



## **PUBLIC DISCLOSURE**

July 28, 2025

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

Mabrey Bank  
RSSD# 139553

14821 South Memorial Drive  
Bixby, Oklahoma 74008

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

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

Major factors supporting the rating include:

**Lending Test**

- Lending levels reflect adequate responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- A high percentage of the bank's loans are originated within its delineated AAs.
- The bank's distribution of loans by income level of geography (geographic distribution) is adequate.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes (borrower distribution) is adequate.
- The bank makes an adequate level of community development (CD) loans.

**Investment Test**

- The bank makes a significant level of qualified CD investments and grants and is occasionally in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits good responsiveness to credit and CD needs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels in its AAs.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- The bank is a leader in providing CD services and is responsive to the available service opportunities.

**INSTITUTION****DESCRIPTION OF INSTITUTION**

The bank is an interstate financial institution headquartered in Bixby, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Mabrey Bancorporation, Inc.
- The bank has total assets of \$1.9 billion as of March 31, 2025.
- As of December 31, 2024, the bank operates 14 full-service banking facilities and one limited-service branch throughout its three delineated AAs in Oklahoma. These are the Tulsa Metropolitan AA, the Oklahoma City Metropolitan AA, and the Eastern Oklahoma Nonmetropolitan AA.
- All but two branches have cash-dispensing automated teller machines (ATMs) onsite, as well as five stand-alone ATMs in the Tulsa Metropolitan AA.
- As shown in the table below, the bank's primary business focus is commercial lending followed by residential real estate lending.
- There has been no merger or acquisition activity since the prior evaluation.

**Table 1**

Composition of Loan Portfolio as of March 31, 2025		
Loan Type	\$(000)	%
Construction and Land Development	102,786	7.6
Farmland	46,433	3.4
1- to 4-Family Residential Real Estate	370,677	27.5
Multifamily Residential Real Estate	32,195	2.4
Nonfarm Nonresidential Real Estate	463,741	34.4
Agricultural	11,683	0.9
Commercial and Industrial	283,408	21.0
Consumer	23,595	1.7
Other	14,476	1.1
Gross Loans	<b>1,348,994</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 Community Reinvestment Act (CRA) at its June 12, 2023 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.

**SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large 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. Performance was assessed within the bank's three AAs. The Tulsa Metropolitan and Eastern Oklahoma Nonmetropolitan AAs were assessed using a full-scope review. The Oklahoma City Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank's small business and small farm loans reported on the bank's 2023 and 2024 CRA LARs;
- CD loans originated from January 1, 2023 to December 31, 2024.
- Qualified investments that were made from January 1, 2023 to December 31, 2024, qualified investments made prior to but still outstanding during this period, and qualified grants and donations made during this period; and,
- Retail banking services and CD services from January 1, 2023 to December 31, 2024.

Small business lending carried more weight in the analysis based on the higher volumes of loans by both number and dollar volume compared to the bank's home mortgage lending. Small farm lending performance carried the least weight in the conclusion of performance based on having lower lending volumes in comparison to the other two products.

In addition, more emphasis was placed on the bank's lending performance in comparison to aggregate lending data, as it is an indicator of credit demand and numbers of individuals served within the AA. Lending was also compared to demographic data to understand the level of available credit opportunities present throughout the bank's AAs.

CRA aggregate lending data for 2023 was the most recent publicly available data for small business and small farm lending at the time of the evaluation. As a result, the bank's 2023 small business and small farm lending performance is discussed in detail within the applicable sections that follow. The discussion of the bank's small business and small farm lending performance for 2024 was limited but provided support to the overall rating during the evaluation period.

Table 2 illustrates the bank's presence in each AA by number of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank's June 30, 2024 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

**Table 2**

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank's Lending by \$ <sup>1</sup>		Percent of Bank's Deposits by \$ <sup>2</sup>		Deposit Market Share	
			Bank	State	Bank	State	% Market Share <sup>2</sup>	Market Share Rank <sup>3</sup>
State of Oklahoma		15	100.0	100.0	100.00	100.00	2.0	7 of 94
Tulsa Metropolitan	Full	10	69.7	69.7	85.1	85.1	4.2	4 of 55
Oklahoma City Metropolitan	Limited	1	6.1	6.1	5.2	5.2	0.2	42 of 59
Eastern Oklahoma	Full	4	24.2	24.2	9.7	9.7	6.4	6 of 15
<sup>1.</sup> Based on the bank's HMDA, small business, and small farm lending used in the analysis. <sup>2.</sup> Based on the June 30, 2024 FDIC's Deposit Market Share Report. <sup>3.</sup> Based on the bank's ranking among FDIC-insured financial institutions in each AA.								

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Tulsa Metropolitan AA and the Eastern Oklahoma Nonmetropolitan AA. Lending data for the Oklahoma City Metropolitan AA that received a limited-scope review is located in Appendix E.

## LENDING TEST

The bank's overall lending test performance is low satisfactory. The lending test performance for the Tulsa Metropolitan AA is rated adequate, while the Eastern Oklahoma Nonmetropolitan AA is rated good.

In both of the AAs subject to full-scope reviews, the volume of individual HMDA loan products, such as home improvement or multifamily loans, was too low to render a meaningful analysis; thus, in some instances, these loan products are only discussed as part of the total HMDA lending for the geographic and borrower distribution analyses.

### Lending Activity

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect adequate responsiveness to AA credit needs. Table 3 provides a detailed summary of the loan products and volumes evaluated during the review period.

**Table 3**

Summary of Lending Activity Reviewed				
Loan Type	2023 and 2024			
	#	\$(000)	#%	\$%
Home Purchase	317	102,925	--	--
Home Improvement	34	2,577	--	--
Multifamily Housing	20	26,042	--	--
Other Purpose Closed-End	24	2,816	--	--
Refinancing	73	19,562	--	--
<b>Total HMDA Loans</b>	<b>468</b>	<b>153,922</b>	<b>29.0</b>	<b>44.0</b>
Small Business Loans	855	175,948	53.0	50.0
Small Farms Loans	288	23,719	18.0	7.0
<b>Total Loans</b>	<b>1,611</b>	<b>353,589</b>	<b>100.0</b>	<b>100.0</b>

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including to LMI borrowers. For this evaluation, the bank did not provide any lending that was considered innovative; however, the bank participated in a few industry-recognized government guaranteed lending programs, displaying flexibility in the way the bank serves its communities. The bank offers flexible programs throughout all of its AAs.

The bank provides additional support for small business borrowers by participating in the Small Business Administration's (SBA) 7(a) and Express Loan Programs, which promote business growth and job creation. The SBA 7(a) Loan Program is the SBA's primary program designed to provide start-up and existing small businesses with increased access to capital through more flexible terms than conventional commercial financing. The loan proceeds can then be used for business acquisition and expansion, equipment and commercial real estate purchases, working capital, or to refinance debt. The Express Loan Program is a small dollar loan program that can be set up either as a term loan or line of credit that offers fixed or variable loan rates as well as an easier loan application process, quicker approval times, more flexible terms, and lower downpayment requirements than conventional commercial loans. This loan program is ideal for businesses with less established credit and/or start-up businesses and can be secured or unsecured. During the evaluation period, the bank originated one SBA 7(a) loan for \$546,979.81 and one Express Loan for \$255,000.

The bank also participates in a government guaranteed loan program administered by the Bureau of Indian Affairs. The loan program helps American Indian and Alaska Native tribes and individuals overcome barriers to conventional financing and to secure reasonable interest rates, while also reducing the risk to lenders by providing financial backing from the federal government. Loans under the program may be used for a variety of purposes, including operating capital, equipment purchases, acquisition and financing, building, construction, and lines of credit but must benefit the economy of a reservation or tribal service area. During the evaluation period, the bank originated one loan totaling \$4.5 million (MM) through this program.



### Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AAs. The bank originated a high percentage of loans, by number and dollar, inside its AAs.

**Table 4**

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	29	85.3	2,017	78.3	5	14.7	560	21.7
Home Purchase - Conventional	232	78.6	54,390	55.6	63	21.4	43,413	44.4
Home Purchase - FHA	17	85.0	3,793	86.1	3	15.0	613	13.9
Home Purchase - VA	2	100.0	716	100.0	0	0.0	0	0.0
Multi-Family Housing	17	85.0	22,545	86.6	3	15.0	3,497	13.4
Other Purpose Closed-End	20	83.3	1,919	68.1	4	16.7	897	31.9
Refinancing	65	89.0	12,306	62.9	8	11.0	7,256	37.1
<b>Total HMDA related</b>	<b>382</b>	<b>81.6</b>	<b>97,686</b>	<b>63.5</b>	<b>86</b>	<b>18.4</b>	<b>56,236</b>	<b>36.5</b>
Small Business	731	85.5	146,683	83.4	124	14.5	29,265	16.6
Small Farm	247	85.8	19,041	80.3	41	14.2	4,678	19.7
<b>TOTAL LOANS</b>	<b>1,360</b>	<b>84.4</b>	<b>263,410</b>	<b>74.5</b>	<b>251</b>	<b>15.6</b>	<b>90,179</b>	<b>25.5</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

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

### Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AAs. This conclusion is primarily derived from an adequate level of penetration noted in the Tulsa Metropolitan AA, which has a majority of the lending activity. The Eastern Oklahoma Nonmetropolitan AA was rated as having a good geographic distribution.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank's lending has an overall adequate penetration among individuals of different income levels and businesses and farms of different sizes. This conclusion is primarily derived from an adequate level of penetration noted in the Tulsa Metropolitan AA and the Eastern Oklahoma Nonmetropolitan AA.

### **Community Development Lending**

This performance criterion evaluates the bank's level of CD lending. The bank makes an adequate level of CD loans when considering the bank's capacity, AA needs, and the availability of lending opportunities. This conclusion is consistent with the individual ratings for CD lending in the Tulsa Metropolitan AA and Eastern Oklahoma Nonmetropolitan AA.

The Tulsa Metropolitan AA had the highest dollar volume of CD loan activity during the review period, with 62.8 percent of the bank-wide CD loans by dollar. By number volume, the Eastern Oklahoma Nonmetropolitan AA had 42.1 percent of the bank-wide CD loans.

The bank originated one loan to a school district outside of the bank's AAs, but within the state of Oklahoma, for the purpose of making improvements to various buildings in the district; in Table 5, this loan is included with the other Community Service loans. A majority of the students in this school district are eligible for the free and reduced lunch program. Table 5 illustrates the volume of CD loans by number and dollar volume based on CD purpose. Additional details of specific CD performance results are further discussed in the analysis of each AA evaluation.

**Table 5**

<b>Community Development Loans – All</b>		
<b>Community Development Purpose</b>	<b>#</b>	<b>\$(000)</b>
Affordable Housing	5	7,761
Community Services	10	14,573
Economic Development	1	1,612
Revitalization and Stabilization	3	150
Outside Activities	0	0
<b>Total Loans</b>	<b>19</b>	<b>24,095</b>

### **INVESTMENT TEST**

This performance criterion evaluates the bank's level of qualified grants, donations, or in-kind contributions of property made since the last examination that have a primary purpose of community development.

The bank's overall performance under the investment test is high satisfactory. The bank has a significant level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits good responsiveness to the credit and CD needs of its AAs. The rating was derived primarily from an excellent level of investments in the Eastern Oklahoma Nonmetropolitan AA, and an adequate level of investments in the Tulsa Metropolitan AA. There were also a number of investments the bank made in the form of bonds for funding the construction and/or renovation of buildings for various school districts in Oklahoma.

and neighboring states. In Table 6, the five outside activities show the investments made outside the state of Oklahoma, while the investments made outside of the AAs but within the state of Oklahoma, are included in the Community Service section. Of all the investment activity, 75.0 percent of the activities occurred outside of the bank's AAs. The bank's overall investment activity increased from the last evaluation where the bank had 7 prior period investments totaling \$1.4MM and 20 current investments totaling \$10.6MM.

In addition to qualified investments within the bank's AAs, the bank made a number of qualified CD donations. Overall, 80.9 percent of the donations by number were made in the Tulsa Metropolitan AA, 10.3 percent in the Eastern Oklahoma Nonmetropolitan AA, and 8.8 percent in the Oklahoma City Metropolitan AA.

**Table 6**

Investments, Grants, and Donations – All								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	0	0	3	12	3	12
Community Services	11	4,110	52	18,105	65	144	128	22,358
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Outside Activities	5	2,799	0	0	0	0	5	2,799
<b>Total</b>	<b>16</b>	<b>6,909</b>	<b>52</b>	<b>18,105</b>	<b>68</b>	<b>156</b>	<b>136</b>	<b>25,169</b>
<sup>1.</sup> Book Value of Investment								
<sup>2.</sup> Original Market Value of Investment								

## SERVICE TEST

The bank's overall performance under the service test is outstanding. The rating is derived from excellent service test conclusions in the Tulsa Metropolitan AA and Eastern Oklahoma Nonmetropolitan AA.

## Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic classification.

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in each AA. Of the 15 total branch offices included in this evaluation, three offices were located in low-, three in moderate-, four in middle-, and five in upper-income census tracts. All branch locations except two have onsite cash-dispensing ATMs. There are also five stand-alone cash-dispensing ATMs in the Tulsa

Metropolitan AA. Bank office and ATM locations generally align with the total percentage of census tracts by income level throughout its AAs.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the last evaluation, the bank closed the ATM at the Oklahoma City branch.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby hours are consistent across the various AAs with general hours being from 9 a.m. to 4 p.m. Monday through Friday, with drive-through facilities being open an hour earlier and staying open an hour later. Saturday hours are generally from 9 a.m. to 12 p.m.

**Table 7**

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	20.0	20.0	26.7	33.3	0.0	100.0	7.9	30.5	30.5	28.2	2.9	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	16.7	27.8	27.8	27.8	0.0	100.0	7.1	30.7	32.5	28.8	0.9	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	15		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	6		117		16		1		140		39	
<sup>1.</sup> Based on 2024 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

<sup>1</sup>. Based on 2024 FFIEC census tract definitions.

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

## Community Development Services

This performance criterion evaluates the bank's level of CD services. The bank is a leader in providing CD services. The bank officers and staff provided 140 qualified services to 39 different organizations. Services provided include serving on boards of directors of affordable housing organizations, non-profit entities that primarily serve LMI individuals and families, economic development organizations that primarily focus on attracting and retaining small businesses, and local organizations that serve to revitalize and stabilize distressed and/or underserved areas. Other staff serve on committees that provide technical assistance and advice on financial matters. A substantial portion of CD services was performed in the Tulsa Metropolitan AA, which accounted for 72.1 percent of the CD services bank-wide. Service totals for the Eastern Oklahoma Nonmetropolitan AA accounted for 20.0 percent, while the Oklahoma City Metropolitan AA made up 6.4 percent. The remainder of the activities occurred in the overall state of Oklahoma.

**FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

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

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

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

The bank's Tulsa Metropolitan AA consists of Tulsa, Okmulgee and Wagoner counties in their entirety. This AA comprises a portion of the larger Tulsa, Oklahoma Metropolitan Statistical Area (Tulsa MSA). Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- In March of 2024, the bank removed Creek County from the delineated AA. The bank previously took 13 of the 23 census tracts in this county.
- As of the 2024 FFIEC Census data, the AA is comprised of 244 census tracts, including 15 low-, 73 moderate-, 71 middle-, 84 upper-, and 1 unknown-income census tract(s). The census tract designations represent a change from the prior exam where the tract composition consisted of 257 census tracts, of which 15 were low-, 76 were moderate-, 78 were middle-, 87 were upper-, and 1 was an unknown-income census tract(s). These changes were updated with the 2024 FFIEC census data.
- The bank operates 10 of its 15 banking offices in this AA. This includes the bank's main office in Bixby, a limited-service branch (drive-through only) in Okmulgee, and eight full-service branches. All branch locations except one full-service branch in Okmulgee maintain cash-only ATMs. Additionally, the bank operates five stand-alone ATMs throughout the AA.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank had a 4.2 percent market share of total deposits within the AA, ranking 4<sup>th</sup> of 55 FDIC-insured financial institutions operating 220 banking offices in the AA.
- To further augment the evaluation, two community contacts recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA were 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. The two individuals were both from economic development organizations.

**Table 8**

<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	738,172	786,966	6.6
Okmulgee County, OK	39,446	36,706	(6.9)
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			

- The AA's population comprises approximately 77.5 percent of the larger Tulsa Oklahoma MSA's population.
- Population growth outpaced the state of Oklahoma from 2015-2020, except in Okmulgee County, where there was a population decline.
- One community contact noted that Tulsa has a low cost of living and has seen a steady migration of people from higher cost west coast areas that can work remotely in recent years.
- Another contact noted that with the growth in Tulsa, there are more opportunities for businesses to locate there, which promotes economic vitality and mobility and allows Tulsa to promote opportunities not available in more saturated markets.

**Table 9**

<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	67,068	73,099	9.0
Okmulgee County, OK	53,473	57,161	6.9
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.			

- Changes in median family income (MFI) reflected positive growth throughout all of the AA counties. The highest growth rates in the AA occurred in Wagoner and Tulsa Counties, although these two counties also had the highest MFI by dollar amount.

- Based on the 2020 American Community Survey (ACS) data, the portion of AA families living below the poverty level was 10.7 percent, which was similar to the Tulsa MSA at 10.4 percent and below the state of Oklahoma at 11.3 percent. Families living below the poverty level in the AA counties ranged from a low of 7.1 percent in Wagoner County to a high of 14.5 percent in Okmulgee County.

**Table 10**

<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	75.2	38.0	38.9	56.7	30.9	16.4
Okmulgee County, OK	67.8	31.2	36.2	49.5	24.5	15.5
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
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy</i>						
<i>Note: Cost Burden is housing cost that equals 30 percent or more of household income.</i>						

- The AA cost burden for both LMI renters and homeowners was generally consistent with figures for the state of Oklahoma, with the greatest burden among low-income renters when compared to low-income homeowners.
- The median housing value in the AA counties ranged from \$85,900 in Okmulgee County to a high of \$162,900 in Wagoner County, compared to \$158,043 for the AA and \$142,400 for the state of Oklahoma.
- The median age of housing stock in the AA is 46 years of age. When broken down by the income level of census tract, the median age is 59 years in low-, 56 in moderate-, 46 in middle-, and 36 years in upper-income census tracts. The older age of homes in LMI census tracts suggest more dilapidated homes in need of repair.
- A community contact noted that there is a shortage of housing for both affordable and market rate units.



**Table 11**

<b>Unemployment Rates</b>					
<b>Assessment Area: Tulsa Metropolitan</b>					
<b>Area</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>
Tulsa Metropolitan	3.1	6.7	4.2	3.1	3.2
Okmulgee County, OK	4.7	7.5	5.4	4.2	4.2
Tulsa County, OK	3.0	6.7	4.2	3.1	3.2
Wagoner County, OK	3.0	5.9	3.7	3.0	3.2
Tulsa, OK MSA	3.1	6.6	4.2	3.1	3.2
Oklahoma	3.1	6.3	4.0	3.1	3.2

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Unemployment rates in the AA were aligned with the figures for Oklahoma between 2019 and 2023, with the exception of Okmulgee County. As illustrated in Table 11, unemployment rates increased in 2020 throughout all the geographic areas due to the onset of the Coronavirus Disease 2019 Pandemic (pandemic) before decreasing in 2022 to levels consistent with the pre-pandemic rates.
- A community contact noted the major industries in the area are oil and gas, aerospace, and manufacturing. They also noted that no major employers had left the area but that new ones had entered such as those in advanced mobility, drone technology resulting from a federal grant, and the creation of a technology hub.

## **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 adequate. Overall, the bank's lending activity responsiveness is adequate, and the geographic distribution of loans and borrower distribution of loans among individuals of different income levels and businesses and farms of different revenue sizes is also adequate. Furthermore, the bank makes an adequate level of CD loans in the AA.

### **Lending Activity**

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of lending in this AA included 519 small business, 141 small farm, and 288 home mortgage loans originated between January 1, 2023 and December 31, 2024.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. For this evaluation, the bank did not provide any lending

that was considered particularly innovative; however, the bank participated in a few government-guaranteed lending programs, as noted previously in the overall Institution section, demonstrating flexibility in the way the bank services its communities. A description of the bank's flexible lending products is also discussed in the overall Institution description.

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects an adequate distribution among the different census tracts and dispersion throughout the AA. The geographic distribution for small business and small farm loans is adequate, while the distribution of home mortgage loans is good. Home improvement and multifamily loans for 2024 as well as home refinance, home improvement and multifamily loans for 2023 were not evaluated at the individual product level based on lending levels that were too low to conduct a meaningful analysis.

#### **Home Mortgage Lending**

The geographic distribution of home mortgage lending is good. The distribution of 2024 home mortgage loans among low-income census tracts was significantly above aggregate by number and dollar and the demographic figure, which represents the percentage of owner-occupied housing units in each census tract. Lending in moderate-income census tracts was comparable to aggregate by number and dollar and the demographic figure.

The geographic distribution of home mortgage lending in 2023 was above the 2024 lending patterns.

An analysis of dispersion of loans revealed gaps and lapses; however, these gaps did not impact the overall conclusion based on the limited levels of home mortgage lending relative to the number of census tracts in the AA.

#### **Home Purchase Loans**

The geographic distribution of home purchase lending is excellent. The bank's 2024 home purchase lending in low-income census tracts was significantly above aggregate lenders by number and dollar, as well as the demographic figure. Lending among moderate-income census tracts was comparable to aggregate by number and dollar and the demographic figure. When combining LMI together, the distribution was significantly above aggregate by number, above by dollar and above the demographic figure, leading to the excellent rating.

The geographic distribution of home mortgage lending in 2023 was consistent with 2024 lending patterns.

Home Refinance Loans

The geographic distribution of home refinance lending is adequate. The bank's 2024 home refinance lending in low-income census tracts was significantly above aggregate lending data by number and dollar and the demographic figure. Lending among moderate-income census tracts was below aggregate lending by number and dollar as well as the demographic figure.

Lending volumes in 2023 were too low to conduct a meaningful analysis.

**Table 12**

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)	\$ %	\$ %	
Home Purchase Loans													
Low	15	14.0	2.3	1,322	5.6	1.1	13	15.5	2.6	993	4.9	1.3	3.6
Moderate	29	27.1	21.0	3,824	16.2	14.1	17	20.2	19.4	2,470	12.2	12.1	22.4
Middle	36	33.6	30.2	7,762	33.0	26.4	23	27.4	29.5	5,229	25.7	23.3	31.5
Upper	27	25.2	46.5	10,632	45.2	58.3	30	35.7	48.4	11,528	56.8	63.3	42.5
Unknown	0	0.0	0.0	0	0.0	0.0	1	1.2	0.1	88	0.4	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	107	100.0	100.0	23,540	100.0	100.0	84	100.0	100.0	20,308	100.0	100.0	100.0
Refinance Loans													
Low	3	13.6	2.0	61	1.4	1.1	4	13.3	2.2	951	14.4	1.5	3.6
Moderate	4	18.2	21.2	1,017	23.3	14.6	3	10.0	20.9	611	9.2	14.1	22.4
Middle	10	45.5	34.5	1,324	30.4	31.7	18	60.0	32.2	3,205	48.5	29.3	31.5
Upper	5	22.7	42.4	1,958	44.9	52.6	5	16.7	44.7	1,840	27.8	55.0	42.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	22	100.0	100.0	4,360	100.0	100.0	30	100.0	100.0	6,607	100.0	100.0	100.0
Home Improvement Loans													
Low	2	16.7	1.9	39	4.5	1.6	2	25.0	2.2	75	15.8	2.0	3.6
Moderate	5	41.7	18.6	350	40.4	15.8	2	25.0	17.0	53	11.2	12.9	22.4
Middle	2	16.7	29.6	92	10.6	25.5	1	12.5	26.5	83	17.5	22.8	31.5
Upper	3	25.0	49.9	385	44.5	57.0	3	37.5	54.3	264	55.6	62.4	42.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	866	100.0	100.0	8	100.0	100.0	475	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	12.5	11.3	200	1.6	13.3	1	50.0	11.5	500	20.3	5.2	12.4
Moderate	3	37.5	36.8	1,345	11.0	20.6	0	0.0	43.7	0	0.0	41.8	37.6
Middle	4	50.0	27.4	10,646	87.3	22.6	1	50.0	23.0	1,961	79.7	18.8	27.3
Upper	0	0.0	24.5	0	0.0	43.5	0	0.0	21.8	0	0.0	34.2	21.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	12,191	100.0	100.0	2	100.0	100.0	2,461	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	22	14.2	2.2	1,748	4.2	2.3	21	15.8	2.5	2,591	8.4	1.6	3.6
Moderate	41	26.5	20.6	6,536	15.7	14.8	22	16.5	19.2	3,134	10.2	14.5	22.4
Middle	54	34.8	30.7	19,912	47.7	26.6	47	35.3	29.6	10,881	35.3	23.7	31.5
Upper	38	24.5	46.4	13,518	32.4	56.2	42	31.6	48.7	14,135	45.8	60.2	42.5
Unknown	0	0.0	0.0	0	0.0	0.0	1	0.8	0.1	88	0.3	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	155	100.0	100.0	41,714	100.0	100.0	133	100.0	100.0	30,829	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.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

### Small Business Lending

The geographic distribution of small business lending is adequate. The bank's distribution of small business lending in 2023 among low-income census tracts was significantly above aggregate lending by number, below by dollar, and significantly above the demographic figure, which represents the percentage of total businesses by income level of geography. Lending among moderate-income tracts was comparable to aggregate lending data by both number and dollar and the demographic figure.

The geographic distribution of small business lending in 2024 reflected performance that was consistent with 2023 lending patterns.

The bank's small business loan dispersion by income level of AA geographies revealed gaps and lapses that included LMI census tracts. However, given the number of tracts in the AA, it would be unreasonable to expect the bank to reach every census tract. Additionally, the originations were primarily located in proximity to the bank's branches. Based on these factors, the gaps and lapses did not impact the overall conclusion.

**Table 13**

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				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	23	9.1	3.8	2,073	3.5	5.2	25	9.4	4,511	7.9	5.0
Moderate	51	20.1	23.1	15,379	25.9	28.5	45	17.0	14,429	25.2	26.7
Middle	74	29.1	28.8	17,585	29.6	28.2	78	29.4	11,381	19.9	31.6
Upper	104	40.9	43.6	23,723	39.9	37.8	115	43.4	26,733	46.6	36.6
Unknown	2	0.8	0.1	695	1.2	0.1	2	0.8	275	0.5	0.2
Tract-Unk	0	0.0	0.6	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	254	100.0	100.0	59,455	100.0	100.0	265	100.0	57,329	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. *Aggregate data is not currently available.											

### Small Farm Lending

The geographic distribution of small farm lending is adequate. The bank's distribution of small farm lending in 2023 among low-income census tracts was significantly above the aggregate lending by number and dollar, as well as the demographic figure, which represents the percentage of total farms by income level of geography. Lending among moderate-income tracts was below aggregate lending data by number, comparable by dollar, and below the demographic figure.

The geographic distribution of small farm lending in 2024 reflected performance that was consistent with 2023 lending patterns.

The bank's small farm loan dispersion by income level of AA geographies revealed gaps and lapses that included LMI census tracts. Similar to small business lending, the AA consists of over 200 census tracts, and it would be unreasonable to expect the bank to lend in every tract. Based on this factor, the gaps and lapses did not impact the overall conclusion.

**Table 14**

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography											
Assessment Area: Tulsa Metropolitan											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	3	4.3	1.0	178	2.7	0.9	4	5.6	486	7.9	2.0
Moderate	4	5.7	11.1	281	4.2	5.7	5	7.0	243	3.9	14.0
Middle	59	84.3	59.0	5,912	88.2	65.4	53	74.6	4,535	73.6	43.4
Upper	4	5.7	28.3	332	5.0	27.8	9	12.7	898	14.6	40.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	70	100.0	100.0	6,703	100.0	100.0	71	100.0	6,162	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. *Aggregate data is not currently available.											

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses and farms of different sizes. Home improvement loans were not evaluated at the individual product level in 2024, while home improvement and home refinance loans were not evaluated at the individual product level in 2023 based on levels that were too low to render a meaningful analysis.

### Home Mortgage Lending

The borrower distribution of home mortgage lending is adequate. The distribution of 2024 loans to low-income borrowers was comparable to aggregate lending data by number and dollar and significantly below the demographic figure, which represents the distribution of families in the AA by income level. Lending to moderate-income borrowers was comparable to aggregate by number and dollar and the demographic figure.

The borrower distribution of home mortgage lending in 2023 was consistent with the 2024 lending patterns.

#### Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2024 home purchase loans to low-income borrowers was comparable to aggregate by number and dollar, and significantly below the demographic figure. Lending to moderate-income borrowers was below aggregate by number and dollar and the demographic figure.

The borrower distribution of home purchase lending in 2023 reflected consistent performance with the 2024 lending levels.

#### Home Refinance Loans

The borrower distribution of home refinance lending is poor. The distribution of 2024 home refinance loans to low-income borrowers was below aggregate by number and significantly below by dollar as well as significantly below the demographic figure. Lending to moderate-income borrowers was comparable to aggregate by number, below by dollar and below the demographic figure.

Lending levels in 2023 were too low to conduct a meaningful analysis.

**Table 15**

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Tulsa 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)	\$ %	\$ %	
Home Purchase Loans													
Low	7	6.5	5.4	858	3.6	2.7	3	3.6	4.1	413	2.0	1.8	21.5
Moderate	9	8.4	16.2	1,258	5.3	11.1	9	10.7	16.6	1,396	6.9	10.4	17.4
Middle	19	17.8	19.8	4,009	17.0	17.9	14	16.7	20.5	3,478	17.1	16.3	19.3
Upper	33	30.8	31.9	12,847	54.6	42.6	27	32.1	30.3	10,144	50.0	36.1	41.9
Unknown	39	36.4	26.7	4,568	19.4	25.8	31	36.9	28.5	4,877	24.0	35.3	0.0
Total	107	100.0	100.0	23,540	100.0	100.0	84	100.0	100.0	20,308	100.0	100.0	100.0
Refinance Loans													
Low	4	18.2	8.0	186	4.3	4.0	1	3.3	5.6	26	0.4	2.6	21.5
Moderate	2	9.1	17.1	327	7.5	11.5	3	10.0	14.4	229	3.5	9.6	17.4
Middle	3	13.6	19.6	346	7.9	16.7	2	6.7	17.7	170	2.6	13.2	19.3
Upper	4	18.2	33.0	967	22.2	41.7	12	40.0	31.4	3,314	50.2	37.4	41.9
Unknown	9	40.9	22.4	2,534	58.1	26.0	12	40.0	30.8	2,868	43.4	37.3	0.0
Total	22	100.0	100.0	4,360	100.0	100.0	30	100.0	100.0	6,607	100.0	100.0	100.0
Home Improvement Loans													
Low	3	25.0	5.9	61	7.0	3.2	0	0.0	5.9	0	0.0	3.3	21.5
Moderate	1	8.3	16.0	70	8.1	11.6	1	12.5	15.9	44	9.3	9.9	17.4
Middle	1	8.3	22.2	100	11.5	17.8	2	25.0	20.7	42	8.8	17.1	19.3
Upper	1	8.3	47.9	97	11.2	56.2	3	37.5	48.8	275	57.9	56.8	41.9
Unknown	6	50.0	8.0	538	62.1	11.2	2	25.0	8.7	114	24.0	12.9	0.0
Total	12	100.0	100.0	866	100.0	100.0	8	100.0	100.0	475	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	14	9.5	6.0	1,105	3.7	2.9	5	3.8	4.7	533	19	2.0	21.5
Moderate	14	9.5	16.3	1,743	5.9	11.2	16	12.2	16.2	1,975	7.0	10.3	17.4
Middle	23	15.6	20.0	4,455	15.1	17.7	19	14.5	20.1	3,884	13.7	15.9	19.3
Upper	42	28.6	34.3	14,580	49.4	43.2	46	35.1	32.8	14,117	49.8	37.2	41.9
Unknown	54	36.7	23.5	7,640	25.9	25.1	45	34.4	26.1	7,859	27.7	34.5	0.0
Total	147	100.0	100.0	29,523	100.0	100.0	131	100.0	100.0	28,368	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.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these are not displayed individually but are included in the total HMDA section of the table.													



Small Business Lending

The borrower distribution of small business lending is adequate. The bank's 2023 distribution of lending to businesses with revenues of \$1MM or less was comparable to the aggregate lending data by number, significantly below aggregate by dollar and below the demographic figure. The demographic figure represents the percentage of small businesses in the AA based on Dun & Bradstreet (D&B) data.

Additionally, 69.7 percent of the originated loans were in dollar amounts of \$250,000 or less, which reflects the bank's willingness to meet the credit needs of small businesses in the AA.

The distribution of 2024 small business loans was consistent with 2023 lending patterns.

**Table 16**

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses										
Assessment Area: Tulsa Metropolitan										
	Bank And Aggregate Loans By Year									
	2023						2024*			
	Bank		Agg	Bank		Agg	Bank			
	#	%	%	\$(000)	%	%	#	%	\$(000)	%
By Revenue										
\$1 Million or Less	119	46.9	54.2	6,458	10.9	35.5	142	53.6	6,801	11.9
Over \$1 Million	58	22.8		10,368	17.4		53	20.0	9,788	17.1
Revenue	77	30.3		42,629	71.7		70	26.4	40,740	71.1
Total	254	100.0		59,455	100.0		265	100.0	57,329	100.0
By Loan Size										
\$100,000 or Less	119	46.9	92.3	6,458	10.9	33.0	142	53.6	6,801	11.9
\$100,001 - \$250,000	58	22.8	3.8	10,368	17.4	15.4	53	20.0	9,788	17.1
\$250,001 - \$1 Million	77	30.3	4.0	42,629	71.7	51.6	70	26.4	40,740	71.1
Total	254	100.0	100.0	59,455	100.0	100.0	265	100.0	57,329	100.0
By Loan Size and Revenues \$1 Million or Less										
\$100,000 or Less	119	100.0		6,458	100.0		142	100.0	6,801	100.0
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0
\$250,001 - \$1	0	0.0		0	0.0		0	0.0	0	0.0
Total	119	100.0		6,458	100.0		142	100.0	6,801	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. *Aggregate data is not currently available.										

### Small Farm Lending

The borrower distribution of small farm lending is adequate. The bank's 2023 distribution of lending to farms with revenues of \$1MM or less was comparable to aggregate lending by number, below by dollar and comparable to the demographic figure. The demographic figure represents the percentage of small farms in the AA based on D&B data.

Additionally, 90.0 percent of the originated loans were in dollar amounts of \$250,000 or less, which reflects the bank's willingness to meet the credit needs of small farms in the AA.

The distribution of 2024 small farm loans was consistent with 2023 lending patterns.

**Table 17**

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Tulsa Metropolitan											
	Bank And Aggregate Loans By Year										Total Farms %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	\$%	#	%	\$(000)	\$%	
By Revenue											
\$1 Million or Less	49	70.0	82.4	1,935	28.9	79.1	56	78.9	2,343	38.0	98.2
Over \$1 Million	14	20.0		2,143	32.0		10	14.1	1,721	27.9	1.3
Revenue Unknown	7	10.0		2,625	39.2		5	7.0	2,098	34.0	0.5
Total	70	100.0		6,703	100.0		71	100.0	6,162	100.0	100.0
By Loan Size											
\$100,000 or Less	49	70.0	81.4	1,935	28.9	34.9	56	78.9	2,343	38.0	
\$100,001 - \$250,000	14	20.0	13.0	2,143	32.0	32.2	10	14.1	1,721	27.9	
\$250,001 - \$500,000	7	10.0	5.5	2,625	39.2	32.9	5	7.0	2,098	34.0	
Total	70	100.0	100.0	6,703	100.0	100.0	71	100.0	6,162	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	49	100.0		1,935	100.0		56	100.0	2,343	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0	0	0.0	
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0	0	0.0	
Total	49	100.0		1,935	100.0		56	100.0	2,343	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. *Aggregate data is not currently available.											

### **Community Development Lending**

The bank provides an adequate level of CD loans. The bank originated 5 CD loans totaling \$15.1MM in this AA. Examples of the bank's CD lending activities in this AA include:

- Two loans totaling \$13.5MM were originated for the purpose of purchasing furniture, fixtures and expansion of a local health facility in a low-income area that provides services primarily to LMI individuals. The area had also been designated as being medically underserved by the Oklahoma Department of Health.
- A \$1.0MM loan was originated to construct a duplex community that will be used to house those experiencing housing insecurity in the Tulsa area. The organization also provides financial, mental health, and addiction recovery resources.

**Table 18**

<b>Community Development Loans – Tulsa Metropolitan AA</b>		
<b>Community Development Purpose</b>	<b>#</b>	<b>\$(000)</b>
Affordable Housing	1	1,000
Community Services	4	14,135
Economic Development	0	0
Revitalization and Stabilization	0	0
<b>Total Loans</b>	<b>5</b>	<b>15,135</b>

## **INVESTMENT TEST**

The bank's performance under the investment test in the Tulsa Metropolitan AA is adequate. The bank has an adequate level of qualified CD investments and grants and is occasionally in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA. Examples of investment activity in the AA include:

- All eight of the investments consisted of bonds that provided funding for improvements to schools in which a majority of students qualified for the free or reduced lunch program. The eight bonds were divided amongst three different school districts.
- One donation for \$17,000 was given to a local organization that primarily serves LMI families and individuals. This organization serves a number of counties in the Tulsa area.
- Two donations totaling \$1,000 were given to a local organization that provides school supplies for teachers to use in their classrooms at local schools that are eligible to receive free and reduced lunch.
- One donation for \$6,000 was for an organization that provides community services for children under the age of 5 when their families are facing financial and personal challenges.

**Table 19**

Investments, Grants, and Donations – Tulsa Metropolitan AA								
Community Development Purpose	Prior Period Investments <sup>1</sup>		Current Investments <sup>2</sup>		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	0	0	3	12	3	12
Community Services	0	0	8	2,010	52	123	60	2,133
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	0	0	8	2,010	55	135	63	2,145
<sup>1.</sup> Book Value of Investment								
<sup>2.</sup> Original Market Value of Investment								

## SERVICE TEST

The bank's performance under the service test in the Tulsa Metropolitan AA is excellent.

### Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates two branches in low-income census tracts, one branch in a moderate-income census tract, three in middle-income census tracts, and four in upper-income census tracts. Branch locations generally align with the total percentage of census tracts in the AA by income level and remain the same as the branch locations noted in the prior evaluation. The bank's ATM network also generally aligns with the percentage of census tracts in the AA by income level. The bank has two ATMs in low-income census tracts, three in moderate-, four in middle-, and five in upper-income census tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened and/or closed any branches or ATMs in this AA since the prior CRA evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. A majority of the branches in this AA offer hours from 9:00 a.m. to 4:00 p.m., Monday through Friday, and drive-through hours ranging from 7:30 a.m. to 6:00 p.m. Additionally, Saturday hours are from 9:00 a.m. to 12:00 p.m.

**Table 20**

Retail Banking and Community Development Services – Tulsa Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	20.0	10.0	30.0	40.0	0.0	100.0	6.1	29.9	29.1	34.4	0.4	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	14.3	21.4	28.6	35.7	0.0	100.0	6.4	29.1	30.4	33.8	0.3	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	10		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	6		84		11		0		101		23	
¹. Based on 2024 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

## Community Development Services

The bank is a leader in providing CD services. As noted in the table above, bank employees supported 23 organizations throughout the AA, providing 101 services. Examples of services provided by bank employees include:

- Thirty-nine employees provided fifty-one services to an organization that promotes financial literacy to local schools that participate in the free and reduced lunch program.
- Four bank employees served on the boards of directors (board) of an organization supporting economic development and revitalization of a downtown area by retaining, expanding and recruiting new businesses.
- One employee served on the board and provided financial and technical expertise to an organization that provides affordable housing to LMI seniors.

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

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

The bank's delineated AA is comprised of Oklahoma County in its entirety. This AA consists of one of seven counties that comprise the Oklahoma City, Oklahoma MSA. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data

- The AA remains unchanged since the prior evaluation.
- The AA is comprised of 266 census tracts, including 26 low-, 85 moderate-, 73 middle-, 67 upper-, and 15 unknown-income census tracts. No changes to the income designations of census tracts have changed since the previous evaluation.
- The AA includes one full-service branch located in Oklahoma City in an upper-income tract, offering drive-through services. The ATM at this location was closed in February 2024. The bank has not opened or closed any branches in this AA since the prior evaluation.
- Based on the 2020 ACS data, the AA population was 796,292. This AA contains roughly 20.1 percent of the overall state population.
- According to the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank held a 0.2 percent market share of total deposits within the AA, ranking 42nd out of 59 FDIC-insured financial institutions operating from 232 banking offices in the AA.

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

The AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information.

**Table 21**

Assessment Area	Lending Test	Investment Test	Service Test
Oklahoma City Metropolitan	Consistent	Consistent	Consistent

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

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

The bank's Eastern Oklahoma Nonmetropolitan AA consists of Hughes, McIntosh, Muskogee and Okfuskee Counties in their entities. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- In March 2024, the bank changed the AA delineation to include all of Okfuskee County. The bank previously took one of the four census tracts in this county.
- The AA is comprised of 37 census tracts, including 2 low-, 9 moderate-, 23 middle-, and 3-upper income census tracts. This represents a change in census tract composition since the prior evaluation where there was a total of 34 census tracts - 2 low-, 8 moderate-, 21 middle-, and 3 upper-income census tracts. The changes were updated with the 2024 FFIEC Census data.
- According to 2024 FFIEC designations, 3 tracts in Hughes County, 6 tracts in McIntosh County, and 2 tracts in Okfuskee County are all designated as distressed middle-income census tracts.
- The bank operates four branches in this AA, each with an onsite ATM. One branch is located in a low-income census tract, two are located in moderate-income census tracts, and one is located in a middle-income census tract.
- No branch openings or closings occurred in this AA since the prior evaluation.
- As of the June 30, 2024 FDIC Summary of Deposits Market Share Report, the bank held a 6.4 percent market share of total deposits within the AA, ranking 6<sup>th</sup> out of 15 FDIC-insured financial institutions operating from 35 banking offices in the AA.
- To further augment the CRA evaluation, one interview with a community member that was previously conducted in the bank's market was referenced to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and the perspective on local economics and demographic characteristics. The community member was from a local government agency.

**Table 22**

Population Change Assessment Area: Eastern Oklahoma			
Area	2015 Population	2020 Population	Percent Change
Eastern Oklahoma	116,537	109,957	(5.6)
Hughes County, OK	13,785	13,367	(3.0)
McIntosh County, OK	20,280	18,941	(6.6)
Muskogee County, OK	70,224	66,339	(5.5)
Okfuskee County, OK	12,248	11,310	(7.7)
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
Oklahoma	3,849,733	3,959,353	2.8
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The population in the Eastern Oklahoma Nonmetropolitan AA makes up only 2.8 percent of the state of Oklahoma population.
- In the AA, 60.3 percent of residents reside in Muskogee County, while only 10.3 percent reside in Okfuskee County.

**Table 23**

Median Family Income Change Assessment Area: Eastern Oklahoma			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Eastern Oklahoma	52,560	52,456	(0.2)
Hughes County, OK	52,104	47,059	(9.7)
McIntosh County, OK	50,651	49,827	(1.6)
Muskogee County, OK	54,281	55,555	2.3
Okfuskee County, OK	49,903	47,415	(5.0)
NonMSA Oklahoma	56,258	58,565	4.1
Oklahoma	63,401	67,511	6.5
Source: 2011- 2015 U.S. Census Bureau: American Community Survey 2016 - 2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The AA's MFI experienced a slight decline from 2015 to 2020, which was primarily driven by a decline in Hughes and Okfuskee Counties. Only Muskogee County experienced an increase in MFI during this time frame.
- Based on the 2020 ACS data, the portion of AA families living below the poverty level was 16.1 percent, which was higher than the non-metropolitan figure of 13.5 percent and the state of Oklahoma at 11.3 percent. Families living below the poverty level in the AA counties ranged from a low of 14.6 in Huges County to a high of 20.5 in Okfuskee County.



**Table 24**

Housing Cost Burden Assessment Area: Eastern Oklahoma						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Eastern Oklahoma	66.6	27.9	37.4	43.9	22.8	15.7
Hughes County, OK	46.6	13.7	23.4	28.8	9.6	9.1
McIntosh County, OK	60.6	42.9	37.0	40.1	21.4	15.9
Muskogee County, OK	70.7	29.2	40.0	49.4	26.5	16.7
Okfuskee County, OK	60.9	15.2	31.0	43.7	15.6	16.4
NonMSA Oklahoma	66.5	30.6	35.0	48.2	22.2	14.9
Oklahoma	72.5	35.3	37.9	52.2	26.2	15.4
Source: HUD, 2017-2021 Comprehensive Housing Affordability Strategy						
Note: Cost Burden is housing cost that equals 30 percent or more of household income.						

- The cost burden for LMI renters and homeowners was the lowest in Hughes County and highest among low-income renters and homeowners in Muskogee County.
- The median housing value in the AA counties ranged from \$74,200 in Hughes County to a high of \$115,900 in McIntosh County, compared to \$103,991 for the AA and \$142,400 for the state of Oklahoma.
- The median age of housing stock in the AA is 48 years of age. When broken down by the income level of census tracts, the median age is 60 years in low-, 61 years in moderate-, 45 years in middle-, and 42 years in upper-income census tracts. All of the low- and upper-income census tracts in the AA are located in Muskogee County.
- A community contact noted that in Okfuskee County, there is a severe shortage of housing to buy, with the last two housing developments being built in the 1970s.

**Table 25**

Unemployment Rates Assessment Area: Eastern Oklahoma					
Area	2019	2020	2021	2022	2023
Eastern Oklahoma	4.2	6.8	5.0	3.8	4.2
Hughes County, OK	4.6	7.7	5.4	3.9	4.0
McIntosh County, OK	5.6	8.7	6.3	4.9	5.4
Muskogee County, OK	3.7	6.2	4.5	3.5	3.9
Okfuskee County, OK	4.4	6.9	5.1	4.0	4.1
NonMSA Oklahoma	3.4	6.1	4.0	3.2	3.4
Oklahoma	3.1	6.3	4.0	3.1	3.2
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates increased in 2020 throughout the geographic areas due to the onset of the pandemic, before declining in 2022 to levels consistent with pre-pandemic rates.
- The primary employment sectors in the AA include Health Care and Social Assistance, Manufacturing, Retail Trade, Educational Assistance and Public Administration.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EASTERN OKLAHOMA AA**

### **LENDING TEST**

The bank's performance under the lending test in the Eastern Oklahoma Nonmetropolitan AA is good.

#### **Lending Activity**

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation of lending in this AA included 157 small business, 106 small farm and 66 home mortgage loans originated between January 1, 2023 and December 31, 2024.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of various flexible lending programs is discussed in the overall Institution section.

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

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. While the geographic distribution of home mortgage and small farm loans is good, the distribution of small business loans is adequate. Home refinance, home improvement and multifamily loans were not evaluated at the individual product level based on lending levels that were too low to conduct a meaningful analysis. In addition, home purchase loans for 2023 were not evaluated due to low lending volumes.

#### **Home Mortgage Lending**

The geographic distribution of home mortgage lending is excellent. The bank did not have any lending in low-income census tracts in 2024, which was below aggregate lending by number and dollar as well as the demographic figure. The percentage of owner-occupied units in the low-income census tracts was 1.7 percent, which means the opportunities to lend are minimal. Lending in moderate-income census tracts was significantly above aggregate by number, comparable by dollar and significantly above the demographic

figure. When combining the lending to LMI census tracts, the bank's lending was significantly above aggregate by number, comparable by dollar and significantly above the demographic figure.

The geographic distribution of home mortgage lending in 2023 was below the 2024 lending patterns.

An analysis of dispersion of loans revealed gaps and lapses; however, these gaps did not impact the overall conclusion. Three of the moderate-income census tracts with gaps are largely rural, so the opportunity to lend in these tracts is limited. As mentioned above, the low-income census tracts only contain 1.7 percent of owner-occupied homes, so the lending is limited here as well.

#### Home Purchase Loans

The geographic distribution of home purchase lending is excellent. No loans were originated in low-income census tracts, which was below aggregate lenders by number and dollar and below the demographic figure. However, as stated above, the opportunity to lend in these census tracts is very limited. Lending in moderate-income census tracts was significantly above aggregate by number, comparable by dollar and significantly above the demographic figure.

The lending volume for home purchase loans in 2023 was too low to conduct a meaningful analysis.

The evaluation of dispersion of loans revealed gaps and lapses; however, these gaps did not impact the overall conclusion. Similar to total home mortgage lending, three of the moderate-income tracts are largely rural so the opportunity to lend in these tracts is limited. Additionally, the low-income census tracts only contain 1.7 percent of owner-occupied homes, limiting lending opportunities.

**Table 26**

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Eastern Oklahoma													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	1.0	0	0.0	0.9	0	0.0	1.5	0	0.0	0.9	1.7
Moderate	2	22.2	21.4	92	6.8	17.0	11	36.7	22.1	794	17.6	16.1	21.5
Middle	6	66.7	64.7	1,175	86.3	67.1	19	63.3	66.2	3,723	82.4	72.2	67.6
Upper	1	11.1	13.0	95	7.0	15.0	0	0.0	9.9	0	0.0	10.7	9.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	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	
Total	9	100.0	100.0	1,362	100.0	100.0	30	100.0	100.0	4,517	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.9	0	0.0	1.1	1.7
Moderate	2	33.3	16.5	240	43.4	12.9	2	40.0	18.6	81	19.0	13.6	21.5
Middle	4	66.7	66.7	313	56.6	70.4	2	40.0	67.3	198	46.5	72.1	67.6
Upper	0	0.0	16.5	0	0.0	16.5	1	20.0	13.2	147	34.5	13.2	9.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	553	100.0	100.0	5	100.0	100.0	426	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.3	0	0.0	2.2	0	0.0	0.7	0	0.0	0.7	1.7
Moderate	2	25.0	24.6	79	12.6	22.3	0	0.0	24.6	0	0.0	26.1	21.5
Middle	5	62.5	57.7	527	84.1	54.3	1	100.0	60.9	49	100.0	60.3	67.6
Upper	1	12.5	15.4	21	3.3	21.2	0	0.0	13.8	0	0.0	12.9	9.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	627	100.0	100.0	1	100.0	100.0	49	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	28.6	0	0.0	33.7	8.0
Moderate	0	0.0	50.0	0	0.0	66.6	0	0.0	14.3	0	0.0	2.0	35.3
Middle	1	100.0	50.0	148	100.0	33.4	1	100.0	57.1	100	100.0	64.3	49.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	6.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	148	100.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	1.0	0	0.0	0.8	0	0.0	1.4	0	0.0	2.2	1.7
Moderate	6	22.2	20.4	411	14.7	16.8	15	38.5	21.5	955	18.5	15.2	21.5
Middle	17	63.0	64.7	2,199	78.7	67.1	23	59.0	66.1	4,070	78.7	71.5	67.6
Upper	4	14.8	13.9	184	6.6	15.3	1	2.6	10.8	147	2.8	11.0	9.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	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	
Total	27	100.0	100.0	2,794	100.0	100.0	39	100.0	100.0	5,172	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.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

### Small Business Lending

The geographic distribution of small business lending is adequate. The bank's 2023 small business lending in low-income census tracts was comparable to aggregate lending data by number and dollar, and comparable to the demographic figure. Lending in moderate-income census tracts was comparable to aggregate by number, above by dollar and comparable to the demographic figure.

Lending performance in 2024 was consistent with the 2023 lending patterns.

While gaps or lapses were identified in the dispersion analysis, they did not include LMI census tracts and did not impact the conclusion.

**Table 27**

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography											
Assessment Area: Eastern Oklahoma											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
Low	8	9.5	8.1	559	10.9	10.6	7	9.6	727	12.9	13.6
Moderate	17	20.2	18.2	1,617	31.4	24.1	9	12.3	379	6.7	29.0
Middle	54	64.3	60.8	2,683	52.1	55.4	54	74.0	4,355	77.5	51.4
Upper	5	6.0	10.8	292	5.7	9.0	3	4.1	159	2.8	6.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	2.0	0	0.0	0.8	0	0.0	0	0.0	0.0
Total	84	100.0	100.0	5,151	100.0	100.0	73	100.0	5,620	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. *Aggregate data is not currently available.											

### Small Farm Lending

The geographic distribution of small farm lending is good. The bank's 2023 small farm lending in low-income census tracts was significantly above aggregate lenders by number and dollar, as well as the demographic figure. In lending to moderate-income census tracts, the bank was comparable to aggregate by number, above by dollar and comparable to the demographic figure.

The lending performance in 2024 was consistent with the 2023 lending patterns.

When evaluating dispersion, gaps or lapses were identified; however, this did not impact the overall conclusion. Limited farming operations were noted where the gaps were identified, so the opportunity to lend in these census tracts was limited.

**Table 28**

Distribution of 2023 and 2024 Small Farm Lending By Income Level of Geography											
Assessment Area: Eastern Oklahoma											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Farms %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	\$(000)	\$%	
Low	3	5.8	1.6	529	16.6	3.5	0	0.0	0	0.0	1.4
Moderate	12	23.1	19.2	614	19.2	13.8	11	20.4	516	17.3	18.0
Middle	37	71.2	75.9	2,049	64.2	79.3	43	79.6	2,468	82.7	77.0
Upper	0	0.0	3.0	0	0.0	3.3	0	0.0	0	0.0	3.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.0	0	0.0	0	0.0	0.0
Total	52	100.0	100.0	3,192	100.0	100.0	54	100.0	2,984	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. *Aggregate data is not currently available.											

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

The bank's lending has an adequate distribution among individuals of different income levels and businesses and farms of different sizes. The distribution of home mortgage loans reflects poor performance, while small farm lending reflects adequate performance and small business lending reflects good performance.

### Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. The distribution of 2024 loans among low-income borrowers was comparable to aggregate lending data by number and dollar, but significantly below the demographic figure. Lending to moderate-income borrowers was below aggregate by both number and dollar, as well as below the demographic figure.

The borrower distribution of 2023 home mortgage lending reflected stronger performance than 2024; however, due to the lower lending volume in 2023, more weight was given to 2024 performance.

Home Purchase Loans

The borrower distribution of home purchase lending is poor. The distribution of 2024 home purchase loans among low-income borrowers was comparable to aggregate data by number and dollar and significantly below the demographic figure. Lending to moderate-income borrowers was below aggregate by number and dollar and below the demographic figure.

The lending volume for home purchase loans in 2023 was too low to conduct a meaningful analysis.

**Table 29**

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Eastern Oklahoma													
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)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	4.3	0	0.0	2.1	1	3.3	4.3	68	15	2.0	25.0
Moderate	2	22.2	15.3	551	40.5	10.7	2	6.7	16.3	206	4.6	11.4	19.4
Middle	2	22.2	20.1	235	17.3	17.0	3	10.0	18.0	292	6.5	15.8	20.2
Upper	2	22.2	31.9	332	24.4	41.9	16	53.3	32.8	2,949	65.3	42.2	35.4
Unknown	3	33.3	28.4	244	17.9	28.3	8	26.7	28.6	1,002	22.2	28.6	0.0
Total	9	100.0	100.0	1,362	100.0	100.0	30	100.0	100.0	4,517	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.3	0	0.0	1.6	1	20.0	4.8	28	6.6	2.0	25.0
Moderate	0	0.0	13.5	0	0.0	7.8	0	0.0	13.0	0	0.0	7.5	19.4
Middle	0	0.0	20.4	0	0.0	16.2	2	40.0	15.2	214	50.2	11.7	20.2
Upper	4	66.7	41.7	429	77.6	52.4	2	40.0	37.7	184	43.2	40.1	35.4
Unknown	2	33.3	21.0	124	22.4	22.0	0	0.0	29.3	0	0.0	38.8	0.0
Total	6	100.0	100.0	553	100.0	100.0	5	100.0	100.0	426	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.9	0	0.0	5.2	0	0.0	5.8	0	0.0	4.1	25.0
Moderate	1	12.5	13.1	33	5.3	9.3	0	0.0	13.8	0	0.0	9.0	19.4
Middle	1	12.5	22.3	31	4.9	14.1	0	0.0	17.4	0	0.0	12.9	20.2
Upper	5	62.5	45.4	545	86.9	60.4	1	100.0	47.8	49	100.0	56.2	35.4
Unknown	1	12.5	12.3	18	2.9	11.0	0	0.0	15.2	0	0.0	17.8	0.0
Total	8	100.0	100.0	627	100.0	100.0	1	100.0	100.0	49	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	4.5	0	0.0	2.2	2	5.3	4.7	96	19	2.1	25.0
Moderate	5	19.2	15.2	647	24.5	10.2	3	7.9	15.5	238	4.7	10.6	19.4
Middle	4	15.4	20.1	307	11.6	16.7	6	15.8	17.9	554	10.9	15.0	20.2
Upper	11	42.3	34.9	1,306	49.4	44.4	19	50.0	35.6	3,182	62.7	42.3	35.4
Unknown	6	23.1	25.4	386	14.6	26.5	8	21.1	26.3	1,002	19.8	30.0	0.0
Total	26	100.0	100.0	2,646	100.0	100.0	38	100.0	100.0	5,072	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.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these are not displayed individually but are included in the total HMDA section of the table.													



### Small Business Lending

The borrower distribution of small business lending is good. The 2023 distribution of loans to businesses with revenues of \$1MM or less was above aggregate data by number, comparable by dollar and comparable to the demographic figure.

Additionally, 97.6 percent of the originated loans were in dollar amounts of \$250,000 or less, which reflects the bank's willingness to meet the credit needs of small businesses in the AA.

Lending patterns for 2024 were consistent with the 2023 lending performance.

**Table 30**

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Eastern Oklahoma											
	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	75	89.3	61.7	2,791	54.2	44.9	58	79.5	2,295	40.8	88.6
Over \$1 Million	7	8.3		1,088	21.1		12	16.4	1,787	31.8	8.7
Revenue	2	2.4		1,272	24.7		3	4.1	1,538	27.4	2.7
Unknown											
Total	84	100.0		5,151	100.0		73	100.0	5,620	100.0	100.0
By Loan Size											
\$100,000 or Less	75	89.3	91.9	2,791	54.2	39.2	58	79.5	2,295	40.8	
\$100,001 - \$250,000	7	8.3	4.8	1,088	21.1	19.0	12	16.4	1,787	31.8	
\$250,001 - \$1 Million	2	2.4	3.3	1,272	24.7	41.7	3	4.1	1,538	27.4	
Total	84	100.0	100.0	5,151	100.0	100.0	73	100.0	5,620	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	75	100.0		2,791	100.0		58	100.0	2,295	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0			
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0			
Total	75	100.0		2,791	100.0		58	100.0	2,295	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. *Aggregate data is not currently available.											

### Small Farm Lending

The borrower distribution of small farm lending is adequate. The 2023 distribution of loans to farms with revenues of \$1MM or less was comparable to aggregate data by number, below by dollar and comparable to the demographic figure.

By loan size, 98.1 percent of the originated loans were in dollar amounts of \$250,000 or less, which reflects the bank's willingness to meet the credit needs of small farms in the AA.

The 2024 performance was consistent with 2023 lending patterns.

**Table 31**

Distribution of 2023 and 2024 Small Farm Lending By Revenue Size of Farms											
Assessment Area: Eastern Oklahoma											
	Bank And Aggregate Loans By Year										Total Farms %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	\$%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	44	84.6	81.4	1,501	47.0	83.0	45	83.3	1,289	43.2	100.0
Over \$1 Million	7	13.5		1,241	38.9		7	13.0	993	33.3	0.0
Revenue Unknown	1	1.9		450	14.1		2	3.7	702	23.5	0.0
Total	52	100.0		3,192	100.0		54	100.0	2,984	100.0	100.0
By Loan Size											
\$100,000 or Less	44	84.6	86.2	1,501	47.0	45.0	45	83.3	1,289	43.2	
\$100,001 - \$250,000	7	13.5	10.8	1,241	38.9	34.1	7	13.0	993	33.3	
\$250,001 - \$500,000	1	1.9	3.0	450	14.1	20.9	2	3.7	702	23.5	
Total	52	100.0	100.0	3,192	100.0	100.0	54	100.0	2,984	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	44	100.0		1,501	100.0		45	100.0	1,289	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0			
\$250,001 - \$500,000	0	0.0		0	0.0		0	0.0			
Total	44	100.0		1,501	100.0		45	100.0	1,289	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. *Aggregate data is not currently available.											

## Community Development Lending

The bank provides an adequate level of CD loans. The bank originated 8 CD loans totaling \$259,000 in this AA. Examples of the bank's CD lending in this AA include:

- The bank originated five loans totaling approximately \$110,000 to an organization that provides medical transportation services to LMI individuals. These five loans were used to purchase wheelchair/handicap accessible vehicles to help transport the patients.

- One loan for approximately \$90,000 was originated to a local municipality to facilitate the repairs to a water plant. These repairs help maintain access to the water supply and sewer system in a local distressed area.

**Table 32**

<b>Community Development Loans – Eastern Oklahoma AA</b>		
<b>Community Development Purpose</b>	<b>#</b>	<b>\$(000)</b>
Affordable Housing	0	0
Community Services	5	109
Economic Development	0	0
Revitalization and Stabilization	3	150
<b>Total Loans</b>	<b>8</b>	<b>259</b>

## INVESTMENT TEST

The bank's performance under the investment test in the Eastern Oklahoma Nonmetropolitan AA is excellent. The bank has an excellent level of qualified CD investments and grants and is often in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits excellent responsiveness to the credit and CD needs of its AA. Examples of investment activity in this AA include:

- All seven of the investments consisted of bonds that provided funding for improvements to schools in which a majority of students qualified for the free or reduced lunch program.
- Two donations totaling \$2,000 went to an organization that provides essential needs to children entering the foster care program.
- Two donations totaling \$1,500 went to an organization that helps support education and school curriculum for a local public school district where a majority of the students qualify for the free and reduced lunch program.

**Table 33**

<b>Investments, Grants, and Donations – Eastern Oklahoma AA</b>								
<b>Community Development Purpose</b>	<b>Prior Period Investments<sup>1</sup></b>		<b>Current Investments<sup>2</sup></b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>
Affordable Housing	0	0	0	0	0	0	0	0
Community Services	1	750	6	2,630	7	8	14	3,388
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>750</b>	<b>6</b>	<b>2,630</b>	<b>7</b>	<b>8</b>	<b>14</b>	<b>3,388</b>
<sup>1.</sup> Book Value of Investment								
<sup>2.</sup> Original Market Value of Investment								

## **SERVICE TEST**

The bank's performance under the service test in the Eastern Oklahoma Nonmetropolitan AA is excellent.

### **Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates one branch in a low-income census tract, two in moderate-income census tracts, and one in a middle-income census tract. Branch locations generally align with the total percentage of census tracts in the AA by income level of geography and remain the same as the branch locations noted in the prior evaluation. The bank's ATM network also generally aligns with the percentage of census tracts in the AA by income level. The bank has one ATM in a low-income census tract, two in moderate-income census tracts, and one in a middle-income census tract.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has not opened and/or closed any branches or ATMs in this AA since the prior CRA evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. A majority of the branches in this AA offer hours from 9:00 a.m. to 4:00 p.m. Monday through Friday, and drive-through hours ranging from 7:30 a.m. to 6:00 p.m. Additionally, Saturday hours are from 9:00 a.m. to 12:00 p.m.

**Table 34**

Retail Banking and Community Development Services – Eastern Oklahoma AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	25.0	50.0	25.0	0.0	0.0	100.0	5.4	24.3	62.2	8.1	0.0	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	25.0	50.0	25.0	0.0	0.0	100.0	2.7	26.3	63.2	7.8	0.0	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	4		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations		
	0	24		3		1		28		11		
¹. Based on 2024 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

## Community Development Services

The bank is a leader in providing CD services. As noted in the table above, bank employees supported 11 organizations throughout the AA, providing 24 services. Examples of services provided by bank employees include:

- One employee provided two services by serving as president and a board member for an organization that supports education and workforce and economic development to local schools. This employee used technical and financial expertise to approve the financial budget and expenses for the organization. A majority of the schools that are served by this organization qualify for free and reduced lunch.
- An employee served on the board of an organization that provides emergency medical services to communities within a local distressed area.
- Two employees served on the board of a local organization that is primarily involved in economic development.

**APPENDIX A – SCOPE OF EXAMINATION**

**Table A-1**

Scope of Examination			
<u>Financial Institution</u> Mabrey Bank Bixby, Oklahoma		<u>Products/Services Reviewed</u> <div><div>• Home Purchase Loans</div><div>• Home Refinance Loans</div><div>• Home Improvement Loans</div><div>• Multifamily Loans</div></div> <div><div>• Small Business (SB) Loans</div><div>• Small Farm (SF) Loans</div><div>• Community Development Loans</div><div>• Qualified Investments and Donations</div><div>• Community Development Services</div></div>	
<u>Time Period</u> <div><div><u>HMDA LAR and CRA SB and SF Loans:</u></div><div>January 1, 2023 to December 31, 2024</div></div> <div><div><u>Community Development Activities:</u></div><div>January 1, 2023 to December 31, 2024</div></div>			
List of Affiliates Considered in this Evaluation			
Affiliates	Affiliate Relationship		Products Reviewed
None	None		None
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
<u>Oklahoma</u>			
MSA 46140 Tulsa Metropolitan	Full Review	None	2 prior
MSA 36420 Oklahoma City Metropolitan	Limited Review	None	None
MSA 99999 Eastern Oklahoma	Full Review	None	1 prior

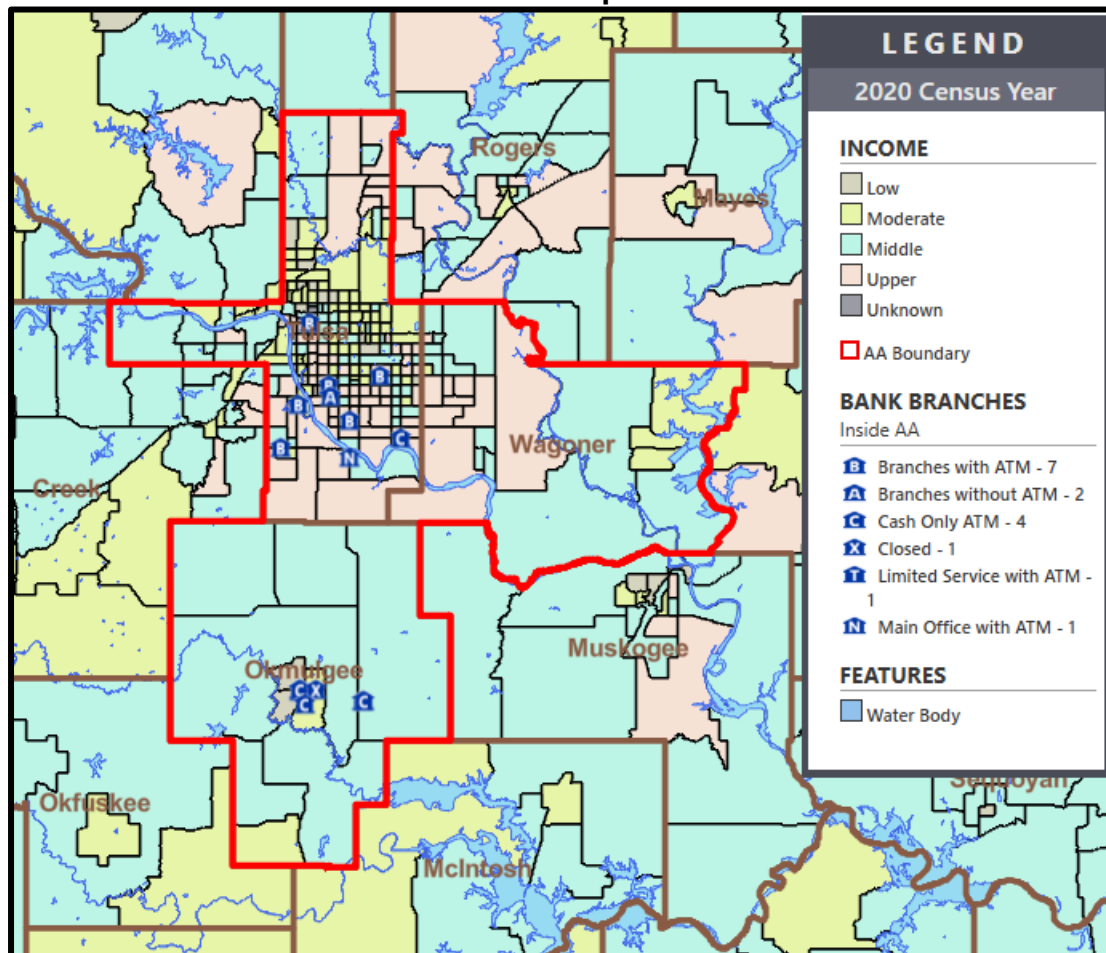
**APPENDIX B – SUMMARY OF STATE RATINGS**

**Table B-1**

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Oklahoma	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory

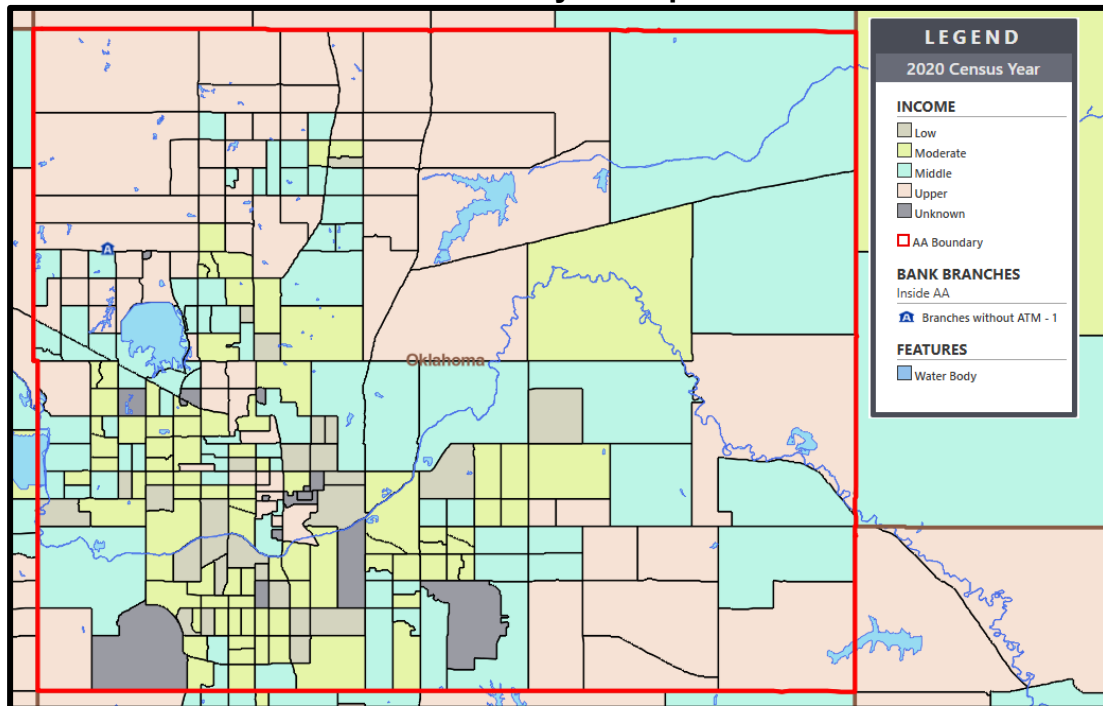
APPENDIX C – MAPS OF THE ASSESSMENT AREAS

Map C-1  
Tulsa Metropolitan

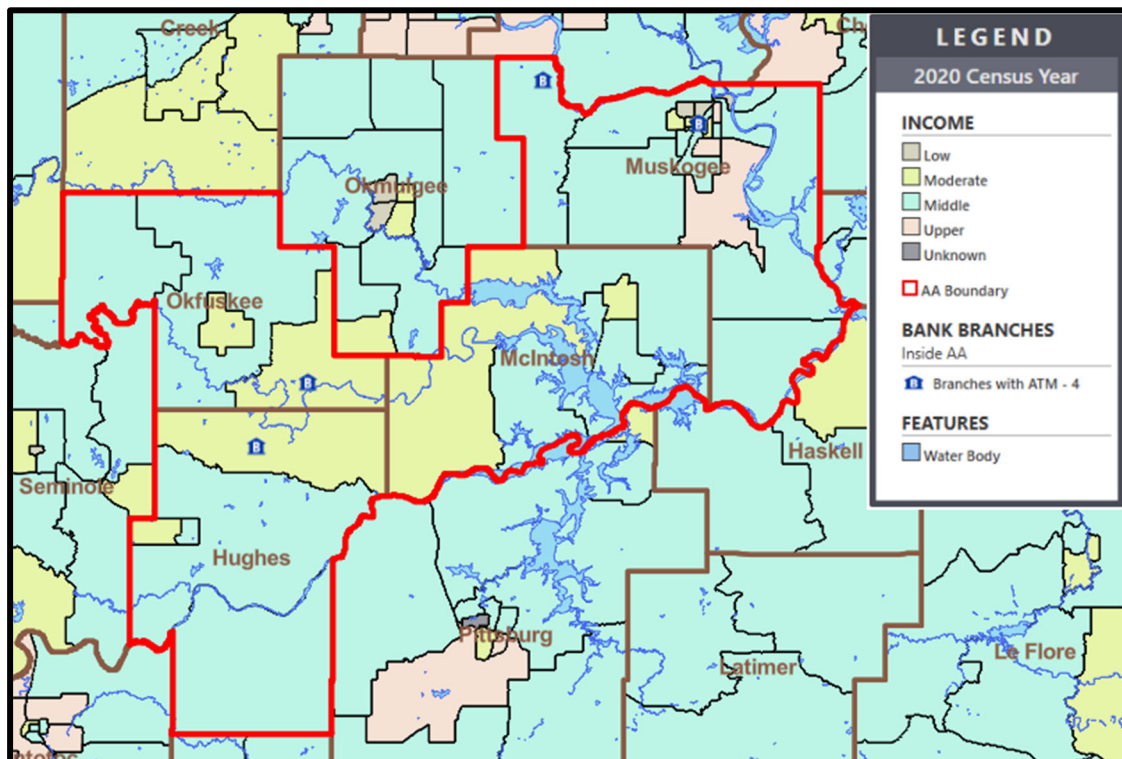




Map C-2  
Oklahoma City Metropolitan



Map C-3  
Eastern Oklahoma



**APPENDIX D – DEMOGRAPHIC INFORMATION**

**TULSA METROPOLITAN AA**

**Table D-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	15	6.1	10,618	5.6	4,248	40.0	40,761	21.5
Moderate	73	29.9	51,099	26.9	9,369	18.3	32,980	17.4
Middle	71	29.1	56,093	29.5	4,157	7.4	36,665	19.3
Upper	84	34.4	71,956	37.9	2,436	3.4	79,495	41.9
Unknown	1	0.4	135	0.1	26	19.3	0	0.0
Total AA	244	100.0	189,901	100.0	20,236	10.7	189,901	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,505	6,579	3.6	29.2	12,362	54.9	3,564	15.8
Moderate	101,976	41,352	22.4	40.6	45,516	44.6	15,108	14.8
Middle	101,010	58,209	31.5	57.6	32,326	32.0	10,475	10.4
Upper	108,300	78,671	42.5	72.6	22,229	20.5	7,400	6.8
Unknown	1,185	104	0.1	8.8	796	67.2	285	24.1
Total AA	334,976	184,915	100.0	55.2	113,229	33.8	36,832	11.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,748	5.0	1,513	4.8	224	7.8	11	3.7
Moderate	9,268	26.7	8,216	26.0	979	34.0	73	24.4
Middle	10,974	31.6	9,928	31.4	934	32.4	112	37.5
Upper	12,729	36.6	11,894	37.6	733	25.5	102	34.1
Unknown	53	0.2	43	0.1	9	0.3	1	0.3
Total AA	34,772	100.0	31,594	100.0	2,879	100.0	299	100.0
Percentage of Total Businesses:				90.9		8.3		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8	2.0	8	2.1	0	0.0	0	0.0
Moderate	55	14.0	54	14.0	1	20.0	0	0.0
Middle	170	43.4	169	43.9	1	20.0	0	0.0
Upper	159	40.6	154	40.0	3	60.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	392	100.0	385	100.0	5	100.0	2	100.0
Percentage of Total Farms:				98.2		1.3		0.5
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-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	15	5.9	10,618	5.4	4,248	40.0	42,643	21.5
Moderate	76	29.8	52,746	26.6	9,532	18.1	34,539	17.4
Middle	77	30.2	61,489	31.0	4,817	7.8	38,360	19.3
Upper	86	33.7	73,338	37.0	2,492	3.4	82,784	41.7
Unknown	1	0.4	135	0.1	26	19.3	0	0.0
<b>Total AA</b>	<b>255</b>	<b>100.0</b>	<b>198,326</b>	<b>100.0</b>	<b>21,115</b>	<b>10.6</b>	<b>198,326</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	22,505	6,579	3.4	29.2	12,362	54.9	3,564	15.8
Moderate	105,006	42,954	22.2	40.9	46,491	44.3	15,561	14.8
Middle	109,661	63,887	33.0	58.3	34,350	31.3	11,424	10.4
Upper	110,101	80,091	41.4	72.7	22,469	20.4	7,541	6.8
Unknown	1,185	104	0.1	8.8	796	67.2	285	24.1
<b>Total AA</b>	<b>348,458</b>	<b>193,615</b>	<b>100.0</b>	<b>55.6</b>	<b>116,468</b>	<b>33.4</b>	<b>38,375</b>	<b>11.0</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,796	4.4	1,552	4.2	232	6.9	12	3.4
Moderate	10,513	25.7	9,313	25.0	1,116	33.1	84	23.8
Middle	12,988	31.7	11,697	31.4	1,164	34.5	127	36.0
Upper	15,600	38.1	14,622	39.3	849	25.2	129	36.5
Unknown	52	0.1	42	0.1	9	0.3	1	0.3
<b>Total AA</b>	<b>40,949</b>	<b>100.0</b>	<b>37,226</b>	<b>100.0</b>	<b>3,370</b>	<b>100.0</b>	<b>353</b>	<b>100.0</b>
Percentage of Total Businesses:				90.9		8.2		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6	1.3	6	1.3	0	0.0	0	0.0
Moderate	55	11.9	54	11.9	1	16.7	0	0.0
Middle	194	42.0	192	42.3	2	33.3	0	0.0
Upper	207	44.8	202	44.5	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>462</b>	<b>100.0</b>	<b>454</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
Percentage of Total Farms:				98.3		1.3		0.4
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.								

**EASTERN OKLAHOMA AA**

**Table D-3**

2024 Eastern Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	5.4	566	2.0	224	39.6	7,056	25.0
Moderate	9	24.3	7,228	25.6	1,641	22.7	5,475	19.4
Middle	23	62.2	17,893	63.4	2,421	13.5	5,709	20.2
Upper	3	8.1	2,545	9.0	263	10.3	9,992	35.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>37</b>	<b>100.0</b>	<b>28,232</b>	<b>100.0</b>	<b>4,549</b>	<b>16.1</b>	<b>28,232</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	1,529	501	1.7	32.8	671	43.9	357	23.3
Moderate	14,673	6,370	21.5	43.4	4,905	33.4	3,398	23.2
Middle	36,523	20,048	67.6	54.9	7,062	19.3	9,413	25.8
Upper	3,670	2,737	9.2	74.6	599	16.3	334	9.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>56,395</b>	<b>29,656</b>	<b>100.0</b>	<b>52.6</b>	<b>13,237</b>	<b>23.5</b>	<b>13,502</b>	<b>23.9</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	423	13.6	365	13.3	54	20.0	4	4.8
Moderate	902	29.0	800	29.0	78	28.9	24	28.9
Middle	1,597	51.4	1,420	51.6	125	46.3	52	62.7
Upper	185	6.0	169	6.1	13	4.8	3	3.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,107</b>	<b>100.0</b>	<b>2,754</b>	<b>100.0</b>	<b>270</b>	<b>100.0</b>	<b>83</b>	<b>100.0</b>
Percentage of Total Businesses:				88.6		8.7		2.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.4	2	1.4	0	0.0	0	0.0
Moderate	25	18.0	25	18.0	0	0.0	0	0.0
Middle	107	77.0	107	77.0	0	0.0	0	0.0
Upper	5	3.6	5	3.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>139</b>	<b>100.0</b>	<b>139</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
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 D-4**

2023 Eastern Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	5.9	566	2.2	224	39.6	6,457	25.0
Moderate	8	23.5	6,325	24.5	1,406	22.2	4,950	19.1
Middle	21	61.8	16,420	63.5	2,214	13.5	5,240	20.3
Upper	3	8.8	2,545	9.8	263	10.3	9,209	35.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>34</b>	<b>100.0</b>	<b>25,856</b>	<b>100.0</b>	<b>4,107</b>	<b>15.9</b>	<b>25,856</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	1,529	501	1.8	32.8	671	43.9	357	23.3
Moderate	12,942	5,648	20.8	43.6	4,254	32.9	3,040	23.5
Middle	33,979	18,332	67.4	54.0	6,826	20.1	8,821	26.0
Upper	3,670	2,737	10.1	74.6	599	16.3	334	9.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>52,120</b>	<b>27,218</b>	<b>100.0</b>	<b>52.2</b>	<b>12,350</b>	<b>23.7</b>	<b>12,552</b>	<b>24.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	433	14.2	376	13.9	53	19.6	4	5.7
Moderate	752	24.6	670	24.7	63	23.2	19	27.1
Middle	1,624	53.2	1,443	53.2	138	50.9	43	61.4
Upper	246	8.1	225	8.3	17	6.3	4	5.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,055</b>	<b>100.0</b>	<b>2,714</b>	<b>100.0</b>	<b>271</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>
Percentage of Total Businesses:				88.8		8.9		2.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.5	2	1.5	0	0.0	0	0.0
Moderate	28	20.4	28	20.6	0	0.0	0	0.0
Middle	101	73.7	100	73.5	0	0.0	1	100.0
Upper	6	4.4	6	4.4	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>137</b>	<b>100.0</b>	<b>136</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>1</b>	<b>100.0</b>
Percentage of Total Farms:				99.3		0.0		0.7
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 – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES**

**Table E-1**

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Oklahoma City 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)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	6.5	0	0.0	4.2	1	9.1	5.1	252	8.1	3.2	5.9
Moderate	2	20.0	24.2	256	4.2	16.5	3	27.3	25.0	407	13.0	17.5	26.4
Middle	4	40.0	30.1	797	13.2	25.6	3	27.3	30.9	735	23.5	26.9	31.8
Upper	4	40.0	38.2	4,989	82.6	52.9	4	36.4	38.2	1,736	55.5	51.8	34.7
Unknown	0	0.0	1.0	0	0.0	0.7	0	0.0	0.8	0	0.0	0.6	1.3
Tract-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	6,042	100.0	100.0	11	100.0	100.0	3,130	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.5	0	0.0	3.0	0	0.0	6.6	0	0.0	4.0	5.9
Moderate	0	0.0	26.7	0	0.0	18.2	0	0.0	25.9	0	0.0	18.8	26.4
Middle	1	50.0	32.8	136	37.8	28.1	0	0.0	31.5	0	0.0	27.5	31.8
Upper	1	50.0	34.4	224	62.2	50.2	0	0.0	35.2	0	0.0	49.4	34.7
Unknown	0	0.0	0.6	0	0.0	0.5	0	0.0	0.8	0	0.0	0.4	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	360	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.2	0	0.0	5.1	0	0.0	4.4	0	0.0	4.1	5.9
Moderate	0	0.0	20.7	0	0.0	14.6	0	0.0	24.3	0	0.0	20.3	26.4
Middle	0	0.0	31.9	0	0.0	26.1	0	0.0	30.6	0	0.0	25.9	31.8
Upper	0	0.0	41.3	0	0.0	53.7	0	0.0	39.9	0	0.0	49.1	34.7
Unknown	0	0.0	0.9	0	0.0	0.6	0	0.0	0.7	0	0.0	0.7	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	33.3	10.3	2,345	36.0	7.7	0	0.0	14.3	0	0.0	9.9	8.1
Moderate	0	0.0	46.8	0	0.0	43.9	2	100.0	37.1	1,130	100.0	34.0	41.3
Middle	0	0.0	20.6	0	0.0	20.1	0	0.0	25.7	0	0.0	28.1	27.9
Upper	2	66.7	214	4,170	64.0	25.8	0	0.0	214	0	0.0	27.4	18.6
Unknown	0	0.0	0.8	0	0.0	2.4	0	0.0	14	0	0.0	0.6	4.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	6,515	100.0	100.0	2	100.0	100.0	1,130	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	6.7	6.1	2,345	18.2	4.4	1	7.7	5.3	252	5.9	4.0	5.9
Moderate	2	13.3	24.1	256	2.0	19.0	5	38.5	24.8	1,537	36.1	19.3	26.4
Middle	5	33.3	30.7	933	7.2	25.5	3	23.1	31.2	735	17.3	27.1	31.8
Upper	7	46.7	38.1	9,383	72.6	50.4	4	30.8	37.8	1,736	40.8	49.1	34.7
Unknown	0	0.0	0.9	0	0.0	0.8	0	0.0	0.8	0	0.0	0.6	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	12,917	100.0	100.0	13	100.0	100.0	4,260	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.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

**Table E-2**

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography											
Assessment Area: Oklahoma City Metropolitan											
Geographic Income Level	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	#%	#%	\$(000)	%	%	#	#%	\$(000)	%	
Low	0	0.0	6.0	0	0.0	6.6	0	0.0	0	0.0	6.9
Moderate	2	11.8	25.8	1,850	25.8	28.4	6	15.8	2,485	20.8	29.5
Middle	6	35.3	25.8	1,495	20.8	23.8	8	21.1	1,461	12.2	28.3
Upper	8	47.1	39.9	2,989	41.6	38.9	23	60.5	7,148	59.8	32.6
Unknown	1	5.9	1.8	850	11.8	2.3	1	2.6	850	7.1	2.8
Tract-Unk	0	0.0	0.6	0	0.0	0.1	0	0.0	0	0.0	0.0
Total	17	100.0	100.0	7,184	100.0	100.0	38	100.0	11,944	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. *Aggregate data is not currently available.											

**Table E-3**

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Oklahoma City 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)	\$ %	\$ %	
Home Purchase Loans													
Low	0	0.0	5.8	0	0.0	2.9	0	0.0	5.8	0	0.0	3.0	24.1
Moderate	0	0.0	16.3	0	0.0	11.1	0	0.0	17.0	0	0.0	11.5	18.7
Middle	1	10.0	16.9	260	4.3	14.9	0	0.0	17.0	0	0.0	14.4	18.8
Upper	2	20.0	30.5	756	12.5	43.0	7	63.6	29.7	2,396	76.5	41.4	38.4
Unknown	7	70.0	30.5	5,026	83.2	28.1	4	36.4	30.5	734	23.5	29.7	0.0
Total	10	100.0	100.0	6,042	100.0	100.0	11	100.0	100.0	3,130	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.0	0	0.0	4.2	0	0.0	7.4	0	0.0	3.3	24.1
Moderate	0	0.0	15.0	0	0.0	9.6	0	0.0	13.0	0	0.0	7.9	18.7
Middle	0	0.0	16.8	0	0.0	13.2	0	0.0	15.4	0	0.0	11.1	18.8
Upper	1	50.0	29.6	224	62.2	40.4	0	0.0	27.5	0	0.0	35.6	38.4
Unknown	1	50.0	30.6	136	37.8	32.7	0	0.0	36.7	0	0.0	42.1	0.0
Total	2	100.0	100.0	360	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	8.0	0	0.0	4.2	0	0.0	7.9	0	0.0	4.4	24.1
Moderate	0	0.0	17.2	0	0.0	10.7	0	0.0	17.2	0	0.0	11.8	18.7
Middle	0	0.0	20.7	0	0.0	15.2	0	0.0	23.0	0	0.0	17.7	18.8
Upper	0	0.0	45.7	0	0.0	57.1	0	0.0	43.7	0	0.0	54.9	38.4
Unknown	0	0.0	8.3	0	0.0	12.9	0	0.0	8.3	0	0.0	11.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	6.4	0	0.0	3.2	0	0.0	6.3	0	0.0	3.1	24.1
Moderate	0	0.0	16.2	0	0.0	10.9	0	0.0	16.2	0	0.0	10.9	18.7
Middle	1	8.3	17.3	260	4.1	14.6	0	0.0	17.4	0	0.0	14.0	18.8
Upper	3	25.0	32.1	980	15.3	43.3	7	63.6	30.9	2,396	76.5	41.0	38.4
Unknown	8	66.7	28.0	5,162	80.6	28.0	4	36.4	29.2	734	23.5	31.1	0.0
Total	12	100.0	100.0	6,402	100.0	100.0	11	100.0	100.0	3,130	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.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these are not displayed individually but are included in the total HMDA section of the table.													



**Table E-4**

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses											
Assessment Area: Oklahoma City Metropolitan											
	Bank And Aggregate Loans By Year										Total Businesses %
	2023						2024*				
	Bank		Agg	Bank		Agg	Bank				
	#	%	%	\$(000)	%	%	#	%	\$(000)	%	
By Revenue											
\$1 Million or Less	4	23.5	53.5	195	2.7	35.0	11	28.9	674	5.6	90.4
Over \$1 Million	4	23.5		689	9.6		12	31.6	2,385	20.0	8.4
Revenue Unknown	9	52.9		6,300	87.7		15	39.5	8,885	74.4	1.2
Total	17	100.0		7,184	100.0		38	100.0	11,944	100.0	100.0
By Loan Size											
\$100,000 or Less	4	23.5	92.3	195	2.7	34.7	11	28.9	674	5.6	
\$100,001 - \$250,000	4	23.5	4.0	689	9.6	16.0	12	31.6	2,385	20.0	
\$250,001 - \$1 Million	9	52.9	3.6	6,300	87.7	49.3	15	39.5	8,885	74.4	
Total	17	100.0	100.0	7,184	100.0	100.0	38	100.0	11,944	100.0	
By Loan Size and Revenues \$1 Million or Less											
\$100,000 or Less	4	100.0		195	100.0		11	100.0	674	100.0	
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0			
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0			
Total	4	100.0		195	100.0		11	100.0	674	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. *Aggregate data is not currently available.											

**Table E-5**

2024 Oklahoma City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	26	9.8	15,253	8.1	4,903	32.1	45,154	24.1
Moderate	85	32.0	55,307	29.5	9,430	17.1	34,969	18.7
Middle	73	27.4	55,451	29.6	4,480	8.1	35,206	18.8
Upper	67	25.2	58,427	31.2	1,893	3.2	71,957	38.4
Unknown	15	5.6	2,848	1.5	1,186	41.6	0	0.0
<b>Total AA</b>	<b>266</b>	<b>100.0</b>	<b>187,286</b>	<b>100.0</b>	<b>21,892</b>	<b>11.7</b>	<b>187,286</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	30,957	10,791	5.9	34.9	15,261	49.3	4,905	15.8
Moderate	114,338	47,927	26.4	41.9	52,374	45.8	14,037	12.3
Middle	102,338	57,794	31.8	56.5	34,499	33.7	10,045	9.8
Upper	87,846	63,042	34.7	71.8	18,979	21.6	5,825	6.6
Unknown	6,033	2,320	1.3	38.5	2,793	46.3	920	15.2
<b>Total AA</b>	<b>341,512</b>	<b>181,874</b>	<b>100.0</b>	<b>53.3</b>	<b>123,906</b>	<b>36.3</b>	<b>35,732</b>	<b>10.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,353	6.9	2,052	6.7	270	9.4	31	7.7
Moderate	10,046	29.5	8,991	29.2	942	32.8	113	28.2
Middle	9,639	28.3	8,810	28.6	738	25.7	91	22.7
Upper	11,109	32.6	10,152	32.9	804	28.0	153	38.2
Unknown	961	2.8	828	2.7	120	4.2	13	3.2
<b>Total AA</b>	<b>34,108</b>	<b>100.0</b>	<b>30,833</b>	<b>100.0</b>	<b>2,874</b>	<b>100.0</b>	<b>401</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.4</b>		<b>8.4</b>		<b>1.2</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	18	5.5	16	5.0	2	25.0	0	0.0
Moderate	70	21.5	67	21.1	3	37.5	0	0.0
Middle	91	27.9	90	28.3	1	12.5	0	0.0
Upper	147	45.1	145	45.6	2	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>326</b>	<b>100.0</b>	<b>318</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.5</b>		<b>2.5</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 E-6**

2023 Oklahoma City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	26	9.8	15,253	8.1	4,903	32.1	45,154	24.1
Moderate	85	32.0	55,307	29.5	9,430	17.1	34,969	18.7
Middle	73	27.4	55,451	29.6	4,480	8.1	35,206	18.8
Upper	67	25.2	58,427	31.2	1,893	3.2	71,957	38.4
Unknown	15	5.6	2,848	1.5	1,186	41.6	0	0.0
<b>Total AA</b>	<b>266</b>	<b>100.0</b>	<b>187,286</b>	<b>100.0</b>	<b>21,892</b>	<b>11.7</b>	<b>187,286</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	30,957	10,791	5.9	34.9	15,261	49.3	4,905	15.8
Moderate	114,338	47,927	26.4	41.9	52,374	45.8	14,037	12.3
Middle	102,338	57,794	31.8	56.5	34,499	33.7	10,045	9.8
Upper	87,846	63,042	34.7	71.8	18,979	21.6	5,825	6.6
Unknown	6,033	2,320	1.3	38.5	2,793	46.3	920	15.2
<b>Total AA</b>	<b>341,512</b>	<b>181,874</b>	<b>100.0</b>	<b>53.3</b>	<b>123,906</b>	<b>36.3</b>	<b>35,732</b>	<b>10.5</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,506	6.6	2,178	6.3	298	9.0	30	6.4
Moderate	10,534	27.6	9,405	27.4	1,009	30.5	120	25.8
Middle	10,871	28.5	9,829	28.6	930	28.1	112	24.0
Upper	13,021	34.2	11,909	34.7	924	27.9	188	40.3
Unknown	1,170	3.1	1,006	2.9	148	4.5	16	3.4
<b>Total AA</b>	<b>38,102</b>	<b>100.0</b>	<b>34,327</b>	<b>100.0</b>	<b>3,309</b>	<b>100.0</b>	<b>466</b>	<b>100.0</b>
Percentage of Total Businesses:				90.1		8.7		1.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	18	5.0	15	4.3	3	33.3	0	0.0
Moderate	68	18.9	65	18.5	3	33.3	0	0.0
Middle	100	27.8	99	28.2	1	11.1	0	0.0
Upper	173	48.1	171	48.7	2	22.2	0	0.0
Unknown	1	0.3	1	0.3	0	0.0	0	0.0
<b>Total AA</b>	<b>360</b>	<b>100.0</b>	<b>351</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				97.5		2.5		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## APPENDIX F – GLOSSARY

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

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

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

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

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

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

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary

reports of their mortgage lending activity. The reports include such data as the race, gender and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

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

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

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

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

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

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

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

**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.

**Small loan(s) to business(es):** A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage commercial loans.

**Small loan(s) to farm(s):** A loan included in "loans to small farms" as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Upper-income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.