



PUBLIC DISCLOSURE

November 18, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sovereign Bank
RSSD# 396253

130 East MacArthur
Shawnee, Oklahoma 74804

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.***

Sovereign 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 majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable 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 its AAs.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. In addition, available aggregate data for the most recent three years (2020, 2021, and 2022) was referenced for additional perspective to gauge credit demand within the bank's AAs. Performance was assessed within the bank's four AAs. The Oklahoma City Metropolitan and Central Oklahoma AAs were assessed using a full-scope review. The Lawton Metropolitan and Southwest Oklahoma AAs were assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 22-quarter average NLTD ratio;
- A statistical sample of 123 small business loans from a universe of 312 loans originated January 1, 2023, through December 31, 2023;
- The universe of 444 home mortgage loans reported on the bank's 2023 Home Mortgage Disclosure Act (HMDA) Loan/Application Register (LAR); and

- CD loans, qualified investments, and CD services from August 15, 2019, through June 20, 2024.

For this evaluation, more weight was placed on the bank's performance within the Oklahoma City Metropolitan AA when determining the overall institution rating given the bank's loan and deposit volumes and deposit market share within that AA. In terms of products, more weight was placed on commercial loans in the analysis due to the bank's strategic focus on commercial lending.

DESCRIPTION OF INSTITUTION

Sovereign Bank is a community bank headquartered in Shawnee, Oklahoma. The bank's characteristics include:

- Sovereign Bank is the result of a rebranding of the former First National Bank and Trust Company (FNB), Shawnee, Oklahoma following a merger with The First State Bank, Oklahoma City, Oklahoma on July 17, 2021.
- The bank is a wholly owned subsidiary of Sovereign Bancorp, Inc., which is owned by the Citizen Potawatomi Nation (CPN), Shawnee, Oklahoma.
- The bank has total assets of \$1.1 billion as of June 30, 2024.
- The bank operates 10 full-service branch offices, all located in Oklahoma. In addition to the headquarters in Shawnee, the bank also has two offices in Lawton, and one office location each in Oklahoma City, Midwest City, Mangum, Holdenville, Granite, Canute, and Edmond.
- All branch offices have an automated teller machine (ATM) except the Edmond location, and the Oklahoma City branch office has two ATMs.
- As shown in the table below, the bank's primary business focus is commercial and residential real estate lending.

Table 1

Composition of Loan Portfolio as of June 30, 2024		
Loan Type	\$(000)	%
Construction and Land Development	141,564	16.4
Farmland	24,422	2.8
1- to 4-Family Residential Real Estate	154,625	17.9
Multifamily Residential Real Estate	21,560	2.5
Nonfarm Nonresidential Real Estate	348,357	40.3
Agricultural	4,370	0.5
Commercial and Industrial	152,463	17.7
Consumer	4,346	0.5
Other	11,947	1.4
Gross Loans	863,654	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its August 14, 2019, performance evaluation conducted by the Office of the Comptroller of the Currency (OCC). 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 Oklahoma City Metropolitan and Central Oklahoma AAs (full-scope review); and a brief discussion of performance in the Lawton Metropolitan and Southwest Oklahoma AAs (limited-scope review).

The bank's overall lending test performance is Satisfactory. This conclusion was based on a reasonable NLTD ratio, a majority of loans originated within the bank's AAs, and a reasonable geographic and borrower distribution of lending. More consideration was given to the volume of loan originations than the dollar amount, as this represents the number of individuals or entities served.

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 performance compared to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and the area where they are located. The bank's NLTD ratio is reasonable. The bank's NLTD ratio is below the ratios of similarly situated financial institutions. However, the bank's NLTD ratio was significantly impacted by the merger in 2021. During the 12 quarters subsequent to the merger, the bank's NLTD ratio averaged 89.6 percent which is in line with the similarly situated institutions.

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.

Table 2

Comparative NLTD Ratios March 31, 2019 – June 30, 2024			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			22 Quarter Average
Sovereign Bank	Shawnee, OK	1,098,902	72.6
Similarly Situated Institutions			
Liberty National Bank	Lawton, OK	1,247,819	73.5
First Oklahoma Bank	Jenks, OK	1,099,215	94.1
Regent Bank	Tulsa, OK	1,619,859	98.3
Firststar Bank	Sallisaw, OK	1,166,564	89.2
Great Plains National Bank	Elk City, OK	1,696,152	92.5

Assessment Area Concentration

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

Table 3

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	10	71.4	499	74.9	4	28.6	167	25.1
Home Purchase - Conventional	199	79.6	52,920	73.7	51	20.4	18,839	26.3
Home Purchase - FHA	57	85.1	12,166	82.8	10	14.9	2,524	17.2
Home Purchase - VA	36	87.8	12,966	91.0	5	12.2	1,290	9.0
Multifamily Housing	10	90.9	8,171	28.0	1	9.1	21,000	72.0
Other Purpose Closed-End	2	100.0	162	100.0	0	0.0	0	0.0
Refinancing	53	89.8	12,071	89.6	6	10.2	1,395	10.4
Total HMDA related	367	82.7	98,955	68.6	77	17.3	45,215	31.4
Small Business	97	78.9	17,995	75.9	26	21.1	5,702	24.1
TOTAL LOANS	464	81.8	116,950	69.7	103	18.2	50,917	30.3
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

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 AAs. Performance in the Oklahoma City Metropolitan and Central Oklahoma AAs were both rated reasonable.

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 reasonable distribution among individuals of different income levels and businesses of different sizes. Performance in the Oklahoma City Metropolitan and Central Oklahoma AAs was consistent with the overall rating.

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 to area CD needs. The bank's CD activity reflected excellent responsiveness in the Oklahoma City Metropolitan AA and adequate responsiveness in the Central Oklahoma AA. It is noted that the Southwest Oklahoma AA, which received a limited-scope analysis, had a significant volume of CD activities when considering the volume of loan and deposit concentration in the AA relative to other bank markets. The performance in this AA had a positive influence on the overall CD test conclusion.

Table 4

Community Development Activity - All									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	6	8,212	0	0	0	0	0	0	0
Community Services	3	2,675	1	160	7	165	8	325	33
Economic Development	5	7,926	0	0	2	501	2	501	3
Revitalization and Stabilization	3	29,399	3	4,810	1	100	4	4,910	3
Outside Activities	0	0	0	0	0	0	0	0	0
Totals	17	48,212	4	4,971	10	766	14	5,737	39

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.

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

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

The bank's Oklahoma City Metropolitan AA consists of the entirety of Oklahoma, Canadian, and Cleveland Counties in Oklahoma (see Appendix A for an AA map and Appendix B for additional demographic data).

- This AA includes three of seven counties that comprise the Oklahoma City, Oklahoma MSA. This assessment area was added in 2021 with the acquisition of First State Bank.
- The composition of the AA consists of a total of 374 census tracts, including 29 low-, 97 moderate-, 123 middle-, 106 upper-, and 19 unknown-income tracts based on 2016-2020 American Community Survey (ACS) data.
- The bank operates three branches in the AA located in the cities of Oklahoma City, Midwest City, and Edmond. The Edmond branch was a de novo branch that opened on September 3, 2024, and previously operated as a Loan Production Office (LPO).
- The Oklahoma City branch has two ATMs, and the Midwest City branch has one ATM. Currently, the Edmond branch does not have an ATM.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 0.7 percent market share of deposits, ranking 27th of 67 FDIC-insured financial institutions operating from 337 offices in the AA.
- An interview of one community member conducted as part of the CRA evaluation of another financial institution with offices in the AA was reviewed to ascertain the credit needs of the area, responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The community member represents a housing authority organization with an office in the AA.

Table 5

Population Change			
Assessment Area: Oklahoma City Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Oklahoma City Metropolitan	1,149,287	1,246,225	8.4
Canadian County, OK	126,193	154,405	22.4
Cleveland County, OK	268,614	295,528	10.0
Oklahoma County, OK	754,480	796,292	5.5
Oklahoma City, OK MSA	1,318,408	1,425,695	8.1
Oklahoma	3,849,733	3,959,353	2.8
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The AA's 2020 population accounts for 87.4 percent of the Oklahoma City MSA and 31.5 percent of the Oklahoma statewide population.
- Population growth in the AA aligns with growth in the Oklahoma City MSA and is significantly greater than the population increase in the state of Oklahoma.
- Canadian County, the least populous county in the AA, had the highest growth rate and contains 12.4 percent of the total AA population.

Table 6

Median Family Income Change			
Assessment Area: Oklahoma City Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Oklahoma City Metropolitan	69,959	74,922	7.1
Canadian County, OK	79,529	85,700	7.8
Cleveland County, OK	76,689	80,924	5.5
Oklahoma County, OK	65,933	70,629	7.1
Oklahoma City, OK MSA	69,988	75,170	7.4
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 inflation-adjusted and are expressed in 2020 dollars.			

- Based on 2020 ACS data, the portion of AA families living below the poverty level, at 9.8 percent, was slightly above the Oklahoma City MSA figure of 9.5 percent and below to the state of Oklahoma figure of 11.3 percent. The portion of AA families living below the poverty level ranged from 4.9 percent in Canadian County to 11.7 percent in Oklahoma County.

Table 7

Housing Cost Burden Assessment Area: Oklahoma City Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Oklahoma City Metropolitan	75.9	31.2	40.2	54.5	27.0	15.6
Canadian County, OK	73.3	30.8	32.6	50.7	32.7	13.4
Cleveland County, OK	76.6	35.1	39.4	61.3	31.5	14.8
Oklahoma County, OK	75.9	29.9	41.1	53.2	24.7	16.3
Oklahoma City, OK MSA	75.0	30.2	39.9	52.0	26.4	15.3
Oklahoma	71.3	30.7	37.7	50.0	24.0	15.2

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy

- The housing affordability ratio² in the AA was in alignment with the state of Oklahoma, at 36.7 percent and 37.8 percent, respectively. Housing affordability ratios varied among the four AA counties, ranging from a high of 43.1 percent in Canadian County to a low of 35.3 percent in Oklahoma County.
- Rent prices are generally higher in the AA with 40.2 percent of renters paying rent greater than 30.0 percent of their income. This is above the Oklahoma statewide figure of 37.7 percent.
- The community contact considered the lack of affordable housing, worsening interest rates, and lack of housing for the homeless population to be the most pressing concerns.

Table 8

Unemployment Rates Assessment Area: Oklahoma City Metropolitan					
Area	2018	2019	2020	2021	2022
Oklahoma City Metropolitan	3.0	2.9	6.3	3.9	2.8
Canadian County, OK	2.7	2.7	6.0	3.4	2.5
Cleveland County, OK	2.8	2.7	5.7	3.4	2.5
Oklahoma County, OK	3.2	3.0	6.6	4.2	2.9
Oklahoma City, OK MSA	3.0	2.9	6.2	3.9	2.8
Oklahoma	3.3	3.1	6.3	4.0	3.0

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- As noted in Table 8, unemployment rates have recovered from the upsurge in 2020 that resulted from the Coronavirus Disease 2019 pandemic.
- Despite a wide geographic area with counties of varying populations, the unemployment rate showed little variance across the AA counties.

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.

- The community contact stated the driving forces in the community included local government. The major employers in the area are the University of Oklahoma (18,000) and Oklahoma Postal Training Center (100) which is operated by the University of Oklahoma.

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

LENDING TEST

The bank's performance in the Oklahoma City Metropolitan AA is reasonable. Overall, the bank's geographic distribution of loans is reasonable, and the borrower distribution of loans among individuals of different income levels and business of different sizes is reasonable. The review in this AA consisted of an evaluation of 284 home mortgage loans and 59 small business loans.

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 is reasonable, and the distribution of small business lending is reasonable.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of home mortgage loans among low-income census tracts was comparable to aggregate lending data by number and dollar volume, and comparable to the demographic figure, which represents the percentage of owner-occupied housing units in each census tract income level. Lending in moderate-income census tracts was also comparable to aggregate and the demographic figure. An evaluation of the dispersion of home mortgage loans identified gaps and lapses that included LMI census tracts, but this did not impact the conclusion. Further evaluation revealed concentrations of lending in and around areas where the bank's branches are located, with gaps noted in areas further away from the branches. The bank's HMDA origination volume within the AA is too low to conduct a meaningful analysis for home improvement and multifamily loan product categories; thus, analysis focused primarily on home purchase and home refinance lending.

Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. The bank's home purchase lending in the AA's low-income census tracts was comparable to aggregate lending data, by number and dollar volume, and comparable to the demographic figure.

Lending in moderate-income census tracts was also comparable to the aggregate and demographic figures. Dispersion was noted but it did not impact the conclusion.

Home Refinance Lending

The geographic distribution of home refinance lending is reasonable. The bank's home refinance lending in the AA's low-income census tracts was comparable to aggregate lending data, by number and dollar volume, and comparable to the demographic figure. Lending in moderate-income census tracts was also comparable to the aggregate and demographic figures. As noted above, lending gaps were noted that included LMI census tracts, but this did not impact the conclusion.

Table 9

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Oklahoma City Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	##	##	\$(000)	%	%	
Home Purchase Loans							
Low	5	2.2	3.9	854	1.2	2.5	3.9
Moderate	40	17.4	16.7	9,085	13.2	11.5	19.0
Middle	74	32.2	34.2	16,598	24.2	29.9	37.5
Upper	109	47.4	44.5	41,625	60.7	55.5	38.5
Unknown	2	0.9	0.7	418	0.6	0.6	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	230	100.0	100.0	68,580	100.0	100.0	100.0
Refinance Loans							
Low	1	2.3	3.6	91	0.8	2.0	3.9
Moderate	10	22.7	19.1	2,129	18.6	13.3	19.0
Middle	12	27.3	37.1	2,247	19.6	31.7	37.5
Upper	21	47.7	39.6	6,998	61.0	52.5	38.5
Unknown	0	0.0	0.6	0	0.0	0.5	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	44	100.0	100.0	11,465	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.5	0	0.0	3.4	3.9
Moderate	1	20.0	14.6	61	27.0	10.3	19.0
Middle	3	60.0	36.5	84	37.2	32.2	37.5
Upper	1	20.0	44.5	81	35.8	53.3	38.5
Unknown	0	0.0	1.0	0	0.0	0.8	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	226	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	1	20.0	8.4	2,529	61.0	6.6	
Moderate	2	40.0	36.5	455	11.0	37.9	35.3
Middle	1	20.0	30.5	464	11.2	26.6	36.6
Upper	1	20.0	24.0	700	16.9	26.9	17.5
Unknown	0	0.0	0.6	0	0.0	2.0	3.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	4,148	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	7	2.5	3.7	3,474	4.1	2.7	
Moderate	53	18.7	16.7	11,730	13.9	13.3	19.0
Middle	90	31.7	35.0	19,393	23.0	29.9	37.5
Upper	132	46.5	43.9	49,404	58.5	53.4	38.5
Unknown	2	0.7	0.7	418	0.5	0.6	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	284	100.0	100.0	84,419	100.0	100.0	100.0
Source: 2023 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of loans among low-income census tracts was comparable to the percent of AA businesses operating in these tracts (demographic figure), while the distribution of loans among moderate-income census tracts was below the demographic figure. However, a review of the bank's market share at 0.7 percent with the top 26 competing financial institution having approximately 229 branches makes the market a competitive lending market.

The dispersion of small business loans throughout the AA revealed no conspicuous gaps or lapses in lending.

Table 10

Distribution of 2023 Small Business Lending By Income Level of Geography Assessment Area: Oklahoma City Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	2	3.4	348	2.7	5.0
Moderate	8	13.6	2,503	19.4	22.3
Middle	21	35.6	4,074	31.6	33.3
Upper	28	47.5	5,951	46.2	36.3
Unknown	0	0.0	0	0.0	3.2
Tract-Unk	0	0.0	0	0.0	
Total	59	100.0	12,876	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

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

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

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of home mortgage lending to low-income borrowers was comparable to aggregate lending data, but below demographic figure, which represents the percent of families by family income level. Lending to moderate-income borrowers was comparable to the aggregate and demographic figures.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. The bank's lending to low-income borrowers was comparable to aggregate lending data, by number and dollar volume, and below the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate and demographic figures.

Home Refinance Lending

The borrower distribution of home refinance lending is poor. The bank's lending to low-income borrowers was comparable to aggregate lending data by number volume but below dollar volume, and below the demographic figure. Lending to moderate-income borrowers was below aggregate lending data by number and dollar volume, and below the demographic figure.

Table 11

Distribution of 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Oklahoma City Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	9	3.9	4.8	1,223	1.8	2.5	21.3
Moderate	38	16.5	16.4	6,825	10.0	11.6	17.7
Middle	50	21.7	18.6	11,772	17.2	16.9	20.3
Upper	102	44.3	30.5	38,669	56.4	41.1	40.7
Unknown	31	13.5	29.7	10,091	14.7	27.9	0.0
Total	230	100.0	100.0	68,580	100.0	100.0	100.0
Refinance Loans							
Low	3	6.8	6.9	176	1.5	3.6	21.3
Moderate	1	2.3	15.7	11	0.1	10.3	17.7
Middle	2	4.5	18.2	425	3.7	15.2	20.3
Upper	18	40.9	31.9	3,574	31.2	41.4	40.7
Unknown	20	45.5	27.3	7,279	63.5	29.5	0.0
Total	44	100.0	100.0	11,465	100.0	100.0	100.0
Home Improvement Loans							
Low	1	20.0	6.8	50	22.1	4.0	21.3
Moderate	0	0.0	17.8	0	0.0	11.9	17.7
Middle	0	0.0	21.0	0	0.0	16.4	20.3
Upper	1	20.0	46.8	81	35.8	55.9	40.7
Unknown	3	60.0	7.7	95	42.0	11.8	0.0
Total	5	100.0	100.0	226	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	13	4.7	5.3	1,449	1.8	2.7	21.3
Moderate	39	14.0	16.4	6,836	8.5	11.5	17.7
Middle	52	18.6	18.9	12,197	15.2	16.6	20.3
Upper	121	43.4	32.7	42,324	52.7	41.8	40.7
Unknown	54	19.4	26.8	17,465	21.8	27.4	0.0
Total	279	100.0	100.0	80,271	100.0	100.0	100.0
Source: 2023 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.							

Small Business Lending

The borrower distribution of small business lending is reasonable. The distribution of loans to businesses with annual revenues of \$1MM or less (small businesses) reflects performance below the demographic figure, which reflects the percentage of businesses in the AA by revenue size. A three-year analysis of aggregate small business lending data noted an average lending distribution to small business of 40.7 percent by number volume and 31.4 percent by dollar volume. While aggregate small business data is not a direct comparison as the bank is not a CRA reporter, aggregate lending volumes are reflective of a more limited demand than depicted by the demographic figure. In addition, 67.8 percent of the bank's lending was in amounts of \$250,000 or less, which demonstrates a willingness to meet the credit demands of smaller business operations.

Table 12

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Oklahoma City Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	32	54.2	6,582	51.1	91.1
Over \$1 Million	24	40.7	5,615	43.6	7.8
Revenue Unknown	3	5.1	678	5.3	1.1
Total	59	100.0	12,876	100.0	100.0
By Loan Size					
\$100,000 or Less	23	39.0	1,351	10.5	
\$100,001 - \$250,000	17	28.8	2,935	22.8	
\$250,001 - \$1 Million	19	32.2	8,589	66.7	
Total	59	100.0	12,876	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	12	37.5	792	12.0	
\$100,001 - \$250,000	10	31.3	1,907	29.0	
\$250,001 - \$1 Million	10	31.3	3,883	59.0	
Total	32	100.0	6,582	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates excellent responsiveness.

- The bank originated nine community development loans totaling \$39.3 million (MM) supporting community service, economic development, affordable housing, and revitalization and stabilization of LMI tracts in the AA.
- \$4.3MM in investments went towards a plan for improving utilities infrastructure benefitting LMI areas.
- Bank officers served on the board of directors of two organizations which provide community services and economic development to LMI individuals and families.

Table 13

Community Development Activity Assessment Area: Oklahoma City Metropolitan									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	3	6,561	0	0	0	0	0	0	0
Community Services	2	2,279	0	0	2	15	2	15	19
Economic Development	3	1,926	0	0	0	0	0	0	3
Revitalization and Stabilization	1	28,500	2	4,310	0	0	2	4,310	0
Totals	9	39,265	2	4,310	2	15	4	4,325	22

**LAWTON METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)**

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

The bank delineates the entirety of Comanche County as its Lawton Metropolitan AA (see Appendix A for an AA map and Appendix C for additional demographic data). The AA is comprised of a portion of the two-county Lawton, Oklahoma MSA, which is situated southwest of the greater Oklahoma City, Oklahoma MSA.

- The composition of the AA consisted of a total of 38 census tracts, including 3 low-, 10 moderate-, 15 middle-, 7 upper-, and 3 unknown-income tracts based on 2016-2020 ACS data.
- There were no changes to the AA delineation since the prior evaluation; however, the composition has changed. Previously, the AA consisted of 3 low-, 10 moderate-, 11 middle-, 7 upper-, and 1 unknown-income tract.
- The AA consisted of 6.6 percent of families in low-, 22.5 percent in moderate-, 43.5 percent in middle-, 26.1 in upper-, and 1.3 in unknown-percent income tracts.
- The bank operates two full services branches in the AA, including one branch in a moderate-income tract and the remaining branch in a middle-income tract. Each branch contains an ATM on its premises.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 1.0 percent market share of deposits, ranking 9th of 10 FDIC-insured financial institutions operating from 34 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAWTON METROPOLITAN AA

The institution's lending test performance in the AA is consistent with the overall institution's lending test performance, while community development performance in the AA is below the conclusion for the overall institution.

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

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE CENTRAL OKLAHOMA AA

The bank's Central Oklahoma AA consists of the entirety of Pottawatomie, Hughes, and Seminole Counties in Oklahoma (see Appendix A for an AA map and Appendix B for additional demographic data).

- The composition of the AA consists of a total of 34 census tracts, including 2 low-, 6 moderate-, 21 middle-, and 5 upper-income tracts based on 2016-2020 ACS data. The AA's composition has changed since the prior evaluation, at which time the AA consisted of 1 low-, 7 moderate-, 18 middle-, and 4 upper-income tracts.
- At the prior evaluation the AA contained a total of 30 tracts 1 low-, 7 moderate-, 18 middle-, and 4 upper-income tracts.
- The bank operates two branches in the AA located in the cities of Shawnee and Holdenville and each branch has one ATM.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 15.0 percent market share of deposits, ranking 3rd of 14 FDIC-insured financial institutions operating from 31 offices in the AA.
- One community member was interviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The community member is a member of an affordable housing department in the AA.

Table 14

Population Change Assessment Area: Central Oklahoma			
Area	2015 Population	2020 Population	Percent Change
Central Oklahoma	110,402	109,377	(0.9)
Hughes County, OK	13,785	13,367	(3.0)
Pottawatomie County, OK	71,136	72,454	1.9
Seminole County, OK	25,481	23,556	(7.6)
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
Oklahoma	3,849,733	3,959,353	2.8
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Pottawatomie County, the most populous county in the AA, had the highest growth rate and contains 66.2 percent of the total AA population.
- The town of Shawnee, in Pottawatomie County where the bank is headquartered, had a population of 31,377.
- A community contact indicated that the population has been stagnant.
- According to 2020 US Census Bureau data, the AA's population of resident's accounts for 8.5 percent of the total nonmetropolitan population in the state of Oklahoma and 2.8 percent of the total statewide population.

Table 15

Median Family Income Change Assessment Area: Central Oklahoma			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Central Oklahoma	55,646	57,811	3.9
Hughes County, OK	52,104	47,059	(9.7)
Pottawatomie County, OK	58,196	63,813	9.7
Seminole County, OK	49,648	44,826	(9.7)
NonMSA Oklahoma	56,258	58,565	4.1
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 inflation-adjusted and are expressed in 2020 dollars.			

- The increase in median family income in the AA was below the statewide nonmetropolitan rate, and below the state of Oklahoma.
- Based on 2016-2020 ACS data, the portion of AA families living below the poverty level, at 14.2 percent, was slightly above the statewide nonmetropolitan figure of 13.5 percent and above the state of Oklahoma figure of 11.3 percent.
- The portion of AA families living below the poverty level ranged from 12.1 percent in Pottawatomie County to 19.9 percent in Seminole County.

Table 16

Housing Cost Burden Assessment Area: Central Oklahoma						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Central Oklahoma	59.6	21.9	31.9	43.1	20.3	14.8
Hughes County, OK	44.0	11.3	22.7	31.7	14.5	11.3
Pottawatomie County, OK	63.5	24.9	34.4	44.7	21.7	14.3
Seminole County, OK	55.8	18.4	29.2	44.5	19.2	17.9
NonMSA Oklahoma	65.0	27.9	34.8	46.6	21.0	14.8
Oklahoma	71.3	30.7	37.7	50.0	24.0	15.2
<i>Cost Burden is housing cost that equals 30 percent or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy</i>						

- As illustrated in Table 6 above, the percentage of renters considered cost burdened in the AA were slightly below the statewide nonmetropolitan rate while the percent of cost burdened owners mirrored the statewide nonmetropolitan rate.
- The median housing value for the AA is \$106,370 which is lower than the median statewide value of \$142,400.
- Rent prices are generally lower in the AA with 31.9 percent of renters paying rent greater than 30.0 percent of their income. This is lower than the Oklahoma statewide figure of 37.7 percent.

Table 17

Unemployment Rates Assessment Area: Central Oklahoma					
Area	2018	2019	2020	2021	2022
Central Oklahoma	3.8	3.8	6.7	4.4	3.6
Hughes County, OK	4.0	4.6	7.7	5.3	3.9
Pottawatomie County, OK	3.6	3.5	6.3	4.0	3.4
Seminole County, OK	4.6	4.6	7.6	5.3	4.2
NonMSA Oklahoma	3.5	3.4	6.1	4.0	3.2
Oklahoma	3.3	3.1	6.3	4.0	3.0
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- AA unemployment rates held steady from 2018 to 2019, before experiencing an increase in 2020 throughout the AA due to the pandemic. Unemployment rates returned to levels at or below pre-pandemic levels in 2021 and 2022.
- The AA unemployment rate is slightly higher than the statewide nonmetropolitan rate and the Oklahoma statewide rate.
- Major industries in the AA include, manufacturing, aviation and aerospace, and agriculture.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CENTRAL OKLAHOMA AA

LENDING TEST

The bank's performance in the Central Oklahoma AA is reasonable. Overall, the bank's geographic distribution of loans is reasonable, and the borrower distribution of loans is reasonable. The review in this AA consisted of an evaluation of 33 home mortgage loans and 24 small business loans.

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 is reasonable, and the distribution of small business lending is reasonable.

Home Mortgage Lending

The bank's HMDA origination volume within the AA is too low to conduct a meaningful analysis of the individual loan product categories; thus, the product categories were combined and analyzed at the total HMDA level.

The geographic distribution of home mortgage lending is reasonable. The distribution of home mortgage loans among low-income census tracts was comparable to aggregate lending data by number and dollar volume and comparable to the demographic figure. Lending in moderate-income census tracts was comparable to aggregate lending data by number volume, above aggregate by dollar volume, and below the demographic figure. An evaluation of the dispersion of home mortgage loans identified gaps and lapses that included LMI census tracts, but this did not impact the conclusion. Further evaluation 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.

Table 18

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Central Oklahoma							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.2	0	0.0	1.5	2.3
Moderate	0	0.0	10.4	0	0.0	8.0	16.0
Middle	16	69.6	55.3	2,700	58.5	51.7	57.1
Upper	7	30.4	31.0	1,919	41.5	38.8	24.6
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	4,619	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.0	0	0.0	1.9	2.3
Moderate	1	20.0	13.6	220	55.1	9.6	16.0
Middle	3	60.0	56.1	147	36.8	55.7	57.1
Upper	1	20.0	27.3	32	8.0	32.7	24.6
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	5	100.0	100.0	399	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.7	0	0.0	0.6	2.3
Moderate	0	0.0	16.4	0	0.0	15.0	16.0
Middle	2	100.0	53.7	188	100.0	49.8	57.1
Upper	0	0.0	29.1	0	0.0	34.7	24.6
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	2	100.0	100.0	188	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	35.3	0	0.0	15.9	19.0
Moderate	1	100.0	17.6	1,139	100.0	10.8	17.1
Middle	0	0.0	41.2	0	0.0	70.8	46.9
Upper	0	0.0	5.9	0	0.0	2.5	17.1
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	1	100.0	100.0	1,139	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	3.2	0	0.0	2.2	2.3
Moderate	3	9.1	11.7	1,495	23.0	8.7	16.0
Middle	21	63.6	54.9	3,035	46.6	53.3	57.1
Upper	9	27.3	30.2	1,977	30.4	35.8	24.6
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	33	100.0	100.0	6,507	100.0	100.0	100.0
Source: 2023 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of loans among low-income census tracts was below the percent of AA businesses operating in these tracts (demographic figure), while the distribution of loans among moderate-income census tracts was above the demographic figure. However, a review of the bank's market share at 15.0 percent with the top two competing financial institutions having approximately 14 branches makes the market a competitive lending market.

The dispersion of small business loans among the various geographic income levels revealed no conspicuous gaps or lapses in lending.

Table 19

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Central Oklahoma					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	1	4.2	8	0.3	10.5
Moderate	8	33.3	1,559	66.5	16.2
Middle	12	50.0	472	20.1	52.5
Upper	3	12.5	308	13.1	20.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	24	100.0	2,346	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

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

The bank's lending has a reasonable 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 bank's HMDA origination volume within the AA is too low to conduct a meaningful analysis of the individual loan product categories; thus, the product categories were combined and analyzed at the total HMDA level.

The borrower distribution of home mortgage lending is reasonable. The bank's lending to low-income borrowers was comparable to aggregate lending data by number but was below aggregate lending by dollar volume, and below the demographic figure. Lending to moderate-income borrowers was below aggregate lending data by number, comparable by dollar volume, and below the demographic figure. Further analysis revealed that the difference between below and comparable to aggregate by dollar and demographic was one loan.

Table 20

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Central Oklahoma							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.2	0	0.0	1.6	23.2
Moderate	2	8.7	14.1	341	7.4	9.1	16.7
Middle	9	39.1	22.8	1,446	31.3	19.7	19.8
Upper	9	39.1	34.1	2,424	52.5	45.8	40.2
Unknown	3	13.0	25.7	408	8.8	23.9	0.0
Total	23	100.0	100.0	4,619	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.3	0	0.0	2.1	23.2
Moderate	1	20.0	16.4	32	8.0	9.7	16.7
Middle	0	0.0	22.1	0	0.0	19.1	19.8
Upper	2	40.0	39.1	270	67.7	47.7	40.2
Unknown	2	40.0	19.1	97	24.3	21.4	0.0
Total	5	100.0	100.0	399	100.0	100.0	100.0
Home Improvement Loans							
Low	1	50.0	6.0	18	9.6	4.3	23.2
Moderate	0	0.0	9.7	0	0.0	5.9	16.7
Middle	1	50.0	29.1	170	90.4	33.5	19.8
Upper	0	0.0	45.5	0	0.0	45.5	40.2
Unknown	0	0.0	9.7	0	0.0	10.8	0.0
Total	2	100.0	100.0	188	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	3.1	3.6	18	0.3	1.8	23.2
Moderate	3	9.4	14.4	373	6.9	9.3	16.7
Middle	12	37.5	22.9	1,778	33.1	19.9	19.8
Upper	11	34.4	37.2	2,694	50.2	46.5	40.2
Unknown	5	15.6	21.9	505	9.4	22.6	0.0
Total	32	100.0	100.0	5,368	100.0	100.0	100.0
Source: 2023 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.							
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Small Business Lending

The borrower distribution of small business lending is excellent. The distribution of loans originated to small businesses reflects performance comparable to the demographic figure. In addition, 91.7 percent loans were in amounts of \$250,000 or less, which demonstrates a willingness to meet the credit demands of smaller business operations. A three-year analysis of aggregate small business lending data noted an average lending distribution to small business of 46.6 percent by number volume and 41.3 percent by dollar volume. While aggregate small business data is not a direct comparison as the bank is not a CRA reporter, aggregate lending volumes are reflective of a more limited demand than depicted by the demographic figure which supports the bank's excellent rating.

Table 21

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Central Oklahoma					
	Bank Loans				Total Businesses %
	#	%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	19	79.2	899	38.3	89.9
Over \$1 Million	1	4.2	81	3.5	7.8
Revenue Unknown	4	16.7	1,367	58.3	2.3
Total	24	100.0	2,346	100.0	100.0
By Loan Size					
\$100,000 or Less	20	83.3	716	30.5	
\$100,001 - \$250,000	2	8.3	368	15.7	
\$250,001 - \$1 Million	2	8.3	1,263	53.8	
Total	24	100.0	2,346	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	17	89.5	531	59.1	
\$100,001 - \$250,000	2	10.5	368	40.9	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	19	100.0	899	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates adequate responsiveness.

- The bank originated three community development loans totaling \$1.3MM where \$898,813 served part of Oklahoma's Disaster Declaration under FEMA serving several schools and helping with storm impacted buildings throughout the AA.
- Community development investments and donations totaled \$1.4MM, which included a \$500,000 donation for economic development benefiting under-served Native Americans.
- Bank officers and staff volunteered and served as board members of several organizations which provide community services and economic development to LMI individuals and families.

Table 22

Community Development Activity Assessment Area: Central Oklahoma									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	1	396	1	160	5	150	6	310	12
Economic Development	0	0	0	0	2	501	2	501	0
Revitalization and Stabilization	2	899	1	500	1	100	2	600	3
Totals	3	1,295	2	660	8	751	10	1,411	15

**SOUTHWEST OKLAHOMA ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited-Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SOUTHWEST OKLAHOMA AA

The bank delineates the entireties of Greer, Jackson, Kiowa, and Washita Counties as its Southwest Oklahoma AA (see Appendix A for an AA map and Appendix C for additional demographic data).

- Since the prior evaluation, the bank expanded this AA as a result of acquisition activities to include the entirety of Washita County.
- The composition of the AA consists of a total of 17 census tracts, including 3 moderate-, 11 middle-, and 3 upper-income tracts based on 2016-2020 ACS data. This represents a change from the prior evaluation when the composition included 3 moderate-, 7 middle-, and 3 upper-income tracts.
- The AA consists of 16.5 percent moderate-, 60.6 percent middle-, and 22.9 percent upper-income families.
- The bank operates three branches in the rural communities of Mangum (Greer County), Granite (Greer County), and Canute (Washita County) with the Canute branch being obtained during the acquisition. Each of the branches operate with an ATM on the premises.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 3.8 percent market share of deposits, ranking 9th of 18 FDIC-insured financial institutions operating from 33 offices in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTHWEST OKLAHOMA AA

The institution's lending and community development performance in this AA is consistent with the institution's overall performance conclusion.

APPENDIX A – MAP OF THE ASSESSMENT AREAS

Map A-1
Oklahoma City Metropolitan AA

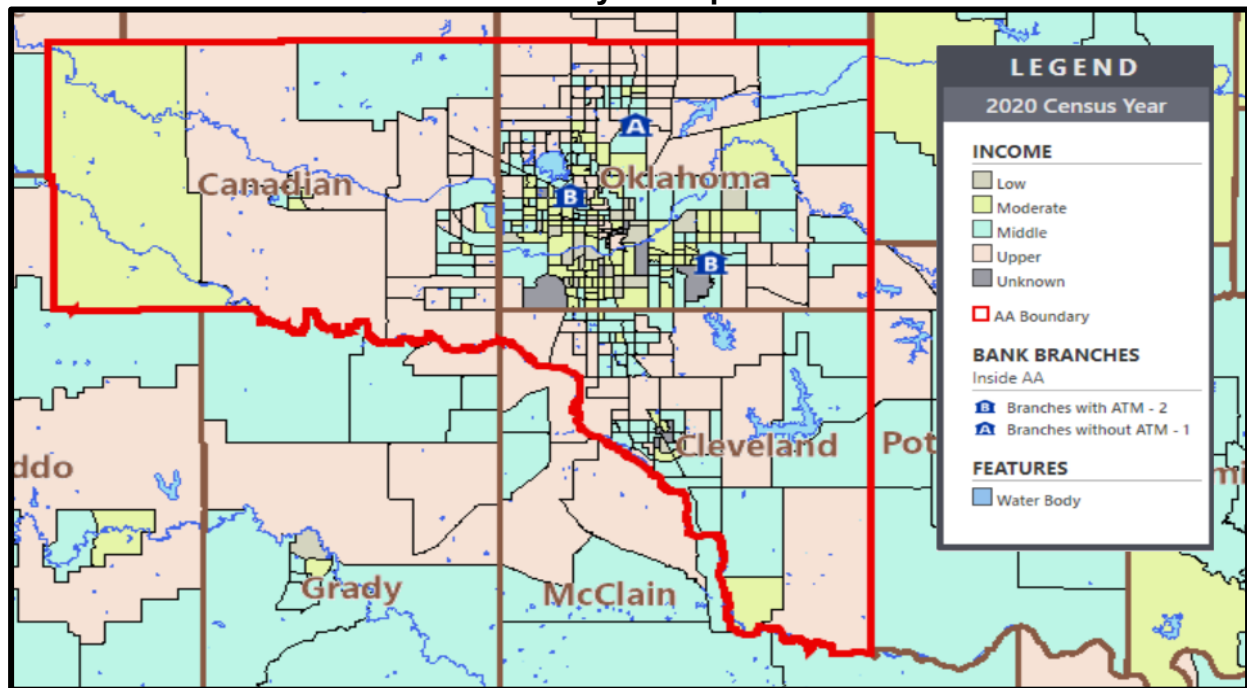
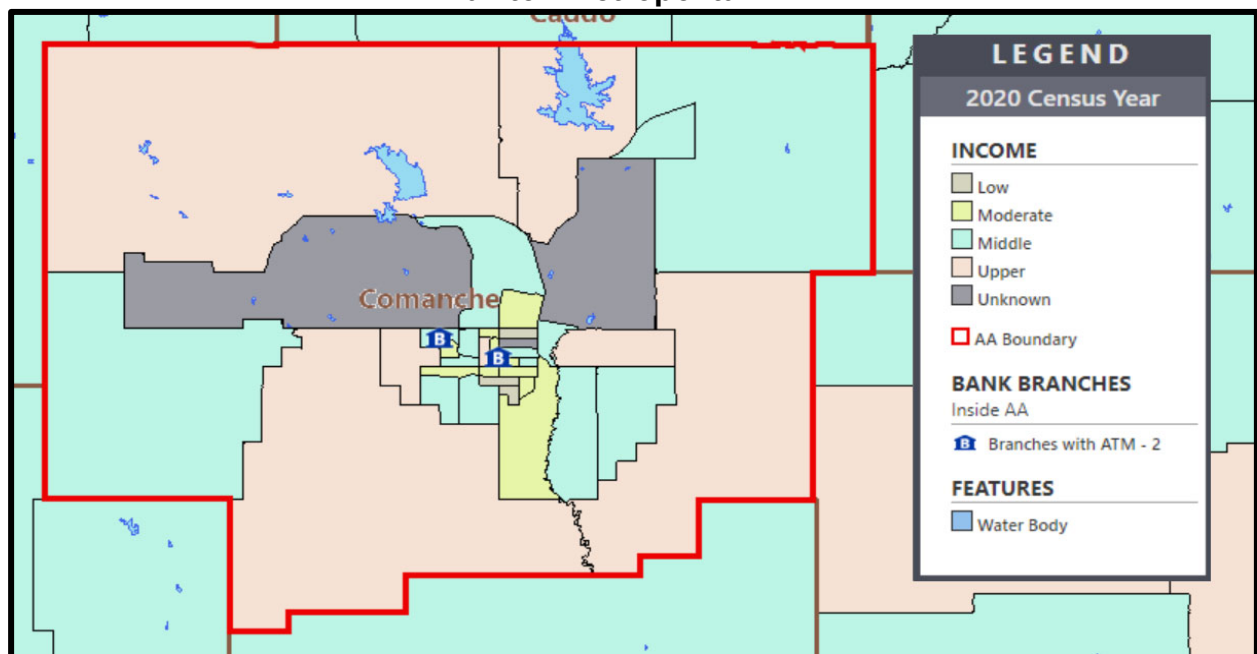
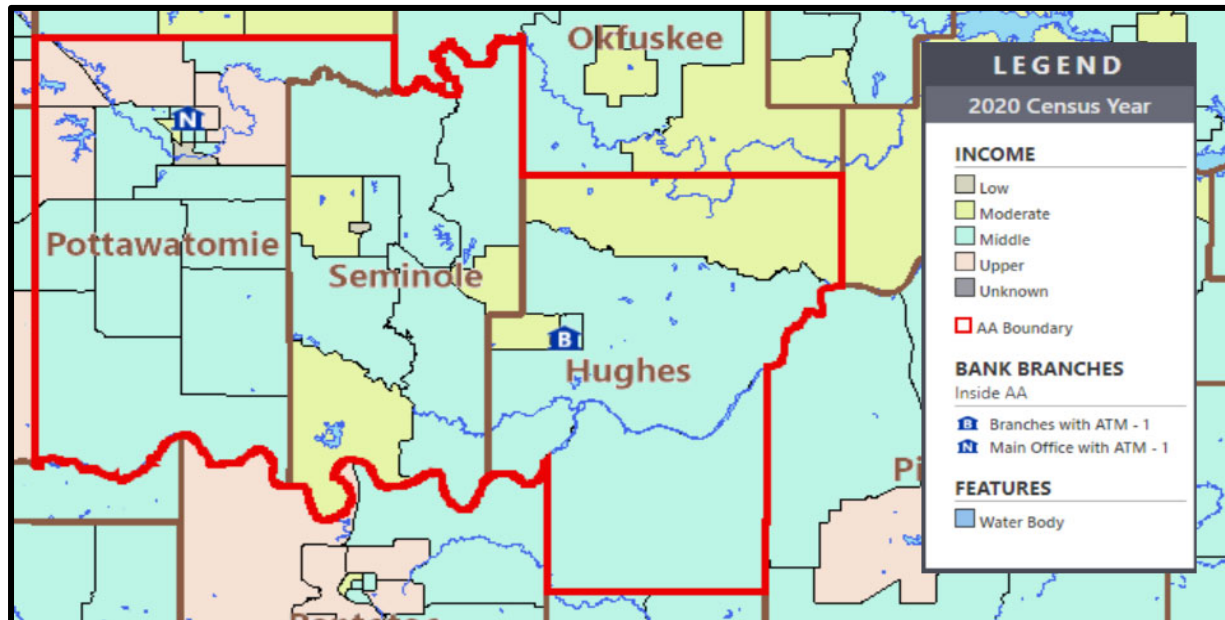


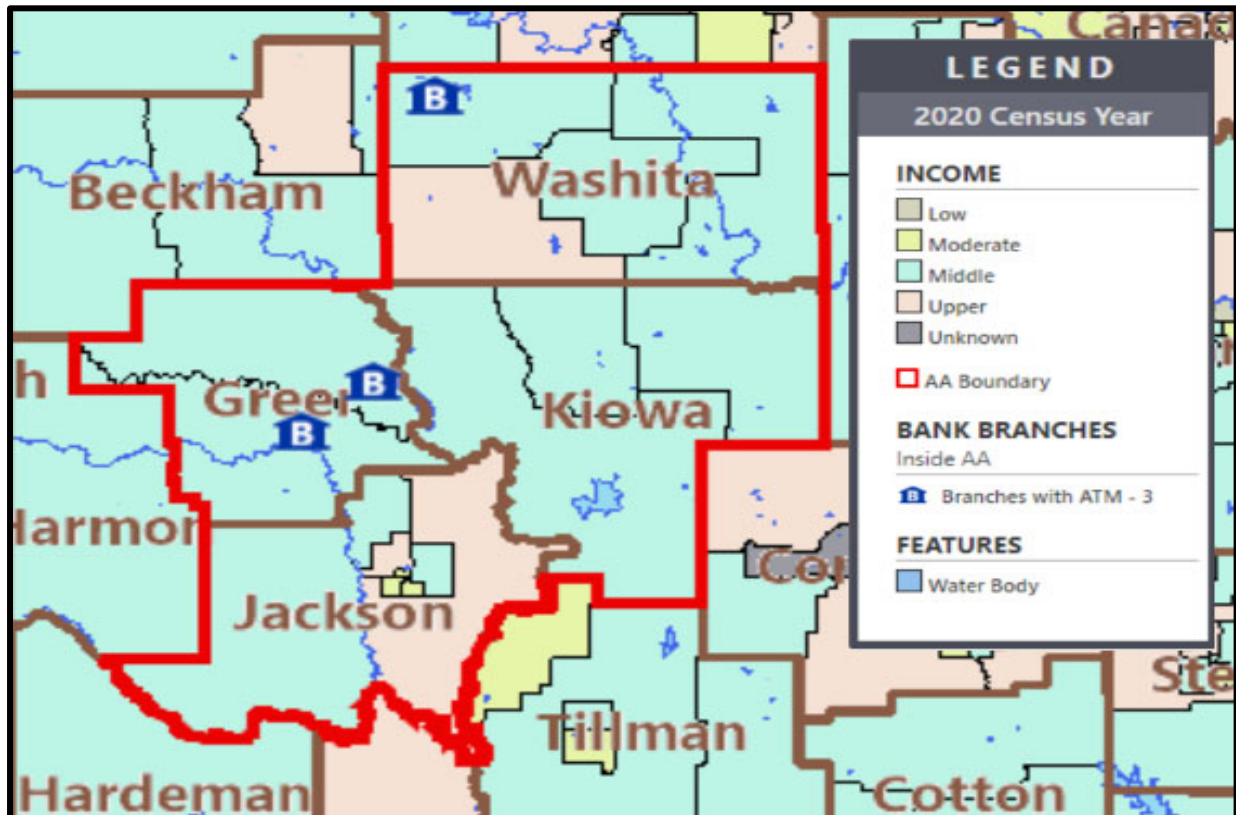
Table A-2
Lawton Metropolitan AA



Map A-3
Central Oklahoma AA



Map A-4
Southwest Oklahoma AA



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2023 Oklahoma City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	29	7.8	16,097	5.5	5,159	32.0	61,848	21.3
Moderate	97	25.9	63,679	21.9	10,492	16.5	51,509	17.7
Middle	123	32.9	105,875	36.4	7,988	7.5	59,150	20.3
Upper	106	28.3	101,244	34.8	3,310	3.3	118,168	40.7
Unknown	19	5.1	3,780	1.3	1,426	37.7	0	0.0
Total AA	374	100.0	290,675	100.0	28,375	9.8	290,675	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	33,831	11,276	3.9	33.3	17,373	51.4	5,182	15.3
Moderate	130,701	54,451	19.0	41.7	59,851	45.8	16,399	12.5
Middle	186,075	107,241	37.5	57.6	63,490	34.1	15,344	8.2
Upper	147,772	110,177	38.5	74.6	28,733	19.4	8,862	6.0
Unknown	8,154	2,874	1.0	35.2	4,108	50.4	1,172	14.4
Total AA	506,533	286,019	100.0	56.5	173,555	34.3	46,959	9.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,592	5.0	2,255	4.8	303	7.5	34	5.8
Moderate	11,532	22.3	10,324	21.9	1,077	26.6	131	22.4
Middle	17,233	33.3	15,804	33.5	1,275	31.5	154	26.3
Upper	18,815	36.3	17,353	36.8	1,216	30.1	246	42.0
Unknown	1,647	3.2	1,453	3.1	173	4.3	21	3.6
Total AA	51,819	100.0	47,189	100.0	4,044	100.0	586	100.0
Percentage of Total Businesses:				91.1		7.8		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	19	2.9	16	2.5	3	20.0	0	0.0
Moderate	97	15.0	93	14.7	3	20.0	1	100.0
Middle	196	30.2	195	30.9	1	6.7	0	0.0
Upper	331	51.1	323	51.1	8	53.3	0	0.0
Unknown	5	0.8	5	0.8	0	0.0	0	0.0
Total AA	648	100.0	632	100.0	15	100.0	1	100.0
Percentage of Total Farms:				97.5		2.3		0.2
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table B-2

2023 Central Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	5.9	1,110	4.0	460	41.4	6,387	23.2
Moderate	6	17.6	4,685	17.0	1,129	24.1	4,609	16.7
Middle	21	61.8	15,496	56.3	1,889	12.2	5,456	19.8
Upper	5	14.7	6,240	22.7	439	7.0	11,079	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	34	100.0	27,531	100.0	3,917	14.2	27,531	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,503	635	2.3	25.4	1,457	58.2	411	16.4
Moderate	9,554	4,473	16.0	46.8	2,821	29.5	2,260	23.7
Middle	26,764	15,919	57.1	59.5	6,007	22.4	4,838	18.1
Upper	9,028	6,870	24.6	76.1	1,347	14.9	811	9.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	47,849	27,897	100.0	58.3	11,632	24.3	8,320	17.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	339	10.5	303	10.5	28	11.2	8	10.7
Moderate	521	16.2	437	15.1	66	26.4	18	24.0
Middle	1,690	52.5	1,535	53.1	115	46.0	40	53.3
Upper	668	20.8	618	21.4	41	16.4	9	12.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,218	100.0	2,893	100.0	250	100.0	75	100.0
Percentage of Total Businesses:				89.9		7.8		2.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.6	1	0.6	0	0.0	0	0.0
Moderate	18	10.1	18	10.1	0	0.0	0	0.0
Middle	133	74.7	133	74.7	0	0.0	0	0.0
Upper	26	14.6	26	14.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	178	100.0	178	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Lawton Metropolitan AA

Table C-1

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Lawton Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	2	6.5	3.2	225	5.1	1.4	5.4
Moderate	6	19.4	14.2	672	15.4	9.3	15.6
Middle	19	61.3	50.6	2,627	60.0	48.0	46.0
Upper	4	12.9	30.7	853	19.5	40.4	31.9
Unknown	0	0.0	1.3	0	0.0	0.9	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	4,377	100.0	100.0	100.0
Refinance Loans							
Low	2	100.0	5.3	134	100.0	2.2	5.4
Moderate	0	0.0	14.5	0	0.0	8.6	15.6
Middle	0	0.0	45.3	0	0.0	42.7	46.0
Upper	0	0.0	33.8	0	0.0	46.0	31.9
Unknown	0	0.0	1.1	0	0.0	0.5	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	134	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.6	0	0.0	4.1	5.4
Moderate	0	0.0	19.0	0	0.0	13.1	15.6
Middle	0	0.0	40.9	0	0.0	44.1	46.0
Upper	0	0.0	32.1	0	0.0	37.8	31.9
Unknown	0	0.0	1.5	0	0.0	0.9	1.1
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
Multifamily Loans							Multi-family Units %
Low	2	50.0	16.7	1,718	59.6	10.1	8.5
Moderate	1	25.0	37.5	536	18.6	7.0	35.3
Middle	1	25.0	25.0	630	21.8	46.3	43.3
Upper	0	0.0	16.7	0	0.0	36.2	12.1
Unknown	0	0.0	4.2	0	0.0	0.4	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	2,884	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	6	16.2	3.7	2,077	28.1	2.0	5.4
Moderate	7	18.9	14.6	1,208	16.3	9.1	15.6
Middle	20	54.1	49.1	3,257	44.0	47.1	46.0
Upper	4	10.8	31.4	853	11.5	40.9	31.9
Unknown	0	0.0	1.3	0	0.0	0.8	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	7,395	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table C-2

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Lawton Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	6.8
Moderate	3	37.5	1,923	87.6	34.9
Middle	2	25.0	71	3.2	34.0
Upper	3	37.5	201	9.2	21.6
Unknown	0	0.0	0	0.0	2.7
Tract-Unk	0	0.0	0	0.0	
Total	8	100.0	2,195	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Table C-3

Distribution of 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Lawton Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	1	3.2	3.5	50	1.1	1.5	22.1
Moderate	3	9.7	13.6	493	11.3	9.1	17.5
Middle	2	6.5	22.5	219	5.0	20.5	18.8
Upper	11	35.5	35.2	2,110	48.2	45.4	41.6
Unknown	14	45.2	25.2	1,505	34.4	23.5	0.0
Total	31	100.0	100.0	4,377	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.8	0	0.0	1.4	22.1
Moderate	0	0.0	7.5	0	0.0	4.1	17.5
Middle	0	0.0	14.2	0	0.0	12.8	18.8
Upper	1	50.0	39.7	68	50.7	48.5	41.6
Unknown	1	50.0	35.8	66	49.3	33.2	0.0
Total	2	100.0	100.0	134	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.6	0	0.0	2.5	22.1
Moderate	0	0.0	13.9	0	0.0	9.8	17.5
Middle	0	0.0	16.8	0	0.0	10.8	18.8
Upper	0	0.0	54.0	0	0.0	63.6	41.6
Unknown	0	0.0	11.7	0	0.0	13.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	3.0	3.4	50	1.1	1.5	22.1
Moderate	3	9.1	12.7	493	10.9	8.5	17.5
Middle	2	6.1	20.6	219	4.9	19.2	18.8
Upper	12	36.4	37.4	2,178	48.3	46.2	41.6
Unknown	15	45.5	25.9	1,571	34.8	24.6	0.0
Total	33	100.0	100.0	4,511	100.0	100.0	100.0
Source: 2023 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.							

Table C-4

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Lawton Metropolitan					
	Bank Loans				Total
	#	#%	\$(000)	%	Businesses %
By Revenue					
\$1 Million or Less	4	50.0	1,050	47.8	92.4
Over \$1 Million	4	50.0	1,146	52.2	6.1
Revenue Unknown	0	0.0	0	0.0	1.5
Total	8	100.0	2,195	100.0	100.0
By Loan Size					
\$100,000 or Less	5	62.5	189	8.6	
\$100,001 - \$250,000	1	12.5	105	4.8	
\$250,001 - \$1 Million	2	25.0	1,902	86.7	
Total	8	100.0	2,195	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	3	75.0	98	9.3	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	1	25.0	952	90.7	
Total	4	100.0	1,050	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Table C-5

2023 Lawton Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.9	1,853	6.6	470	25.4	6,178	22.1
Moderate	10	26.3	6,290	22.5	1,194	19.0	4,894	17.5
Middle	15	39.5	12,153	43.5	1,027	8.5	5,247	18.8
Upper	7	18.4	7,288	26.1	490	6.7	11,622	41.6
Unknown	3	7.9	357	1.3	128	35.9	0	0.0
Total AA	38	100.0	27,941	100.0	3,309	11.8	27,941	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,357	1,239	5.4	28.4	2,058	47.2	1,060	24.3
Moderate	12,899	3,600	15.6	27.9	6,998	54.3	2,301	17.8
Middle	21,881	10,623	46.0	48.5	7,803	35.7	3,455	15.8
Upper	11,280	7,369	31.9	65.3	2,568	22.8	1,343	11.9
Unknown	1,248	244	1.1	19.6	739	59.2	265	21.2
Total AA	51,665	23,075	100.0	44.7	20,166	39.0	8,424	16.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	248	6.8	231	6.9	16	7.3	1	1.8
Moderate	1,267	34.9	1,149	34.2	99	45.0	19	34.5
Middle	1,233	34.0	1,163	34.7	57	25.9	13	23.6
Upper	785	21.6	724	21.6	41	18.6	20	36.4
Unknown	98	2.7	89	2.7	7	3.2	2	3.6
Total AA	3,631	100.0	3,356	100.0	220	100.0	55	100.0
Percentage of Total Businesses:				92.4		6.1		1.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.6	2	1.7	0	0.0	0	0.0
Moderate	13	10.6	12	10.0	1	50.0	0	0.0
Middle	40	32.5	38	31.7	1	50.0	1	100.0
Upper	68	55.3	68	56.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	123	100.0	120	100.0	2	100.0	1	100.0
Percentage of Total Farms:				97.6		1.6		0.8
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Southwest Oklahoma AA

Table C-6

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Southwest Oklahoma							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	7.7	11.6	87	13.7	8.2	15.7
Middle	12	92.3	56.0	547	86.3	47.5	60.7
Upper	0	0.0	32.3	0	0.0	44.2	23.6
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	634	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

Table C-7

Distribution of 2023 Small Business Lending By Income Level of Geography Assessment Area: Southwest Oklahoma					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	18.8
Middle	6	100.0	578	100.0	59.2
Upper	0	0.0	0	0.0	22.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	6	100.0	578	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

Table C-8

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Southwest Oklahoma							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Total Home Mortgage Loans							
Low	2	15.4	4.5	65	10.3	1.8	18.5
Moderate	4	30.8	11.0	231	36.4	6.3	16.4
Middle	3	23.1	20.1	170	26.8	17.0	23.3
Upper	4	30.8	33.5	168	26.5	43.6	41.8
Unknown	0	0.0	30.8	0	0.0	31.3	0.0
Total	13	100.0	100.0	634	100.0	100.0	100.0
Source: 2023 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.							

Table C-9

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Southwest Oklahoma					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	4	66.7	24	4.2	88.0
Over \$1 Million	1	16.7	54	9.3	7.7
Revenue Unknown	1	16.7	500	86.5	4.2
Total	6	100.0	578	100.0	100.0
By Loan Size					
\$100,000 or Less	5	83.3	78	13.5	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	1	16.7	500	86.5	
Total	6	100.0	578	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	4	100.0	24	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	24	100.0	
Source: 2023 FFIEC Census Data					
2023 Dun & Bradstreet Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Table C-10

2023 Southwest Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,400	18.5
Moderate	3	17.6	2,146	16.5	445	20.7	2,131	16.4
Middle	11	64.7	7,886	60.6	1,031	13.1	3,036	23.3
Upper	3	17.6	2,972	22.9	83	2.8	5,437	41.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	17	100.0	13,004	100.0	1,559	12.0	13,004	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	4,789	2,047	15.7	42.7	1,567	32.7	1,175	24.5
Middle	15,812	7,919	60.7	50.1	3,894	24.6	3,999	25.3
Upper	4,766	3,087	23.6	64.8	1,126	23.6	553	11.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	25,367	13,053	100.0	51.5	6,587	26.0	5,727	22.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	280	18.8	250	19.1	27	23.5	3	4.8
Middle	882	59.2	761	58.0	69	60.0	52	82.5
Upper	327	22.0	300	22.9	19	16.5	8	12.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,489	100.0	1,311	100.0	115	100.0	63	100.0
Percentage of Total Businesses:				88.0		7.7		4.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	8	3.8	8	3.9	0	0.0	0	0.0
Middle	133	63.6	132	64.4	1	25.0	0	0.0
Upper	68	32.5	65	31.7	3	75.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	209	100.0	205	100.0	4	100.0	0	0.0
Percentage of Total Farms:				98.1		1.9		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

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.