



## **PUBLIC DISCLOSURE**

July 21, 2025

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

FNB Coweta  
RSSD# 61953

106 South Broadway  
Coweta, Oklahoma 74429

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**

FNB Coweta (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- 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.

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. In addition, available aggregate data for the most recent three years (2021, 2022, and 2023) was referenced for additional perspective to gauge credit demand within the bank's AA. Lending performance was assessed within the bank's single AA. Examiners reviewed the following data:

- The bank's 16-quarter average NLTD ratio,
- The universe of 75 small business loans originated between August 31, 2021 and December 31, 2024,
- The universe of 22 home mortgage loans originated between August 31, 2021 and December 31, 2024, and
- The universe of 51 motor vehicle loans originated between August 31, 2021 and December 31, 2024

Greater weight was placed on small business lending performance in this evaluation as commercial lending is the bank's primary business focus and comprises the largest portion of the loan portfolio.

## DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of First Coweta Corporation.
- The bank has total assets of \$118.1 million as of March 31, 2025.
- In addition to its main office in Coweta, Oklahoma, which does not maintain an automated teller machine (ATM), the bank also operates a drive-thru-only branch with an on-site, cash-only ATM located in Coweta.
- In September 2023, the bank closed a full-service branch and on-site ATM located in Broken Arrow, Oklahoma (Oneta Branch).
- As shown in the table below, the bank's primary business focus is commercial lending.

**Table 1**

Composition of Loan Portfolio as of March 31, 2025		
Loan Type	\$(000)	
Construction and Land Development	8,908	14.4
Farmland	2,451	4.0
1-4 Family Residential Real Estate	11,251	18.2
Multifamily Residential Real Estate	2,708	4.4
Non-Farm Non-Residential Real Estate	21,597	34.9
Agricultural	1,514	2.4
Commercial and Industrial	12,120	19.6
Consumer	1,292	2.1
Other	60	0.1
<b>Gross Loans</b>	<b>61,901</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its August 30, 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.

## DESCRIPTION OF ASSESSMENT AREA

The bank's Tulsa Metropolitan AA consists of western portions of Wagoner County, which is one of seven counties comprising the Tulsa, Oklahoma Metropolitan Statistical Area (see Appendix A for an AA map and Appendix B for additional demographic data).

- There have been no changes to the bank's AA delineation since the prior evaluation.
- The AA is comprised of a total of 20 census tracts, including 1 moderate-, 10 middle-, and 9 upper-income tract tracts. This represents a change from the prior examination, when the AA was comprised of a total of 17 census tracts, including 12 middle- and 5 upper-income census tracts.
- According to the June 30, 2024 FDIC Deposit Market Share Report, the bank's total market share in the area was 17.3 percent, ranking 3<sup>rd</sup> of 9 FDIC-insured financial institutions operating from 11 offices in the AA.
- One interview with a member of the community within the bank's AA was conducted to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member is affiliated with a local economic development agency.

**Table 2**

<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	75,391	80,981	7.4
Tulsa, OK MSA	962,676	1,015,331	5.5
Oklahoma	3,849,733	3,959,353	2.8
<i>Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>			

- The AA experienced population growth that outpaced the entire MSA, as well as the state of Oklahoma. The larger population growth is attributed to Wagoner County's proximity to big city amenities while remaining more affordable.
- Area demographics reflect a higher concentration of residents aged 65 and older at 22.1 percent of the AA's total population, compared to the statewide figure of 15.7 percent, and the non-MSA Kansas figure of 18.6 percent.
- The community contact stated that nearly 40.0 percent of Wagoner County's population lives in the city of Broken Arrow. In addition, unincorporated areas of the county had new housing development levels comparable to the city of Tulsa, signaling strong residential growth.

**Table 3**

Median Family Income Change Assessment Area: Tulsa Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Tulsa Metropolitan	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. All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.			

- The concentration of AA families with income levels below poverty, at 5.6 percent, was significantly lower than the overall statewide figure of 11.3 percent, while the larger Tulsa MSA reflected a figure of 10.4 percent.
- Of the families living in the AA, 29.8 percent were designated as LMI, which is significantly lower than both the statewide and Tulsa MSA figures of 39.1 percent each.
- The median family income in the AA, at \$79,407, is 17.6 percent higher than the statewide median at \$67,511.

**Table 4**

Housing Cost Burden Assessment Area: Tulsa Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Tulsa Metropolitan	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 All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.						

- The AA's median housing value of \$169,958 is 19.4 percent higher than the statewide figure of \$142,400.
- Of the AA's total housing units, 76.6 percent are owner-occupied units, which is significantly higher than the statewide figure of 56.7 percent.
- The AA's housing affordability ratio<sup>1</sup> of 42.5 percent is slightly higher than the statewide figure of 37.8 percent.

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

- Approximately 37.4 percent of renters in the AA had rent costs greater than 30.0 percent of their income.

**Table 5**

Unemployment Rates					
Assessment Area: Tulsa Metropolitan					
Area	2020	2021	2022	2023	2024
Tulsa Metropolitan	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  
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- Most recent unemployment figures suggest a highly stable job market within the AA and entire Tulsa MSA, as well as throughout the state of Oklahoma.
- Major industries found in the area include manufacturing, retail trade, and construction.
- The community contact stated that while the retail sector in Coweta is lacking, infrastructure is being built out and economic development projects are underway to support and encourage long-term growth.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank's overall lending test performance is Satisfactory. This conclusion was based on a reasonable NLTD, a majority of loans originated within the bank's AA, as well as reasonable geographic distribution of lending and borrower distribution of lending.

The evaluation assessed small business loans, home mortgage loans, and motor vehicle loans originated since the last evaluation; August 31, 2021 through December 31, 2024. Loan data for 2022 through 2024 were combined and evaluated aggregately within the AA and compared to 2024 demographic data. The volume of small business loans originated in 2021 was too low to conduct a meaningful analysis and was therefore not included in this evaluation.

In addition, available CRA and HMDA aggregate data for the most recent three years (2021, 2022, and 2023) was referenced. While not a direct comparison to the bank's performance, as the bank is neither a CRA nor HMDA reporter, aggregate loan data provides a relevant proxy to understand area lending performance in light of local conditions and competition that may impact financial institutions originating loans in the AA.

### 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 FDIC-insured institutions. The similarly-situated institutions were selected based on asset size, loan portfolio composition, and geographic proximity.

The bank's NLTD ratio is reasonable. The bank's 16-quarter average NLTD ratio of 45.7 percent was within the range of the five similarly situated institutions with ratios ranging from 35.8 percent to 92.1 percent.

**Table 6**

Comparative NLTD Ratios [09/30/2021-03/31/2025]			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			16-Quarter Average
FNB Coweta	Coweta, OK	118,147	45.7
<b>Similarly Situated Institutions</b>			
First National Bank and Trust of Broken Arrow	Broken Arrow, OK	251,202	68.2
Oklahoma Capital Bank	Tulsa, OK	156,828	92.1
Exchange Bank	Skiatook, OK	152,106	42.5
Spiro State Bank	Spiro, OK	87,387	35.8
Patrons Bank, National Association	Okmulgee, OK	288,528	63.2

### Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. A majority of the bank's total loans, by number, were originated inside the AA; however, a majority of the bank's total loans, by dollar, were originated outside the AA, particularly for small business loans.

The volume of lending occurring outside of the AA is primarily due to the bank's participation in a national program that provides financing solutions for healthcare and legal professionals. As such, 23 of the 45 small business loans originated outside of the AA are attributed to this program. Lending activity outside the AA is reasonable given the bank's close proximity to Tulsa County, a major metropolitan area where many Wagoner residents commute to for work.



**Table 7**

<b>Lending Inside and Outside the Assessment Area</b>								
<b>Loan Type</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>#</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>
MV - Motor Vehicle	40	78.4	1,146	82.8	11	21.6	238	17.2
RL - Residential Loans	16	72.7	2,558	76.4	6	27.3	792	23.6
SB – Small Business	30	40.0	3,311	28.0	45	60.0	8,517	72.0
<b>Total Loans</b>	<b>86</b>	<b>58.1</b>	<b>7,015</b>	<b>42.4</b>	<b>62</b>	<b>41.9</b>	<b>9,547</b>	<b>57.6</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

## **Geographic Distribution of Loans**

This performance criterion evaluates the bank's distribution of lending within its AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts throughout the AA.

An analysis of lending dispersion was conducted and revealed conspicuous gaps and lapses in the AA's single moderate-income census tract; however, this did not impact the overall conclusion given the bank's distance from the moderate-income census tract and the presence of other financial institutions within or near the census tract.

### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank did not originate any home mortgage loans in the AA's single moderate-income tract. Lending performance was comparable to the demographic figure (percentage of owner-occupied units in the tract) of 2.7 percent, and aggregate data shows that just 0.9 percent of loans by number volume and 0.7 percent of loans by dollar volume were originated in the moderate-income tract over the three-year period.

**Table 8**

Distribution of 2023 and 2024 Residential Lending By Income Level of Geography									
Assessment Area: Tulsa Metropolitan									
Geographic Income Level	Bank Loans By Year								Owner Occupied Units %
	2023				2024				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	2.7
Middle	1	33.3	137	37.2	4	50.0	709	37.8	44.0
Upper	2	66.7	231	62.8	4	50.0	1,168	62.2	53.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0	
Total	3	100.0	368	100.0	8	100.0	1,877	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.									

**Table 9**

Distribution of 2022 Residential Lending By Income Level of Geography					
Assessment Area: Tulsa Metropolitan					
Geographic Income Level	Bank Loans				Owner Occupied Units %
	#	#%	\$(000)	\$%	
<b>Low</b>	0	0.0	0	0.0	0.0
<b>Moderate</b>	0	0.0	0	0.0	2.7
<b>Middle</b>	4	80.0	252	80.3	44.0
<b>Upper</b>	1	20.0	62	19.7	53.3
<b>Unknown</b>	0	0.0	0	0.0	0.0
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	5	100.0	314	100.0	100.0
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

### Small Business Lending

The geographic distribution of small business lending is reasonable. The bank did not originate any small business loans in the AA's single moderate-income tract. Lending performance was comparable to the demographic figure (percentage of businesses operating in the tract) of 2.4 percent, and aggregate data shows that just 1.2 percent of

loans by number volume and 0.4 percent by dollar volume were originated in the moderate-income tract over the three-year period.

**Table 10**

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography													
Assessment Area: Tulsa Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	2.0	0	0.0	0.9	0	0.0	1.2	0	0.0	0.4	2.4
Middle	2	20.0	36.0	41	3.1	30.9	1	8.3	32.8	240	25.5	35.2	39.8
Upper	8	80.0	62.0	1,262	96.9	68.2	11	91.7	65.9	701	74.5	64.4	57.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Trct - Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	1,303	100.0	100.0	12	100.0	100.0	941	100.0	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 11**

Distribution of 2022 Small Business Lending By Income Level of Geography							
Assessment Area: Tulsa Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.3	0	0.0	0.4	2.4
Middle	1	20.0	37.9	16	1.9	47.4	41.6
Upper	4	80.0	60.8	840	98.1	52.2	56.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	856	100.0	100.0	100.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table 12**

Distribution of 2021 Small Business Lending By Income Level of Geography							
Assessment Area: Tulsa Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	100.0	69.7	210	100.0	73.7	69.6
Upper	0	0.0	30.3	0	0.0	26.3	30.4
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>210</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

### Motor Vehicle Lending

The geographic distribution of motor vehicle lending is reasonable. Lending in the moderate-income tract was comparable to both the demographic figure and aggregate lending data.

**Table 13**

Distribution of 2023 and 2024 Motor Vehicle Lending By Income Level of Geography									
Assessment Area: Tulsa Metropolitan									
Geographic Income Level	Bank Loans By Year								Household s %
	2023				2024				
	#	#%	\$(000)	%	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	3.8
Middle	6	42.9	89	33.0	12	63.2	607	88.6	48.0
Upper	8	57.1	181	67.0	7	36.8	77	11.2	48.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	0	0.0	1	0.1	
Total	14	100.0	270	100.0	19	100.0	685	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.									

**Table 14**

Distribution of 2022 Motor Vehicle Lending By Income Level of Geography					
Assessment Area: Tulsa Metropolitan					
Geographic Income Level	Bank Loans				Households %
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	3.8
Middle	2	28.6	16	8.4	48.0
Upper	5	71.4	175	91.6	48.2
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>191</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

## **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 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. Combined borrower distribution of home mortgage loans to low- and moderate-income borrowers, at 31.3 percent, was comparable to the demographic figure (percentage of families of the same income level living within the AA) of 29.9 percent.

**Table 15**

Distribution of 2023 and 2024 Residential Lending By Borrower Income Level									
Assessment Area: Tulsa Metropolitan									
Borrower Income Level	Bank Loans By Year								Families by Family Income %
	2023				2024				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	2	25.0	187	10.0	13.4
Moderate	0	0.0	0	0.0	1	12.5	292	15.6	16.5
Middle	2	66.7	286	77.7	1	12.5	65	3.5	21.9
Upper	1	33.3	82	22.3	4	50.0	1,333	71.0	48.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Total	3	100.0	368	100.0	8	100.0	1,877	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.									

**Table 16**

Distribution of 2022 Residential Lending By Borrower Income Level					
Assessment Area: Tulsa Metropolitan					
Borrower Income Level	Bank Loans				Families by Family Income %
	#	#%	\$(000)	\$%	
Low	1	20.0	50	15.9	13.4
Moderate	1	20.0	39	12.4	16.5
Middle	2	40.0	163	51.9	21.9
Upper	1	20.0	62	19.7	48.3
Unknown	0	0.0	0	0.0	0.0
Total	5	100.0	314	100.0	100.0
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

### Small Business Lending

The borrower distribution of small business lending is reasonable. While the bank's lending to businesses with revenues of \$1MM or less was below demographic figure (percentage of total businesses operating in the AA with revenues of \$1MM or less), aggregate data shows that 56.6 percent of small business loans were made to businesses with revenues of \$1MM or less. Additionally, 70.0 percent of loans originated to small businesses were in amounts of \$100,000 or less, which are amounts typically associated with the credit demands of smaller businesses and further demonstrates the bank's willingness to meet AA credit needs.

**Table 17**

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses														
Assessment Area: Tulsa Metropolitan														
	Bank And Aggregate Loans By Year												Total Businesses %	
	2023						2024							
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
By Revenue														
\$1 Million or Less	6	60.0	63.9	281	21.6	43.7	4	33.3	57.4	337	35.8	39.6	94.7	
Over \$1 Million	4	40.0		1,022	78.4		8	66.7		604	64.2		3.8	
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.6	
Total	10	100.0		1,303	100.0		12	100.0		941	100.0		100.0	
By Loan Size														
\$100,000 or Less	8	80.0	95.5	296	22.7	52.7	8	66.7	95.5	275	29.2	51.4		
\$100,001 - \$250,000	1	10.0	3.3	109	8.4	21.9	4	33.3	2.8	667	70.9	18.4		
\$250,001 - \$1 Million	1	10.0	1.2	898	68.9	25.4	0	0.0	1.7	0	0.0	30.2		
Total	10	100.0	100.0	1,303	100.0	100.0	12	100.0	100.0	941	100.0	100.0		
By Loan Size and Revenues \$1 Million or Less														
\$100,000 or Less	5	83.3		172	61.2		2	50.0		36	10.7			
\$100,001 - \$250,000	1	16.7		109	38.8		2	50.0		301	89.3			
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0			
Total	6	100.0		281	100.0		4	100.0		337	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 18**

Distribution of 2022 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Tulsa Metropolitan							
	Bank And Aggregate Loans						Total
	Bank		Agg	Bank		Agg	Businesses
	#	#%	#%	\$(000)	\$%	\$%	%
By Revenue							
\$1 Million or Less	2	40.0	59.8	117	13.7	41.0	95.1
Over \$1 Million	3	60.0		739	86.3		3.5
Revenue Unknown	0	0.0		0	0.0		1.3
Total	5	100.0		856	100.0		100.0
By Loan Size							
\$100,000 or Less	3	60.0	95.4	72	8.4	47.3	
\$100,001 - \$250,000	1	20.0	2.6	101	11.8	14.5	
\$250,001 - \$1 Million	1	20.0	2.0	684	79.9	38.2	
Total	5	100.0	100.0	856	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	1	50.0		16	13.7		
\$100,001 - \$250,000	1	50.0		101	86.3		
\$250,001 - \$1 Million	0	0.0		0	0.0		
Total	2	100.0		117	100.0		
Source: 2022 FFIEC Census Data							
2022 Dun & Bradstreet Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



**Table 19**

<b>Distribution of 2021 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: Tulsa Metropolitan</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	<b>Businesses</b>
	<b>#</b>	<b>#%</b>	<b>#%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>%</b>
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	2	66.7	46.1	179	85.2	36.2	95.4
<b>Over \$1 Million</b>	1	33.3		32	15.2		3.6
<b>Revenue Unknown</b>	0	0.0		0	0.0		1.0
<b>Total</b>	3	100.0		210	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	2	66.7	95.4	45	21.4	49.0	
<b>\$100,001 - \$250,000</b>	1	33.3	2.1	165	78.6	11.8	
<b>\$250,001 - \$1 Million</b>	0	0.0	2.5	0	0.0	39.2	
<b>Total</b>	3	100.0	100.0	210	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	1	50.0		14	7.8		
<b>\$100,001 - \$250,000</b>	1	50.0		165	92.2		
<b>\$250,001 - \$1 Million</b>	0	0.0		0	0.0		
<b>Total</b>	2	100.0		179	100.0		
Source: 2021 FFIEC Census Data							
2021 Dun & Bradstreet Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

### Motor Vehicle Lending

The borrower distribution of motor vehicle lending is excellent. The combined borrower distribution loans to low- and moderate-income borrowers, at 60.0 percent, was above the demographic figure (percentage of households of the same income level living within the AA) of 28.8 percent.

**Table 20**

Distribution of 2023 and 2024 Motor Vehicle Lending By Borrower Income Level									
Assessment Area: Tulsa Metropolitan									
Borrower Income Level	Bank Loans By Year								Households by Household Income %
	2023				2024				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	
Low	4	28.6	43	15.9	9	47.4	539	78.7	15.0
Moderate	3	21.4	67	24.8	4	21.1	53	7.7	13.8
Middle	5	35.7	130	48.1	5	26.3	64	9.3	18.4
Upper	2	14.3	29	10.7	1	5.3	29	4.2	52.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0
Total	14	100.0	270	100.0	19	100.0	685	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.									

**Table 21**

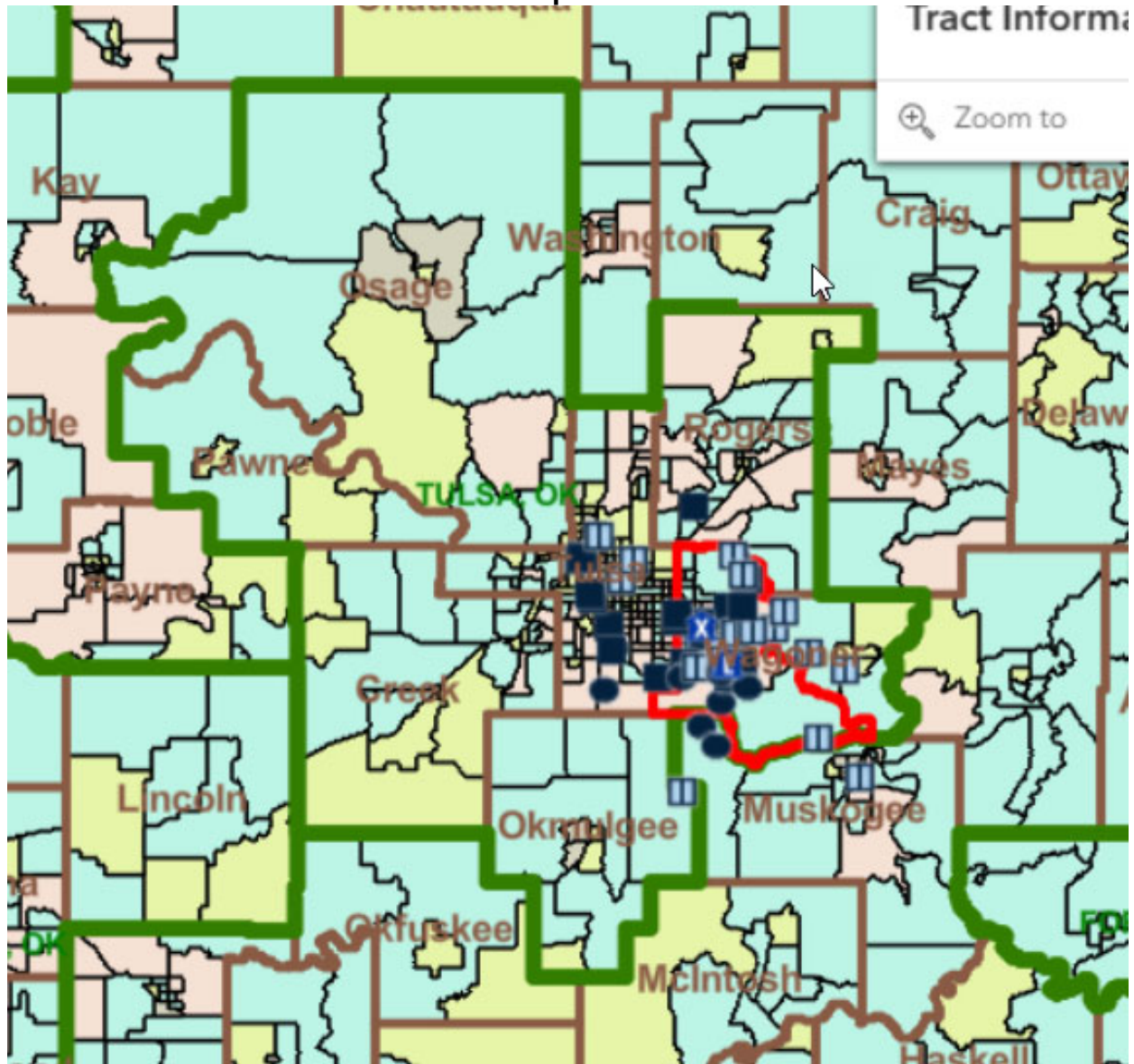
Distribution of 2022 Motor Vehicle Lending By Borrower Income Level					
Assessment Area: Tulsa Metropolitan					
Borrower Income Level	Bank Loans				Households by Household Income %
	#	#%	\$(000)	\$%	
Low	3	42.9	50	26.2	15.0
Moderate	1	14.3	52	27.2	13.8
Middle	1	14.3	18	9.4	18.4
Upper	2	28.6	71	37.2	52.8
Unknown	0	0.0	0	0.0	0.0
Total	7	100.0	191	100.0	100.0
Source: 2022 FFIEC Census Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

## FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

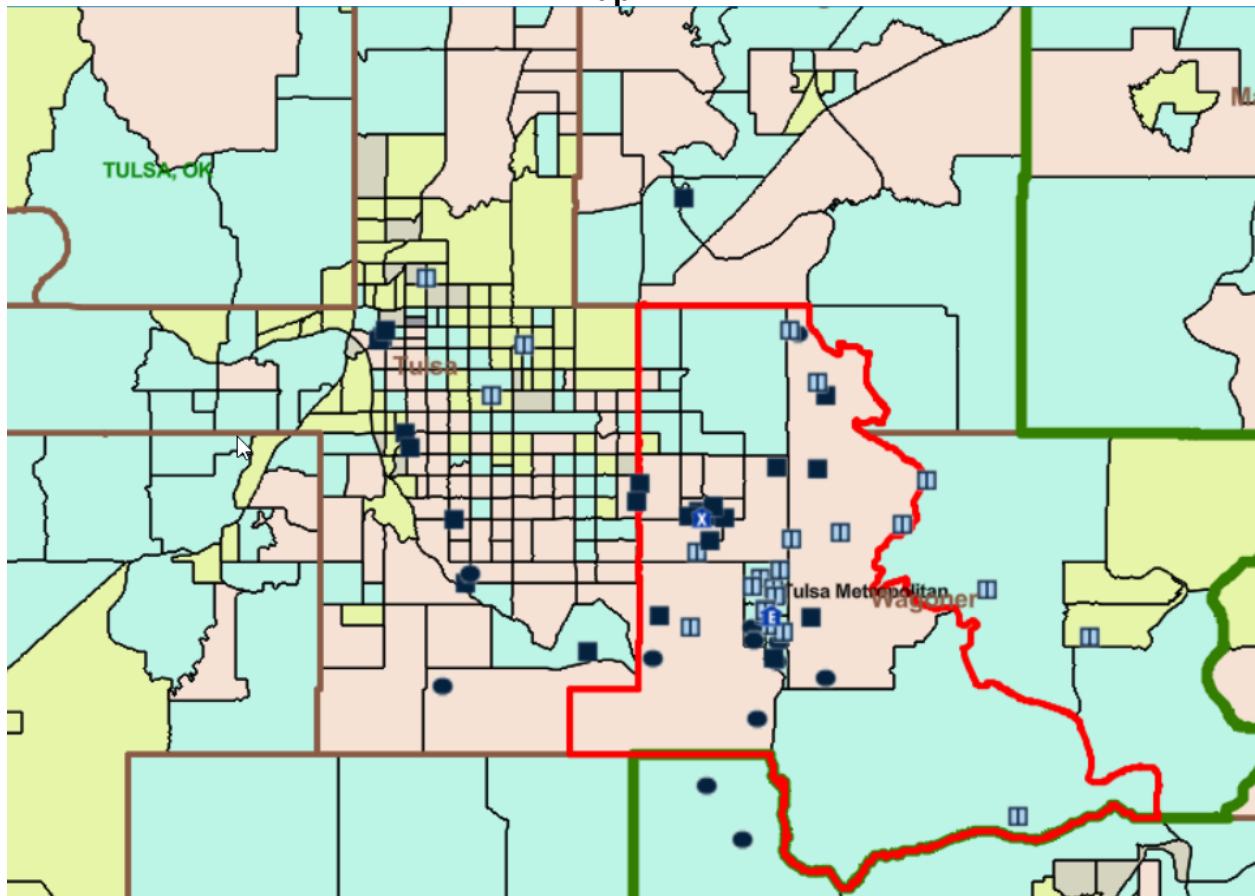
Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited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

APPENDIX A – MAP OF THE ASSESSMENT AREA

Map A-1



Map A-2



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-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	
	#	%	#	%	#	%	#	%
	0	0.0	0	0.0	0	0.0	2,237	13.4
	1	5.0	610	3.6	111	18.2	2,755	16.5
	10	50.0	7,387	44.1	591	8.0	3,662	21.9
	9	45.0	8,736	52.2	232	2.7	8,079	48.3
	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	20	100.0	16,733	100.0	934	5.6	16,733	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
	0	0	0.0	0.0	0	0.0	0	0.0
	998	511	2.7	51.2	366	36.7	121	12.1
	11,818	8,262	44.0	69.9	2,751	23.3	805	6.8
	11,684	9,993	53.3	85.5	1,055	9.0	636	5.4
	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	24,500	18,766	100.0	76.6	4,172	17.0	1,562	6.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
	0	0.0	0	0.0	0	0.0	0	0.0
	38	2.4	35	2.3	2	3.3	1	4.0
	635	39.8	600	39.7	25	41.7	10	40.0
	922	57.8	875	57.9	33	55.0	14	56.0
	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,595	100.0	1,510	100.0	60	100.0	25	100.0
Percentage of Total Businesses:				94.7		3.8		1.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
	0	0.0	0	0.0	0	0.0	0	0.0
	0	0.0	0	0.0	0	0.0	0	0.0
	27	46.6	27	46.6	0	0.0	0	0.0
	31	53.4	31	53.4	0	0.0	0	0.0
	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	58	100.0	58	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
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 B-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	
	#	%	#	%	#	%	#	%
	0	0.0	0	0.0	0	0.0	2,237	13.4
ate	1	5.0	610	3.6	111	18.2	2,755	16.5
e	10	50.0	7,387	44.1	591	8.0	3,662	21.9
	9	45.0	8,736	52.2	232	2.7	8,079	48.3
own	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	20	100.0	16,733	100.0	934	5.6	16,733	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
	0	0	0.0	0.0	0	0.0	0	0.0
ate	998	511	2.7	51.2	366	36.7	121	12.1
e	11,818	8,262	44.0	69.9	2,751	23.3	805	6.8
	11,684	9,993	53.3	85.5	1,055	9.0	636	5.4
own	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	24,500	18,766	100.0	76.6	4,172	17.0	1,562	6.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
	0	0.0	0	0.0	0	0.0	0	0.0
ate	39	2.2	37	2.2	1	1.5	1	3.8
e	752	42.0	711	41.9	29	42.6	12	46.2
	1,000	55.8	949	55.9	38	55.9	13	50.0
own	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,791	100.0	1,697	100.0	68	100.0	26	100.0
Percentage of Total Businesses:				94.8		3.8		1.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
	0	0.0	0	0.0	0	0.0	0	0.0
ate	0	0.0	0	0.0	0	0.0	0	0.0
e	28	44.4	28	44.4	0	0.0	0	0.0
	35	55.6	35	55.6	0	0.0	0	0.0
own	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	63	100.0	63	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-3

2022 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,237	13.4
Moderate	1	5.0	610	3.6	111	18.2	2,755	16.5
Middle	10	50.0	7,387	44.1	591	8.0	3,662	21.9
Upper	9	45.0	8,736	52.2	232	2.7	8,079	48.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	20	100.0	16,733	100.0	934	5.6	16,733	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	998	511	2.7	51.2	366	36.7	121	12.1
Middle	11,818	8,262	44.0	69.9	2,751	23.3	805	6.8
Upper	11,684	9,993	53.3	85.5	1,055	9.0	636	5.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	24,500	18,766	100.0	76.6	4,172	17.0	1,562	6.4
	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	46	2.4	44	2.4	1	1.5	1	3.8
Middle	805	41.6	764	41.5	29	42.6	12	46.2
Upper	1,086	56.1	1,035	56.2	38	55.9	13	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,937	100.0	1,843	100.0	68	100.0	26	100.0
Percentage of Total Businesses:				95.1		3.5		1.3
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	30	41.1	30	41.1	0	0.0	0	0.0
Upper	43	58.9	43	58.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	73	100.0	73	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau; American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-4

2021 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,062	12.8
Moderate	0	0.0	0	0.0	0	0.0	2,792	17.4
Middle	12	70.6	11,095	69.0	817	7.4	3,762	23.4
Upper	5	29.4	4,979	31.0	185	3.7	7,458	46.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	17	100.0	16,074	100.0	1,002	6.2	16,074	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	15,815	11,795	68.3	74.6	2,886	18.2	1,134	7.2
Upper	6,391	5,487	31.7	85.9	544	8.5	360	5.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	22,206	17,282	100.0	77.8	3,430	15.4	1,494	6.7
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1,365	69.6	1,299	69.4	56	80.0	10	50.0
Upper	597	30.4	573	30.6	14	20.0	10	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	1,962	100.0	1,872	100.0	70	100.0	20	100.0
Percentage of Total Businesses:				95.4		3.6		1.0
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	63	86.3	62	86.1	1	100.0	0	0.0
Upper	10	13.7	10	13.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	73	100.0	72	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau; American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								



## APPENDIX C – 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.