Family Income %
ficome Lever	#	#%o	#%	\$(000)	\$%	\$%	runniy neonie 70
	-	·	Home Pure	chase Loans			
Low	9	8.7	6.5	628	2.8	3.4	22.7
Moderate	16	15.4	17.4	1,758	7.9	12.5	17.8
Middle	13	12.5	18.7	2,510	11.3	17.2	19.3
Upper	40	38.5	30.7	11,422	51.5	41.3	40.3
Unknown	26	25.0	26.7	5,865	26.4	25.6	0.0
Total	104	100.0	100.0	22,183	100.0	100.0	100.0
			Refinar	nce Loans			
Low	7	11.3	9.7	554	5.5	4.9	22.7
Moderate	14	22.6	19.8	1,597	15.9	13.9	17.8
Middle	15	24.2	20.1	2,377	23.6	17.5	19.3
Upper	23	37.1	33.3	5,265	52.3	45.5	40.3
Unknown	3	4.8	17.2	267	2.7	18.2	0.0
Total	62	100.0	100.0	10,060	100.0	100.0	100.0
			Home Impro	vement Loans			
Low	3	14.3	7.2	160	7.2	5.0	22.7
Moderate	5	23.8	16.4	580	26.2	13.1	17.8
Middle	2	9.5	20.7	216	9.8	17.4	19.3
Upper	7	33.3	48.9	598	27.0	55.0	40.3
Unknown	4	19.0	6.8	658	29.7	9.5	0.0
Total	21	100.0	100.0	2,212	100.0	100.0	100.0
	·	-	Total Home N	Aortgage Loans	i		
Low	20	10.2	7.3	1,472	4.1	3.7	22.7
Moderate	39	19.8	17.7	4,226	11.7	12.8	17.8
Middle	31	15.7	19.0	5,208	14.4	17.2	19.3
Upper	74	37.6	33.0	18,397	51.0	42.7	40.3
Unknown	33	16.8	23.0	6,790	18.8	23.6	0.0
Total	197	100.0	100.0	36,093	100.0	100.0	100.0
Source: 2022 FI	FIEC Census Data	1		ŀ			
Note: Percenta)20 U.S. Census I ges may not total nily loans are not	100.0 percent du	ue to rounding.	U U			

Table B-2

Distri	bution of 2022 Sn	nall Business Len	ding By Income L	evel of Geograph	ıy						
Assessment Area: Tulsa Metropolitan											
Geographic		Bank Loans									
Income Level	#	# #% \$(000) \$%									
Low	4	1.2	300	1.2	4.4						
Moderate	116	34.0	7,910	31.1	27.2						
Middle	183	53.7	14,374	56.6	32.7						
Upper	38	11.1	2,821	11.1	35.6						
Unknown	0	0.0	0	0.0	0.1						
Tract-Unk	0	0.0	0	0.0							
Total	341	100.0	25,405	100.0	100.0						
2022 Dun & Bi											

Table B-3

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

			T									
Distribut	ion of 2022 Small B	Business Lendin	ig By Revenue Si	ze of Businesses								
	Assessm	ent Area: Tulsa	Metropolitan									
		Bank I	loans		Total							
	#	#%o	\$(000)	\$%	Businesses %							
By Revenue												
\$1 Million or Less	276	80.9	17,500	68.9	90.8							
Over \$1 Million	65	19.1	7,905	31.1	8.2							
Revenue Unknown	0	0.0	0	0.0	1.0							
Total	341	100.0	25,405	100.0	100.0							
		By Loan Siz	ze									
\$100,000 or Less	293	85.9	9,867	38.8								
\$100,001 - \$250,000	30	8.8	4,898	19.3								
\$250,001 - \$1 Million	18	5.3	10,640	41.9								
Total	341	100.0	25,405	100.0								
	By Loan Size	e and Revenues	\$1 Million or Les	S								
\$100,000 or Less	244	88.4	7,354	42.0								
\$100,001 - \$250,000	21	7.6	3,361	19.2								
\$250,001 - \$1 Million	11	4.0	6,785	38.8								
Total	276	100.0	17,500	100.0								
Source: 2022 FFIEC Census D 2022 Dun & Bradstree												
2016-2020 U.S. Censt	ıs Bureau: American Con	nmunity Survey										
Note: Percentages may not to	tal 100.0 percent due to re	ounding.										

Table B-4

		2022 Tuls:	a Metropolit	an AA Demi	ographics			
Income Categories	Tract Dis			Fract Income	Families < P	overty Level ilies by Tract	Families b Inco	
	#	%	#	%	#	%	#	%
Low	16	6.2	11,228	5.5	4,351	38.8	46,419	22.7
Moderate	84	32.3	59,523	29.1	10,606	17.8	36,335	17.8
Middle	80	30.8	66,876	32.7	5,297	7.9	39,439	19.3
Upper	79	30.4	66,846	32.7	2,521	3.8	82,415	40.3
Unknown	1	0.4	135	0.1	26	19.3	0	0.0
Total AA	260	100.0	204,608	100.0	22,801	11.1	204,608	100.0
	Housing			Hous		Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vacant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	23,615	7,291	3.6	30.9	12,597	53.3	3,727	15.8
Moderate	117,806	50,241	25.1	42.6	49,756	42.2	17,809	15.1
Middle	118,374	70,094	35.0	59.2	34,383	29.0	13,897	11.7
Upper	101,545	72,498	36.2	71.4	21,810	21.5	7,237	7.1
Unknown	1,185	104	0.1	8.8	796	67.2	285	24.1
T otal AA	362,525	200,228	100.0	55.2	119,342	32.9	42,955	11.8
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	Total Businesses by Tract		r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	1,905	4.4	1,647	4.2	239	6.7	19	4.3
Moderate	11,817	27.2	10,485	26.6	1,215	34.3	117	26.4
Middle	14,232	32.7	12,820	32.5	1,255	35.4	157	35.4
Upper	15,466	35.6	14,491	36.7	826	23.3	149	33.6
Unknown	56	0.1	46	0.1	9	0.3	1	0.2
T otal AA	43,476	100.0	39,489	100.0	3,544	100.0	443	100.0
Per	centage of Tota	l Businesses:		90.8		8.2		1.0
				Fa	rms by Tract	& Revenue Si	ize	
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	8	1.4	8	1.5	0	0.0	0	0.0
Moderate	107	19.1	106	19.2	1	14.3	0	0.0
Middle	263	47.0	260	47.2	3	42.9	0	0.0
Upper	182	32.5	177	32.1	3	42.9	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
T otal AA	560	100.0	551	100.0	7	100.0	2	100.0
	Percentage of	Total Farms:		98.4		1.3		0.4
Source: 2022 FFIEC Census 2022 Dun & Bradstr 2016-2020 U.S. Cen	Data reet Data		tu Surau	90.4		1.3		0.4

Table B-5

		2021 Tulsa	Metropolita	an AA Demo	ographics			
Income Categories	Tract Dist		Families by T		Families < Po as % of Fami	-	Families b Inco	
	#	%	#	%	#	%	#	%
Low	17	7.7	10,765	5.3	4,413	41.0	45,773	22.7
Moderate	69	31.1	51,190	25.3	10,359	20.2	35,506	17.6
Middle	82	36.9	81,506	40.3	7,668	9.4	40,267	19.9
Upper	54	24.3	58,583	29.0	2,349	4.0	80,498	39.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	222	100.0	202,044	100.0	24,789	12.3	202,044	100.0
	Housing			Hous	sing Type by	Гract		
	Units by	0	wner-occupie	d	Rer	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	3.4	29.1	12,302	53.7	3,930	17.2
Moderate	100,106	42,093	21.5	42.0	43,307	43.3	14,706	14.7
Middle	140,542	84,387	43.1	60.0	41,194	29.3	14,961	10.6
Upper	88,234	62,699	32.0	71.1	19,202	21.8	6,333	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	351,785	195,850	100.0	55.7	116,005	33.0	39,930	11.4
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Business	es by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	1,578	3.5	1,364	3.4	202	5.6	12	3.1
Moderate	10,424	23.4	9,166	22.7	1,164	32.0	94	24.3
Middle	17,246	38.8	15,661	38.7	1,431	39.4	154	39.8
Upper	15,206	34.2	14,243	35.2	836	23.0	127	32.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA		0.0	Ű		0	0.0	0	
			40,434	100.0	3,633	100.0	387	100.0
	44,454 ercentage of Total	100.0			_			
		100.0		100.0 91.0	_	100.0 8.2	387	
		100.0 Businesses:		100.0 91.0 Fa	3,633	100.0 8.2 & Revenue Si	387	0.9
	ercentage of Total	100.0 Businesses:	40,434	100.0 91.0 Fa	3,633 rms by Tract	100.0 8.2 & Revenue Si	387 ze	0.9
Pe	Total Farms	100.0 Businesses: by Tract	40,434 Less Than or	100.0 91.0 Fa: r = \$1 Million	3,633 rms by Tract o Over \$1	100.0 8.2 & Revenue Si Million	387 ze Revenue No	0.9 ot Reported %
Pe	Total Farms	100.0 Businesses: by Tract %	40,434 Less Than or # 7	100.0 91.0 Fa: r = \$1 Million %	3,633 rms by Tract o Over \$1 # 1	100.0 8.2 & Revenue Si Million %	387 ze Revenue No #	0.9 ot Reported % 0.0
Pe Low Moderate	Total Farms	100.0 Businesses: by Tract % 1.4	40,434 Less Than or # 7	100.0 91.0 Fa x = \$1 Million % 1.2	3,633 rms by Tract o Over \$1 # 1	100.0 8.2 & Revenue Si Million % 14.3	387 ze Revenue No # 0	0.5 Dt Reported % 0.0 0.1
Pe Low Moderate Middle	Total Farms # 8 85	100.0 Businesses: by Tract % 1.4 14.8	40,434 Less Than or # 7 84	100.0 91.0 Fa: * = \$1 Million % 1.2 14.8	3,633 rms by Tract o Over \$1 # 1 1	100.0 8.2 & Revenue Si Million % 14.3 14.3	387 ze Revenue No # 0 0	0.5 ot Reported % 0.0 0.0 0.0
Pe Low Moderate Middle Upper	Total Farms # 8 85 317	100.0 Businesses: by Tract % 1.4 14.8 55.0	40,434 Less Than or # 7 84 313	100.0 91.0 Fa: x = \$1 Million % 1.2 14.8 55.2	3,633 rms by Tract o Over \$1 # 1 1 4	100.0 8.2 & Revenue Si Million % 14.3 14.3 57.1	387 ze Revenue No # 0 0 0	0.5 ot Reported % 0.0 0.0 100.0
	Total Farms # 8 8 317 166	100.0 Businesses: by Tract % 1.4 14.8 55.0 28.8	40,434 Less Than or # 7 84 313 163	100.0 91.0 Fa: x = \$1 Million % 1.2 14.8 55.2 28.7	3,633 rms by Tract o Over \$1 # 1 1 4 4 1	100.0 8.2 & Revenue Si Million % 14.3 14.3 57.1 14.3	387 ze Revenue No # 0 0 0 0 2	-

Table B-6

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX C – LIMITED SCOPE REVIEW AA TABLES

	Distribution	of 2021 Hom		e C-1 Lending By I	ncome Level	of Geograp	hy
		As	sessment Are	ea: Payne Co	unty		
Geographic	Owner Occupied						
Income Level	Bar	ık	Agg	Ba	nk	Agg	Units %
ficome Lever	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	38.5	0	0.0	35.4	29.5
Middle	3	100.0	61.5	253	100.0	64.6	70.5
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	253	100.0	100.0	100.0
2011-20	FIEC Census Dat 015 U.S. Census I ages may not tota	Bureau: America	5	rvey			

Table C-2

	Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: Payne County											
Geographic		0										
Income Level	Ban	k	Agg	Ba	nk	Agg	Owner Occupied Units %					
ficome Lever	#	#%	#%o	\$(000)	\$%	\$%	Cluts 70					
Low	0	0.0	0.0	0	0.0	0.0	0.0					
Moderate	4	100.0	36.2	371	100.0	38.2	48.6					
Middle	0	0.0	63.8	0	0.0	61.8	51.4					
Upper	0	0.0	0.0	0	0.0	0.0	0.0					
Unknown	0	0.0	0.0	0	0.0	0.0	0.0					
Tract-Unk	0	0.0	0.0	0	0.0	0.0						
Total	4	100.0	100.0	371	100.0	100.0	100.0					
2016-2	FIEC Census Data 020 U.S. Census 1 ages may not total	Bureau: America	e	ırvey								

Distribution of 2021 Small Business Lending By Income Level of Geography								
Assessment Area: Payne County								
Geographic		Bank Loans						
Income Level	#	#%o	\$(000)	\$%	Businesses %			
Low	0	0.0	0	0.0	0.0			
Moderate	0	0.0	0	0.0	20.2			
Middle	4	100.0	98	100.0	79.8			
Upper	0	0.0	0	0.0	0.0			
Unknown	0	0.0	0	0.0	0.0			
Tract-Unk	0	0.0	0	0.0				
Total	4	100.0	98	100.0	100.0			
Source: 2021 FFIEC Census Data								
2021 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table C-3

Table C-4

Distribution of 2022 Small Business Lending By Income Level of Geography									
Assessment Area: Payne County									
Geographic		Bank Loans							
Income Level	#	#%o	\$(000)	\$%	Businesses %				
Low	0	0.0	0	0.0	0.0				
Moderate	15	93.8	752	93.8	44.6				
Middle	1	6.3	50	6.2	55.4				
Upper	0	0.0	0	0.0	0.0				
Unknown	0	0.0	0	0.0	0.0				
Tract-Unk	0	0.0	0	0.0					
Total	16	100.0	802	100.0	100.0				
Source: 2022 FFIEC	Census Da ta								
2022 Dun & Bradstreet Data									
2016-2020 U.S. Census Bureau: American Community Survey									
Note: Percentages m	te: Percentages may not total 100.0 percent due to rounding.								

Distribution of 2021 Home Mortgage Lending By Borrower Income Level								
Assessment Area: Payne County								
Borrower		Families by						
Income Level	Bank		Agg	Bank		Ασσ		
income lever	#	#%o	#%	\$(000)	\$%	\$%	Family Income %	
	Total Home Mortgage Loans							
Low	0	0.0	3.1	0	0.0	1.6	19.1	
Moderate	1	33.3	15.5	27	10.7	10.6	22.0	
Middle	1	33.3	11.0	200	79.1	9.9	24.3	
Upper	1	33.3	38.1	26	10.3	47.6	34.5	
Unknown	0	0.0	32.3	0	0.0	30.3	0.0	
Total	3	100.0	100.0	253	100.0	100.0	100.0	
Source: 2021 FFIEC Census Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								
Multifamily loans are not included in the borrower distribution analysis.								

Table C-5

Table C-6								
Distribution of 2022 Home Mortgage Lending By Borrower Income Level								
Assessment Area: Payne County								
Borrower	Bank And Aggregate Loans							
Income Level	Bank		Agg	Bank		Agg	Families by Family Income %	
Income Lever	#	#%o	#%o	\$(000)	\$%	\$%	Tuniny meone 70	
Low	0	0.0	8.2	0	0.0	3.7	27.4	
Moderate	1	25.0	15.7	100	27.0	11.9	18.2	
Middle	0	0.0	22.7	0	0.0	22.1	17.2	
Upper	3	75.0	26.7	271	73.0	32.5	37.2	
Unknown	0	0.0	26.7	0	0.0	29.8	0.0	
Total	4	100.0	100.0	371	100.0	100.0	100.0	
Source: 2022 FFIEC Census Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								
Multifamily loans are not included in the borrower distribution analysis.								

Distribution of 2021 Small Business Lending By Revenue Size of Businesses								
Assessment Area: Payne County								
		Bank I	Loans		Total			
	#	#%	\$(000)	\$%	Businesses			
		By Revenue						
\$1 Million or Less	4	100.0	98	100.0	87.4			
Over \$1 Million	0	0.0	0	0.0	11.0			
Revenue Unknown	0	0.0	0	0.0	1.6			
Total	4	100.0	98	100.0	100.0			
	· · · ·	By Loan Size	e					
\$100,000 or Less	4	100.0	98	100.0				
\$100,001 - \$250,000	0	0.0	0	0.0				
\$250,001 - \$1 Million	0	0.0	0	0.0				
Total	4	100.0	98	100.0				
	By Loan Size	and Revenues	51 Million or Les	s				
\$100,000 or Less	4	100.0	98	100.0				
\$100,001 - \$250,000	0	0.0	0	0.0				
\$250,001 - \$1 Million	0	0.0	0	0.0				
Total	4	100.0	98	100.0				
Source: 2021 FFIEC Census D	Da ta							
2021 Dun & Bradstreet Data								
2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table C-7

			•									
Distribution	of 2022 Small E	Business Lendi	ng By Revenue	Size of Busin	esses							
	Asses	sment Area: Pa	yne County									
		Bank I	Loans		Total							
	#	#%	\$(000)	\$%	Businesses							
By Revenue												
\$1 Million or Less	100.0	86.9										
Over \$1 Million	0	0.0	0	0.0	11.0							
Revenue Unknown	0	0.0	0	0.0	2.1							
Total	16	100.0	802	100.0	100.0							
		By Loan Si	ze									
\$100,000 or Less	15	93.8	302	37.7								
\$100,001 - \$250,000	0	0.0	0	0.0								
\$250,001 - \$1 Million	1	6.3	500	62.3								
Total	16	100.0	802	100.0								
	By Loan Size	e and Revenues	s \$1 Million or	Less								
\$100,000 or Less	15	93.8	302	37.7								
\$100,001 - \$250,000	0	0.0	0	0.0								
\$250,001 - \$1 Million	1	6.3	500	62.3								
Total	16	100.0	802	100.0								
Source: 2022 FFIEC Censu												
2022 Dun & Brads												
2016-2020 U.S. C	ensus Bureau: Amer	ican Community S	urvey									

Table C-8

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

						l api	e C-9						
Di	stributi	on of 2	2021 a	nd 2022	Small	Busin	ess Lenc	ling B	y Inco	me Leve	l of Ge	eograp	hy
				Ass	essme	ent Are	ea: Payne	e Cour	nty				
C 11	Bank And Aggregate Loans By Year											Total	
Geographic			20	21					20	22			
Income	Bar	ık	Agg	Ban	ık	Agg	Bank Agg Bank Agg Bus					Businesses	
Level	# #% \$\$(000) \$% \$% # #% \$\$(000) \$% \$%								%				
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	20.9	0	0.0	9.7	15	93.8	42.9	752	93.8	35.9	44.6
Middle	4	100.0	79.1	98	100.0	90.3	1	6.3	57.1	50	6.2	64.1	55.4
Upper	0	0 0.0 0.0 0 0.0 0						0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	98	100.0	100.0	16	100.0	100.0	802	100.0	100.0	100.0
Source: 2022 FFI	IEC Census	Data											
2022 Dur	1 & Bradstre	et Data											
2016-202	0 U.S. Cen	sus Burea	u: Ameri	can Commu	nity Surt	vey							
Note: Percentag	ges may not	total 100).0 percer	it due to rou	nding.								

Table C-9

		2021 Pag	yne County		aphics			
Income Categories	Tract Dis	tribution	Families	by Tract	Families < Po as % of Fa Tra	5	Families I Inco	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	681	19.1
Moderate	1	25.0	1,158	32.5	207	17.9	784	22.0
Middle	3	75.0	2,400	67.5	263	11.0	864	24.3
Upper	0	0.0	0	0.0	0	0.0	1,229	34.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4	100.0	3,558	100.0	470	13.2	3,558	100.0
	Housing			Hous	ing Type by	Tract		
	Units by	0	wner-occupi	ed	Rer	ıtal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,787	1,055	29.5	59.0	494	27.6	238	13.3
Middle	4,573	2,520	70.5	55.1	1,156	25.3	897	19.6
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	6,360	3,575	100.0	56.2	1,650	25.9	1,135	17.8
	Total Businesses by Tract			an or =	esses by Tra Over \$1		Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	88	20.2	78	20.5	10	20.8	0	0.0
Middle	348	79.8	303	79.5	38	79.2	7	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	436	100.0	381	100.0	48	100.0	7	100.0
Perce	entage of Total	Businesses:		87.4		11.0		1.6
				Far	ms by Tract	& Revenue S	ize	
	Total Farm	ns by Tract	Less Th \$1 M	an or = illion	Over \$1	Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	8.3	2	8.3	0	0.0	0	0.0
Middle	22	91.7	22	91.7	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	24	100.0	24	100.0	0	0.0	0	0.0
]	Percentage of	Total Farms:		100.0		0.0		0.0
Source: 2021 FFIEC Census Dat 2021 Dun & Bradstreet D 2011-2015 U.S. Census I Note: Percentages may not tota	ata Bureau: American C	0	y					

Table C-10

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

		2022 Pa	yne County		raphics			
In come Categories	Tract Dis	tribution		by Tract ome		overty Level lies by Tract	Families l Inco	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	968	27.4
Moderate	2	50.0	1,571	44.5	222	14.1	643	18.2
Middle	2	50.0	1,960	55.5	299	15.3	607	17.2
Upper	0	0.0	0	0.0	0	0.0	1,313	37.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4	100.0	3,531	100.0	521	14.8	3,531	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	0	wner-occupi	ed	Ren	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	2,908	1,572	48.6	54.1	664	22.8	672	23.1
Middle	3,481	1,663	51.4	47.8	1,106	31.8	712	20.5
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	6,389	3,235	100.0	50.6	1,770	27.7	1,384	21.7
	Tatal Bua			Busi	nesses by Tra	sses by Tract & Revenue		
		Total Businesses by Tract		an or = illion	Over \$1	Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	194	44.6	173	45.8	15	31.3	6	66.7
Middle	241	55.4	205	54.2	33	68.8	3	33.3
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	435	100.0	378	100.0	48	100.0	9	100.0
Perc	entage of Total	Businesses:		86.9		11.0		2.1
				Fai	rms by Tract	& Revenue S	ize	
	Total Farm	s by Tract	Less Th \$1 M		Over \$1	Million	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	14	56.0	14	56.0	0	0.0	0	0.0
Middle	11	44.0	11	44.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	25	100.0	25	100.0	0	0.0	0	0.0
	Percentage of	Total Farms:		100.0		0.0		0.0
Source: 2022 FFIEC Census Dat 2022 Dun & Bradstreet E 2016-2020 U.S. Census i Note: Percentages may not tota	Data Bureau: American C		y					

Table C-11

Bank		Bank And Aggi	rogato Loans			
Bank			legate LUAIIS			Owner Occupied
		Agg	Ban	k	Agg	Units %
	#%	#%o	\$(000)	\$%	\$%	Units 76
0	0.0	0.7	0	0.0	0.4	2.3
2	8.0	3.3	104	2.7	1.5	6.0
13	52.0	43.0	2,427	62.5	40.0	45.6
10	40.0	52.9	1,353	34.8	58.1	46.0
0	0.0	0.0	0	0.0	0.0	0.0
0	0.0	0.0	0	0.0	0.0	
25	100.0	100.0	3,884	100.0	100.0	100.0
	10 0 0	2 8.0 13 52.0 10 40.0 0 0.0 0 0.0 25 100.0	2 8.0 3.3 13 52.0 43.0 10 40.0 52.9 0 0.0 0.0 0 0.0 0.0 25 100.0 100.0	2 8.0 3.3 104 13 52.0 43.0 2,427 10 40.0 52.9 1,353 0 0.0 0.0 0 0 0.0 0.0 0 25 100.0 100.0 3,884	2 8.0 3.3 104 2.7 13 52.0 43.0 2,427 62.5 10 40.0 52.9 1,353 34.8 0 0.0 0.0 0 0.0 0 0.0 0.0 0.0 0.0 25 100.0 100.0 3,884 100.0	2 8.0 3.3 104 2.7 1.5 13 52.0 43.0 2,427 62.5 40.0 10 40.0 52.9 1,353 34.8 58.1 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 0.0 0.0 25 100.0 100.0 3,884 100.0 100.0

Table C-12

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

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

	Distribution o		00	ending By In Washington C		f Geograp	hy
Geographic			Bank And Agg	regate Loans			Owner Occupied
Income Level	Banl	k	Agg	Bank	۲	Agg	Units %
Income Level	#	#%	#%o	\$(000)	\$%	\$%	Units 76
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	10.0	5.9	39	3.2	9.3	7.0
Middle	5	50.0	53.1	384	31.2	46.4	56.7
Upper	4	40.0	41.0	807	65.6	44.3	36.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,230	100.0	100.0	100.0

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

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

Distri	ibution of 2021 Sm	all Business Lend	ding By Income L	evel of Geograph	ıy				
	Asso	essment Area: Wa	shington County						
Geographic		Bank Loans							
Income Level	#	#%	\$(000)	\$%	Businesses %				
Low	0	0.0	0	0.0	4.4				
Moderate	0	0.0	0	0.0	1.6				
Middle	3	60.0	139	63.8	57.5				
Upper	2	40.0	79	36.2	36.5				
Unknown	0	0.0	0	0.0	0.0				
Tract-Unk	0	0.0	0	0.0					
Total	5	100.0	218	100.0	100.0				
Source: 2021 FFIEC Ce	ensus Da ta								
2021 Dun & Bi	radstreet Data								
2011-2015 U.S.	. Census Bureau: Americ	can Community Survey	y						
Note: Percentages mag	y not total 100.0 percent	due to rounding.							

Table C-14

Table C-15

Distr	ibution of 2022 Sm	all Business Lend	ling By Income L	evel of Geograph	ıy						
Assessment Area: Washington County											
Geographic		Bank Loans									
Income Level	#	#%	\$(000)	\$%	Businesses %						
Low	0	0.0	0	0.0	0.0						
Moderate	3	23.1	230	13.4	22.2						
Middle	3	23.1	208	12.1	42.2						
Upper	7	53.8	1,284	74.6	35.6						
Unknown	0	0.0	0	0.0	0.0						
Tract-Unk	0	0.0	0	0.0							
Total	13	100.0	1,722	100.0	100.0						
Source: 2022 FFIEC C	ensus Da ta										
2022 Dun & B	radstreet Data										
2016-2020 U.S	5. Census Bureau: Ameri	can Community Surve	y								
Note: Percentages ma	y not total 100.0 percent	due to rounding.									

	Distributio	n of 2021 Ho	me Mortgag	e Lending B	y Borrower In	come Level	
		Asses	sment Area:	Washington	County		
Borrower			Bank And Agg	regate Loans			Families by
Income Level	Bar	ık	Agg	Bai	nk	Agg	Family Income %
ficome Lever	#	#%	#%	\$(000)	\$%	\$%	ranny neone 76
Low	0	0.0	5.5	0	0.0	2.9	17.0
Moderate	1	4.0	11.9	180	4.6	8.2	16.4
Middle	2	8.0	14.9	284	7.3	13.0	18.0
Upper	16	64.0	38.3	2,950	76.0	47.7	48.6
Unknown	6	24.0	29.4	470	12.1	28.2	0.0
Total	25	100.0	100.0	3,884	100.0	100.0	100.0
2011-20	FIEC Census Dat 015 U.S. Census I ages may not tota	Bureau: America	5	rvey	·		

Table C-16

Multifamily loans are not included in the borrower distribution analysis.

Table C-17 Distribution of 2022 Home Mortgage Lending By Borrower Income Level **Assessment Area: Washington County** Bank And Aggregate Loans Borrower Families by Bank Bank Agg Agg Family Income % Income Level # #% #% \$(000) \$% \$% Low 0 0.0 5.2 0 0.0 2.5 17.0 30 Moderate 1 10.0 13.7 2.4 10.1 15.6 5 Middle 50.0 17.9 373 30.3 16.1 18.0 1 Upper 10.0 39.0 314 25.5 48.1 49.4 3 Unknown 30.0 24.1 513 41.7 23.3 0.0 Total 10 100.0 100.0 1,230 100.0 100.0 100.0 Source: 2022 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribut	ion of 2021 Small	Business Lendin	ig By Revenue Si	ze of Businesses	
	Assessm	nent Area: Wash	ington County		
		Bank l	Loans		Total
	#	#%o	\$(000)	\$%	Businesses %
		By Revenu	e		•
\$1 Million or Less	4	80.0	168	77.1	92.6
Over \$1 Million	1	20.0	50	22.9	6.6
Revenue Unknown	0	0.0	0	0.0	0.8
Total	5	100.0	218	100.0	100.0
	· · · · ·	By Loan Siz	ze		-
\$100,000 or Less	5	100.0	218	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	5	100.0	218	100.0	
	By Loan Siz	e and Revenues	\$1 Million or Le	SS	•
\$100,000 or Less	4	100.0	168	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	4	100.0	168	100.0	
Source: 2021 FFIEC Census D	a ta				
2021 Dun & Bradstree					
	s Bureau: American Cor	0 0			
Note: Percentages may not to	tal 100.0 percent due to	rounding.			

Table C-18

Distribut	ion of 2022 Small B	Business Lendir	ng By Revenue S	ize of Businesse	3							
		ent Area: Wash	0,		, ,							
		Bank L	0 1		Total							
	#	#%	\$(000)	\$%	Businesses %							
By Revenue												
\$1 Million or Less	11	84.6	1,458	84.7	92.5							
Over \$1 Million	2	15.4	264	15.3	6.6							
Revenue Unknown	0	0.0	0	0.0	0.9							
Total	13	100.0	1,722	100.0	100.0							
	·	By Loan Siz	ze									
\$100,000 or Less	9	69.2	466	27.1								
\$100,001 - \$250,000	3	23.1	536	31.1								
\$250,001 - \$1 Million	1	7.7	720	41.8								
Total	13	100.0	1,722	100.0								
	By Loan Size	e and Revenues	\$1 Million or Le	SS								
\$100,000 or Less	8	72.7	412	28.3								
\$100,001 - \$250,000	2	18.2	326	22.4								
\$250,001 - \$1 Million	1	9.1	720	49.4								
Total	11	100.0	1,458	100.0								
		5 5										

Table C-19

		2021 Washi	ington Cour		ographics			
Income Categories	Tract Dist		Families	2	Families < Po as % of Fa Tra	milies by	Families I Inco	
	#	%	#	%	#	%	#	%
Low	1	7.7	450	3.2	167	37.1	2,414	17.0
Moderate	2	15.4	1,148	8.1	333	29.0	2,321	16.4
Middle	5	38.5	6,492	45.8	714	11.0	2,554	18.0
Upper	5	38.5	6,078	42.9	324	5.3	6,879	48.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	13	100.0	14,168	100.0	1,538	10.9	14,168	100.0
	Housing			Hous	ing Type by	Tract		
	Units by	0	wner-occupi	ed	Rer	ıtal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	981	353	2.3	36.0	351	35.8	277	28.2
Moderate	1,826	918	6.0	50.3	654	35.8	254	13.9
Middle	11,111	6,935	45.6	62.4	2,838	25.5	1,338	12.0
Upper	9,698	6,987	46.0	72.0	1,965	20.3	746	7.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	23,616	15,193	100.0	64.3	5,808	24.6	2,615	11.1
	Total Businesses by Tract		\$1 M		Over \$1		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	86	4.4	69	3.8	17	13.1	0	0.0
Moderate	32	1.6	31	1.7	1	0.8	0	0.0
Middle	1,130	57.5	1,053	57.9	64	49.2	13	81.3
Upper	718	36.5		36.6	48	36.9	3	18.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,966	100.0	1,820	100.0	130	100.0	16	100.0
Perce	ntage of Total	Businesses:		92.6		6.6		0.8
	Total Farm	s by Tract	Less Th \$1 M	an or =	ms by Tract Over \$1		iize Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	1	1.7	1	1.7	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	39	65.0	39	65.0	0	0.0	0	0.0
Middle	59				0	0.0	0	0.0
Middle Upper	20	33.3	20	33.3	0	0.0	0	0.0
		33.3 0.0		33.3 0.0	0	0.0	0	
Upper	20		0					0.0 0.0

Table C-20

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

0 3 7 4 0 14 5 9 5 9 5 9 7 0 3,504 5,977 0 3,739 8 0 3,739 7 7 0 0 3,739 8 0 3,739 7 0 0 3,739 7 0 0 3,7539 7 0 0 3,755 7 0 0 1 4 0 0 1 4 0 0 1 4 0 0 1 4 0 0 1 4 0 0 1 4 0 0 1 4 0 0 1 4 0 0 0 1 4 0 0 1 4 0 0 1 4 0 0 0 1 4 0 0 0 1 4 0 0 0 1 4 0 0 0 0	# 0 1,010 8,225 5,281 0 14,516 inesses by act %	Inc # 0 1,382 7,205 4,382 0 0 12,969 wner-occupi % by tract 0.0 7.0 56.7 36.4 0.0	ed % by unit 0.0 31.0 60.9 75.7 0.0 61.1 Busin tan or =	as % of Fami # 0 0 337 822 186 0 0 1,345 sing Type by Rer # 0 1,364 3,374 1,122 0 0 5,860 messes by Tra Over \$1	ntal % by unit 0.0 41.9 25.0 16.1 0.0 24.7 ct & Revenue Million	# 2,211 2,022 2,328 6,408 0 12,969 Vac # 0 884 1,905 574 0 3,363 e Size Revenue Na	>me % 17.0 15.6 18.0 49.4 0.0 100.0 ant % by unit 0.0 27.1 14.1 8.2 0.0 14.2
3 7 4 0 14 by tt 0 3,258 3,504 5,977 0 8,739 Buss Trr 0 0	0.0 21.4 50.0 28.6 0.0 100.0 # 0 1,010 8,225 5,281 0 14,516 inesses by act %	0 1,382 7,205 4,382 0 12,969 wner-occupi % by tract 0.0 7.0 56.7 36.4 0.0 100.0 100.0	0.0 10.7 55.6 33.8 0.0 100.0 Hous ed % by unit 0.0 31.0 60.9 75.7 0.0 61.1 Busin an or = illion	0 337 822 186 0 1,345 5ing Type by Rer # 0 1,364 3,374 1,122 0 5,860 messes by Tra Over \$1	0.0 24.4 111.4 4.2 0.0 10.4 Tract Tract 10.4 10.4 10.4 10.4 10.0 25.0 16.1 0.0 24.7 ct & Revenue Million	2,211 2,022 2,328 6,408 0 12,969 Vac # 0 884 1,905 574 0 3,363 e Size Revenue No	17.0 15.6 18.0 49.4 0.0 100.0 ant 0.0 27.1 14.1 8.2 0.0 14.2
3 7 4 0 14 by tt 0 3,258 3,504 5,977 0 8,739 Buss Trr 0 0	21.4 50.0 28.6 0.0 100.0 # 0 1,010 8,225 5,281 0 14,516 inesses by act %	1,382 7,205 4,382 0 12,969 wner-occupi % by tract 0.0 7.0 56.7 36.4 0.0 100.0 100.0	10.7 55.6 33.8 0.0 100.0 Hous ed % by unit 0.0 31.0 60.9 75.7 0.0 61.1 Busin tan or = illion	337 822 186 0 1,345 sing Type by Rer # 0 1,364 3,374 1,122 0 5,860 nesses by Tra Over \$1	24.4 11.4 4.2 0.0 10.4 Tract ntal % by unit 0.0 41.9 25.0 16.1 0.0 24.7 ct & Revenue Million	2,022 2,328 6,408 0 12,969 Vac # 0 884 1,905 574 0 3,363 e Size Revenue Na	15.6 18.0 49.4 0.0 100.0 ant % by unit 0.0 27.1 14.1 8.2 0.0 14.2
7 4 0 14 by t 0 3,258 3,504 5,977 0 3,739 Busi Tr Tr	50.0 28.6 0.0 100.0 # 0 1,010 8,225 5,281 0 14,516 inesses by act %	7,205 4,382 0 12,969 wner-occupi % by tract 0.0 7.0 56.7 36.4 0.0 100.0 Less Th \$1 M	55.6 33.8 0.0 100.0 Hous ed % by unit 0.0 31.0 60.9 75.7 0.0 61.1 Busin tan or = illion	822 186 0 1,345 sing Type by Rer # 0 1,364 3,374 1,122 0 5,860 nesses by Tra Over \$1	11.4 4.2 0.0 10.4 Tract ntal % by unit 0.0 41.9 25.0 16.1 0.0 24.7 ct & Revenue Million	2,328 6,408 0 12,969 Vac # 0 884 1,905 574 0 3,363 e Size Revenue No	18.0 49.4 0.0 100.0 ant % by unit 0.0 27.1 14.1 14.1 8.2 0.0 14.2
4 0 14 by 258 3,554 5,977 0 3,739 Busis Tr 0 0 0	28.6 0.0 100.0 # 0 1,010 8,225 5,281 0 14,516 inesses by act	4,382 0 12,969 wner-occupi % by tract 0.0 7.0 56.7 36.4 0.0 100.0 Less Th \$1 M	33.8 0.0 100.0 Hous ed % by unit 0.0 31.0 60.9 75.7 0.0 61.1 Busin an or = illion	186 0 1,345 sing Type by Rer # 0 1,364 3,374 1,122 0 5,860 nesses by Tra Over \$1	4.2 0.0 10.4 Tract ntal % by unit 0.0 41.9 25.0 16.1 0.0 24.7 ct & Revenue Million	6,408 0 12,969 # 0 884 1,905 574 0 3,363 e Size Revenue Na	49.4 0.0 100.0 ant % by unit 0.0 27.1 14.1 8.2 0.0 14.2
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14 ng by 3,258 3,504 5,977 0 3,739 Busi Tr. 0	100.0 # 0 1,010 8,225 5,281 0 14,516 inesses by act %	12,969 w ner-occupi % by tract 0.0 7.0 56.7 36.4 0.0 100.0 Less Th \$1 M	100.0 Hous ed % by unit 0.0 31.0 60.9 75.7 0.0 61.1 Busin tan or = illion	1,345 sing Type by Rer # 0 1,364 3,374 1,122 0 0 5,860 nesses by Tra Over \$1	10.4 Tract Tract (% by unit) (0.0) (41.9) (25.0) (16.1) (0.0) (24.7) (ct & Revenue) Million	Vac # 0 884 1,905 574 0 3,363 e Size Revenue No	100.0 ant % by unit 0.0 27.1 14.1 8.2 0.0 14.2
ing by et 0 3,258 3,504 5,977 0 3,739 Busi Tr 0 0	0 # 0 1,010 8,225 5,281 0 14,516 inesses by act	wner-occupi % by tract 0.0 7.0 56.7 36.4 0.0 100.0 Less Th \$1 M	Hous ed % by unit 0.0 31.0 60.9 75.7 0.0 61.1 Busin an or = illion	sing Type by Rer # 0 1,364 3,374 1,122 0 5,860 messes by Tra Over \$1	Tract ntal % by unit 0.0 41.9 25.0 16.1 0.0 24.7 ct & Revenue Million	Vac # 0 884 1,905 574 0 3,363 e Size Revenue No	ant % by unit 0.0 27.1 14.1 8.2 0.0 14.2
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0 3,258 3,504 5,977 0 3,739 Busi Tr 0	# 0 1,010 8,225 5,281 0 14,516 inesses by act %	% by tract 0.0 7.0 56.7 36.4 0.0 100.0 Less Th \$1 M	% by unit 0.0 31.0 60.9 75.7 0.0 61.1 Busin tan or = illion	# 0 1,364 3,374 1,122 0 5,860 nesses by Tra Over \$1	% by unit 0.0 41.9 25.0 16.1 0.0 24.7 ct & Revenue Million	# 0 884 1,905 574 0 3,363 e Size Revenue Na	% by unit 0.0 27.1 14.1 8.2 0.0 14.2
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3,258 3,504 5,977 0 3,739 Busi Tr	1,010 8,225 5,281 0 14,516 in esses by act %	7.0 56.7 36.4 0.0 100.0 Less Th \$1 M	31.0 60.9 75.7 0.0 61.1 Busin tan or = illion	1,364 3,374 1,122 0 5,860 nesses by Tra Over \$1	41.9 25.0 16.1 0.0 24.7 ct & Revenue Million	884 1,905 574 0 3,363 e Size Revenue No	27.1 14.1 8.2 0.0 14.2
3,504 5,977 0 3,739 Busi Tr	8,225 5,281 0 14,516 inesses by act %	56.7 36.4 0.0 100.0 Less Th \$1 M	60.9 75.7 0.0 61.1 Busin an or = illion	3,374 1,122 0 5,860 nesses by Tra Over \$1	25.0 16.1 0.0 24.7 ct & Revenue Million	1,905 574 0 3,363 e Size Revenue No	14.1 8.2 0.0 14.2
5,977 0 3,739 Busi Tr	5,281 0 14,516 inesses by act %	36.4 0.0 100.0 Less Th \$1 M	75.7 0.0 61.1 Busin an or = illion	1,122 0 5,860 nesses by Tra Over \$1	16.1 0.0 24.7 ct & Revenue Million	574 0 3,363 e Size Revenue No	14.1 8.2 0.0 14.2 ot Reported
0 3,739 Busi Tr	0 14,516 inesses by act %	0.0 100.0 Less Th \$1 M	0.0 61.1 Busin an or = illion	0 5,860 nesses by Tra Over \$1	0.0 24.7 ct & Revenue Million	0 3,363 e Size Revenue No	0.0
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Busi	inesses by act %	Less Th \$1 M	Busin an or = illion	nesses by Tra Over \$1	ct & Revenue Million	e Size Revenue No	
Tr	act %	\$1 M	an or = illion	Over \$1	Million	Revenue No	ot Reported
Tr	act %	\$1 M	illion				ot Reported
		#	0/_				
			/0	#	%	#	%
	0.0	0	0.0	0	0.0	0	0.0
435	22.2	386	21.3	46	35.7	3	17.6
826	42.2	775	42.7	40	31.0	11	64.2
698	35.6	652	36.0	43	33.3	3	17.6
0	0.0	0	0.0	0	0.0	0	0.0
l <i>,</i> 959	100.0	1,813	100.0	129	100.0	17	100.0
Tota	l Businesses:		92.5		6.6		0.9
			Fai	rms by Tract	& Revenue S	ize	
Total Farms by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	%	#	%	#	%	#	%
0	0.0	0	0.0	0	0.0	0	0.0
8	13.6	8	13.6	0	0.0	0	0.0
34	57.6	34	57.6	0	0.0	0	0.0
17	28.8	17	28.8	0	0.0	0	0.0
0	0.0	0	0.0	0	0.0	0	0.0
59	100.0	59	100.0	0	0.0	0	0.0
ge of	Total Farms:		100.0		0.0		0.0
	1,959 Tota Farn 0 8 34 17 0 59	No.0 1,959 100.0 Total Businesses: Farms by Tract 0 0.0 8 13.6 34 57.6 17 28.8 0 0.0 59 100.0	Image: system of the syste	No. No. No. 1,959 100.0 1,813 100.0 Total Businesses: 92.5 Farms by Tract Less Than or = \$1 Million % # % 0 0.0 0 0.0 8 13.6 8 13.6 34 57.6 34 57.6 17 28.8 17 28.8 0 0.0 0 0.0 59 100.0 59 100.0	No. No. <td>Image: state state</td> <td>Image: No. of the second se</td>	Image: state	Image: No. of the second se

Table C-21

APPENDIX D – 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, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. 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.