



## **PUBLIC DISCLOSURE**

December 1, 2025

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

Blue Sky Bank  
RSSD# 517357

101 East 8<sup>th</sup> Street  
Pawhuska, Oklahoma 74056

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: **Satisfactory**

Blue Sky 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' (AA) 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 adequate 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, overall business strategy and market competition, as well as AA demographic and economic characteristics, and overall credit needs. In addition, available CRA aggregate data for the most recent three years (2021, 2022, and 2023) was referenced for additional perspective to gauge credit demand within the bank's AAs.

Performance was assessed within the bank's five AAs. The Tulsa Metropolitan AA in Oklahoma and the Tarrant County Metropolitan AA in Texas were both assessed using a full-scope review. The North Central Oklahoma AA and Western Oklahoma AA in Oklahoma and the Bexar County Metropolitan AA in Texas were all assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 17-quarter average NLTD ratio;
- CD loans, qualified investments, and CD services from September 20, 2021 through December 31, 2024;

- Home mortgage loans originated between January 1, 2023 and December 31, 2024, which included a total of 135 home mortgage loans; and
- Small business loans originated between January 1, 2024 and December 31, 2024, which included a sample of 157 small business loans.

Furthermore, greater consideration was given to the volume of loan originations rather than the dollar amount, as it is considered representative of the number of entities served. Additionally, in determining the overall institution rating, the bank's performance in the state of Oklahoma received substantially more weight than the State of Texas based on the overall distribution of total loans, deposits, and banking offices located within each respective state. Lastly, more weight was placed on the bank's small business lending performance in the overall evaluation consistent with the bank's strategic focus on commercial lending and make-up of the overall loan portfolio composition.

## **DESCRIPTION OF INSTITUTION**

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

- The bank is a wholly owned subsidiary of N.B.C. Bancshares, a non-complex financial holding company, also located in Pawhuska.
- The bank has total assets of \$1.2 billion as of June 30, 2025.
- Since the prior examination, the bank acquired three other financial institutions located in Wagoner, Fairfax, and Weatherford, Oklahoma, resulting in eight new branch locations in Oklahoma and one new AA in Western Oklahoma. The bank also closed a branch in Stillwater, Oklahoma in October 2024.
- Additionally, since the previous examination, the bank opened a de novo branch in San Antonio, Texas in January 2021 and converted a loan production office (LPO) located in Fort Worth, Texas to a full-service branch location in October 2023; this resulted in two new AAs in Texas, including the Tarrant County Metropolitan AA and the Bexar County Metropolitan AA.
- In total, the bank operates 13 branches, including the main office, in the state of Oklahoma and 2 branches in the state of Texas. Within the state of Oklahoma, this includes 6 full-service branches in the Tulsa Metropolitan AA in the cities of Pawhuska, Cleveland, Wagoner, Tulsa, and Fairfax; 3 full-service branches and 1 limited-service branch in the North Central Oklahoma in the cities of Cushing, Morrison, and Stillwater; and 3 full-service branches in the Western Oklahoma AA in the cities of Weatherford, Cordell, and Hinton. In the state of Texas, this includes 1 full-service branch in the Tarrant County Metropolitan AA in the city of Fort Worth; and 1 full-service branch in the Bexar County Metropolitan AA in the city of San Antonio.
- The bank operates 16 automated teller machines (ATMs) within its five AAs, including two standalone cash-only ATMs and one standalone full-service ATM

- located within the Oklahoma AAs. All ATMs located at branch locations are cash-only.
- As shown in the table below, the bank’s primary business focus is commercial lending followed by residential real estate lending.

**Table 1**

<b>Composition of Loan Portfolio as of June 30, 2025</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	57,699	5.7
Farmland	25,140	2.5
1- to 4-Family Residential Real Estate	85,583	8.4
Multifamily Residential Real Estate	68,183	6.7
Nonfarm Nonresidential Real Estate	392,625	38.5
Agricultural	20,803	2.0
Commercial and Industrial	358,144	35.1
Consumer	10,499	1.0
Other	1,027	0.1
<b>Gross Loans</b>	<b>1,019,703</b>	<b>100.0</b>

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

The bank was rated Satisfactory under the CRA at its September 20, 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 TESTS<sup>1</sup>**

**LENDING TEST**

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth evaluation of performance in the states of Oklahoma and Texas.

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, as well as a reasonable distribution of loans throughout the bank’s AAs and a reasonable distribution of loans to individuals of different income levels and to businesses of different revenue sizes. In determining the overall lending test rating, equal weight was given to each of the performance criteria listed.

<sup>1</sup> 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 states, multistate metropolitan areas, and 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 AA, and in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. Similarly situated institutions were selected based on asset size, product offerings, market share, and location.

The bank’s NLTD ratio is reasonable. The bank’s 17-quarter average NLTD ratio of 90.6 percent is within range of the five other similarly situated banks with ratios ranging from a low of 88.8 percent to a high of 93.9 percent.

**Table 2**

Comparative NLTD Ratios June 30, 2021 – June 30, 2025			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			17 Quarter Average
Blue Sky Bank	Pawhuska, Oklahoma	1,239,822	90.6
<b>Similarly Situated Institutions</b>			
First Oklahoma Bank	Jenks, Oklahoma	1,196,080	93.9
Grand Bank	Tulsa, Oklahoma	664,585	90.1
Spiritbank	Tulsa, Oklahoma	890,574	93.4
Firststar Bank	Sallisaw, Oklahoma	1,108,804	88.8
Security Bank	Tulsa, Oklahoma	903,199	89.7

**Assessment Area Concentration**

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

**Table 3**

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Purchase – Conventional	56	54.9	16,978	57.3	46	45.1	12,670	42.7
Home Improvement	0	0.0	0	0.0	1	100.0	25	100.0
Multi-Family Housing	0	0.0	0	0.0	2	100.0	25,600	100.0
Refinancing	23	76.7	4,231	42.9	7	23.3	5,627	57.1
<b>Total HMDA Related</b>	<b>79</b>	<b>58.5</b>	<b>21,209</b>	<b>32.6</b>	<b>56</b>	<b>41.5</b>	<b>43,922</b>	<b>67.4</b>
Small Business	129	82.2	22,132	81.2	28	17.8	5,116	18.8
<b>Total Loans</b>	<b>208</b>	<b>71.2</b>	<b>43,341</b>	<b>46.9</b>	<b>84</b>	<b>28.8</b>	<b>49,038</b>	<b>53.1</b>

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

### **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.

### **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 penetration among individuals of different income levels and businesses of different sizes.

### **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 present in the bank's AAs.

The bank's overall CD test performance is Satisfactory and demonstrates adequate responsiveness. The CD test performance state rating for Oklahoma was rated as Satisfactory while the state rating for Texas was Needs to Improve.

All the bank's qualified CD activity occurred in the state of Oklahoma. Of the bank's three Oklahoma markets, the highest level of CD activity occurred within the North Central Oklahoma AA.

**TABLE 4**

<b>Community Development Activity – All</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	0	0	0	0	0	0	0	0	0
<b>Community Services</b>	1	75	3	2,861	37	110	40	2,971	11
<b>Economic Development</b>	1	5,915	0	0	0	0	0	0	2
<b>Revitalization and Stabilization</b>	1	174	0	0	0	0	0	0	0
<b>Totals</b>	<b>3</b>	<b>6,164</b>	<b>3</b>	<b>2,861</b>	<b>37</b>	<b>110</b>	<b>40</b>	<b>2,971</b>	<b>13</b>

**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, were 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.

## **STATE OF OKLAHOMA**

CRA rating for Oklahoma: ***Satisfactory***  
The Lending Test is rated: ***Satisfactory***  
The Community Development Test is rated: ***Satisfactory***

This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- An excellent distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including LMI, and businesses of different sizes.
- CD activity reflects adequate responsiveness to CD needs of the bank's AAs.

## **SCOPE OF EXAMINATION**

The scope of the review for the state of Oklahoma was consistent with the overall scope for the institution. A full-scope review was conducted for the Tulsa Metropolitan AA. Limited-scope reviews were conducted for the North Central Oklahoma and Western Oklahoma AAs to ascertain if the bank's performance in those areas was generally consistent with its performance in the overall state evaluation.

The analysis of loans originated in the state included 124 small business loans and 74 home mortgage loans. More weight was given to the bank's small business lending performance in alignment with the overall scope for the institution.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN OKLAHOMA**

The bank delineates three of its five AAs and operates 13 branches in the state of Oklahoma. A detailed description of the bank's operations in the Tulsa Metropolitan AA is provided in the analysis for that AA, followed by a brief discussion of bank operations in the North Central Oklahoma and Western Oklahoma AAs, which were subject to a limited-scope review.

Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of the report, with a primary emphasis on small business lending, followed by home mortgage lending.

A community contact recently conducted as part of a CRA evaluation for another financial institution with offices in the Tulsa Metropolitan AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions.

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

### **LENDING TEST**

The bank's overall lending test performance in the state of Oklahoma is Satisfactory. Bank performance under the lending test in the Tulsa Metropolitan AA is considered reasonable. The bank's lending performance in the limited-scope reviewed North Central Oklahoma AA was consistent with performance in the Tulsa Metropolitan AA, while the Western Oklahoma AA exceeds the performance.

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

The bank's overall geographic distribution of loans within Oklahoma reflects excellent distribution among the different census tracts and dispersion throughout the AAs. This rating is consistent with the geographic distribution performance noted in the Tulsa Metropolitan AA.

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

The bank's lending has an overall reasonable distribution among individuals of different income levels and businesses of different sizes. This rating is consistent with the borrower distribution performance in the Tulsa Metropolitan AA.

### **COMMUNITY DEVELOPMENT TEST**

The bank's overall CD test performance in the state of Oklahoma is Satisfactory and demonstrates adequate responsiveness.

All the bank's qualified CD activity occurred in the state of Oklahoma. While poor CD performance was noted for the Tulsa Metropolitan AA, the bank's level of CD activity in the North Central Oklahoma AA was considered excellent based on the dollar volume of activity, exceeding performance in the full-scope review AA, and contributed to the overall rating for the state. Performance in the Western Oklahoma AA was below the performance of the full-scope review AA. In addition, based on the bank meeting the CD needs of its Oklahoma AAs, consideration was also given to the bank's CD activities that took place outside of its AAs, but within the broader statewide/regional area.

**Table 5**

<b>Community Development Activity State of Oklahoma</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	0	0	0	0	0	0	0	0	0
<b>Community Services</b>	1	75	1	2,017	34	108	35	2,125	10
<b>Economic Development</b>	1	5,915	0	0	0	0	0	0	2
<b>Revitalization and Stabilization</b>	1	174	0	0	0	0	0	0	0
<b>Outside Activities</b>	0	0	2	844	3	2	5	846	1
<b>Totals</b>	<b>3</b>	<b>6,164</b>	<b>3</b>	<b>2,861</b>	<b>37</b>	<b>110</b>	<b>40</b>	<b>2,971</b>	<b>13</b>

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

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

The bank's Tulsa Metropolitan AA is comprised of Creek, Osage, Pawnee, Tulsa, and Wagoner Counties in their entirety, which are five of the seven counties that comprise the Tulsa, Oklahoma Metropolitan Statistical Area (MSA). See Appendix B for an AA map and Appendix C for additional demographic data.

- The AA delineation has changed since the previous CRA evaluation, as the bank has now added Wagoner County to the AA following a branch acquisition in May of 2022.
- Furthermore, due to the 2016-2020 American Community Survey (ACS) release, the composition of AA census tracts has also changed. The AA is comprised of 274 census tracts, which include 14 low-, 85 moderate-, 86 middle-, 88 upper, and 1 unknown-income census tract(s). At the previous evaluation, the AA was comprised of 212 census tracts that included 17 low-, 64 moderate-, 77 middle- and 54 upper-income census tracts.
- The bank operates and maintains six full-service banking locations within the AA. Three branches are located in moderate-income census tracts, and three branches are located in middle-income census tracts of the AA.
- In addition, the bank also operates six limited-service ATMs located at each banking location, as well as one standalone full-service ATM that is located in Drumright, Oklahoma.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank held a 1.5 percent market share of deposits, ranking 18<sup>th</sup> of 59 institutions operating from 247 banking offices throughout the AA.
- One previously conducted interview with a community member within the AA was referenced to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an organization that focuses on local economic development.

**Table 6**

<b>Population Change</b>			
<b>Assessment Area: Tulsa Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Tulsa Metropolitan	834,040	883,385	5.9
Creek County, OK	70,761	71,754	1.4
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
Wagoner County, OK	75,391	80,981	7.4
Tulsa, OK MSA	962,676	1,015,331	5.5
Oklahoma	3,849,733	3,959,353	2.8

*Source: 2020 U.S. Census Bureau Decennial Census  
2011-2015 U.S. Census Bureau: American Community Survey*

- Overall, the AA population experienced growth during the period between 2015 and 2020, although there was significant population decline in the AA’s two most sparsely populated counties, Osage and Pawnee Counties.
- Tulsa, the largest city in the AA, has a population of 413,066 and accounts for approximately 46.8 percent of the AA’s total population.
- A member of the community stated that there has been a steady influx of individuals moving to the Tulsa metropolitan area from the west coast in recent years, seeking a lower cost of living.

**Table 7**

<b>Median Family Income Change</b>			
<b>Assessment Area: Tulsa Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Tulsa Metropolitan	66,637	72,125	8.2
Creek County, OK	59,697	66,569	11.5
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
Wagoner County, OK	70,042	79,407	13.4
Tulsa, OK MSA	66,846	72,203	8.0
Oklahoma	63,401	67,511	6.5

*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.*

- According to the 2020 ACS data, the Tulsa Metropolitan AA contained a concentration of families below the poverty level of 10.6 percent, which was slightly below the statewide figure of 11.3 percent. Poverty rates ranged from

a low of 7.1 percent in Wagoner County to a high of 12.0 percent in Creek County.

**Table 8**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Tulsa Metropolitan</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Tulsa Metropolitan	73.5	37.1	38.3	54.4	28.5	16.1
Creek County, OK	53.6	19.0	28.3	45.6	17.4	15.3
Osage County, OK	62.7	27.6	37.3	44.5	20.1	14.6
Pawnee County, OK	64.1	41.8	31.0	45.3	16.1	11.9
Tulsa County, OK	75.5	38.8	39.1	58.4	31.5	16.9
Wagoner County, OK	75.7	29.2	37.2	48.2	30.4	13.6
Tulsa, OK MSA	73.0	36.9	38.0	54.2	28.5	16.0
Oklahoma	72.5	35.3	37.9	52.2	26.2	15.4

*Cost Burden is housing cost that equals 30 percent or more of household income.*  
*Source: U.S. Department of Housing and Urban Development (HUD), 2017 - 2021 Comprehensive Housing Affordability Strategy*

- The median family housing value in the Tulsa Metropolitan AA, at \$155,496, was above the statewide figure of \$142,400. Median housing values ranged from a low of \$98,900 in Pawnee County to a high of \$162,900 in Wagoner County.
- The median gross rent in the Tulsa Metropolitan AA of \$870 was above the state of Oklahoma figure of \$818.
- Overall, the housing cost burden for both LMI homeowners and renters was generally consistent when compared to figures of the state of Oklahoma, with the greatest burden among low-income renters.

**Table 9**

<b>Unemployment Rates</b>					
<b>Assessment Area: Tulsa Metropolitan</b>					
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Tulsa Metropolitan	6.6	4.2	3.1	3.2	3.3
Creek County, OK	6.6	4.3	3.5	3.3	3.5
Osage County, OK	6.8	4.5	3.7	3.7	3.9
Pawnee County, OK	7.2	4.6	3.9	3.6	3.6
Tulsa County, OK	6.7	4.2	3.1	3.2	3.3
Wagoner County, OK	5.8	3.6	2.9	3.0	3.1
Tulsa, OK MSA	6.5	4.1	3.1	3.2	3.3
Oklahoma	6.3	4.0	3.0	3.2	3.3

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

- The 2024 unemployment figures in the AA and the state of Oklahoma have trended down from highs in 2020 but have remained relatively stable from 2021 through 2023.
- The primary industries operating in the Tulsa MSA include advanced manufacturing, aerospace and defense, logistics and distribution, healthcare and social services, and professional services.

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

### **LENDING TEST**

The bank's performance under the lending test in the Tulsa Metropolitan AA is satisfactory. In determining the lending test rating, equal weight was given to each of the performance criteria. The review in the AA consisted of an evaluation of 55 home mortgage loans and 79 small business loans. The bank's HMDA origination volume within the AA was too low to conduct a meaningful analysis for individual loan product categories; thus, the product categories were combined and analyzed at the total HMDA level.

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage and small business lending reflects excellent levels of penetration.

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2023 home mortgage loans among low-income census tracts was above the aggregate lending data by both number and dollar volume and above the demographic figure, which represents the percentage of owner-occupied housing units in each census tract income level. Lending among moderate-income census tracts was also above the aggregate lending data by both number and dollar volume and above the demographic figure.

The geographic distribution of home mortgage loans in 2024 reflected penetration levels consistent with 2023 lending patterns.

An evaluation of the dispersion of home mortgage loans identified gaps and lapses in lending that included LMI census tracts, although the overall conclusion was not impacted. 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. Additionally, the AA contains a high number of census tracts relative to the number of bank branches and volume of lending within the AA.

**Table 10**

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Tulsa Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	2	6.1	1.8	214	4.1	2.1	3	13.6	2.0	505	15.3	1.3	2.9
Moderate	20	60.6	22.0	2,073	39.4	15.9	8	36.4	20.9	932	28.3	15.7	24.0
Middle	6	18.2	31.9	1,172	22.3	27.8	7	31.8	31.7	1,046	31.8	26.3	34.4
Upper	5	15.2	44.3	1,799	34.2	54.1	4	18.2	45.4	810	24.6	56.6	38.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>5,258</b>	<b>100.0</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>3,293</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.  
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.

**Small Business Lending**

The geographic distribution of small business lending is excellent. The distribution of 2024 small business lending among low-income census tracts was above the demographic figure, which represents the percentage of businesses operating in these tracts by income level of geography. The distribution of small business lending in moderate-income census tracts was comparable to the demographic figure.

While aggregate CRA data is not a direct comparator to the bank's lending, as the bank is not a CRA reporter, aggregate lending volumes reflect limited credit demand for small business loans within the bank's AA. A review of aggregate lending data submitted by CRA reporters operating in the bank's AA from 2021-2023 revealed an average distribution of 3.3 percent by number volume and 4.7 percent by dollar volume of loans in low-income census tracts and 22.9 percent by number volume and 27.1 percent by dollar volume of loans in moderate-income census tracts. This further supports the bank's excellent performance regarding the geographic distribution of small business lending.

An analysis of dispersion revealed conspicuous gaps or lapses in the AA that included LMI census tracts. However, given the bank's limited branching presence (and relatively lower volume of loans) in a large market, these gaps did not impact the overall conclusion.

**Table 11**

Distribution of 2024 Small Business Lending By Income Level of Geography					
Assessment Area: Tulsa Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	7	8.9	955	7.1	4.3
Moderate	23	29.1	3,894	28.9	27.7
Middle	31	39.2	5,499	40.8	33.3
Upper	18	22.8	3,146	23.3	34.6
Unknown	0	0.0	0	0.0	0.1
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>79</b>	<b>100.0</b>	<b>13,494</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 FFIEC Census Data  
2024 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.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2023 home mortgage loans to low-income borrowers was below aggregate lending by both number and dollar volume and was also below the demographic figure, which represents the percentage of families by family income residing within the AA. Lending to moderate-income borrowers was also below aggregate lending by both number and dollar and was below the demographic figure.

The borrower distribution of home mortgage loans in 2024 reflected penetrations levels above the 2023 lending patterns, which supported the overall conclusion of reasonable performance.

Additionally, home mortgage lending in this market included a substantial number of loans with unknown incomes. These loans were primarily comprised of business loans to purchase, refinance, or improve investment properties and are exempt from HMDA income reporting requirements.

**Table 12**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Tulsa Metropolitan</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Low</b>	1	3.0	6.0	83	1.6	3.0	3	13.6	4.9	483	14.7	2.1	21.7
<b>Moderate</b>	0	0.0	16.5	0	0.0	11.2	3	13.6	16.3	239	7.3	10.5	17.7
<b>Middle</b>	2	6.1	20.2	224	4.3	17.8	0	0.0	20.2	0	0.0	16.0	19.4
<b>Upper</b>	3	9.1	34.2	1,279	24.3	43.1	4	18.2	32.6	516	15.7	37.5	41.2
<b>Unknown</b>	27	81.8	23.1	3,672	69.8	24.8	12	54.5	26.0	2,055	62.4	33.9	0.0
<b>Total</b>	33	100.0	100.0	5,258	100.0	100.0	22	100.0	100.0	3,293	100.0	100.0	100.0

Source: 2024 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.  
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.

**Small Business Lending**

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with revenues of \$1 million (MM) or less was below the demographic figure, which represents the percentage of businesses operating in the AA by revenue size.

While aggregate CRA data is not a direct comparator as the bank is not a CRA reporter, aggregate lending volumes reflect limited credit demand for small business loans within the bank's AA. A review of aggregate lending data submitted by CRA reporters operating in the bank's AA from 2021-2023 revealed an average distribution of lending to small businesses with gross annual revenues of \$1MM or less at 49.7 percent by number volume and 32.6 percent by dollar volume. This further supports the bank's reasonable performance regarding the borrower distribution of small business lending.

Furthermore, 77.3 percent of loans were in amounts of \$250,000 or less, which are amounts typically associated with credit demands of small business entities and further demonstrates the bank's willingness to meet the needs of small businesses operating throughout the AA.

**Table 13**

<b>Distribution of 2024 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Tulsa Metropolitan</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	47	59.5	6,274	46.5	90.8
<b>Over \$1 Million</b>	23	29.1	6,282	46.6	8.3
<b>Revenue Unknown</b>	9	11.4	939	7.0	0.9
<b>Total</b>	79	100.0	13,494	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	42	53.2	1,792	13.3	
<b>\$100,001 - \$250,000</b>	19	24.1	3,225	23.9	
<b>\$250,001 - \$1 Million</b>	18	22.8	8,478	62.8	
<b>Total</b>	79	100.0	13,494	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	29	61.7	1,081	17.2	
<b>\$100,001 - \$250,000</b>	9	19.1	1,461	23.3	
<b>\$250,001 - \$1 Million</b>	9	19.1	3,732	59.5	
<b>Total</b>	47	100.0	6,274	100.0	
<i>Source: 2024 FFIEC Census Data 2024 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>					
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>					

**COMMUNITY DEVELOPMENT TEST**

The bank’s CD performance demonstrates poor responsiveness. The bank had a limited volume of CD activity in this AA with only two CD loans and a small number of donations in the AA during the evaluation period.

**Table 14**

<b>Community Development Activity Assessment Area: Tulsa Metropolitan</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
			<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>
<b>Affordable Housing</b>	0	0	0	0	0	0	0	0	0
<b>Community Services</b>	1	75	0	0	34	108	34	108	7
<b>Economic Development</b>	0	0	0	0	0	0	0	0	0
<b>Revitalization and Stabilization</b>	1	174	0	0	0	0	0	0	0
<b>Totals</b>	<b>2</b>	<b>249</b>	<b>0</b>	<b>0</b>	<b>34</b>	<b>108</b>	<b>34</b>	<b>108</b>	<b>7</b>

**NORTH CENTRAL OKLAHOMA ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Limited-Scope Review)**

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

The bank's AA is comprised of Payne and Noble Counties in their entirety, along with the northern portion of Lincoln County. Lincoln County is one of seven counties in the Oklahoma City, Oklahoma MSA, but is considered more rural in nature and combined with the nonmetropolitan AA as it does not extend substantially beyond the non-MSA tracts. Refer to Appendix B for a map of the AA and Appendix C for additional demographic data.

- The AA has changed since the last evaluation, including the entirety of Payne County and adding Noble County and the northern portion of Lincoln County as the result of acquisition activity. The AA is comprised of 29 census tracts, including 2 low-, 6 moderate-, 11 middle-, 8 upper-, and 2 unknown-income census tracts based on 2016-2020 ACS data.
- According to FFIEC designations in 2023, all middle-income tracts in Payne County were considered distressed, but these designations did not remain in 2024.
- Based on 2020 ACS data, the AA population was 101,106.
- The AA is home to 21,942 total families. According to 2020 ACS data, 18.1 percent of families are low-, 17.2 percent are moderate-, 17.7 percent are middle-, and 47.1 percent are upper-income families.
- The bank operates a total of four branch offices in this AA including three full-service branches and one limited-service branch. The limited-service branch is located in a moderate-income tract, one full-service branch is located in a middle-income census tract, and the two full-service branches are located in upper-income census tracts.
- The bank closed one location in Stillwater, Oklahoma in a middle-income census tract in October 2024 and acquired two branches in upper-income census tracts in March 2023 during the acquisition of another financial institution.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank ranked 4th of 18 FDIC-insured depository institutions operating from 45 locations in the AA, with a total deposit market share of 6.8 percent.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTH  
CENTRAL OKLAHOMA AA**

The institution's lending performance in the area was consistent with the institution's lending performance overall.

The institution's community development performance in the area exceeded the institution's CD performance for the Tulsa Metropolitan AA and contributed positively to the bank's overall CD performance for the institution.

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

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

The bank's AA is comprised of portions of Blaine, Caddo, Custer, Washita, and Canadian Counties. Canadian County is one of seven counties in the Oklahoma City, Oklahoma MSA but is considered more rural in nature and combined with the nonmetropolitan AA as it does not extend substantially beyond the non-MSA tracts. Refer to Appendix B for a map of the AA and Appendix C for additional demographic data.

- The AA is new since the last evaluation, created in March 2023 as the result of acquisition activity. The AA is comprised of ten census tracts, including two moderate-, five middle-, and three upper-income census tracts based on 2016-2020 ACS data.
- Based on 2020 ACS data, the AA population was 32,896.
- The AA is home to 7,236 total families. According to 2020 ACS data, 17.5 percent of families are low-, 14.5 percent are moderate-, 17.4 percent are middle-, and 50.7 percent are upper-income families.
- The bank operates a total of three full-service branch offices in this AA including a full-service branch in one of the AA's middle-income tracts and two full-service branches in upper-income census tracts.
- The bank operates a cash-only ATM at each branch, as well as two cash-only standalone ATMs.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank ranked 8th of 43 FDIC-insured depository institutions operating from 89 locations in the AA, with a total deposit market share of 3.2 percent.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WESTERN OKLAHOMA AA**

The institution's lending performance in the area exceeded the institution's lending performance overall; however, it did not change the rating for the institution.

The institution's community development performance in the area was below the institution's CD performance for the institution; however, it does not change the rating for the institution.

## **STATE OF TEXAS**

CRA rating for Texas: ***Needs to Improve***  
The Lending Test is rated: ***Needs to Improve***  
The Community Development Test is rated: ***Needs to Improve***

This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- A poor distribution of loans occurs throughout the bank's AAs.
- Lending reflects a poor distribution among businesses of different sizes.
- CD activity reflects poor responsiveness to CD needs of the bank's AAs.

## **SCOPE OF EXAMINATION**

The scope of the review for the State of Texas was consistent with the overall scope for the institution. A full-scope review was conducted for the Tarrant County Metropolitan AA. A limited-scope review was conducted for the Bexar County Metropolitan AA to ascertain if the bank's performance in this area was generally consistent with the bank's performance in the overall state evaluation. Home mortgage lending was not evaluated based on lending levels too low to conduct a meaningful analysis. The State of Texas analysis included an evaluation of a total of five small business loans.

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN TEXAS**

The bank delineates two of its five AAs and operates two branches in the State of Texas. The bank's presence in the state includes banking offices in the densely populated cities of Fort Worth (Tarrant County Metropolitan AA) and San Antonio (Bexar County Metropolitan AA). Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of the report, with primary emphasis on small business lending.

A community contact recently conducted as part of a CRA evaluation for another financial institution with offices in the Tarrant County Metropolitan AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS**

### **LENDING TEST**

The bank's overall lending test performance in the State of Texas is Needs to Improve. Bank performance under the lending test in the Tarrant County Metropolitan AA is considered poor. Performance in the limited-scope reviewed Bexar County Metropolitan AA was considered consistent with performance in the Tarrant County Metropolitan AA.

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

The bank's overall geographic distribution of loans within Texas reflects poor distribution among the different census tracts and dispersion throughout the AAs. This rating is consistent with the geographic distribution performance noted in the Tarrant County Metropolitan AA.

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

The bank's lending has an overall poor distribution among individuals of different income levels and businesses of different sizes. This rating is consistent with the borrower distribution performance noted in the Tarrant County Metropolitan AA.

### **COMMUNITY DEVELOPMENT TEST**

The bank's overall CD test performance in the state of Texas is Needs to Improve and demonstrates poor responsiveness. The bank did not have any qualified CD loans, investments, donations, or services located in the state of Texas during the evaluation period.

**TARRANT COUNTY METROPOLITAN ASSESSMENT AREA  
METROPOLITAN AREA  
(Full-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE TARRANT COUNTY METROPOLITAN AA**

The bank's Tarrant County Metropolitan AA consists of the entirety of Tarrant County, Texas, which is one of four counties within the Fort Worth-Arlington-Grapevine, Texas Metropolitan Division (MD). See Appendix B for an AA map and Appendix C for additional demographic data.

- The Tarrant County AA is new since the prior CRA evaluation. The AA was created because of the transition of a bank LPO to a full-service branch in Fort Worth, Texas in October 2023.
- In total, the AA is comprised of 449 census tracts, which include 35 low-, 130 moderate-, 140 middle-, 139 upper-, and five unknown-income census tracts.
- The bank operates one full-service banking location within the AA that is located in a middle-income tract.
- The bank does not operate any ATMs within the AA.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share report, the bank has a market share of 0.21 percent, ranking 43<sup>rd</sup> out of the 73 institutions also operating within the AA from a total of 408 offices.
- One previously conducted interview with a community member within the AA was referenced to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an organization that focuses on community development and affordable housing.

**Table 15**

<b>Population Change</b>			
<b>Assessment Area: Tarrant County Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Tarrant County Metropolitan	1,914,526	2,110,640	10.2
Fort Worth-Arlington-Grapevine, TX MD	2,252,637	2,507,421	11.3
Texas	26,538,614	29,145,505	9.8
<i>Source: 2020 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			

- Overall, the AA population experienced positive growth during the period between 2015 and 2020, which mirrored similar trends noted in both the MSA and statewide figures.
- The AA's 2020 population comprised 84.2 percent of the total MSA population.

**Table 16**

<b>Median Family Income Change</b>			
<b>Assessment Area: Tarrant County Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Tarrant County Metropolitan	76,367	82,856	8.5
Fort Worth-Arlington-Grapevine, TX MD	75,758	82,649	9.1
Texas	68,523	76,073	11.0

*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.*

- Overall growth in median family income (MFI) from 2015 to 2020 in the AA was similar to the level experienced in the MD but was slightly lower than the growth experienced in the statewide figure.
- The MFI for the AA in 2020 was approximately 8.9 percent higher than the statewide figure.

**Table 17**

<b>Housing Cost Burden</b>						
<b>Assessment Area: Tarrant County Metropolitan</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Tarrant County Metropolitan	84.9	56.8	46.2	65.2	35.8	19.4
Fort Worth-Arlington-Grapevine, TX MD	83.7	55.1	45.4	61.9	34.6	18.9
Texas	79.4	49.8	43.5	59.0	32.7	19.4

*Cost Burden is housing cost that equals 30 percent or more of household income.*

*Source: HUD, 2017 - 2021 Comprehensive Housing Affordability Strategy*

- The median housing value in the AA of \$209,610 was higher than the statewide figure of \$187,200.
- Low-income renters and owners experienced more housing cost burden compared to moderate-income renters and owners; and renters overall have experienced more housing cost burden than homeowners.

**Table 18**

<b>Unemployment Rates</b>					
<b>Assessment Area: Tarrant County Metropolitan</b>					
<b>Area</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
Tarrant County Metropolitan	7.4	5.3	3.7	3.8	3.9
Fort Worth-Arlington-Grapevine, TX MD	7.2	5.2	3.6	3.7	3.9
Texas	7.7	5.6	3.9	4.0	4.1

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

- Unemployment in the AA has been consistent with the overall MD and State of Texas levels, with a steady decline from highs in 2020 as a result of the pandemic.
- According to the community contact, major employers and industries operating in the Tarrant County Metropolitan AA include manufacturing, retail, several local universities, Charles Schwab, Ariat International, and DFW Airport.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TARRANT COUNTY METROPOLITAN AA**

### **LENDING TEST**

The bank's performance under the lending test in the Tarrant County Metropolitan AA is poor. In determining the lending test rating, equal weight was given to each of the performance criteria. Home mortgage lending was not evaluated as a result of low loan volume and a meaningful analysis could not be performed. The review in the AA consisted of an evaluation of a total of three small business loans.

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects poor distribution among the different census tracts and dispersion throughout the AA.

#### Small Business Lending

The geographic distribution of small business lending is poor. The distribution of small business lending in low-income census tracts was below the demographic figure, which represents the percentage of businesses operating in these tracts by income level of geography. The distribution of small business lending in moderate-income census tracts was also below the demographic figure.

An analysis of dispersion revealed conspicuous gaps and lapses in lending that included LMI census tracts that is not explained by performance context.

**Table 19**

Distribution of 2024 Small Business Lending By Income Level of Geography Assessment Area: Tarrant County Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	4.5
Moderate	0	0.0	0	0.0	22.7
Middle	2	66.7	1,100	94.8	30.9
Upper	1	33.3	60	5.2	41.3
Unknown	0	0.0	0	0.0	0.6
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	3	100.0	1,160	100.0	100.0

Source: 2024 FFIEC Census Data  
2024 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 Businesses of Different Sizes**

The bank’s lending has a poor distribution among businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is poor. The bank did not originate any loans to businesses with revenues of \$1MM or less, which was below the percentage of businesses operating in the AA by revenue size (the demographic figure.)

**Table 20**

<b>Distribution of 2024 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Tarrant County Metropolitan</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	0	0.0	0	0.0	93.4
<b>Over \$1 Million</b>	3	100.0	1,160	100.0	5.6
<b>Revenue Unknown</b>	0	0.0	0	0.0	1.0
<b>Total</b>	3	100.0	1,160	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	2	66.7	160	13.8	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	1	33.3	1,000	86.2	
<b>Total</b>	3	100.0	1,160	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	0	0.0	0	0.0	
<b>\$250,001 - \$1 Million</b>	0	0.0	0	0.0	
<b>Total</b>	0	0.0	0	0.0	
<i>Source: 2024 FFIEC Census Data                  2024 Dun &amp; Bradstreet Data                  2016-2020 U.S. Census Bureau: American Community Survey                  Note: Percentages may not total 100.0 percent due to rounding.</i>					

**COMMUNITY DEVELOPMENT TEST**

The bank’s CD performance demonstrates poor responsiveness. The bank did not have any qualified CD loans, investments, donations, or services in the AA during the review period.

**BEXAR COUNTY METROPOLITAN ASSESSMENT AREA  
METROPOLITAN AREA  
(Limited-Scope Review)**

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE BEXAR COUNTY  
METROPOLITAN AA**

The bank's AA is comprised of Bexar County in its entirety, which is one of eight counties that comprises the San Antonio-New Braunfels, Texas MSA. Refer to Appendix B for a map of the AA and Appendix C for additional demographic data.

- The AA is new since the last evaluation, resulting from the opening of a de novo branch in San Antonio in January 2021. The AA is comprised of 375 census tracts, including 35 low-, 137 moderate-, 102 middle-, 97 upper-, and 4 unknown-income census tracts based on 2016-2020 ACS data.
- Based on 2020 ACS data, the AA population was 2,009,324.
- The AA is home to 421,271 total families. According to 2020 ACS data, 23.9 percent of families are low-, 17.9 percent are moderate-, 19.6 percent are middle-, and 38.6 percent are upper-income families.
- The bank maintains a full-service branch in one of the AA's moderate-income tracts.
- The bank does not operate or maintain any ATMs within the AA.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank ranked 41st of 51 FDIC-insured depository institutions operating from 284 locations in the AA, with a total deposit market share of less than 1.0 percent.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BEXAR  
COUNTY METROPOLITAN AA**

The institution's lending performance in the area is consistent with the institution's lending performance overall.

The institution's community development performance in the area is consistent with the institution's CD performance for the institution.

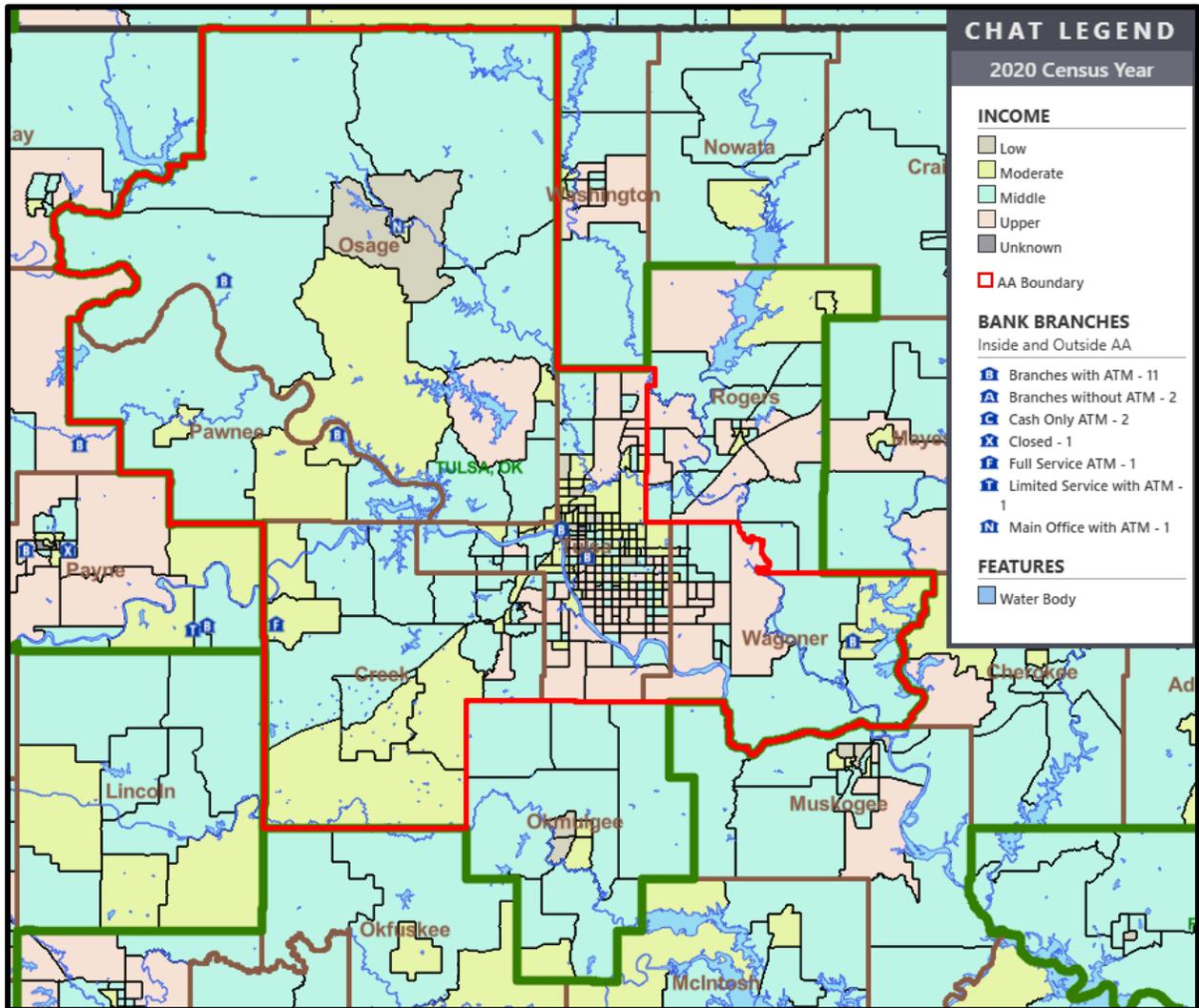
**APPENDIX A – SCOPE OF EXAMINATION TABLE**

**Table A-1**

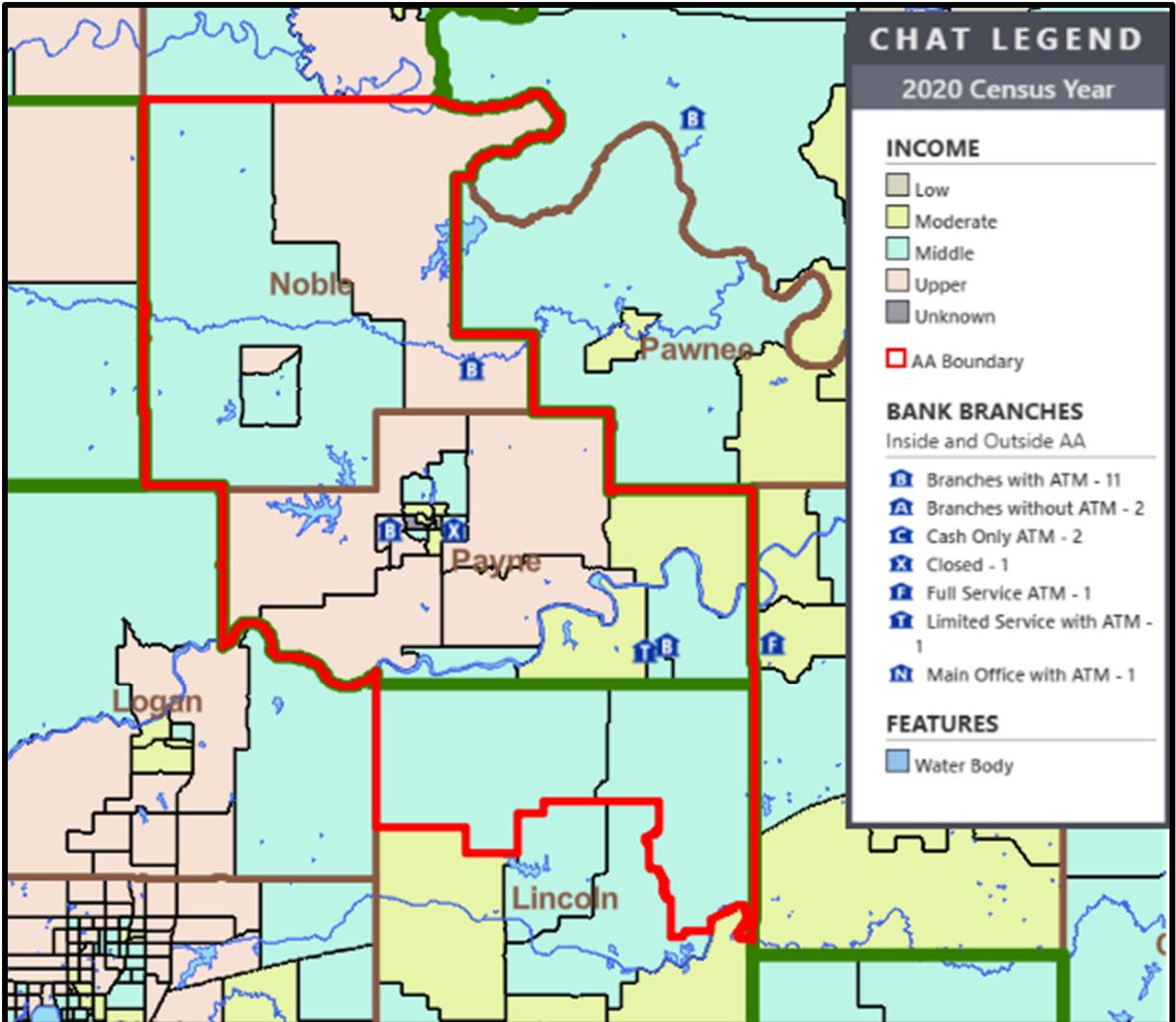
<b>SCOPE OF EXAMINATION</b>			
<b><u>FINANCIAL INSTITUTION</u></b> Blue Sky Bank Pawhuska, Oklahoma		<b><u>PRODUCTS/SERVICES REVIEWED</u></b> <ul style="list-style-type: none"> <li>• HMDA</li> <li>• Small Business</li> </ul>	
<b><u>TIME PERIODS REVIEWED</u></b>			
<u>HMDA:</u>		January 1, 2023 to December 31, 2024	
<u>Small Business:</u>		January 1, 2024 to December 31, 2024	
<b>LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION</b>			
<b>AFFILIATES</b>	<b>AFFILIATE RELATIONSHIP</b>	<b>PRODUCTS REVIEWED</b>	
N/A	N/A	N/A	
<b>LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION</b>			
<b>ASSESSMENT AREA</b>	<b>TYPE OF EXAM</b>	<b>BRANCHES VISITED</b>	<b>OTHER INFORMATION</b>
<u>OKLAHOMA</u> Tulsa Metropolitan North Central Oklahoma Western Oklahoma	Full Limited Limited	N/A	
<u>TEXAS</u> Tarrant County Metropolitan Bexar County Metropolitan	Full Limited	N/A	

APPENDIX B – MAPS OF THE ASSESSMENT AREAS

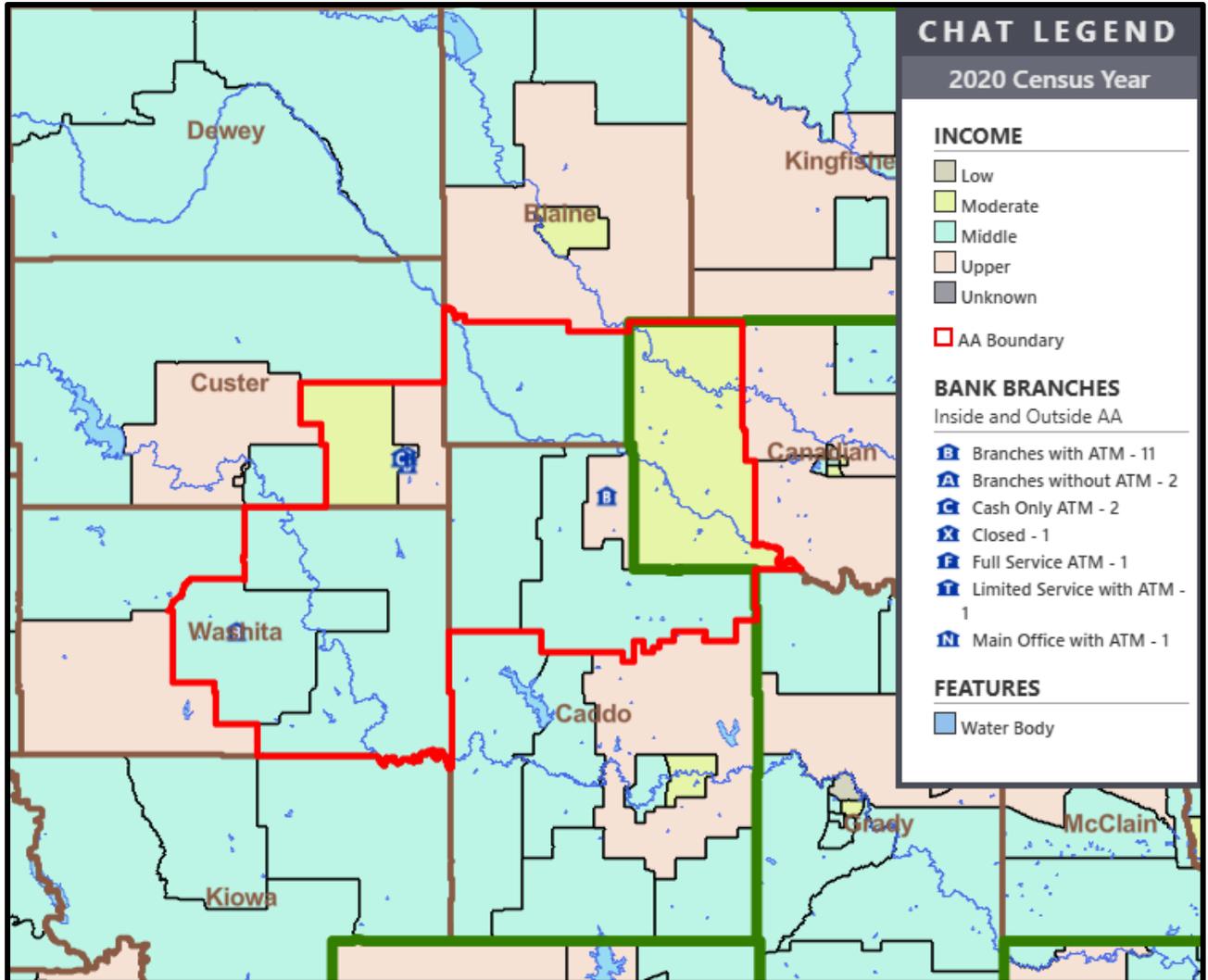
Tulsa Metropolitan



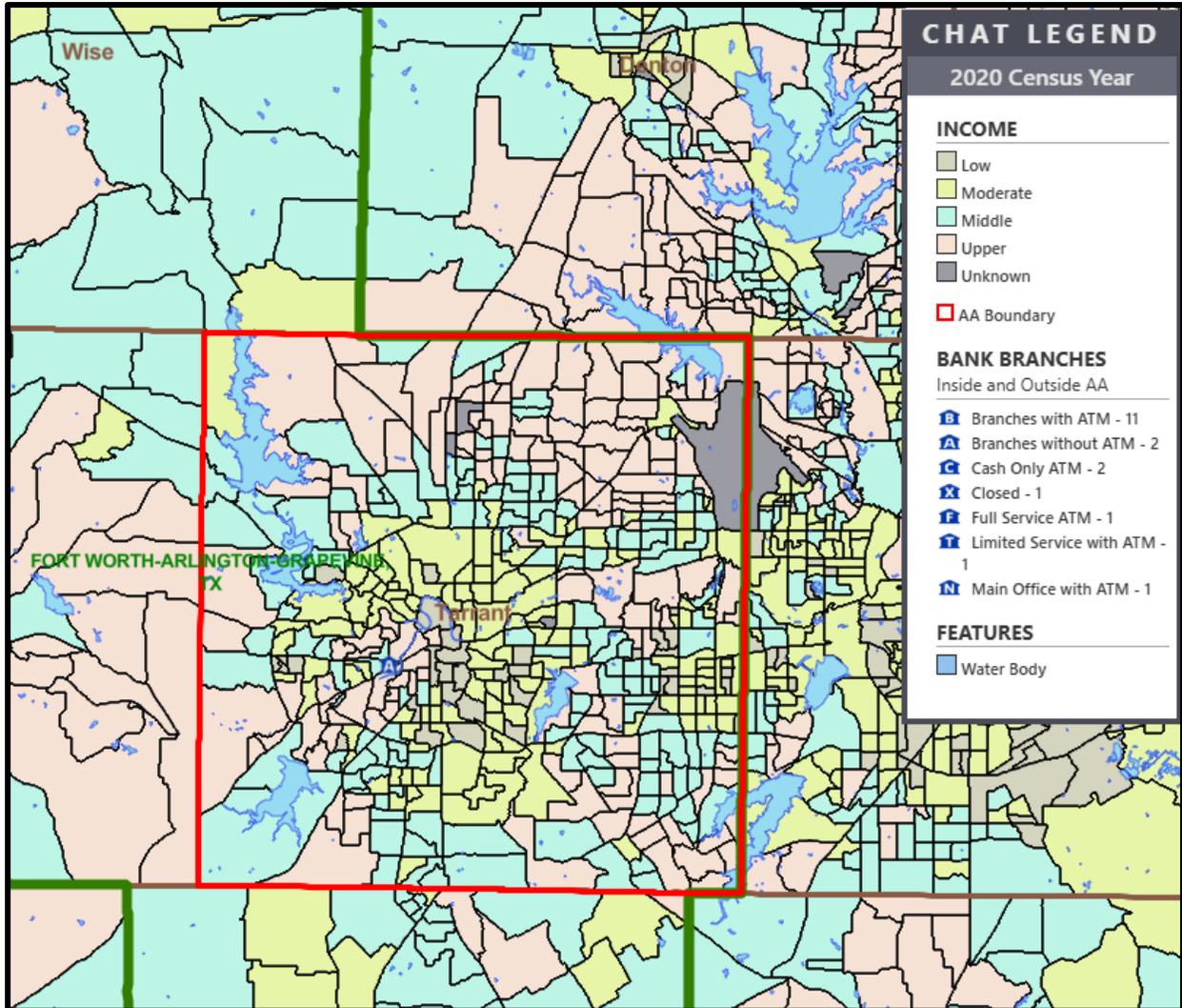
North Central Oklahoma



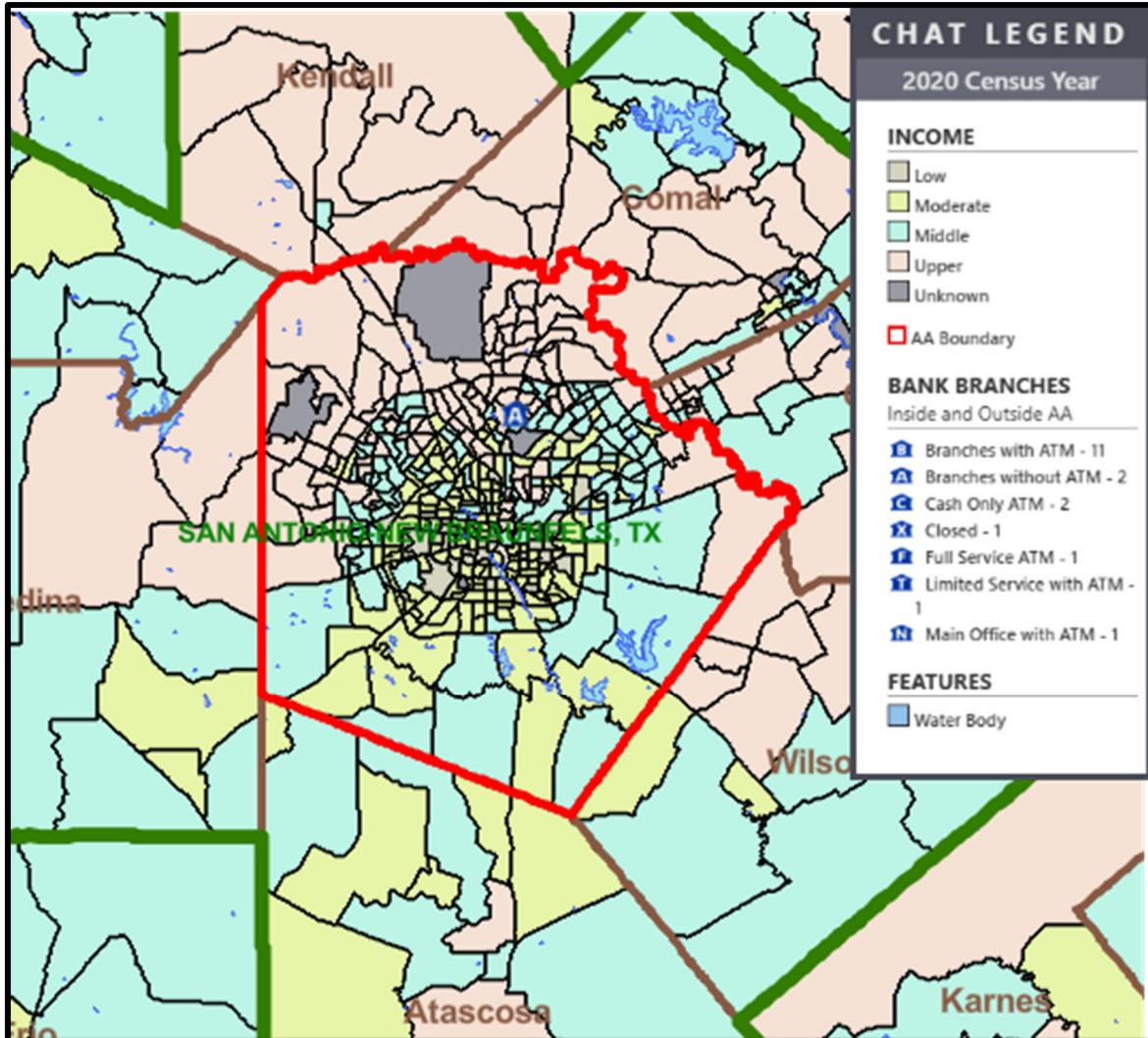
Western Oklahoma



Tarrant County Metropolitan



Bexar County Metropolitan



**APPENDIX C – DEMOGRAPHIC INFORMATION**

**Table C-1**

2024 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	14	5.1	10,082	4.7	4,091	40.6	46,880	21.7
Moderate	85	31.0	60,599	28.0	10,572	17.4	38,269	17.7
Middle	86	31.4	69,884	32.3	5,473	7.8	41,969	19.4
Upper	88	32.1	75,582	34.9	2,753	3.6	89,164	41.2
Unknown	1	0.4	135	0.1	26	19.3	0	0.0
<b>Total AA</b>	<b>274</b>	<b>100.0</b>	<b>216,282</b>	<b>100.0</b>	<b>22,915</b>	<b>10.6</b>	<b>216,282</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,701	6,170	2.9	29.8	11,546	55.8	2,985	14.4
Moderate	119,160	51,144	24.0	42.9	49,855	41.8	18,161	15.2
Middle	123,177	73,416	34.4	59.6	36,130	29.3	13,631	11.1
Upper	113,229	82,491	38.7	72.9	22,865	20.2	7,873	7.0
Unknown	1,185	104	0.0	8.8	796	67.2	285	24.1
<b>Total AA</b>	<b>377,452</b>	<b>213,325</b>	<b>100.0</b>	<b>56.5</b>	<b>121,192</b>	<b>32.1</b>	<b>42,935</b>	<b>11.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,605	4.3	1,383	4.0	212	6.8	10	2.8
Moderate	10,449	27.7	9,257	27.1	1,092	34.9	100	28.4
Middle	12,536	33.3	11,334	33.2	1,067	34.1	135	38.4
Upper	13,026	34.6	12,169	35.6	751	24.0	106	30.1
Unknown	53	0.1	43	0.1	9	0.3	1	0.3
<b>Total AA</b>	<b>37,669</b>	<b>100.0</b>	<b>34,186</b>	<b>100.0</b>	<b>3,131</b>	<b>100.0</b>	<b>352</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.8</b>		<b>8.3</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	9	1.9	9	1.9	0	0.0	0	0.0
Moderate	99	20.5	98	20.6	1	16.7	0	0.0
Middle	209	43.2	207	43.5	2	33.3	0	0.0
Upper	167	34.5	162	34.0	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>484</b>	<b>100.0</b>	<b>476</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.2</b>		<b>0.4</b>
<i>Source: 2024 FFIEC Census Data 2024 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Table C-2**

2023 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	14	5.1	10,082	4.7	4,091	40.6	46,880	21.7
Moderate	85	31.0	60,599	28.0	10,572	17.4	38,269	17.7
Middle	86	31.4	69,884	32.3	5,473	7.8	41,969	19.4
Upper	88	32.1	75,582	34.9	2,753	3.6	89,164	41.2
Unknown	1	0.4	135	0.1	26	19.3	0	0.0
<b>Total AA</b>	<b>274</b>	<b>100.0</b>	<b>216,282</b>	<b>100.0</b>	<b>22,915</b>	<b>10.6</b>	<b>216,282</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,701	6,170	2.9	29.8	11,546	55.8	2,985	14.4
Moderate	119,160	51,144	24.0	42.9	49,855	41.8	18,161	15.2
Middle	123,177	73,416	34.4	59.6	36,130	29.3	13,631	11.1
Upper	113,229	82,491	38.7	72.9	22,865	20.2	7,873	7.0
Unknown	1,185	104	0.0	8.8	796	67.2	285	24.1
<b>Total AA</b>	<b>377,452</b>	<b>213,325</b>	<b>100.0</b>	<b>56.5</b>	<b>121,192</b>	<b>32.1</b>	<b>42,935</b>	<b>11.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,657	3.9	1,424	3.7	221	6.3	12	3.0
Moderate	11,314	26.5	10,022	25.8	1,183	33.8	109	27.5
Middle	13,895	32.6	12,523	32.3	1,229	35.2	143	36.0
Upper	15,745	36.9	14,759	38.1	854	24.4	132	33.2
Unknown	52	0.1	42	0.1	9	0.3	1	0.3
<b>Total AA</b>	<b>42,663</b>	<b>100.0</b>	<b>38,770</b>	<b>100.0</b>	<b>3,496</b>	<b>100.0</b>	<b>397</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.9</b>		<b>8.2</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7	1.3	7	1.3	0	0.0	0	0.0
Moderate	102	18.7	101	18.8	1	14.3	0	0.0
Middle	224	41.1	221	41.2	3	42.9	0	0.0
Upper	212	38.9	207	38.6	3	42.9	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>545</b>	<b>100.0</b>	<b>536</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.3</b>		<b>0.4</b>
<i>Source: 2023 FFIEC Census Data 2023 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Table C-3**

2024 Tarrant County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	7.8	27,035	5.4	8,129	30.1	106,209	21.2
Moderate	130	29.0	125,780	25.1	18,427	14.7	88,143	17.6
Middle	140	31.2	172,590	34.4	11,117	6.4	101,401	20.2
Upper	139	31.0	173,348	34.6	4,447	2.6	205,236	41.0
Unknown	5	1.1	2,236	0.4	157	7.0	0	0.0
<b>Total AA</b>	<b>449</b>	<b>100.0</b>	<b>500,989</b>	<b>100.0</b>	<b>42,277</b>	<b>8.4</b>	<b>500,989</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	53,340	11,895	2.7	22.3	33,862	63.5	7,583	14.2
Moderate	209,902	89,120	20.5	42.5	101,816	48.5	18,966	9.0
Middle	265,807	155,834	35.8	58.6	94,038	35.4	15,935	6.0
Upper	247,088	176,933	40.6	71.6	55,534	22.5	14,621	5.9
Unknown	4,244	1,761	0.4	41.5	1,653	38.9	830	19.6
<b>Total AA</b>	<b>780,381</b>	<b>435,543</b>	<b>100.0</b>	<b>55.8</b>	<b>286,903</b>	<b>36.8</b>	<b>57,935</b>	<b>7.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	4,346	4.5	3,999	4.4	318	5.9	29	3.0
Moderate	21,877	22.7	19,923	22.2	1,790	33.0	164	16.7
Middle	29,770	30.9	28,273	31.4	1,255	23.1	242	24.7
Upper	39,747	41.3	37,213	41.4	1,995	36.8	539	55.0
Unknown	582	0.6	511	0.6	65	1.2	6	0.6
<b>Total AA</b>	<b>96,322</b>	<b>100.0</b>	<b>89,919</b>	<b>100.0</b>	<b>5,423</b>	<b>100.0</b>	<b>980</b>	<b>100.0</b>
Percentage of Total Businesses:				<b>93.4</b>		<b>5.6</b>		<b>1.0</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	6	1.0	5	0.8	1	11.1	0	0.0
Moderate	86	13.9	84	13.7	2	22.2	0	0.0
Middle	174	28.1	173	28.3	1	11.1	0	0.0
Upper	348	56.1	343	56.1	5	55.6	0	0.0
Unknown	6	1.0	6	1.0	0	0.0	0	0.0
<b>Total AA</b>	<b>620</b>	<b>100.0</b>	<b>611</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				<b>98.5</b>		<b>1.5</b>		<b>0.0</b>
Source: 2024 FFIEC Census Data 2024 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-4**

2023 Tarrant County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	7.8	27,035	5.4	8,129	30.1	106,209	21.2
Moderate	130	29.0	125,780	25.1	18,427	14.7	88,143	17.6
Middle	140	31.2	172,590	34.4	11,117	6.4	101,401	20.2
Upper	139	31.0	173,348	34.6	4,447	2.6	205,236	41.0
Unknown	5	1.1	2,236	0.4	157	7.0	0	0.0
<b>Total AA</b>	<b>449</b>	<b>100.0</b>	<b>500,989</b>	<b>100.0</b>	<b>42,277</b>	<b>8.4</b>	<b>500,989</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	53,340	11,895	2.7	22.3	33,862	63.5	7,583	14.2
Moderate	209,902	89,120	20.5	42.5	101,816	48.5	18,966	9.0
Middle	265,807	155,834	35.8	58.6	94,038	35.4	15,935	6.0
Upper	247,088	176,933	40.6	71.6	55,534	22.5	14,621	5.9
Unknown	4,244	1,761	0.4	41.5	1,653	38.9	830	19.6
<b>Total AA</b>	<b>780,381</b>	<b>435,543</b>	<b>100.0</b>	<b>55.8</b>	<b>286,903</b>	<b>36.8</b>	<b>57,935</b>	<b>7.4</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4,519	4.3	4,158	4.3	333	5.5	28	2.6
Moderate	23,184	22.1	21,079	21.6	1,926	31.9	179	16.4
Middle	31,912	30.5	30,331	31.1	1,321	21.9	260	23.8
Upper	44,552	42.5	41,543	42.5	2,388	39.6	621	56.8
Unknown	626	0.6	552	0.6	68	1.1	6	0.5
<b>Total AA</b>	<b>104,793</b>	<b>100.0</b>	<b>97,663</b>	<b>100.0</b>	<b>6,036</b>	<b>100.0</b>	<b>1,094</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.2</b>	<b>5.8</b>	<b>1.0</b>		
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7	1.0	6	0.9	1	9.1	0	0.0
Moderate	91	13.2	90	13.2	1	9.1	0	0.0
Middle	191	27.6	190	27.9	1	9.1	0	0.0
Upper	396	57.3	388	57.1	8	72.7	0	0.0
Unknown	6	0.9	6	0.9	0	0.0	0	0.0
<b>Total AA</b>	<b>691</b>	<b>100.0</b>	<b>680</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.4</b>	<b>1.6</b>	<b>0.0</b>		
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 – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES**

North Central Oklahoma

**Table D-1**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: North Central Oklahoma</b>													
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Owner Occupied Units %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0.6	0	0.0	0.4	0	0.0	0.7	0	0.0	10.2	0.1
<b>Moderate</b>	1	50.0	12.9	130	51.8	18.6	0	0.0	11.8	0	0.0	11.4	12.9
<b>Middle</b>	1	50.0	46.7	121	48.2	37.1	12	85.7	44.4	1,441	74.7	34.7	43.5
<b>Upper</b>	0	0.0	38.4	0	0.0	43.1	2	14.3	42.0	488	25.3	42.3	43.0
<b>Unknown</b>	0	0.0	1.3	0	0.0	0.9	0	0.0	1.2	0	0.0	1.3	0.6
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	2	100.0	100.0	251	100.0	100.0	14	100.0	100.0	1,929	100.0	100.0	100.0

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-2**

<b>Distribution of 2024 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: North Central Oklahoma</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	
<b>Low</b>	0	0.0	0	0.0	4.8
<b>Moderate</b>	4	20.0	470	11.6	22.2
<b>Middle</b>	13	65.0	1,673	41.2	44.2
<b>Upper</b>	3	15.0	1,917	47.2	26.6
<b>Unknown</b>	0	0.0	0	0.0	2.2
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	20	100.0	4,061	100.0	100.0

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-3**

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: North Central Oklahoma													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank			Agg			Bank			Agg			
	#	#%	%	\$(000)	%	\$%	#	#%	%	\$(000)	%	\$%	
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	2.8	0	0.0	0.9	0	0.0	3.2	0	0.0	1.3	18.1
Moderate	0	0.0	9.9	0	0.0	5.1	1	7.1	10.3	120	6.2	6.5	17.1
Middle	0	0.0	16.1	0	0.0	13.2	1	7.1	15.1	150	7.8	12.1	17.7
Upper	1	50.0	40.7	121	48.2	46.5	2	14.3	38.5	173	9.0	44.5	47.1
Unknown	1	50.0	30.5	130	51.8	34.3	10	71.4	32.9	1,486	77.0	35.6	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>251</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>1,929</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 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.  
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.

**Table D-4**

Distribution of 2024 Small Business Lending By Revenue Size of Businesses						
Assessment Area: North Central Oklahoma						
	Bank Loans				Total Businesses %	
	#	#%	\$(000)	\$%		
<b>By Revenue</b>						
<b>\$1 Million or Less</b>	12	60.0	1,464	36.1	90.8	
<b>Over \$1 Million</b>	8	40.0	2,596	63.9	7.8	
<b>Revenue Unknown</b>	0	0.0	0	0.0	1.4	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>4,061</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size</b>						
<b>\$100,000 or Less</b>	13	65.0	488	12.0		
<b>\$100,001 - \$250,000</b>	3	15.0	515	12.7		
<b>\$250,001 - \$1 Million</b>	4	20.0	3,057	75.3		
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>4,061</b>	<b>100.0</b>		
<b>By Loan Size and Revenues \$1 Million or Less</b>						
<b>\$100,000 or Less</b>	9	75.0	297	20.3		
<b>\$100,001 - \$250,000</b>	2	16.7	370	25.3		
<b>\$250,001 - \$1 Million</b>	1	8.3	797	54.4		
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>1,464</b>	<b>100.0</b>		

Source: 2024 FFIEC Census Data  
2024 Dori & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-5**

2024 North 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	6.9	127	0.6	109	85.8	3,963	18.1
Moderate	6	20.7	3,355	15.3	571	17.0	3,763	17.1
Middle	11	37.9	9,733	44.4	1,177	12.1	3,890	17.7
Upper	8	27.6	8,405	38.3	413	4.9	10,326	47.1
Unknown	2	6.9	322	1.5	39	12.1	0	0.0
<b>Total AA</b>	<b>29</b>	<b>100.0</b>	<b>21,942</b>	<b>100.0</b>	<b>2,309</b>	<b>10.5</b>	<b>21,942</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,925	17	0.1	0.9	1,443	75.0	465	24.2
Moderate	9,178	2,878	12.9	31.4	4,709	51.3	1,591	17.3
Middle	19,145	9,662	43.5	50.5	6,387	33.4	3,096	16.2
Upper	13,828	9,551	43.0	69.1	3,018	21.8	1,259	9.1
Unknown	1,790	127	0.6	7.1	1,160	64.8	503	28.1
<b>Total AA</b>	<b>45,866</b>	<b>22,235</b>	<b>100.0</b>	<b>48.5</b>	<b>16,717</b>	<b>36.4</b>	<b>6,914</b>	<b>15.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	140	4.8	123	4.6	17	7.4	0	0.0
Moderate	653	22.2	591	22.1	53	23.1	9	22.5
Middle	1,300	44.2	1,167	43.7	113	49.3	20	50.0
Upper	781	26.6	727	27.2	44	19.2	10	25.0
Unknown	64	2.2	61	2.3	2	0.9	1	2.5
<b>Total AA</b>	<b>2,938</b>	<b>100.0</b>	<b>2,669</b>	<b>100.0</b>	<b>229</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.8</b>		<b>7.8</b>		<b>1.4</b>
	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	21	13.6	21	13.8	0	0.0	0	0.0
Middle	71	46.1	70	46.1	1	50.0	0	0.0
Upper	61	39.6	60	39.5	1	50.0	0	0.0
Unknown	1	0.6	1	0.7	0	0.0	0	0.0
<b>Total AA</b>	<b>154</b>	<b>100.0</b>	<b>152</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.7</b>		<b>1.3</b>		<b>0.0</b>
<i>Source: 2024 FFIEC Census Data 2024 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

**Table D-6**

2023 North 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	6.9	127	0.6	109	85.8	3,963	18.1
Moderate	6	20.7	3,355	15.3	571	17.0	3,763	17.1
Middle	11	37.9	9,733	44.4	1,177	12.1	3,890	17.7
Upper	8	27.6	8,405	38.3	413	4.9	10,326	47.1
Unknown	2	6.9	322	1.5	39	12.1	0	0.0
<b>Total AA</b>	<b>29</b>	<b>100.0</b>	<b>21,942</b>	<b>100.0</b>	<b>2,309</b>	<b>10.5</b>	<b>21,942</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,925	17	0.1	0.9	1,443	75.0	465	24.2
Moderate	9,178	2,878	12.9	31.4	4,709	51.3	1,591	17.3
Middle	19,145	9,662	43.5	50.5	6,387	33.4	3,096	16.2
Upper	13,828	9,551	43.0	69.1	3,018	21.8	1,259	9.1
Unknown	1,790	127	0.6	7.1	1,160	64.8	503	28.1
<b>Total AA</b>	<b>45,866</b>	<b>22,235</b>	<b>100.0</b>	<b>48.5</b>	<b>16,717</b>	<b>36.4</b>	<b>6,914</b>	<b>15.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	195	5.9	173	5.7	22	8.4	0	0.0
Moderate	668	20.1	601	19.9	58	22.2	9	20.0
Middle	1,394	42.0	1,246	41.3	123	47.1	25	55.6
Upper	992	29.9	926	30.7	56	21.5	10	22.2
Unknown	71	2.1	68	2.3	2	0.8	1	2.2
<b>Total AA</b>	<b>3,320</b>	<b>100.0</b>	<b>3,014</b>	<b>100.0</b>	<b>261</b>	<b>100.0</b>	<b>45</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.8</b>		<b>7.9</b>		<b>1.4</b>
	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	20	11.4	20	11.6	0	0.0	0	0.0
Middle	79	44.9	77	44.5	2	66.7	0	0.0
Upper	75	42.6	74	42.8	1	33.3	0	0.0
Unknown	1	0.6	1	0.6	0	0.0	0	0.0
<b>Total AA</b>	<b>176</b>	<b>100.0</b>	<b>173</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>		<b>1.7</b>		<b>0.0</b>
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.								

Western Oklahoma

**Table D-7**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: Western Oklahoma</b>													
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Owner Occupied Units %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Moderate</b>	0	0.0	21.3	0	0.0	19.3	0	0.0	22.9	0	0.0	20.9	14.5
<b>Middle</b>	0	0.0	35.2	0	0.0	28.9	2	66.7	33.1	262	60.5	29.3	45.9
<b>Upper</b>	0	0.0	43.6	0	0.0	51.8	1	33.3	44.0	171	39.5	49.8	39.6
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	433	100.0	100.0	100.0

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-8**

<b>Distribution of 2024 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Western Oklahoma</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Low</b>	0	0.0	0	0.0	0.0
<b>Moderate</b>	9	36.0	903	37.6	26.8
<b>Middle</b>	5	20.0	667	27.8	31.6
<b>Upper</b>	11	44.0	829	34.6	41.6
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	25	100.0	2,399	100.0	100.0

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-9**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Western Oklahoma</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>\$</b>	<b>%</b>	<b>\$</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>\$</b>	<b>%</b>	<b>\$</b>	
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	0	0.0	4.3	0	0.0	1.9	0	0.0	4.9	0	0.0	2.1	17.5
<b>Moderate</b>	0	0.0	11.9	0	0.0	7.7	0	0.0	14.4	0	0.0	9.4	14.5
<b>Middle</b>	0	0.0	20.1	0	0.0	18.6	0	0.0	14.6	0	0.0	13.0	17.4
<b>Upper</b>	0	0.0	37.7	0	0.0	44.2	2	66.7	37.0	351	81.1	42.3	50.6
<b>Unknown</b>	0	0.0	26.0	0	0.0	27.6	1	33.3	29.2	82	18.9	33.2	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	433	100.0	100.0	100.0

Source: 2024 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.  
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.

**Table D-10**

<b>Distribution of 2024 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Western Oklahoma</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	16	64.0	2,149	89.6	88.7
<b>Over \$1 Million</b>	0	0.0	0	0.0	9.0
<b>Revenue Unknown</b>	9	36.0	251	10.5	2.3
<b>Total</b>	25	100.0	2,399	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	19	76.0	879	36.6	
<b>\$100,001 - \$250,000</b>	4	16.0	599	25.0	
<b>\$250,001 - \$1 Million</b>	2	8.0	922	38.4	
<b>Total</b>	25	100.0	2,399	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	10	62.5	628	29.2	
<b>\$100,001 - \$250,000</b>	4	25.0	599	27.9	
<b>\$250,001 - \$1 Million</b>	2	12.5	922	42.9	
<b>Total</b>	16	100.0	2,149	100.0	

Source: 2024 FFIEC Census Data  
2024 Data & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-11**

2024 Western 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	1,267	17.5
Moderate	2	20.0	1,291	17.8	250	19.4	1,046	14.5
Middle	5	50.0	2,988	41.3	227	7.6	1,258	17.4
Upper	3	30.0	2,957	40.9	206	7.0	3,665	50.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>10</b>	<b>100.0</b>	<b>7,236</b>	<b>100.0</b>	<b>683</b>	<b>9.4</b>	<b>7,236</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,503	1,074	14.5	30.7	1,629	46.5	800	22.8
Middle	5,769	3,404	45.9	59.0	1,196	20.7	1,169	20.3
Upper	4,588	2,937	39.6	64.0	1,242	27.1	409	8.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>13,860</b>	<b>7,415</b>	<b>100.0</b>	<b>53.5</b>	<b>4,067</b>	<b>29.3</b>	<b>2,378</b>	<b>17.2</b>
	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	323	26.8	288	26.9	31	28.7	4	14.3
Middle	381	31.6	329	30.7	32	29.6	20	71.4
Upper	502	41.6	453	42.3	45	41.7	4	14.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,206</b>	<b>100.0</b>	<b>1,070</b>	<b>100.0</b>	<b>108</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>
Percentage of Total Businesses:				88.7	9.0	2.3		
	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	35	25.4	34	25.2	0	0.0	1	100.0
Middle	73	52.9	71	52.6	2	100.0	0	0.0
Upper	30	21.7	30	22.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>138</b>	<b>100.0</b>	<b>135</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				97.8	1.4	0.7		
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-12**

2023 Western 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	1,267	17.5
Moderate	2	20.0	1,291	17.8	250	19.4	1,046	14.5
Middle	5	50.0	2,988	41.3	227	7.6	1,258	17.4
Upper	3	30.0	2,957	40.9	206	7.0	3,665	50.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>10</b>	<b>100.0</b>	<b>7,236</b>	<b>100.0</b>	<b>683</b>	<b>9.4</b>	<b>7,236</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,503	1,074	14.5	30.7	1,629	46.5	800	22.8
Middle	5,769	3,404	45.9	59.0	1,196	20.7	1,169	20.3
Upper	4,588	2,937	39.6	64.0	1,242	27.1	409	8.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>13,860</b>	<b>7,415</b>	<b>100.0</b>	<b>53.5</b>	<b>4,067</b>	<b>29.3</b>	<b>2,378</b>	<b>17.2</b>
	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	331	26.1	299	26.4	27	25.5	5	16.7
Middle	392	30.9	339	29.9	32	30.2	21	70.0
Upper	546	43.0	495	43.7	47	44.3	4	13.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,269</b>	<b>100.0</b>	<b>1,133</b>	<b>100.0</b>	<b>106</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.3</b>		<b>8.4</b>		<b>2.4</b>
	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	35	24.6	34	24.5	0	0.0	1	100.0
Middle	77	54.2	75	54.0	2	100.0	0	0.0
Upper	30	21.1	30	21.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>142</b>	<b>100.0</b>	<b>139</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.9</b>		<b>1.4</b>		<b>0.7</b>
<i>Source: 2023 FFIEC Census Data 2023 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>								
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

Bexar County Metropolitan

**Table D-13**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography</b>													
<b>Assessment Area: Bexar County Metropolitan</b>													
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Owner Occupied Units %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Low</b>	0	0.0	2.4	0	0.0	2.3	0	0.0	1.9	0	0.0	1.3	4.9
<b>Moderate</b>	0	0.0	21.6	0	0.0	16.5	0	0.0	21.5	0	0.0	15.9	29.8
<b>Middle</b>	1	33.3	31.8	150	3.2	26.7	0	0.0	32.1	0	0.0	29.3	30.6
<b>Upper</b>	2	66.7	44.3	4,575	96.8	54.5	1	100.0	44.5	970	100.0	53.5	34.7
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	3	100.0	100.0	4,725	100.0	100.0	1	100.0	100.0	970	100.0	100.0	100.0

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-14**

<b>Distribution of 2024 Small Business Lending By Income Level of Geography</b>					
<b>Assessment Area: Bexar County Metropolitan</b>					
<b>Geographic Income Level</b>	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
<b>Low</b>	0	0.0	0	0.0	6.5
<b>Moderate</b>	0	0.0	0	0.0	28.3
<b>Middle</b>	1	50.0	218	21.4	25.6
<b>Upper</b>	1	50.0	800	78.6	39.3
<b>Unknown</b>	0	0.0	0	0.0	0.2
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	2	100.0	1,018	100.0	100.0

Source: 2024 FFIEC Census Data  
2024 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-15**

<b>Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level</b>													
<b>Assessment Area: Bexar County Metropolitan</b>													
<b>Borrower Income Level</b>	<b>Bank And Aggregate Loans By Year</b>												<b>Families by Family Income %</b>
	<b>2023</b>						<b>2024</b>						
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Low</b>	0	0.0	3.2	0	0.0	1.3	0	0.0	3.2	0	0.0	1.4	23.9
<b>Moderate</b>	0	0.0	15.1	0	0.0	10.5	0	0.0	14.3	0	0.0	9.7	17.9
<b>Middle</b>	0	0.0	21.2	0	0.0	18.6	0	0.0	19.6	0	0.0	16.5	19.6
<b>Upper</b>	0	0.0	33.3	0	0.0	41.6	0	0.0	31.2	0	0.0	37.3	38.6
<b>Unknown</b>	3	100.0	27.2	4,725	100.0	27.9	1	100.0	31.7	970	100.0	35.0	0.0
<b>Total</b>	3	100.0	100.0	4,725	100.0	100.0	1	100.0	100.0	970	100.0	100.0	100.0

Source: 2024 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.  
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.

**Table D-16**

<b>Distribution of 2024 Small Business Lending By Revenue Size of Businesses</b>					
<b>Assessment Area: Bexar County Metropolitan</b>					
	<b>Bank Loans</b>				<b>Total Businesses %</b>
	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	
<b>By Revenue</b>					
<b>\$1 Million or Less</b>	2	100.0	1,018	100.0	93.0
<b>Over \$1 Million</b>	0	0.0	0	0.0	6.1
<b>Revenue Unknown</b>	0	0.0	0	0.0	0.9
<b>Total</b>	2	100.0	1,018	100.0	100.0
<b>By Loan Size</b>					
<b>\$100,000 or Less</b>	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	1	50.0	218	21.4	
<b>\$250,001 - \$1 Million</b>	1	50.0	800	78.6	
<b>Total</b>	2	100.0	1,018	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>					
<b>\$100,000 or Less</b>	0	0.0	0	0.0	
<b>\$100,001 - \$250,000</b>	1	50.0	218	21.4	
<b>\$250,001 - \$1 Million</b>	1	50.0	800	78.6	
<b>Total</b>	2	100.0	1,018	100.0	

Source: 2024 FFIEC Census Data  
2024 Dori & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

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

**Table D-17**

2024 Bexar County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	9.3	28,772	6.8	9,445	32.8	100,692	23.9
Moderate	137	36.5	140,036	33.2	25,471	18.2	75,243	17.9
Middle	102	27.2	122,558	29.1	10,332	8.4	82,565	19.6
Upper	97	25.9	129,905	30.8	4,711	3.6	162,771	38.6
Unknown	4	1.1	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>375</b>	<b>100.0</b>	<b>421,271</b>	<b>100.0</b>	<b>49,959</b>	<b>11.9</b>	<b>421,271</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	52,666	18,604	4.9	35.3	28,356	53.8	5,706	10.8
Moderate	249,019	112,263	29.8	45.1	114,098	45.8	22,658	9.1
Middle	197,875	115,454	30.6	58.3	70,007	35.4	12,414	6.3
Upper	200,086	130,734	34.7	65.3	55,045	27.5	14,307	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>699,646</b>	<b>377,055</b>	<b>100.0</b>	<b>53.9</b>	<b>267,506</b>	<b>38.2</b>	<b>55,085</b>	<b>7.9</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5,127	6.5	4,532	6.2	553	11.5	42	5.7
Moderate	22,285	28.3	20,588	28.2	1,568	32.7	129	17.4
Middle	20,171	25.6	18,877	25.8	1,134	23.6	160	21.5
Upper	30,893	39.3	28,978	39.6	1,506	31.4	409	55.0
Unknown	172	0.2	131	0.2	38	0.8	3	0.4
<b>Total AA</b>	<b>78,648</b>	<b>100.0</b>	<b>73,106</b>	<b>100.0</b>	<b>4,799</b>	<b>100.0</b>	<b>743</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.0</b>		<b>6.1</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	12	1.7	12	1.7	0	0.0	0	0.0
Moderate	140	19.7	138	19.7	2	22.2	0	0.0
Middle	159	22.4	157	22.4	2	22.2	0	0.0
Upper	398	56.1	393	56.1	5	55.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>709</b>	<b>100.0</b>	<b>700</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.7</b>		<b>1.3</b>		<b>0.0</b>
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-18**

2023 Bexar County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	9.3	28,772	6.8	9,445	32.8	100,692	23.9
Moderate	137	36.5	140,036	33.2	25,471	18.2	75,243	17.9
Middle	102	27.2	122,558	29.1	10,332	8.4	82,565	19.6
Upper	97	25.9	129,905	30.8	4,711	3.6	162,771	38.6
Unknown	4	1.1	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>375</b>	<b>100.0</b>	<b>421,271</b>	<b>100.0</b>	<b>49,959</b>	<b>11.9</b>	<b>421,271</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	52,666	18,604	4.9	35.3	28,356	53.8	5,706	10.8
Moderate	249,019	112,263	29.8	45.1	114,098	45.8	22,658	9.1
Middle	197,875	115,454	30.6	58.3	70,007	35.4	12,414	6.3
Upper	200,086	130,734	34.7	65.3	55,045	27.5	14,307	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>699,646</b>	<b>377,055</b>	<b>100.0</b>	<b>53.9</b>	<b>267,506</b>	<b>38.2</b>	<b>55,085</b>	<b>7.9</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5,271	6.4	4,662	6.1	567	11.3	42	5.5
Moderate	22,765	27.8	21,011	27.6	1,621	32.4	133	17.4
Middle	20,987	25.6	19,650	25.8	1,180	23.6	157	20.5
Upper	32,650	39.9	30,632	40.3	1,588	31.8	430	56.1
Unknown	179	0.2	133	0.2	42	0.8	4	0.5
<b>Total AA</b>	<b>81,852</b>	<b>100.0</b>	<b>76,088</b>	<b>100.0</b>	<b>4,998</b>	<b>100.0</b>	<b>766</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.0</b>		<b>6.1</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	13	1.7	13	1.8	0	0.0	0	0.0
Moderate	143	19.2	141	19.1	2	22.2	0	0.0
Middle	168	22.5	166	22.5	2	22.2	0	0.0
Upper	422	56.6	417	56.6	5	55.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>746</b>	<b>100.0</b>	<b>737</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.8</b>		<b>1.2</b>		<b>0.0</b>
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 E – OTHER FULL-SCOPE REVIEW ASSESSMENT AREA TABLES**

Tarrant County Metropolitan

**Table E-1**

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Tarrant County Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	2.8	0	0.0	3.0	0	0.0	2.8	0	0.0	2.3	2.7
Moderate	0	0.0	16.4	0	0.0	13.2	0	0.0	17.7	0	0.0	13.8	20.5
Middle	0	0.0	35.9	0	0.0	30.7	0	0.0	35.6	0	0.0	30.4	35.8
Upper	1	100.0	44.5	4,350	100.0	52.9	0	0.0	43.5	0	0.0	53.1	40.6
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0	0.0	0.3	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,350</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 FFIEC Census Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.  
The bank's HMDA origination volume with 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.

**Table E-2**

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Tarrant County Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	2.8	0	0.0	1.2	0	0.0	3.5	0	0.0	1.6	21.2
Moderate	0	0.0	14.6	0	0.0	9.9	0	0.0	14.6	0	0.0	10.0	17.6
Middle	0	0.0	22.0	0	0.0	18.8	0	0.0	21.2	0	0.0	18.4	20.2
Upper	1	100.0	36.0	4,350	100.0	45.7	0	0.0	33.7	0	0.0	42.5	41.0
Unknown	0	0.0	24.6	0	0.0	24.3	0	0.0	26.9	0	0.0	27.6	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,350</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2024 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.  
The bank's HMDA origination volume with 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.

## **APPENDIX F – GLOSSARY**

**Aggregate lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

**Census tract:** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

**Consumer loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, 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.