



PUBLIC DISCLOSURE

March 6, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Fidelity Bank
RSSD# 106359

5100 North Classen Boulevard, Suite 500
Oklahoma City, Oklahoma 73118

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 First Fidelity 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 good 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 substantial majority 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 good.
- The bank’s distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes (borrower distribution) is adequate.
- The bank is a leader in making community development (CD) loans.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants and is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits adequate 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 low- and moderate-income (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 of its AAs.

INSTITUTION

DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of First Fidelity Bancorp, Inc., a one-bank holding company also located in Oklahoma City.
- The bank has total assets of \$2.7 billion as of September 30, 2022.
- The bank operates 28 banking facilities among 4 AAs in its three-state geographic footprint that includes 21 branches in Oklahoma, 6 branches in Arizona, and 1 branch in Colorado. The bank also maintains automated teller machines (ATMs) at 25 of the 28 branch offices, plus 2 stand-alone cash dispensing ATMs.
- As illustrated in Table 1, the bank's primary business focus is commercial lending, which comprises 70.4 percent of its lending portfolio by dollar.
- There has been no merger or acquisition activity since the prior evaluation.

Table 1

Composition of Loan Portfolio as of September 30, 2022		
Loan Type	\$(000)	%
Construction and Land Development	160,373	9.5
Farmland	138	0.0
1-4 Family Residential Real Estate	193,321	11.4
Multifamily Residential Real Estate	54,183	3.2
Non-Farm Non-Residential Real Estate	832,010	49.1
Agricultural	128	0.0
Commercial and Industrial	145,789	8.6
Consumer	280,819	16.6
Other	26,359	1.6
Gross Loans	1,693,120	100.0
<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 November 30, 2020 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 four AAs. The Oklahoma City Metropolitan Statistical Area (MSA) AA, the Phoenix Metropolitan AA, and the Denver Metropolitan AA were assessed using a full-scope review. The Tulsa 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 2020 and 2021 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank’s small business and small farm loans reported on the bank’s 2020 and 2021 CRA LARs;
- CD loans originated from January 1, 2020 through December 31, 2021;
- Qualified investments, grants, and donations that were made from January 1, 2020 to December 31, 2021, including those made prior to but still outstanding during this period; and,
- Retail banking services and CD services from January 1, 2020 to December 31, 2021.

When determining the overall institutional rating, more weight was placed on the Oklahoma state rating, based on higher lending volumes, followed by the Arizona state rating, and finally the Colorado state rating. With respect to the lending analysis, more emphasis was placed on small business loans due to the bank’s strategic focus on commercial lending.

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, 2022 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions operating in each AA.

Table 2

Review Type and Market Share by AA								
Assessment Area	Review Type	Br. #	Percent of Bank’s Lending by \$ ¹		Percent of Bank’s Deposits by \$ ²		Deposit Market Share	
			Bank	State	Bank	State	% Market Share ²	Market Share Rank ³
State of Oklahoma		21	51.6		63.6		1.1	14 of 204
Oklahoma City MSA AA	Full	20	49.2	95.3	61.9	97.4	2.8	7 of 71
Tulsa Metropolitan AA	Limited	1	2.4	4.7	1.6	2.6	0.1	43 of 50
State of Arizona		6	37.8		35.6		0.4	21 of 67
Phoenix Metropolitan AA	Full	6	37.8	100.0	35.6	100.0	0.5	17 of 61
State of Colorado		1	1.5		0.8		0.0	119 of 125
Denver Metropolitan AA	Full	1	1.5	100.0	0.8	100.0	0.0	58 of 66

¹ Based on the bank’s HMDA, small business, and small farm lending used in the analysis.
² Based on the June 30, 2022 FDIC’s Deposit Market Share Report.
³ 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 analysis of the bank’s record of lending, investment, and service activities in each state and specific AAs. Lending data for the AA that received a limited-scope review is located in Appendix E. Conclusions with respect to the lending test were evaluated for 2020 and 2021 lending data and are reflected in the body of the report.

LENDING TEST

The bank's overall lending test performance is high satisfactory. The lending test performance for Oklahoma, Arizona, and Colorado also are each rated high satisfactory. The rating for Oklahoma and Arizona were bolstered by the level of CD lending in those states.

In addition, for the geographic and borrower distribution analyses, more consideration was given to the volume of loan originations than the dollar amount, as this represents the numbers of individuals or entities served. Additional emphasis was placed on the bank's performance in comparison to aggregate lending data, rather than in comparison to relative demographic figures, as aggregate lending data is considered representative of credit demand. Specifically, aggregate lending data is expected to describe many factors impacting lenders within an AA. Aggregate lending datasets are updated annually and are, therefore, expected to predict more relevant comparisons.

While other purpose and purpose not applicable loans reported on the HMDA LARs are included in the home mortgage tables, these products were not analyzed as part of the geographic and borrower distribution analyses. Furthermore, in most of the AAs subject to full-scope reviews, lending levels were frequently too low to render meaningful analyses for one or more loan products. These instances typically included home improvement and multifamily loans. Due to lack of volume, only total home mortgage lending data was evaluated collectively in the Phoenix Metropolitan AA, as the volume for individual mortgage products was low and an analysis was not considered meaningful. Home mortgage lending was not evaluated in the Tulsa or Denver AAs due to overall low origination volume.

Additionally, small farm lending was only evaluated under the Lending Activity and AA Concentration lending test components at the institutional level and not within any of the AAs due to overall low origination volume.

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 good responsiveness to AA credit needs. The bank's overall loan distribution for small business lending has increased significantly since the previous evaluation, driven primarily by the bank's participation in the U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP) in response to the Coronavirus Disease 2019 pandemic (pandemic).

Table 3

Summary of Lending Activity Reviewed				
Loan Type	2020 and 2021			
	#	\$(000)	#%	\$%
Home Improvement	36	3,677	7.6	3.2
Home Purchase	101	27,955	21.4	24.4
Multi-Family Housing	29	23,491	6.1	20.5
Refinancing	279	57,981	59.1	50.6
Other Purpose Closed-End	27	1,433	5.7	1.3
Total HMDA related	472	114,537	10.1	19.6
Small Business	4,178	467,729	--	--
Total Small Business related	4,178	467,729	89.6	80.2
Small Farm	11	732	--	--
Total Small Farm related	11	732	0.2	0.1
Total Loans	4,661	582,998	100.0	100.0

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

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank offers flexible programs throughout its AAs, including government guaranteed small business loans and consumer loans that assist in building credit for those with derogatory or no credit history. Such loan programs help borrowers who might not otherwise qualify for credit.

The bank offers a Credit Builder small dollar loan program that assists in building credit for borrowers with derogatory credit or no traditional credit references. In addition, the bank also offers a Line of Credit product for \$750 or less that is available to any applicant regardless of credit score. During the evaluation period, the bank originated 400 Credit Builder loans for \$775,700 and 11 Line of Credit loans for \$18,000 to borrowers with very limited credit files. Additionally, the bank provides support for small business borrowers by participating in the SBA’s 504 Loan Program that provides long-term, fixed rate financing for major fixed assets that promote business growth and job creation. During the evaluation period, the bank originated 28 loans totaling \$27.6 million (MM) through this program.

At the onset of the pandemic in 2020, the regulatory agencies called upon financial institutions to provide flexibility to their customers and borrowers in an effort to avoid a national and international recession. The bank actively participated in this effort by providing loan accommodations, and participating in the SBA’s PPP loan program. Bank representatives also made relief available for all existing borrowers that would enable them to conserve financial resources. In 2020, the bank originated 1,805 PPP loans totaling \$181MM and 1,358 PPP loans totaling \$93.3MM were originated in 2021.

Assessment Area Concentration

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

Total small farm loan origination volume inside the bank’s AAs was significantly lower than HMDA and small business lending, and therefore, under this criterion, carried little weight and was not considered in the overall rating. Additionally, agricultural borrowers and/or properties tend to be located in rural areas farther from branch locations which are primarily situated within metropolitan centers.

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Purchase – Conventional	83	82.2	20,587	73.6	18	17.8	7,368	26.4
Home Improvement	35	97.2	3,642	99.0	1	2.8	35	1.0
Multi-Family Housing	25	86.2	21,291	90.6	4	13.8	2,200	9.4
Other Purpose Closed-End	24	88.9	1,268	88.5	3	11.1	165	11.5
Refinancing	250	89.6	43,407	74.9	29	10.4	14,574	25.1
Total HMDA related	417	88.3	90,195	78.7	55	11.7	24,342	21.3
Total Small Bus. related	3,817	91.4	415,286	88.8	361	8.6	52,443	11.2
Total Small Farm related	8	72.7	577	78.8	3	27.3	155	21.2
Total Loans	4,242	91.0	506,058	86.8	419	9.0	76,940	13.2

Note: Percentages may not total 100.0 percent due to rounding

The remaining loan distribution analyses discussed in this performance evaluation considered only those loans originated within the bank’s AAs. As mentioned previously, small farm loans were not evaluated given the low volume of only eight loans originated within the bank’s four delineated 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 good distribution among the different census tracts and dispersion throughout the AAs. The state ratings for Oklahoma and Arizona are consistent with the overall rating, while performance in Colorado is rated excellent.

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

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s lending has an overall adequate penetration among individuals of different income levels and businesses of different sizes. The state ratings for Oklahoma, Arizona, and Colorado for this criterion are consistent with the overall rating.

Community Development Lending

This performance criterion evaluates the bank’s level of CD lending. The bank is a leader in making CD loans. Table 5 summarizes all CD loans originated in the bank’s four AAs during the evaluation period. The majority of CD loans by dollar volume, 79.2 percent, were originated within the state of Arizona while approximately 16.2 percent was originated within the state of Oklahoma. The bank is a leader in making CD loans in Arizona and makes a relatively high level in Oklahoma and an adequate level in Colorado. Given the significant volume of CD lending with respect to the bank’s lending, deposits, and branching presence in each AA, this performance resulted in a positive impact to the overall lending test rating. Examples of how the bank was responsive to the needs of the AAs include:

- The bank originated 13 loans that supported affordable housing initiatives, which is considered an essential need in all of the bank’s AAs.
- The bank originated two loans in support of community services with the loans focused on providing food and shelter to needy individuals and families.
- The bank originated 49 loans totaling \$111.4MM to small businesses that employ a majority of LMI individuals earning less than 80.0 percent of the area MFI.

Table 5

Community Development Loans – All		
Community Development Purpose	#	\$(000)
Affordable Housing	11	32,725
Community Services	2	5,730
Economic Development	46	96,732
Revitalization and Stabilization	5	9,613
Outside Activities	5	18,652
Total Loans	69	163,453

In addition to loans made within the bank’s AAs, five additional loans totaling \$18.6MM were originated in support of economic development activities and affordable housing efforts in the states of Arizona and Colorado.

INVESTMENT TEST

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

The bank's overall performance under the investment test is low satisfactory. The state ratings for Oklahoma, Arizona, and Colorado are consistent with the overall rating. The bank has an adequate level of qualified CD investments and grants, but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments, but exhibits adequate responsiveness to the credit and CD needs of its AAs. The majority of qualified investments and donations by dollar volume, 72.2 percent, were generated in the state of Oklahoma with 24.2 percent in the state of Arizona, and the remainder in Colorado.

In addition, the majority of prior-period bank investments are government agency-issued mortgage-backed securities (MBS) pools that support affordable housing by providing home loans to LMI individuals and families. The bank made three new community service CD investments totaling \$1.2MM within the Oklahoma, Arizona, and Colorado AAs during the evaluation period. All three current-period investments consisted of school bonds for funding the construction and/or renovation of buildings for schools that were primarily comprised of a LMI student population. Table 6 summarizes the bank's qualified CD investments, including prior-period and current-period investments, as well as donations and grant activity.

In addition to qualified investments, the bank also made a number of qualified donations. The bank's donation activity increased slightly by number but significantly by dollar volume from the previous evaluation and included 52 donations for an approximate total of \$334,000. The bank's donation activity was particularly responsive to nonprofits that provide community services targeted to LMI individuals and families. Overall, 79.2 percent of the donations by number was made in the state of Oklahoma with the remaining amount made in the states of Arizona and Colorado.

Table 6

Investments, Grants, and Donations – All								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	9	2,723	0	0	4	6	13	2,728
Community Services	2	516	3	1,164	39	195	44	1,875
Economic Development	0	0	0	0	8	129	8	130
Revitalization and Stabilization	0	0	0	0	1	4	1	4
Outside Activities	0	0	0	0	0	0	0	0
Total	11	3,239	3	1,164	52	334	66	4,737
¹ Book Value of Investment ² Original Market Value of Investment								

SERVICE TEST

The bank’s overall performance under the service test is outstanding. The Oklahoma state rating was consistent with the institution’s rating, while Arizona was rated High Satisfactory and Colorado was rated Low Satisfactory.

Retail Banking Services

This performance criterion evaluates the bank’s level of service-delivery systems provided in each geographic classification. Table 7 illustrates the distribution of the bank’s branches and ATMs by income level of geographies, as well as the numbers of branch openings/closings and the numbers of CD services provided during the evaluation period.

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 28 total branch offices subject to this evaluation, 5 offices were located in moderate-, 10 in middle-, 11 in upper-, and 2 in unknown-income census tracts. These locations generally align with the total percentage of census tracts in the AAs by income level. The bank also maintains ATMs at 25 of the 28 branch offices, plus 2 stand-alone cash dispensing ATMs. In addition to bank-owned ATMs, the bank’s debit cards can be used at thousands of surcharge-free ATMs across the country at 7-Eleven, OnCue, and QuickTrip locations. Also, the bank has an ATM fee rebate program where customers can submit surcharge fee receipts and receive a full refund (some restrictions do apply).

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’s expansion into the Denver, Colorado market in May 2020 occurred in a middle-

income census tract and was the only branch opening during the evaluation period. The bank closed one branch located in Moore, Oklahoma in a middle-income tract and a restricted-access branch in Oklahoma City in a moderate-income tract; however, the bank retained its full-service ATM at the Oklahoma City location. Although the bank closed a branch in Arizona in an upper-income census tract, it was due to a relocation of that branch and resulted in no change, as the new branch location was also in an upper-income census tract. These changes have not adversely affected the accessibility of bank products and services, as the existing branches nearby and alternative delivery systems can satisfactorily service customer needs.

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. In the Oklahoma markets, the bank’s branches generally operate under the same hours of operation, Monday through Friday from 9:00 a.m. until 5:00 p.m. Two branch locations in Oklahoma City offer only deposit services Monday through Friday from 8:30 a.m. to 5:30 p.m. Within the Oklahoma City MSA AA, drive-through services, with the exception of the limited-service branches, are available Monday through Friday from 8:00 a.m. to 6:00 p.m. and on Saturday from 9:00 a.m. to 12:00 p.m. at 18 of the 20 branches. The lone location in the Tulsa Metropolitan AA is open from 9:00 a.m. to 5:00 p.m. Monday through Friday but closed on Saturday. In the Arizona market, the bank’s branches are open from 9:00 a.m. until 5:00 p.m. Monday through Thursday and until 6:00 p.m. on Friday. Two of the six Arizona market locations provide drive-through services that mirror the bank’s lobby hours. The de novo location in Colorado is open from 8:00 a.m. to 5:00 p.m. Monday through Friday, but closed on Saturdays.

Table 7

Retail Banking and Community Development Services – All												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	3.6	21.4	35.7	35.7	3.6	100.0	10.2	26.0	32.9	29.5	1.4	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total	
0.0	22.2	37.0	37.0	3.7	100.0	8.8	25.0	35.3	30.9	0.1	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	28		1		2		0	(1)	(1)	0	0	(2)
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization		Total Services	Total Organizations					
	5	113	11	0		129	41					

¹ Based on 2021 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. Bank officers and staff provided 129 qualified services to 41 different organizations, donating 2,412 hours of their time. Services provided included serving on boards of directors of affordable housing organizations, non-profit entities that primarily serve LMI individuals and families, and economic development organizations that advise and cater to small business incubation and development. Other staff have served on committees that provide technical assistance on financial matters, such as budgeting and financial planning, or assisted with marketing and fundraising efforts for a number of organizations. The bank's support of CD services largely occurred in the state of Oklahoma, specifically in the Oklahoma City MSA AA which accounted for approximately 82.9 percent of CD services bank-wide. The level of CD services has improved significantly from the prior CRA evaluation conducted on November 30, 2020.

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.

STATE OF OKLAHOMA

CRA rating for Oklahoma: **Satisfactory**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Low Satisfactory**
The Service Test is rated: **Outstanding**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is good.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes is adequate.
- The bank makes a relatively high level of CD loans within its AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants and is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits adequate responsiveness to the credit and CD needs throughout its Oklahoma AAs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout 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 individuals.
- The bank is a leader in providing CD services within its Oklahoma AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Oklahoma was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Oklahoma City, Oklahoma MSA AA, and the overall state rating was based predominantly on the bank's performance in this AA since it represents a substantial majority of the bank's branch network, as well as lending and deposit volume. Additionally, small business lending received greater weight in the product analysis due to a larger volume of originations, consistent with the bank's strategic emphasis on commercial lending.

A limited-scope review was conducted for the Tulsa Metropolitan AA to ascertain if the bank's performance in that area was generally consistent with its performance in the overall state evaluation.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN OKLAHOMA

The bank delineates two of its four AAs and operates 21 of its 28 branches in the state of Oklahoma. The bank's Oklahoma operations represent 51.6 percent of the bank's lending activity and 63.6 percent of the bank's deposits.

Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on commercial lending followed by residential real estate lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's performance under the lending test in the state of Oklahoma is high satisfactory. Bank performance under the lending test in the Oklahoma City MSA AA is considered good.

Lending Activity

The bank's overall lending activities in the state of Oklahoma reflect good responsiveness to AA credit needs.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including programs targeted to LMI borrowers. Refer to the Institution section of the report for a detailed description of the bank's flexible and innovative lending programs.

Geographic Distribution of Loans

The bank’s overall geographic distribution of lending within Oklahoma reflects good distribution among the different census tracts and dispersion throughout the two AAs. The distribution of loans across different geographies is good in the Oklahoma City MSA AA.

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

The bank’s lending within Oklahoma has an overall adequate penetration among individuals of different income levels and businesses of different sizes. The borrower distribution of loans is adequate in the Oklahoma City MSA AA.

Community Development Lending

The bank provides a relatively high level of CD loans within the state of Oklahoma. The Oklahoma City MSA AA accounted for 100.0 percent of the CD lending in the state, in which the bank originated 11 CD loans totaling \$26.5MM. Overall, qualified CD lending in Oklahoma accounted for 16.2 percent by dollar of bank-wide activity.

Table 8

Community Development Loans – State of Oklahoma		
Community Development Purpose	#	\$(000)
Affordable Housing	1	1,261
Community Services	0	0
Economic Development	9	24,135
Revitalization and Stabilization	1	1,131
Outside Activities	0	0
Total Loans	11	26,527

INVESTMENT TEST

The bank’s overall performance under the investment test in the state of Oklahoma is low satisfactory. Bank performance under the investment test in the Oklahoma City MSA AA is considered adequate.

The bank has an adequate level of qualified CD investments and grants within Oklahoma and is rarely 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 AAs. The bank maintains six prior-period government agency-issued MBS pools for \$2.3MM that support affordable housing to LMI borrowers, including four investments for \$915,827 that benefit both the Oklahoma City MSA and Tulsa Metropolitan AAs. Additionally, the bank demonstrated its continued support of public school education with two prior-period investments currently held in portfolio, and one current-period investment

in the Oklahoma City AA during the evaluation period. These schools are primarily comprised of LMI students.

To further demonstrate the bank’s commitment to meeting critical AA needs, 29 donations totaling \$129,000 to various community service organizations were made during the evaluation period. The bank’s donations to all qualifying organizations across Oklahoma totaled \$265,000.

Table 9

Investments, Grants, and Donations – State of Oklahoma								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	6	2,259	0	0	3	6	9	2,264
Community Services	2	516	1	380	29	129	32	1,025
Economic Development	0	0	0	0	6	127	6	127
Revitalization and Stabilization	0	0	0	0	1	4	1	4
Outside Activities	0	0	0	0	0	0	0	0
Total	8	2,775	1	380	39	266	48	3,421

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank’s overall performance under the service test in the state of Oklahoma is outstanding. Bank performance under the service test in the Oklahoma City MSA AA is considered excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Oklahoma are accessible to the bank’s various geographies and to individuals of different income levels in each AA. The Oklahoma City MSA AA has 20 branch locations, including the main office, that are accessible to geographies and individuals of different income levels.

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 prior evaluation, the bank closed two branches in the Oklahoma City MSA AA, one in a moderate- and one in a middle-income census tract. Nearby existing branches and alternative delivery systems satisfactorily service customer needs despite these closures.

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 and drive-through hours are generally consistent across AAs, with all locations offering similar products and services.

Table 10

Retail Banking and Community Development Services – State of Oklahoma												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	19.1	42.9	33.3	4.8	100.0	8.5	29.7	34.9	25.2	1.7	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	17.4	43.5	34.8	4.3	100.0	6.4	25.6	38.5	29.4	0.2	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	21		0	2			0	(1)	(1)	0	0	(2)
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization		Total Services	Total Organizations					
	2	100	7	0		109	28					

¹ Based on 2021 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 within the state of Oklahoma. Bank officers and staff provided 109 services and donated 1,864 hours to various CD services throughout the Oklahoma AAs. Many of these activities included serving on boards of directors or fundraising and marketing committees for various affordable housing and community service organizations, as well as presenting at seminars for small business entrepreneurs.

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

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

The bank's Oklahoma City MSA AA consists of Canadian, Cleveland, Grady, Lincoln, Logan, McClain, and Oklahoma Counties in their entirety. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- There have been no changes to the AA since the prior CRA evaluation.
- The AA is comprised of 363 tracts, including 29 low-, 106 moderate-, 136 middle-, 83 upper-, and 9 unknown-income census tracts. The AA tract composition remains unchanged since the prior evaluation.
- The bank operates 20 of its 28 banking offices in this AA, representing the highest number of branches within any of the bank's four AAs. All locations have on-site ATMs and 19 of the 20 offices have drive-through facilities.
- According to the June 30, 2022 FDIC Deposit Market Share Report, the bank held a 2.8 percent market share, ranking 7th out of 71 FDIC-insured financial institutions operating from 395 banking offices in the AA.
- Four 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. These individuals were representatives of a local chamber of commerce, an economic development organization, a small business development center, and a community service organization.

Table 11

Population Change			
Assessment Area: Oklahoma City MSA			
Area	2010 Population	2015 Population	Percent Change
2021 Oklahoma City MSA AA	1,252,987	1,318,408	5.2
Canadian County, OK	115,541	126,193	9.2
Cleveland County, OK	255,755	268,614	5.0
Grady County, OK	52,431	53,612	2.3
Lincoln County, OK	34,273	34,504	0.7
Logan County, OK	41,848	44,493	6.3
McClain County, OK	34,506	36,512	5.8
Oklahoma County, OK	718,633	754,480	5.0
Oklahoma	3,751,351	3,849,733	2.6
<i>Source: 2010 U.S. Census Bureau Decennial Census 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			

- As noted in Table 11, the Oklahoma City MSA AA population represents 34.2 percent of the entire state population and noted growth from 2010 to 2015, particularly in Canadian County, as well as those counties that primarily surround the city of Oklahoma City.
- Oklahoma County is the most populous county in the AA with 754,480 residents, or 57.2 percent of the total MSA population. Oklahoma County also includes the county seat and state capital of Oklahoma City, which is also the largest city in the state.
- Cleveland County has the second largest population in the MSA and is home to the University of Oklahoma, located in Norman, a suburb south of Oklahoma City.
- A community member stated that the AA consists of a younger population due to numerous companies moving to Oklahoma City that are hiring young professionals to work in those new offices.

Table 12

Median Family Income Change			
Assessment Area: Oklahoma City MSA			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
2021 Oklahoma City MSA AA	64,003	64,058	0.1
Canadian County, OK	74,028	72,790	(1.7)
Cleveland County, OK	71,485	70,191	(1.8)
Grady County, OK	57,594	61,472	6.7
Lincoln County, OK	56,175	55,258	(1.6)
Logan County, OK	67,764	67,562	(0.3)
McClain County, OK	69,471	69,182	(0.4)
Oklahoma County, OK	59,592	60,346	1.3
Oklahoma	58,375	58,029	(0.6)
<i>Source: 2006 – 2010 U.S. Census Bureau: American Community Survey 2011 – 2015 U.S. Census Bureau: American Community Survey</i>			
<i>Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.</i>			

- Median family incomes (MFIs) did not vary significantly among the seven counties, ranging from \$55,258 to \$72,790. Grady County was an outlier with a 6.7 percent increase in MFI from 2010 to 2015; otherwise most counties within the AA had negative to very small MFI growth. These statistics suggest relatively stable economic conditions across the AA.
- The 2015 median family income for the Oklahoma City MSA was 10.4 percent higher than the statewide figure.
- The percent of families in the AA classified as LMI was 38.8 percent, which was similar to the state of Oklahoma figure at 39.2 percent.
- The AA family poverty rate was 11.2 percent, compared to 12.4 percent at the state level. Oklahoma and Lincoln Counties had the highest poverty rates in the AA, at 13.8 percent and 12.1 percent, respectively. When assessed by the income level of census tracts in the MSA, the poverty rates were 17.5 percent in low-, 39.3 percent in moderate-, 32.6 percent in middle-, and 10.3 percent in upper-income census tracts.
- According to a community member, while there is a healthy diversity of employment sectors, the community member noted that most wages remain low.

Table 13

Housing Cost Burden						
Assessment Area: Oklahoma City MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
2021 Oklahoma City MSA AA	77.9	36.5	40.4	59.7	30.9	17.0
Canadian County, OK	72.8	39.2	32.7	66.8	39.4	16.5
Cleveland County, OK	82.2	43.4	40.6	68.0	32.9	16.5
Grady County, OK	63.3	22.8	31.9	46.6	22.9	13.4
Lincoln County, OK	53.3	24.3	28.7	49.3	28.0	15.6
Logan County, OK	70.8	16.8	39.8	48.0	32.3	16.3
McClain County, OK	70.4	17.8	33.1	59.9	27.7	17.5
Oklahoma County, OK	78.6	35.7	41.8	59.2	29.8	17.8
Oklahoma	72.2	37.1	38.1	55.1	28.2	16.6

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- There are 552,016 total housing units in the Oklahoma City MSA of which 57.6 percent are owner-occupied, 32.1 percent are rentals, and 10.4 percent are vacant.
- The median age of housing stock in the AA was 43 years of age. When segregated by the income level of census tract, the median age was 59 years in low-, 55 years in moderate-, 42 years in middle-, and 29 years in upper-income census tracts. The older age of homes in LMI census tracts suggests more dilapidated homes in need of repair.
- The overall affordability ratio within the AA is 37.6 percent. The lowest affordability ratio in the AA was in Oklahoma County at 35.6 percent while more affordable housing was found in Grady, Lincoln, and Canadian Counties with affordability ratios ranging from 44.6 percent to 47.0 percent.
- While home prices appear to be more affordable, rent prices in the AA are costly, with 44.3 percent of renters having rents that exceed 30.0 percent of their monthly income.
- Housing affordability for renters and homeowners is constrained throughout the seven AA counties, with the greatest cost burden to low-income renters and low-income homeowners in Cleveland and Oklahoma Counties.
- According to community members, there is a need for low-income housing options in the AA.
- A community member noted a “hollowing out” of real estate in the area meaning there seems to be primarily high-end and lower-priced fixer-upper type homes.

Table 14

Unemployment Rates					
Assessment Area: Oklahoma City MSA					
Area	2017	2018	2019	2020	2021
2021 Oklahoma City MSA AA	3.6	3.0	2.9	6.2	3.7
Canadian County, OK	3.3	2.7	2.7	5.9	3.2
Cleveland County, OK	3.3	2.8	2.7	5.7	3.2
Grady County, OK	3.8	2.9	2.9	6.2	3.5
Lincoln County, OK	4.1	3.4	3.4	5.7	3.5
Logan County, OK	3.5	2.9	2.7	5.2	3.3
McClain County, OK	3.3	2.7	2.6	5.6	3.1
Oklahoma County, OK	3.8	3.2	3.0	6.5	4.1
Oklahoma	4.0	3.3	3.1	6.2	3.8

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- During the evaluation period, unemployment rates in the AA counties began to stabilize in 2021 after the notable spikes during 2020 resulting from the pandemic.
- The leading industries in the AA are government, education and health services, professional and business services, leisure and hospitality, and retail trade.
- The AA’s largest employers are Tinker Air Force Base, The University of Oklahoma, Integris Health, University of Oklahoma Health Sciences Center, Federal Aviation Administration Mike Monroney Aeronautical Center, Mercy Hospital, Amazon, University of Oklahoma Medical Center, and The Boeing Company.
- A community member stated that the economy was doing well despite the pandemic. A lot of companies are moving into Oklahoma City and increasing the employment opportunities in the area.

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

LENDING TEST

The bank’s performance under the lending test in the Oklahoma City MSA AA is good.

Lending Activity

The bank’s lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in this AA included 346 home mortgage loans and 1,939 small business loans originated between January 1, 2020 and December 31, 2021.

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

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 lending is excellent, the distribution of small business loans is adequate. Home improvement, multifamily and small farm loans were not evaluated at the individual product level based on lending levels that are too low to conduct meaningful analyses.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2021 home mortgage loans among low-income census tracts was significantly above the aggregate lending data by number and comparable by dollar, and also significantly above the demographic figure, which represents the percentage of owner-occupied units in each census tract income level. Lending levels in the moderate-income census tracts were also significantly above the aggregate lending data by number and dollar but comparable with the demographic figure.

The bank's home mortgage lending in 2020 reflected penetration levels consistent with 2021 lending patterns. While the bank's loan dispersion among geographies of different income levels revealed some gaps or lapses, this result was based on the competition in this AA, the distance of many census tracts from the bank's branches, and a relatively low number of home mortgage loans disbursed among an AA consisting of 363 census tracts. As a result, this did not impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is excellent. The bank's 2021 home purchase loan distribution in area low-income census tracts was significantly above aggregate lending data by number and comparable by dollar, and significantly above the demographic figure. Lending in moderate-income census tracts was significantly above aggregate lending data by number and dollar and the demographic figure.

Bank performance in 2020 was consistent with the 2021 distribution. When loan dispersion within the AA was evaluated, some gaps or lapses were noted based on the relatively low number of home purchase loans originated during the evaluation period with respect to the significant number of tracts in the AA, although this did not impact the conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending is excellent. The bank's 2021 home refinance loan distribution in the low-income census tracts was significantly above the aggregate lending data by number and dollar, and above the demographic figure. Lending in moderate-income census tracts was similar to the distribution in low-income tracts, with bank lending significantly above the aggregate lending data by number and dollar, but comparable to the demographic figure.

The bank's lending performance for home refinance lending in 2020 was consistent with the 2021 distribution. When loan dispersion within the AA was evaluated, some gaps or lapses were noted during the evaluation period; for the same reasons described with home purchase loans, this did not impact the conclusion.

Table 15

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Oklahoma City MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	3.4	1.8	47	1.1	1.0	2	6.3	2.1	41	0.9	1.3	3.4
Moderate	8	27.6	13.3	716	16.7	8.8	10	31.3	13.7	1,066	24.5	9.1	18.4
Middle	8	27.6	37.7	829	19.4	32.6	11	34.4	39.3	1,554	35.7	34.1	44.1
Upper	12	41.4	47.1	2,691	62.8	57.3	9	28.1	44.8	1,690	38.8	55.3	34.1
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	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	29	100.0	100.0	4,282	100.0	100.0	32	100.0	100.0	4,351	100.0	100.0	100.0
Refinance Loans													
Low	6	5.3	0.9	1,035	6.6	0.4	5	4.7	1.1	596	4.6	0.7	3.4
Moderate	31	27.2	8.4	2,526	16.2	5.4	20	18.9	10.5	1,447	11.3	6.9	18.4
Middle	37	32.5	35.6	5,686	36.5	29.3	32	30.2	38.0	3,097	24.1	32.1	44.1
Upper	40	35.1	54.9	6,348	40.7	64.6	49	46.2	50.2	7,698	60.0	60.1	34.1
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	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	114	100.0	100.0	15,595	100.0	100.0	106	100.0	100.0	12,838	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.7	0	0.0	2.0	1	5.0	2.7	14	0.6	1.7	3.4
Moderate	2	14.3	11.1	80	9.4	8.0	4	20.0	13.0	295	12.9	9.9	18.4
Middle	7	50.0	43.0	527	61.8	36.2	8	40.0	38.8	635	27.7	32.9	44.1
Upper	5	35.7	43.1	246	28.8	53.3	7	35.0	45.4	1,345	58.8	55.3	34.1
Unknown	0	0.0	0.1	0	0.0	0.4	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	14	100.0	100.0	853	100.0	100.0	20	100.0	100.0	2,289	100.0	100.0	100.0
Multifamily Loans													
													Multi-family Units %
Low	0	0.0	9.5	0	0.0	4.3	2	40.0	12.0	1,294	47.2	4.3	8.5
Moderate	3	100.0	38.7	771	100.0	28.9	2	40.0	39.4	914	33.3	34.6	39.3
Middle	0	0.0	33.2	0	0.0	34.0	1	20.0	32.2	533	19.4	35.3	33.4
Upper	0	0.0	18.0	0	0.0	32.2	0	0.0	16.2	0	0.0	22.4	17.5
Unknown	0	0.0	0.6	0	0.0	0.6	0	0.0	0.3	0	0.0	3.5	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	3	100.0	100.0	771	100.0	100.0	5	100.0	100.0	2,741	100.0	100.0	100.0
Total Home Mortgage Loans													
													Owner Occupied Units %
Low	8	4.7	1.5	1,105	5.1	1.0	12	6.8	1.8	2,055	8.9	1.2	3.4
Moderate	46	27.2	11.5	4,148	19.0	8.4	37	20.9	12.5	3,791	16.4	9.8	18.4
Middle	56	33.1	37.2	7,201	33.0	31.5	59	33.3	38.9	6,336	27.5	33.5	44.1
Upper	59	34.9	49.7	9,357	42.9	58.9	69	39.0	46.7	10,876	47.2	55.0	34.1
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	0	0.0	0.4	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	169	100.0	100.0	21,810	100.0	100.0	177	100.0	100.0	23,058	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
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 distribution of small business loans in 2021 among low-income census tracts was comparable to levels noted in the aggregate lending data by number, as well as the demographic figure. Lending levels in the moderate-income census tracts were above the aggregate lending data by number and dollar and comparable to the demographic figure.

The distribution of small business loans in 2020 reflected distribution levels below the 2021 lending performance. In addition, the dispersion of loans among the various geographic income levels revealed some gaps or lapses, although they did not impact the overall conclusion. The noted gaps were located a considerable distance from the bank's closest branch locations.

Table 16

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Oklahoma City MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	49	4.5	4.2	3,678	3.9	5.5	30	3.5	4.2	1,047	1.7	5.3	4.4
Moderate	242	22.3	19.6	23,499	24.9	22.5	219	25.7	19.3	18,884	30.5	20.9	22.4
Middle	381	35.1	36.7	32,764	34.7	35.2	310	36.3	37.3	21,382	34.5	37.2	37.3
Upper	386	35.5	36.8	28,489	30.2	32.1	278	32.6	36.4	18,397	29.7	32.2	32.7
Unknown	28	2.6	2.4	5,972	6.3	4.5	16	1.9	2.1	2,299	3.7	4.2	3.1
Tract-Unk	0	0.0	0.4	0	0.0	0.2	0	0.0	0.7	0	0.0	0.1	
Total	1,086	100.0	100.0	94,402	100.0	100.0	853	100.0	100.0	62,009	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

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

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

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The distribution of 2021 home mortgage lending to low-income borrowers was significantly above aggregate

lending data by number and dollar, but below the demographic figure. Lending to moderate-income borrowers reflected comparable penetration to aggregate lending data and to the demographic figure.

The borrower distribution of home mortgage lending in 2020 was consistent with the level noted in 2021 lending.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. The distribution of 2021 home purchase lending to 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 also comparable to the aggregate lending data by number but below by dollar and comparable to the demographic figure.

The borrower distribution of home purchase lending in 2020 was below the level noted in 2021 lending.

Home Refinance Loans

The borrower distribution of home refinance lending is good. The distribution of 2021 home refinance lending to low-income borrowers was significantly above aggregate lending data by number and dollar but below the demographic figure. Lending to moderate-income borrowers was above the aggregate lending data by number, significantly above by dollar and comparable to the demographic figure.

The borrower distribution of home refinance lending in 2020 was consistent with the level noted in the 2021 lending.

Home Improvement Loans

The borrower distribution of home improvement lending is good. The bank's distribution of 2021 home improvement lending to low-income borrowers was significantly above the aggregate lending data by number and dollar and comparable with the demographic figure. Also, lending to moderate-income borrowers reflected comparable penetration to aggregate lending data and the demographic figure.

The distribution of home improvement loans in 2020 was not evaluated due to limited lending volume.

Table 17

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Oklahoma City MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	1	3.4	6.3	70	1.6	3.6	2	6.3	5.2	94	2.2	2.9	21.3
Moderate	3	10.3	19.9	191	4.5	15.4	4	12.5	16.4	255	5.9	12.4	17.5
Middle	3	10.3	20.3	395	9.2	19.5	3	9.4	18.3	429	9.9	17.3	20.5
Upper	8	27.6	32.4	2,077	48.5	42.7	9	28.1	30.8	1,400	32.2	40.1	40.7
Unknown	14	48.3	21.1	1,550	36.2	18.8	14	43.8	29.3	2,173	49.9	27.3	0.0
Total	29	100.0	100.0	4,282	100.0	100.0	32	100.0	100.0	4,351	100.0	100.0	100.0
Refinance Loans													
Low	13	11.4	3.1	664	4.3	1.3	9	8.5	4.0	591	4.6	1.9	21.3
Moderate	13	11.4	10.5	1,377	8.8	6.5	19	17.9	12.2	1,926	15.0	8.0	17.5
Middle	18	15.8	16.0	1,434	9.2	12.7	20	18.9	17.4	1,659	12.9	14.1	20.5
Upper	36	31.6	41.0	6,175	39.6	49.3	36	34.0	35.7	5,803	45.2	43.5	40.7
Unknown	34	29.8	29.4	5,945	38.1	30.2	22	20.8	30.7	2,859	22.3	32.5	0.0
Total	114	100.0	100.0	15,595	100.0	100.0	106	100.0	100.0	12,838	100.0	100.0	100.0
Home Improvement Loans													
Low	1	7.1	7.0	50	5.9	3.7	4	20.0	6.2	140	6.1	3.5	21.3
Moderate	2	14.3	13.0	82	9.6	9.1	3	15.0	12.5	170	7.4	8.8	17.5
Middle	5	35.7	18.3	261	30.6	13.9	3	15.0	19.8	181	7.9	15.3	20.5
Upper	6	42.9	52.5	460	53.9	61.8	10	50.0	51.7	1,798	78.5	58.8	40.7
Unknown	0	0.0	9.3	0	0.0	11.5	0	0.0	9.9	0	0.0	13.6	0.0
Total	14	100.0	100.0	853	100.0	100.0	20	100.0	100.0	2,289	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	17	10.2	4.7	843	4.0	2.5	16	9.3	4.7	876	4.3	2.5	21.3
Moderate	22	13.3	15.0	1,786	8.5	11.0	30	17.4	14.3	2,544	12.5	10.5	17.5
Middle	27	16.3	17.7	2,113	10.0	16.0	29	16.9	17.7	2,543	12.5	15.9	20.5
Upper	52	31.3	35.6	8,803	41.8	45.0	61	35.5	33.1	9,322	45.9	41.5	40.7
Unknown	48	28.9	27.0	7,495	35.6	25.5	36	20.9	30.1	5,032	24.8	29.7	0.0
Total	166	100.0	100.0	21,039	100.0	100.0	172	100.0	100.0	20,317	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table</p>													

Small Business Lending

The borrower distribution of small business lending is adequate. The distribution of loans originated in 2021 to businesses with annual revenues of \$1MM or less (small businesses) reflected penetration significantly below aggregate lending data by number but comparable by dollar volume. The bank's proportion of loans to small businesses was also significantly below the demographic figure. The distribution of loans in 2020 reflected performance above 2021 lending.

As previously stated, during this evaluation period, the bank originated a very large volume of PPP loans which skewed its lending performance. Since banks were not required to obtain revenue information when originating PPP loans, these loans were classified in the CRA data in the category of Revenue Not Known. Of the bank's 688 loans in the Revenue Not Known category, 92.9 percent of them were PPP loans. Therefore, for contextual purposes, a re-calculation of the bank's performance was conducted by removing the PPP loans from the analysis. By doing so, the bank's performance in 2021 and 2020 would have been comparable to the aggregate lending data by number, above by dollar, but still below the demographic figure. Although, it is unknown how many of the PPP loans were originated to small businesses, 83.2 percent of the loans in 2021 and 78.9 percent in 2020 were for loan amounts of \$100,000 or less, which can serve as a proxy for typical loan amounts requested by small businesses.

One community member stated the pandemic made it apparent there was a significant need for financial literacy for small businesses. It was noted during the pandemic that a lot of small business owners were not prepared to participate in the traditional business lending industry in order to get a PPP loan as they did not have their finances in order. The community member also stated the common barriers small business applicants face in obtaining bank credit include a poor credit history and documentation of experience in operating a business, especially in developing and maintaining business cash flows and accounting.

Table 18

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Oklahoma City MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	116	10.7	29.7	18,451	19.5	25.9	95	11.1	41.3	15,493	25.0	32.4	91.5
Over \$1 Million	68	6.3		13,886	14.7		70	8.2		14,177	22.9		7.4
Revenue Unknown	902	83.1		62,065	65.7		688	80.7		32,339	52.2		1.2
Total	1,086	100.0		94,402	100.0		853	100.0		62,009	100.0		100.0
By Loan Size													
\$100,000 or Less	857	78.9	86.9	23,990	25.4	30.5	710	83.2	91.0	16,726	27.0	34.7	
\$100,001 - \$250,000	130	12.0	7.4	21,907	23.2	20.2	80	9.4	4.9	13,210	21.3	18.2	
\$250,001 - \$1 Million	99	9.1	5.7	48,505	51.4	49.3	63	7.4	4.1	32,073	51.7	47.1	
Total	1,086	100.0	100.0	94,402	100.0	100.0	853	100.0	100.0	62,009	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	73	62.9		2,773	15.0		60	63.2		2,459	15.9		
\$100,001 - \$250,000	18	15.5		2,939	15.9		14	14.7		2,693	17.4		
\$250,001 - \$1 Million	25	21.6		12,739	69.0		21	22.1		10,341	66.7		
Total	116	100.0		18,451	100.0		95	100.0		15,493	100.0		
<i>Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

Community Development Lending

The bank provides a relatively high level of CD loans. The bank originated 11 CD loans totaling \$26.5MM in this AA. The following are examples of CD loans that were responsive to AA credit needs:

- The bank originated a \$1.1MM loan to operate two commercial rental properties in a moderate-income tract in Norman, Oklahoma. The loan was also located within an Enterprise Zone.
- The bank originated a \$1.3MM affordable housing loan to construct and lease a 20-unit apartment complex where a majority of the rental units had rents set below the Fair Market Rate (FMR) for the Oklahoma City MSA AA.
- The bank originated 9 loans for \$24.1MM to small businesses based on the SBA size standards that ultimately created or retained jobs for LMI individuals.

Table 19

Community Development Loans – Oklahoma City MSA AA		
Community Development Purpose	#	\$(000)
Affordable Housing	1	1,261
Community Services	0	0
Economic Development	9	24,135
Revitalization and Stabilization	1	1,131
Total Loans	11	26,527

INVESTMENT TEST

The bank’s performance under the investment test in the Oklahoma City MSA AA is adequate. The bank has an adequate level of qualified CD investments and grants, but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments, yet exhibits adequate responsiveness to the credit and CD needs of its AA. In addition to the MBS and municipals noted previously, examples of investment activity in the AA include:

- During the evaluation period, the bank made monthly donations totaling \$103,750 to a local university for a curriculum that creates a real-world business experience in which students create and manage a small non-profit business enterprise. The bank is the founding sponsor and provides primary sponsorship and start-up loans to fund inventory and operations for the new entity. All profits from the businesses are donated to other CD organizations that provide support to LMI individuals and families.
- The bank made two community service donations totaling \$15,700 to a nonprofit organization that provides mentorship and various programs to at-risk young adults that are primarily from LMI families.
- The bank made donations totaling \$20,750 to an organization that was established to create quality jobs, increase capital investment, retain existing businesses and improve per capita income in Oklahoma City.

Table 20

Investments, Grants, and Donations – Oklahoma City MSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	6	1,979	0	0	3	6	9	1,985
Community Services	2	516	1	380	27	125	30	1,021
Economic Development	0	0	0	0	4	124	4	125
Revitalization and Stabilization	0	0	0	0	1	4	1	4
Total	8	2,495	1	380	35	259	44	3,135
¹ Book Value of Investment								
² Original Market Value of Investment								

SERVICE TEST

The bank’s performance under the service test in the Oklahoma City MSA 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 distribution of branches is relatively proportional to the percent of tracts by income level as well as the population by tract income. The bank operates 20 branches in the AA which all include on-site ATMs and 19 have drive-through facilities. Three branch offices are located in moderate-, 9 in middle-, 6 in upper- and 2 in unknown-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 closed two branches since the prior CRA evaluation. In 2021, the bank closed one limited-access branch in a moderate-income census tract in Oklahoma City due to the building in which it was located ceasing on-site operations. However, the bank did retain a full-service ATM in that location. The bank also closed a location in Moore, Oklahoma which was located in a middle-income census tract. This location could be effectively serviced via two other branches in the Moore area. Overall, there was no change in accessibility.

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. Lobby hours and additional services do not vary by market. Branch hours range from 9:00 a.m. to 5:00 p.m. from Monday to Friday with extended drive-through hours until 6:00 p.m. and Saturday hours from 9:00 a.m. to 12:00 p.m.

Table 21

Retail Banking and Community Development Services – Oklahoma City MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	20.0	45.0	30.0	5.0	100.0	8.0	29.2	37.5	22.9	2.5	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	18.2	45.5	31.8	4.5	100.0	5.7	24.9	41.2	27.8	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
	20		0	2			0	(1)	(1)	0	0	(2)
Community Development Services	Affordable Housing	Community Services	Economic Development		Revitalization & Stabilization	Total Services	Total Organizations					
	2	98	7		0	107	27					
¹ Based on 2021 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. Bank staff provided a total of 107 CD services to 27 organizations and donated 1,853 hours to service activities during the evaluation period. The services were generally provided by employees who served on boards of directors for area agencies that provide community services to LMI individuals and families. The following activities were considered particularly responsive to CD service needs in the AA:

- A bank officer served on the Loan Committee of an organization focused on providing economic development loans to small businesses.
- A bank officer served on the board of an organization that provides affordable rental housing and home ownership opportunities to LMI individuals and families in all Oklahoma counties.
- Several bank officers provided financial education to schools who have a majority of students enrolled in the Free and Reduced Price Lunch Program and that have a program that educates students on how to generate and create wealth, as well as how to create jobs.
- A bank officer served on the board of an organization that provides education, mentoring, and crisis support to LMI youth.
- Multiple bank officers provided their financial and technical expertise to help local businesses overcome the economic challenges of COVID-19 through their involvement in a statewide small business grant relief program that was implemented during the pandemic.

- A bank officer served as a committee member for an organization that works with local non-profits and other groups to assist with financial literacy to low- and moderate-income applicants.
- A bank officer served on the board of a non-profit organization that promotes growth and improvement for its district and the surrounding community.

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

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

The bank's AA is comprised of Tulsa County in its entirety, one of seven counties that comprise the Tulsa, Oklahoma MSA. In addition, the bank also takes one tract in Osage County. (See Appendix C for an AA map).

- The AA remains unchanged since the prior evaluation and is comprised of 176 census tracts, including 17 low-, 54 moderate-, 52 middle-, and 53 upper-income census tracts.
- The bank operates one full-service location in this AA. The office is located in an upper-income census tract in Tulsa and offers an ATM, lobby, and drive-through services.
- Based on the 2015 American Community Survey (ACS) data, the AA population was 629,165.
- According to the June 30, 2022 FDIC Deposit Market Share Report, the bank held a 0.1 percent market share, ranking 43rd out of 50 FDIC-insured financial institutions operating from 205 banking offices in the AA.

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

The state of Oklahoma 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. The conclusions regarding the bank's performance in this area does not change the rating for the state of Oklahoma.

Table 22

Assessment Area	Lending Test	Investment Test	Service Test
Tulsa Metropolitan	Consistent	Consistent	Consistent

**STATE OF ARIZONA
PHOENIX METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)**

CRA rating for Arizona: **Satisfactory**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Low Satisfactory**
The Service Test is rated: **High Satisfactory**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is good.
- The bank's distribution of loans among businesses of different sizes is adequate.
- The bank is a leader in making CD loans within its AA.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants and is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits adequate responsiveness to the credit and CD needs throughout its Arizona AA.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- 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 AA, particularly LMI geographies and/or individuals.
- The bank provides a relatively high level of CD services within its Arizona AA and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Arizona was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Phoenix Metropolitan AA, the only AA within the state. The overall state rating in Arizona is based exclusively on the bank's performance in the Phoenix Metropolitan AA and is discussed concurrently with the state performance. Additionally, small business lending received greater weight in the product analysis due to a larger volume of originations, consistent with the bank's strategic emphasis on commercial lending. A total of 1,763 loans were reviewed in the state of Arizona, including 1,711 small business and 52 home mortgage loans. Finally, an analysis of home mortgage lending to borrowers of different income levels was not conducted as volume was too low to perform a meaningful analysis, given that this criterion does not include multifamily originations.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA

The bank delineates one of its four AAs and operates six of its 28 branches in the state of Arizona. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on small business lending. Detailed descriptions of the bank's operations in the AA are provided in the analysis below.

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

The bank's Phoenix Metropolitan AA consists of 907 of the 916 census tracts in Maricopa County, Arizona, which is one of two counties that comprise the Phoenix-Mesa-Chandler, Arizona MSA (Phoenix MSA). The nine census tracts omitted from the AA are primarily located in the southwestern portion of Maricopa County and are predominantly rural. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- The AA remains unchanged since the previous evaluation.
- The AA comprises 907 census tracts, including 104 low-, 205 moderate-, 283 middle-, 305 upper-, and 10 unknown-income tracts.
- Six of the bank's 28 branches are located within the Phoenix Metropolitan AA. Three branches have full-service ATMs, while two operate drive-through facilities.
- According to the June 30, 2022 FDIC Deposit Market Share Report, the bank held a 0.5 percent market share, ranking 17th out of 61 FDIC-insured financial institutions operating from 674 banking offices in the AA.

- 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 meetings those credit needs, and for perspective on local economic conditions. These individuals were representatives of a local economic development entity and a non-profit organization that provides homeownership services.

Table 23

Population Change			
Assessment Area: Phoenix Metropolitan			
Area	2010 Population	2015 Population	Percent Change
2021 Phoenix Metropolitan AA	3,817,117	4,018,143	5.3
Phoenix-Mesa-Chandler, AZ MSA	4,192,887	4,407,915	5.1
Arizona	6,392,017	6,641,928	3.9

*Source: 2010 U.S. Census Bureau Decennial Census
2011 – 2015 U.S. Census Bureau: American Community Survey*

Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- The Phoenix MSA represents 66.4 percent of the population of the state of Arizona.
- The Phoenix Metropolitan AA, with a population of 4,018,143 contains 91.2 percent of the MSA’s population.
- Maricopa County is one of the largest counties in the United States, with a land area of 9,224 square miles.

Table 24

Median Family Income Change			
Assessment Area: Phoenix Metropolitan			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
2021 Phoenix Metropolitan AA	71,259	64,751	(9.1)
Phoenix-Mesa-Chandler, AZ MSA	70,137	63,686	(9.2)
Arizona	65,163	59,480	(8.7)

*Source: 2006 – 2010 U.S. Census Bureau: American Community Survey
2011 – 2015 U.S. Census Bureau: American Community Survey*

*Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.*

- Within the AA, 38.7 percent of families are considered LMI, which is similar to the Arizona statewide figure of 39.3 percent.
- The percentage of families below poverty in the AA is 12.6 percent, which is similar to the Arizona statewide figure of 13.3 percent. When assessed by income level of census tracts in the county, the poverty rates were 30.6 percent in low-, 34.6 percent in moderate-, 22.7 percent in middle- and 12.2 percent in upper-income census tracts.

- According to an interview previously conducted with a community member, the family poverty level for families with children under the age of 5 is 15.7 percent and 11.0 percent of households are on food stamps.

Table 25

Housing Cost Burden						
Assessment Area: Phoenix Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
2021 Phoenix Metropolitan AA	79.8	61.0	43.3	64.5	43.0	21.0
Phoenix-Mesa-Chandler, AZ MSA	79.0	60.2	43.1	63.4	42.1	20.9
Arizona	78.0	59.2	43.1	60.9	40.5	20.9
<i>Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy</i> <i>Note: Cost Burden is housing cost that equals 30 percent or more of household income.</i> <i>All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>						

- As illustrated in the table, housing cost burden in the AA generally mirrored the figures at the statewide level, both for renters and homeowners.
- According to 2015 Census data, the housing affordability ratio in the Phoenix Metropolitan AA was 29.1 percent, which is comparable to both the Phoenix MSA and state of Arizona figures, both of which were 30.0 percent. These ratios are low and indicate a housing affordability gap.
- Rent prices in the AA are expensive, with 46.5 percent of renters having rents that exceed 30.0 percent of their monthly income. The low affordability of rents and mortgage payments may hinder the ability of LMI individuals and families to afford home ownership absent special loan programs.
- A community member indicated that housing inventory in the AA is limited, with affordable housing being in short supply. The short supply is due in large part to high demand.
- The community member stated that many of the affordable homes in the AA are on the outskirts of the metropolitan area and many are in need of rehabilitation. Additionally, there are few affordable home builders.

Table 26

Unemployment Rates					
Assessment Area: Phoenix Metropolitan					
Area	2017	2018	2019	2020	2021
2021 Phoenix Metropolitan AA	4.3	4.1	4.2	7.2	4.5
Phoenix-Mesa-Chandler, AZ MSA	4.3	4.2	4.2	7.2	4.5
Arizona	5.0	4.8	4.9	7.7	4.9
<i>Source: Bureau of Labor Statistics: Local Area Unemployment Statistics</i> <i>Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.</i>					

- Unemployment in the AA generally mirrored statewide figures and trends, including a notable spike and gradual decline during, and exiting, the height of the pandemic.
- According to community members, the overall economy prior to the pandemic was extraordinarily strong, but was significantly impacted by the pandemic, especially in the hospitality and tourism industries.
- One community member stated larger businesses in the area were better able to sustain employment during the pandemic, with small businesses experiencing the most impact of job loss.
- Major employers¹ in the AA include Banner Health (10,728), American Express (9,213), Amazon (6,457), and Honeywell (6,171).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PHOENIX METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the Phoenix Metropolitan AA is good and the state of Arizona is rated high satisfactory. The lending test conclusion was bolstered by a significant volume of CD lending which had a favorable impact on the conclusion.

The evaluation of lending performance in this AA does not include an analysis of small farm lending as the bank did not report any small farm originations during the evaluation period.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation includes 1,711 small business and 52 home mortgage loans originated between January 1, 2020 and December 31, 2021.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A discussion of these products is highlighted in the overall Institution section of this evaluation.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. The distribution of small business loans reflects good penetration, while the distribution of home mortgage loans reflects adequate

¹ Source: City of Phoenix

penetration. Additionally, the evaluation of home mortgage lending focused on total home mortgage lending, as individual product level volume was too low to perform a meaningful analysis.

Home Mortgage Lending

The geographic distribution of home mortgage lending is adequate. The distribution of 2021 home mortgage loans in low-income census tracts was comparable to the aggregate lending data by number, above by dollar, and comparable to the demographic figure of the percentage of owner-occupied units. Lending in moderate-income tracts was significantly above the aggregate lending data by number and dollar and above the demographic figure.

The geographic distribution of home mortgage lending in 2020 reflected performance below 2021 penetration levels. While the bank's loan dispersion among geographies of different income levels revealed some gaps or lapses, this result was based on the distance of many census tracts from the bank's branches and a relatively low number of home mortgage loans disbursed among an AA consisting of 907 census tracts. Therefore, this did not impact the overall conclusion.

Table 27

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Phoenix Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	4.5	0	0.0	2.8	0	0.0	5.3	0	0.0	3.3	4.5
Moderate	0	0.0	16.4	0	0.0	11.7	0	0.0	17.1	0	0.0	12.1	18.9
Middle	0	0.0	36.6	0	0.0	31.6	1	9.1	36.0	388	4.6	31.0	34.5
Upper	5	100.0	41.6	2,463	100.0	52.8	10	90.9	41.0	8,002	95.4	53.0	42.0
Unknown	0	0.0	0.9	0	0.0	1.0	0	0.0	0.6	0	0.0	0.7	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	5	100.0	100.0	2,463	100.0	100.0	11	100.0	100.0	8,390	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.0	0	0.0	1.3	0	0.0	2.8	0	0.0	1.8	4.5
Moderate	0	0.0	11.3	0	0.0	8.1	0	0.0	13.3	0	0.0	9.5	18.9
Middle	1	7.7	32.9	13	0.2	28.1	0	0.0	34.7	0	0.0	29.5	34.5
Upper	12	92.3	53.2	7,497	99.8	61.8	7	100.0	48.6	5,359	100.0	58.6	42.0
Unknown	0	0.0	0.6	0	0.0	0.7	0	0.0	0.5	0	0.0	0.6	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	13	100.0	100.0	7,510	100.0	100.0	7	100.0	100.0	5,359	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.0	0	0.0	1.5	0	0.0	2.2	0	0.0	1.7	4.5
Moderate	0	0.0	10.5	0	0.0	8.1	0	0.0	10.5	0	0.0	8.3	18.9
Middle	0	0.0	30.7	0	0.0	25.2	0	0.0	31.6	0	0.0	26.2	34.5
Upper	1	100.0	56.3	500	100.0	64.9	0	0.0	55.3	0	0.0	63.3	42.0
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.6	0	0.0	0.6	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	500	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	2	28.6	27.8	1,200	25.5	24.4	1	14.3	27.0	1,231	10.4	14.5	
Moderate	2	28.6	34.5	2,015	42.8	22.6	6	85.7	39.7	10,620	89.6	32.1	30.7
Middle	2	28.6	23.4	1,175	25.0	31.9	0	0.0	18.3	0	0.0	25.4	30.9
Upper	1	14.3	13.4	319	6.8	20.9	0	0.0	14.0	0	0.0	26.8	19.0
Unknown	0	0.0	0.9	0	0.0	0.2	0	0.0	1.0	0	0.0	1.2	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	4,709	100.0	100.0	7	100.0	100.0	11,851	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	7.4	2.9	1,200	7.8	2.6	1	4.0	3.6	1,231	4.8	2.9	
Moderate	2	7.4	13.0	2,015	13.2	9.8	6	24.0	14.4	10,620	41.5	11.3	18.9
Middle	3	11.1	34.1	1,188	7.8	29.4	1	4.0	34.9	388	1.5	29.7	34.5
Upper	20	74.1	49.4	10,899	71.2	57.5	17	68.0	46.6	13,361	52.2	55.5	42.0
Unknown	0	0.0	0.7	0	0.0	0.8	0	0.0	0.5	0	0.0	0.7	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	15,302	100.0	100.0	25	100.0	100.0	25,600	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
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 good. The distribution of loans in 2021 among low-income census tracts was comparable to aggregate lending data by number and dollar volume, as well as the demographic figure of the percentage of total businesses. Lending in moderate-income census tracts was above the aggregate lending data by number, comparable by dollar, and above the demographic figure.

The geographic distribution of small business lending in 2020 reflected performance which was consistent with the penetration levels noted in 2021 lending. In addition, the dispersion of loans among the various geographic income levels revealed some gaps or lapses, although they did not impact the overall conclusion. The noted gaps were located a considerable distance from the bank's closest branch locations.

Table 28

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Phoenix Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	66	6.8	6.7	15,297	11.1	10.2	41	5.5	6.5	7,687	7.9	9.3	6.7
Moderate	203	20.9	16.6	23,913	17.4	19.1	158	21.4	16.1	17,888	18.3	18.8	16.8
Middle	242	24.9	26.5	34,157	24.8	24.7	186	25.2	27.5	25,312	26.0	25.9	28.5
Upper	453	46.6	49.1	60,503	44.0	44.2	347	47.0	48.6	44,293	45.4	44.7	47.5
Unknown	8	0.8	0.7	3,695	2.7	1.3	7	0.9	0.6	2,313	2.4	1.1	0.6
Tract-Unk	0	0.0	0.5	0	0.0	0.5	0	0.0	0.6	0	0.0	0.1	
Total	972	100.0	100.0	137,565	100.0	100.0	739	100.0	100.0	97,493	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Lending to Businesses of Different Sizes

The bank's lending has an adequate distribution among businesses of different sizes. The distribution of small business lending reflects adequate penetration levels. The distribution of home mortgages to borrowers of different income levels was not evaluated as origination volume was too low to perform a meaningful analysis once multi-family loans were excluded from the total AA originations. Multi-family loans are not included in borrower distribution analyses.

Small Business Lending

The borrower distribution of small business lending is adequate. The distribution of loans originated in 2021 to businesses with annual revenues of \$1MM or less reflected penetration significantly below aggregate lending data by number but was comparable by dollar. The bank's proportion of loans to small businesses was also significantly below the demographic figure. The distribution of loans in 2020 reflected consistent performance to 2021 lending.

The rating considered contextual factors such as the significant volume of PPP loans originated within the AA during the evaluation period. For example, 92.8 percent of the 575 Revenue Unknown loans originated were PPP loans. With these loans removed from the analysis, the bank's distribution of 2021 loans reflected penetration more comparable to the aggregate lending figure by number, significantly above by dollar, but still significantly below the demographic figure. Inclusive of the PPP loans, 67.7 percent of loans in 2021 were for amounts of \$100,000 or less, which can serve as a proxy for typical loan amounts requested by small businesses.

Table 29

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													Total Business es %
Assessment Area: Phoenix Metropolitan													
Bank And Aggregate Loans By Year													
2020						2021							
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	72	7.4	40.2	24,631	17.9	22.0	80	10.8	48.1	26,859	27.5	24.9	93.2
Over \$1 Million	105	10.8		36,781	26.7		84	11.4		27,989	28.7		5.6
Revenue Unknown	795	81.8		76,153	55.4		575	77.8		42,645	43.7		1.2
Total	972	100.0		137,565	100.0		739	100.0		97,493	100.0		100.0
By Loan Size													
\$100,000 or Less	635	65.3	88.8	20,371	14.8	34.4	500	67.7	93.5	15,283	15.7	38.6	
\$100,001 - \$250,000	174	17.9	6.4	28,649	20.8	19.5	115	15.6	3.5	19,328	19.8	16.3	
\$250,001 - \$1 Million	163	16.8	4.8	88,545	64.4	46.1	124	16.8	3.0	62,882	64.5	45.1	
Total	972	100.0	100.0	137,565	100.0	100.0	739	100.0	100.0	97,493	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	21	29.2		967	3.9		21	26.3		1,332	5.0		
\$100,001 - \$250,000	12	16.7		1,853	7.5		15	18.8		2,604	9.7		
\$250,001 - \$1 Million	39	54.2		21,811	88.6		44	55.0		22,923	85.3		
Total	72	100.0		24,631	100.0		80	100.0		26,859	100.0		
<i>Source: 2021 FFIEC Census Data 2021 Data & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 52 CD loans totaling \$116.8MM in the Phoenix Metropolitan AA, which accounts for 75.4 percent of CD lending by volume and 71.4 percent by dollar bank-wide. The bulk of CD lending, 36 loans for \$71.1MM, addressed economic development by financing small businesses based on the SBA size standards, that ultimately created or retained jobs for LMI individuals. In addition, ten loans for \$31.5MM for affordable housing were made, which is a critical need in the AA.

Examples of CD lending in the AA include:

- Three loans totaling \$12.8MM were originated to one borrower for the purchase or refinance of multiple 1- to 4-family or multifamily units with rents under 80.0 percent of the Department of Housing and Urban Development’s Fair Market Rents in the AA.
- A loan to an organization for \$1.5MM for the purchase of a group home for patients seeking substance abuse treatment and on state Medicaid, addressing community service needs.

Table 30

Community Development Loans – Phoenix Metropolitan AA		
Community Development Purpose	#	\$(000)
Affordable Housing	10	31,464
Community Services	2	5,730
Economic Development	36	71,097
Revitalization and Stabilization	4	8,482
Outside Activities	4	12,707
Total Loans	56	129,481

In addition to loans made within the bank’s AA, four additional loans totaling \$12.7MM were originated in support of affordable housing and economic development in the state of Arizona.

INVESTMENT TEST

The bank’s performance under the investment test in the Phoenix Metropolitan AA is adequate and the state of Arizona is low satisfactory. The bank has an adequate level of qualified CD investments and grants and is rarely 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 CD investments in the AA include:

- Three prior period MBS investments totaling \$464,621 that support affordable housing to LMI borrowers.
- One current period school bond investment for \$619,306 for a local school district where the majority of students attend Title 1 schools and whose families are classified as low- or moderate-income.
- In addition, the bank made nine donations totaling \$65,665. All of the donations were made to community service organizations. Two donations totaling \$41,665 were used solely to support programs designed to assist in the delivery of legal services to LMI individuals.

Table 31

Investments, Grants, and Donations – Phoenix Metropolitan AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	3	464	0	0	0	0	3	464
Community Services	0	0	1	619	9	66	10	685
Economic Development	0	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	3	464	1	619	9	66	13	1,149
¹ Book Value of Investment ² Original Market Value of Investment								

SERVICE TEST

The bank’s performance under the service test in the state of Arizona is high satisfactory. The bank’s performance under the service test in the Phoenix Metropolitan AA is good.

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 six branches and three full-service ATMs in the AA. The locations feature two branches and one full-service ATM in moderate-income tracts, and four branches and three full-service ATMs in upper-income tracts. The proportion of branches in LMI census tracts exceeds the percentage of LMI census tracts in the AA.

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 relocated one branch in an upper-income tract to another location a short distance away, also in an upper-income tract, since the prior CRA evaluation, with no change to accessibility.

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. As discussed previously, all branch locations have hours from 9:00 a.m. to 5:00 p.m. Monday through Thursday but are open until 6:00 p.m. on Fridays.

Table 32

Retail Banking and Community Development Services – Phoenix Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	16.7	33.3	0.0	50.0	0.0	100.0	11.5	22.6	31.2	33.6	1.1	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	50.0	0.0	50.0	0.0	100.0	9.5	23.0	33.2	34.1	0.1	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	6		0	0			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development		Revitalization & Stabilization	Total Services	Total Organizations					
	1	11	4		0	16	11					
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank provides a relatively high level of CD services. Seven bank representatives performed 16 services to 11 different organizations during the evaluation period. The services were responsive to a mix of organizations that include services to LMI individuals and families, support for area economic development, and organizations providing affordable housing for LMI individuals. Examples of CD services included:

- One bank representative served as a member of a board of directors for an organization that provides services targeted toward children that are at risk of, or victims of, abuse. These children are predominantly from LMI families.
- One bank representative served on the finance committee for an organization that provides affordable housing to LMI individuals.

**STATE OF COLORADO
DENVER METROPOLITAN ASSESMENT AREA
(Full-Scope Review)**

CRA rating for Colorado: **Satisfactory**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Low Satisfactory**
The Service Test is rated: **Low Satisfactory**

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is excellent.
- The bank's distribution of loans among businesses of different sizes is adequate.
- The bank makes an adequate level of CD loans within its AA.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants and is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives and exhibits adequate responsiveness to the credit and CD needs throughout its Colorado AA.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- 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 AA, particularly LMI geographies and/or individuals.
- The bank provides an adequate level of CD services within its Colorado AA and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Colorado was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. A full-scope review was conducted for the Denver Metropolitan AA, the only AA within the state. Additionally, home mortgage loans were not evaluated for this AA based on lending volumes too low to render a meaningful analysis. The overall state rating in Colorado is based exclusively on the bank's performance in the Denver Metropolitan AA and is discussed concurrently with the state performance.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates one of its four AAs and operates one of its 28 branches in the state of Colorado. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on small business lending. Detailed descriptions of the bank's operations in the AA are provided in the analysis below.

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

The bank's Denver Metropolitan AA consists of Denver and Broomfield Counties in their entirety, 95 of 97 tracts in Adams County, 144 of 147 tracts in Arapahoe County, and 121 of 138 tracts in Jefferson County. All counties are part of the Denver-Aurora-Lakewood, Colorado MSA. The 22 tracts in Adams, Arapahoe, and Jefferson counties omitted from the AA are primarily located in the outermost portions of the counties, are predominantly rural, and are a considerable distance from the bank's only branch in the AA. Refer to Appendix C for a map of the AA and Appendix D for additional demographic data.

- The AA remains unchanged since the previous evaluation. While the AA was in place at the time of the last evaluation, it was not evaluated as it was newly formed and due to very limited lending volume, a meaningful analysis could not be rendered.
- The AA comprises 522 census tracts, including 51 low-, 147 moderate-, 176 middle-, 140 upper-, and 8 unknown-income tracts.
- As of June 30, 2022, the bank held a 0.02 percent share of deposits among FDIC-insured financial institutions with offices in the AA, which ranked 58th out of 66 financial institutions operating from 525 banking offices in the AA.

- One community contact recently conducted as part of the CRA evaluation of another financial institution with offices in the AA was reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspective on local economic conditions. The individual was a representative of a local economic development entity.

Table 33

Population Change			
Assessment Area: Denver Metropolitan			
Area	2010 Population	2015 Population	Percent Change
2021 Denver Metropolitan AA	2,204,196	2,342,213	6.3
Adams County, CO	441,603	471,206	6.7
Arapahoe County, CO	572,003	608,310	6.3
Broomfield County, CO	55,889	60,699	8.6
Denver County, CO	600,158	649,654	8.2
Jefferson County, CO	534,543	552,344	3.3
Denver-Aurora-Lakewood, CO MSA	2,543,482	2,703,972	6.3
Colorado	5,029,196	5,278,906	5.0

*Source: 2010 U.S. Census Bureau Decennial Census
2011 – 2015 U.S. Census Bureau: American Community Survey*

Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- The AA experienced considerable population growth between 2010 and 2015 and reflected the greatest rate of growth among all full-scope AAs in this CRA evaluation.
- The Denver Metropolitan AA population represents 86.6 percent of the MSA and 44.3 percent of the entire state population.
- As the table illustrates, growth was most notable in Denver County, which experienced the second highest growth rate and includes the population center and capitol of the state.

Table 34

Median Family Income Change Assessment Area: Denver Metropolitan			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
2021 Denver Metropolitan AA	75,738	75,859	0.2
Adams County, CO	68,456	66,619	(2.7)
Arapahoe County, CO	78,904	76,437	(3.1)
Broomfield County, CO	102,508	97,886	(4.5)
Denver County, CO	62,268	69,783	12.1
Jefferson County, CO	88,353	86,565	(2.0)
Denver-Aurora-Lakewood, CO MSA	81,781	80,820	(1.2)
Colorado	76,277	74,826	(1.9)

*Source: 2006 – 2010 U.S. Census Bureau: American Community Survey
2011 – 2015 U.S. Census Bureau: American Community Survey*

*Note: Median family incomes have been inflation-adjusted and are expressed in 2015 dollars.
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.*

- As illustrated in Table 34, MFI growth in the AA was low overall and decreased in all counties in the bank’s AA, except for Denver County, which experienced double-digit growth.
- While Denver County experienced significant growth in MFIs, it also contained the greatest rate of families below poverty, at 12.8 percent, which exceeded the rates in the AA and state of Colorado at 9.2 percent and 8.5 percent, respectively.

Table 35

Housing Cost Burden Assessment Area: Denver Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
2021 Denver Metropolitan AA	80.8	59.9	46.5	68.8	45.4	21.5
Adams County, CO	83.3	57.2	49.4	69.4	44.0	23.3
Arapahoe County, CO	84.9	65.4	48.9	71.6	48.3	21.1
Broomfield County, CO	87.5	76.1	43.4	60.1	40.3	18.7
Denver County, CO	75.6	56.4	43.8	67.7	44.7	22.4
Jefferson County, CO	85.2	59.3	47.3	67.8	44.7	20.1
Denver-Aurora-Lakewood, CO MSA	80.9	60.7	46.0	69.1	46.4	21.1
Colorado	80.3	56.4	46.4	65.8	43.6	21.5

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

*Note: Cost Burden is housing cost that equals 30 percent or more of household income.
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.*

- As illustrated in Table 35, housing cost burden in the AA generally mirrored the figures at the statewide level, both for renters and homeowners.
- A community member indicated that a period of rapid growth in the late 2000s and early 2010s was likely slowed with a period of increasing housing prices. The member added that there are still housing shortages in the area, particularly in affordable homes. In the community member’s job capacity, they shared anecdotal experience about the impacts of housing shortages. The member discussed a local business which struggled to recruit new employees due to the high cost of housing in a specific region of the AA.

Table 36

Unemployment Rates					
Assessment Area: Denver Metropolitan					
Area	2017	2018	2019	2020	2021
2021 Denver Metropolitan AA	2.6	2.9	2.5	7.4	5.7
Adams County, CO	2.8	3.2	2.8	7.6	6.2
Arapahoe County, CO	2.6	3.0	2.5	7.5	5.8
Broomfield County, CO	2.4	2.7	2.3	6.2	4.5
Denver County, CO	2.5	2.9	2.5	7.8	5.9
Jefferson County, CO	2.4	2.8	2.4	6.8	5.0
Denver-Aurora-Lakewood, CO MSA	2.5	2.9	2.5	7.1	5.5
Colorado	2.6	3.0	2.6	6.9	5.4

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics
Note: All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- Unemployment in the AA generally mirrored statewide figures and trends, including a notable spike and gradual decline during, and exiting, the height of the pandemic.
- A community member indicated that the area’s diverse economy was not as impacted by the economic downturn and even experienced growth levels in many sectors.
- Major employers² in the AA include Denver International Airport (35,000), Lockheed Martin (14,000), HealthONE Corporation (11,050), Centura Health (8,310), and SCL Health Systems (8,270).

² Source: Colorado Office of Economic Development & International Trade

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the Denver Metropolitan AA is good and the state of Colorado is rated high satisfactory.

The evaluation of lending performance in this AA does not include an analysis of small farm or home mortgage lending as the bank did not report any small farm originations during the evaluation period and originated a low volume of home mortgage loans which did not provide for a meaningful analysis.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of loans included 70 small business loans and 2 HMDA loans originated between January 1, 2020 and December 31, 2021.

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

Geographic Distribution of Loans

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

Small Business Lending

The geographic distribution of small business lending is excellent. The distribution of small business loans in 2021 among low-income census tracts was comparable to levels noted in the aggregate lending data by number, significantly above by dollar, and comparable to the demographic figure of the percentage of total businesses. However, lending in moderate-income census tracts was significantly above the aggregate lending data by number and dollar and also significantly above the demographic figure.

The geographic distribution of small business lending in 2020 reflected performance which was consistent with the penetration levels noted in 2021 lending. In addition, the dispersion of loans among the various geographic income levels revealed some gaps or lapses, although they did not impact the overall conclusion. The noted gaps were located a considerable distance from the bank's only branch location in the AA.

Table 37

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Denver Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	1	3.1	9.3	100	2.4	12.5	3	7.9	9.2	1,329	18.9	12.4	8.4
Moderate	19	59.4	22.1	1,347	31.8	23.5	21	55.3	22.5	2,575	36.7	24.3	22.4
Middle	5	15.6	32.4	214	5.0	30.3	7	18.4	32.9	1,288	18.4	30.5	34.0
Upper	7	21.9	35.6	2,577	60.8	32.6	7	18.4	34.9	1,825	26.0	32.0	34.7
Unknown	0	0.0	0.4	0	0.0	1.0	0	0.0	0.4	0	0.0	0.8	0.4
Tract-Unk	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	
Total	32	100.0	100.0	4,238	100.0	100.0	38	100.0	100.0	7,017	100.0	100.0	100.0

*Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey*

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

Lending to Businesses of Different Sizes

The bank’s lending has an adequate distribution among businesses of different sizes. The distribution of small business lending reflects adequate penetration levels.

Small Business Lending

The borrower distribution of small business lending is adequate. The distribution of loans originated in 2021 to businesses with annual revenues of \$1MM or less reflected penetration below aggregate lending data by number and comparable by dollar. The bank’s proportion of loans to small businesses was also significantly below the demographic figure. The distribution of loans in 2020 reflected performance above 2021 lending.

The rating considered contextual factors such as the significant volume of PPP loans originated within the AA during the evaluation period. Of the Revenue Unknown loans originated, 92.9 percent were PPP loans. With these loans removed, the bank’s distribution of 2021 loans reflected penetration comparable to the aggregate lending figure by number, significantly above by dollar, but still significantly below the demographic figure. Inclusive of PPP loans, 73.7 percent of loans in 2021 were for amounts \$100,000 or less, which can serve as a proxy for typical loan amounts requested by small businesses.

Table 38

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Denver Metropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	18	56.3	40.6	2,280	53.8	22.3	10	26.3	47.0	2,085	29.7	25.2	92.2
Over \$1 Million	1	3.1		34	0.8		13	34.2		3,044	43.4		6.8
Revenue Unknown	13	40.6		1,924	45.4		15	39.5		1,888	26.9		0.9
Total	32	100.0		4,238	100.0		38	100.0		7,017	100.0		100.0
By Loan Size													
\$100,000 or Less	27	84.4	87.0	1,147	27.1	31.2	28	73.7	91.4	1,108	15.8	32.4	
\$100,001 - \$250,000	1	3.1	7.2	102	2.4	19.7	3	7.9	4.6	501	7.1	17.7	
\$250,001 - \$1 Million	4	12.5	5.7	2,989	70.5	49.2	7	18.4	4.0	5,408	77.1	49.9	
Total	32	100.0	100.0	4,238	100.0	100.0	38	100.0	100.0	7,017	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	16	88.9		704	30.9		7	70.0		345	16.5		
\$100,001 - \$250,000	0	0.0		0	0.0		1	10.0		250	12.0		
\$250,001 - \$1 Million	2	11.1		1,576	69.1		2	20.0		1,490	71.5		
Total	18	100.0		2,280	100.0		10	100.0		2,085	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Community Development Lending

The bank provides an adequate level of CD loans. The bank originated one CD loan totaling \$1.5MM in this AA. While the bank originated only one CD loan during the evaluation period, the Denver Metropolitan AA is a new market under evaluation for the first time and the bank maintains a single branch within the AA.

The CD loan addressed economic development by financing a small business based on the SBA size standards that ultimately created or retained jobs for LMI individuals.

Table 39

Community Development Loans – Denver Metropolitan AA		
Community Development Purpose	#	\$(000)
Affordable Housing	0	0
Community Services	0	0
Economic Development	1	1,500
Revitalization and Stabilization	0	0
Outside Activities	1	5,945
Total Loans	2	7,445

In addition to the CD loan made within the bank’s AA, one additional loan totaling \$5.9MM was originated in support of economic development in the state of Colorado.

INVESTMENT TEST

The bank’s performance under the investment test in the Denver Metropolitan AA is adequate and the state of Colorado is low satisfactory. The bank made an adequate level of qualified CD investments and grants in this AA but is rarely 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 CD investments in the AA include:

- An investment totaling \$164,618 that supports public education in a school district that primarily serves LMI families.
- Two donations totaling \$3,000 for services for small business assistance supporting economic development.

Table 40

Investments, Grants, and Donations – Denver Metropolitan AA								
Community Development Purpose	Prior Period Investments¹		Current Investments²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	0	0	1	0	1	0
Community Services	0	0	1	165	1	0	2	165
Economic Development	0	0	0	0	2	3	2	3
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	0	0	1	165	4	4	5	168

¹ Book Value of Investment
² Original Market Value of Investment

SERVICE TEST

The bank’s performance under the service test in the Denver Metropolitan AA is adequate and the state of Colorado is low satisfactory.

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’s only location is located in a middle-income 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 branch opened during the previous evaluation is located in a middle-income tract.

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. The branch has hours from 8:00 a.m. to 5:00 p.m. Monday through Friday.

Table 41

Retail Banking and Community Development Services – Denver Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	9.8	28.2	33.7	26.8	1.5	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts¹ (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	0.0	0.0	0.0	0.0	0.0	9.6	27.6	36.1	26.7	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
	1		0	0			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	2	2	0	0	4	2						
¹ Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

Community Development Services

The bank provides an adequate level of CD services. One bank representative performed four services to two organizations during the evaluation period. The services included serving on the board of directors for an organization that supports affordable housing and community services targeted for LMI individuals and families.

APPENDIX A – SCOPE OF EXAMINATION

Table A-1

Scope of Examination			
<u>Financial Institution</u> First Fidelity Bank Oklahoma City, Oklahoma	<u>Products/Services Reviewed</u> <ul style="list-style-type: none"> • Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans • Small Business Loans • Small Farm Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services 		
<u>Time Period</u> <u>HMDA and CRA Small Business and Small Farm Loans:</u> January 1, 2020 to December 31, 2021 <u>Community Development Activities:</u> January 1, 2020 to December 31, 2021			
List of Affiliates Considered in this Evaluation			
Affiliates	Affiliate Relationship	Products Reviewed	
No affiliates were considered	Not applicable	None	
List of Assessment Areas and Type of Examination			
Assessment Area	Type of Exam	Branches Visited	Community Contacts
<u>Oklahoma</u> MSA 36420 (Oklahoma City MSA) MSA 46140 (Tulsa Metropolitan)	Full Review Limited Review	None None	4 prior none
<u>Arizona</u> MSA 38060 (Phoenix Metropolitan)	Full Review	None	2 prior
<u>Colorado</u> MSA 19740 (Denver Metropolitan)	Full Review	None	1 prior

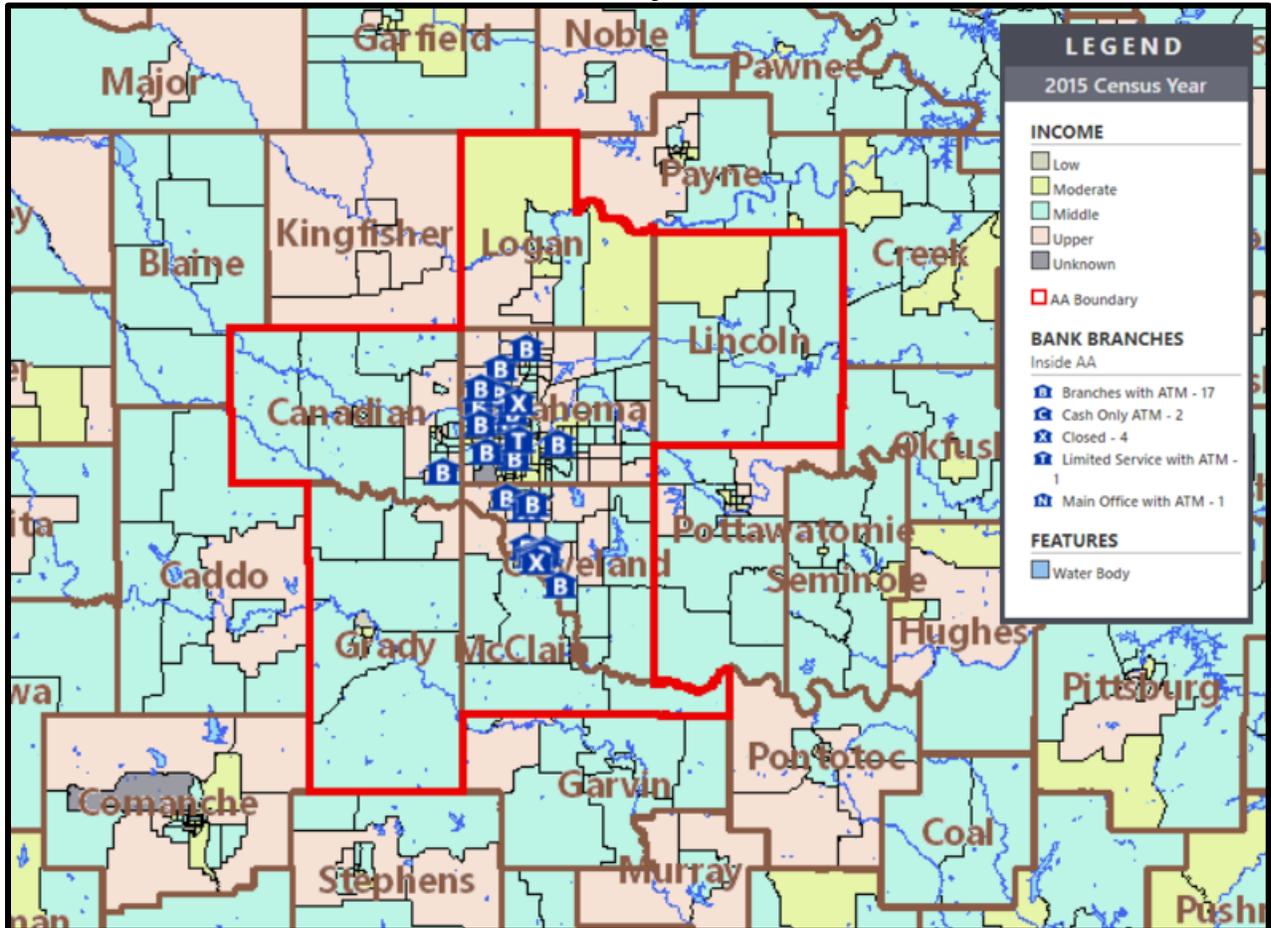
APPENDIX B – SUMMARY OF STATE RATINGS

Table B-1

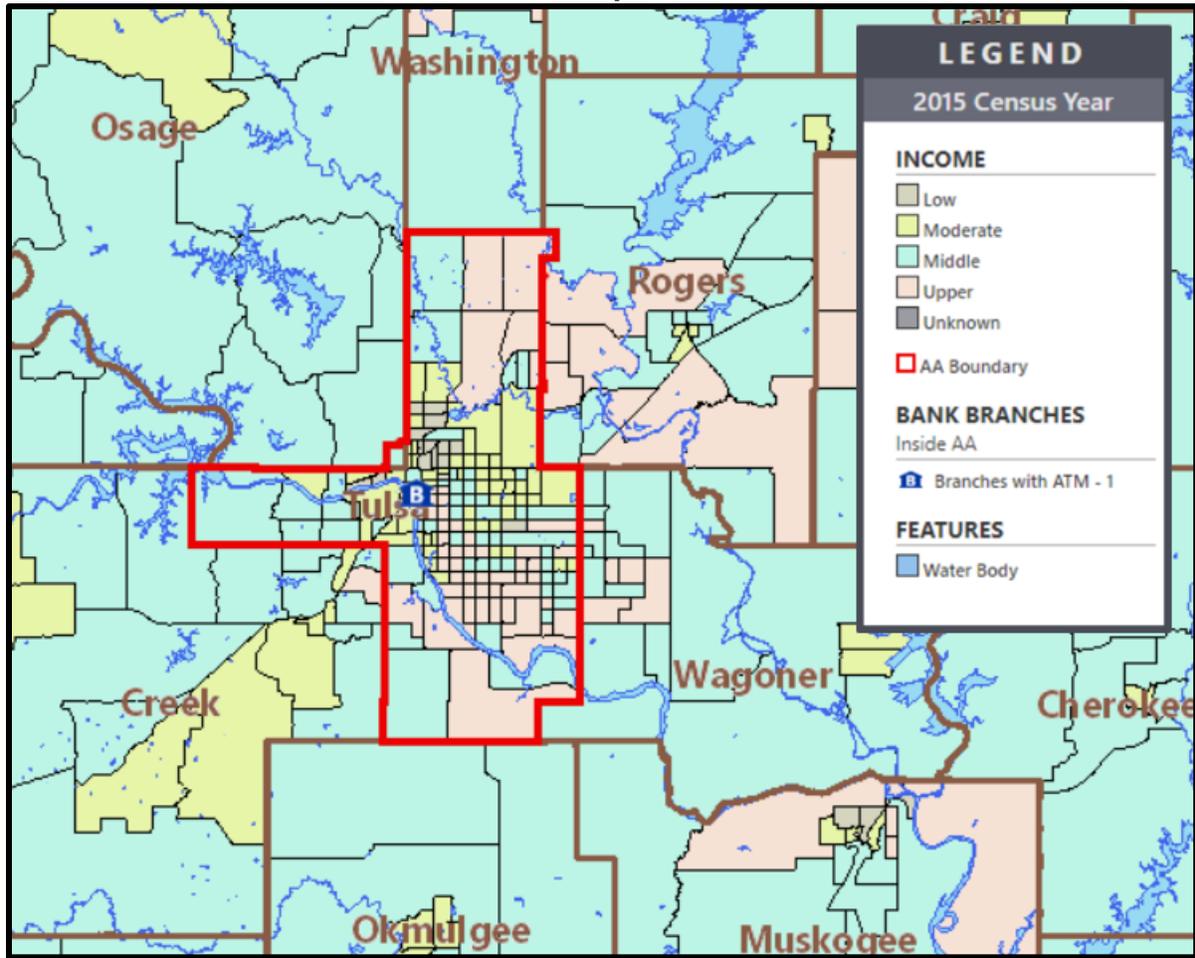
State Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Oklahoma	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Arizona	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Colorado	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

APPENDIX C – MAPS OF THE ASSESSMENT AREAS

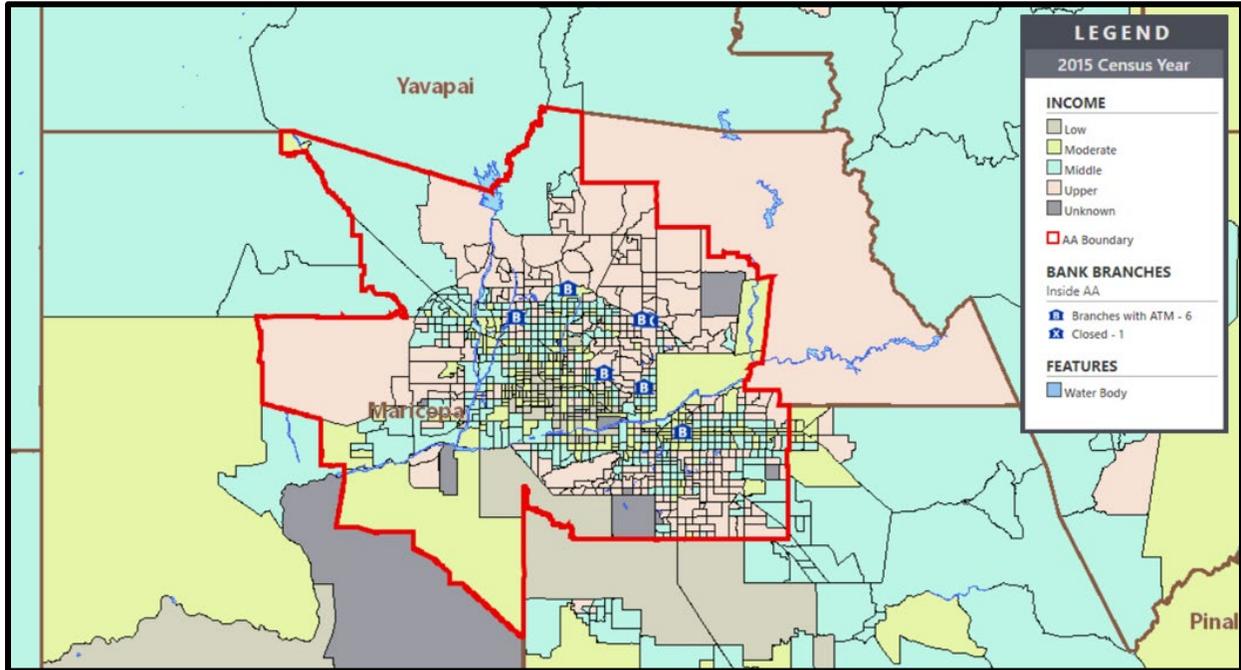
Oklahoma City MSA AA



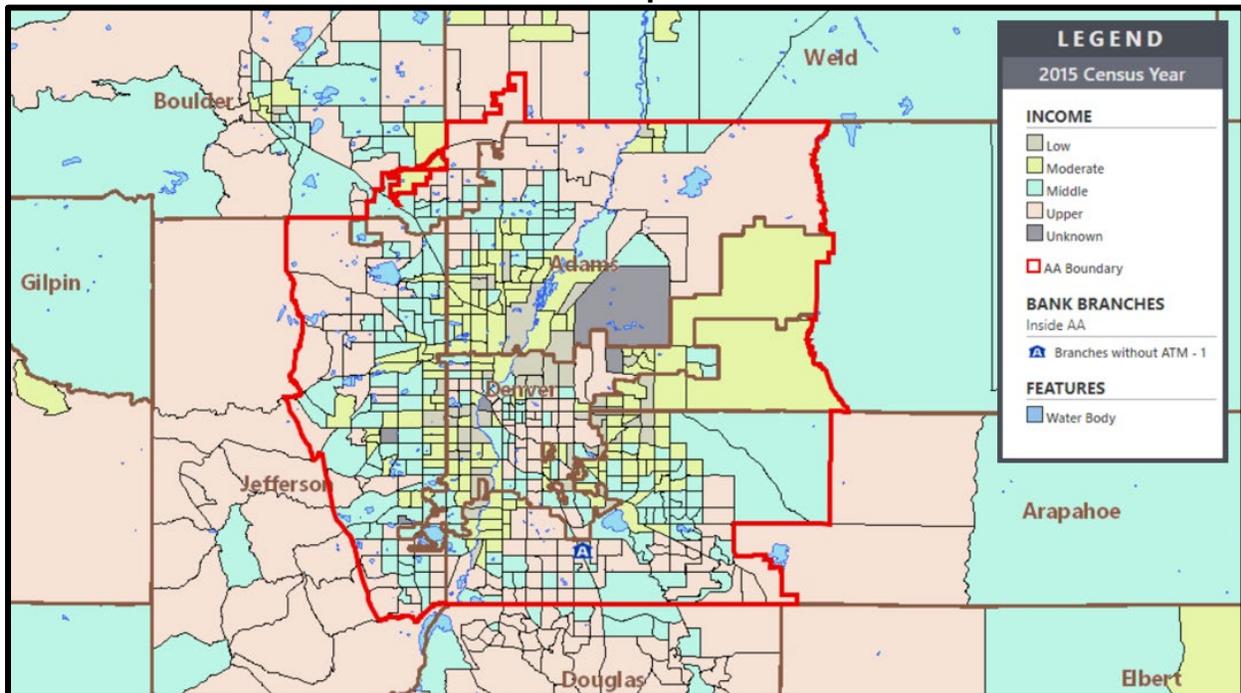
Tulsa Metropolitan AA



Phoenix Metropolitan AA



Denver Metropolitan AA



APPENDIX D – DEMOGRAPHIC INFORMATION

Table D-1

2021 Oklahoma City MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	29	8.0	17,305	5.3	6,311	36.5	68,992	21.3
Moderate	106	29.2	70,397	21.7	14,193	20.2	56,617	17.5
Middle	136	37.5	135,181	41.8	11,774	8.7	66,502	20.5
Upper	83	22.9	100,538	31.1	3,708	3.7	131,650	40.7
Unknown	9	2.5	340	0.1	119	35.0	0	0.0
Total AA	363	100.0	323,761	100.0	36,105	11.2	323,761	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,089	10,670	3.4	31.3	17,711	52.0	5,708	16.7
Moderate	143,022	58,380	18.4	40.8	64,973	45.4	19,669	13.8
Middle	225,991	140,031	44.1	62.0	64,019	28.3	21,941	9.7
Upper	147,331	108,384	34.1	73.6	29,427	20.0	9,520	6.5
Unknown	1,583	195	0.1	12.3	1,094	69.1	294	18.6
Total AA	552,016	317,660	100.0	57.5	177,224	32.1	57,132	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,799	4.4	2,402	4.2	380	8.2	17	2.3
Moderate	14,087	22.4	12,730	22.1	1,197	25.8	160	21.7
Middle	23,457	37.3	21,470	37.3	1,695	36.6	292	39.6
Upper	20,602	32.7	19,317	33.6	1,054	22.7	231	31.3
Unknown	1,974	3.1	1,626	2.8	311	6.7	37	5.0
Total AA	62,919	100.0	57,545	100.0	4,637	100.0	737	100.0
Percentage of Total Businesses:				91.5		7.4		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	18	1.6	17	1.5	1	4.5	0	0.0
Moderate	134	11.8	129	11.6	5	22.7	0	0.0
Middle	627	55.3	615	55.4	11	50.0	1	100.0
Upper	350	30.9	345	31.1	5	22.7	0	0.0
Unknown	4	0.4	4	0.4	0	0.0	0	0.0
Total AA	1,133	100.0	1,110	100.0	22	100.0	1	100.0
Percentage of Total Farms:				98.0		1.9		0.1
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-2

2020 Oklahoma City MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	29	8.0	17,305	5.3	6,311	36.5	68,992	21.3
Moderate	106	29.2	70,397	21.7	14,193	20.2	56,617	17.5
Middle	136	37.5	135,181	41.8	11,774	8.7	66,502	20.5
Upper	83	22.9	100,538	31.1	3,708	3.7	131,650	40.7
Unknown	9	2.5	340	0.1	119	35.0	0	0.0
Total AA	363	100.0	323,761	100.0	36,105	11.2	323,761	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,089	10,670	3.4	31.3	17,711	52.0	5,708	16.7
Moderate	143,022	58,380	18.4	40.8	64,973	45.4	19,669	13.8
Middle	225,991	140,031	44.1	62.0	64,019	28.3	21,941	9.7
Upper	147,331	108,384	34.1	73.6	29,427	20.0	9,520	6.5
Unknown	1,583	195	0.1	12.3	1,094	69.1	294	18.6
Total AA	552,016	317,660	100.0	57.5	177,224	32.1	57,132	10.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2,860	4.4	2,448	4.2	396	8.3	16	2.3
Moderate	14,406	22.4	12,995	22.1	1,259	26.3	152	22.2
Middle	24,022	37.4	22,033	37.4	1,724	36.0	265	38.7
Upper	21,065	32.8	19,749	33.6	1,094	22.9	222	32.5
Unknown	1,961	3.0	1,619	2.8	313	6.5	29	4.2
Total AA	64,314	100.0	58,844	100.0	4,786	100.0	684	100.0
Percentage of Total Businesses:				91.5		7.4		1.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	19	1.6	18	1.5	1	4.2	0	0.0
Moderate	135	11.4	131	11.3	4	16.7	0	0.0
Middle	650	54.8	637	54.8	12	50.0	1	100.0
Upper	380	32.0	373	32.1	7	29.2	0	0.0
Unknown	3	0.3	3	0.3	0	0.0	0	0.0
Total AA	1,187	100.0	1,162	100.0	24	100.0	1	100.0
Percentage of Total Farms:				97.9		2.0		0.1
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-3

2021 Phoenix Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	104	11.5	84,543	9.0	36,093	42.7	204,365	21.8
Moderate	205	22.6	195,613	20.8	40,780	20.8	158,326	16.9
Middle	283	31.2	300,519	32.0	26,728	8.9	180,094	19.2
Upper	305	33.6	357,489	38.1	14,375	4.0	395,614	42.2
Unknown	10	1.1	235	0.0	40	17.0	0	0.0
Total AA	907	100.0	938,399	100.0	118,016	12.6	938,399	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	162,646	39,453	4.5	24.3	96,806	59.5	26,387	16.2
Moderate	387,718	164,006	18.9	42.3	166,454	42.9	57,258	14.8
Middle	549,592	299,595	34.5	54.5	176,624	32.1	73,373	13.4
Upper	553,876	364,867	42.0	65.9	124,259	22.4	64,750	11.7
Unknown	1,922	157	0.0	8.2	1,480	77.0	285	14.8
Total AA	1,655,754	868,078	100.0	52.4	565,623	34.2	222,053	13.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	15,874	6.7	13,791	6.2	1,851	13.8	232	8.0
Moderate	40,026	16.8	36,639	16.5	3,050	22.7	337	11.6
Middle	67,922	28.5	63,877	28.7	3,354	25.0	691	23.7
Upper	113,398	47.5	106,821	48.1	4,935	36.8	1,642	56.3
Unknown	1,340	0.6	1,102	0.5	224	1.7	14	0.5
Total AA	238,560	100.0	222,230	100.0	13,414	100.0	2,916	100.0
Percentage of Total Businesses:				93.2		5.6		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	59	3.4	54	3.2	5	7.2	0	0.0
Moderate	212	12.2	201	12.1	11	15.9	0	0.0
Middle	478	27.6	454	27.3	24	34.8	0	0.0
Upper	977	56.4	948	57.0	29	42.0	0	0.0
Unknown	6	0.3	6	0.4	0	0.0	0	0.0
Total AA	1,732	100.0	1,663	100.0	69	100.0	0	0.0
Percentage of Total Farms:				96.0		4.0		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau; American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-4

2020 Phoenix Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	104	11.5	84,543	9.0	36,093	42.7	204,365	21.8
Moderate	205	22.6	195,613	20.8	40,780	20.8	158,326	16.9
Middle	283	31.2	300,519	32.0	26,728	8.9	180,094	19.2
Upper	305	33.6	357,489	38.1	14,375	4.0	395,614	42.2
Unknown	10	1.1	235	0.0	40	17.0	0	0.0
Total AA	907	100.0	938,399	100.0	118,016	12.6	938,399	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	162,646	39,453	4.5	24.3	96,806	59.5	26,387	16.2
Moderate	387,718	164,006	18.9	42.3	166,454	42.9	57,258	14.8
Middle	549,592	299,595	34.5	54.5	176,624	32.1	73,373	13.4
Upper	553,876	364,867	42.0	65.9	124,259	22.4	64,750	11.7
Unknown	1,922	157	0.0	8.2	1,480	77.0	285	14.8
Total AA	1,655,754	868,078	100.0	52.4	565,623	34.2	222,053	13.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	16,011	6.6	13,924	6.2	1,871	13.7	216	7.6
Moderate	40,506	16.7	37,088	16.4	3,099	22.8	319	11.2
Middle	68,669	28.4	64,574	28.6	3,428	25.2	667	23.4
Upper	115,560	47.7	108,925	48.3	4,990	36.7	1,645	57.6
Unknown	1,337	0.6	1,101	0.5	227	1.7	9	0.3
Total AA	242,083	100.0	225,612	100.0	13,615	100.0	2,856	100.0
Percentage of Total Businesses:				93.2		5.6		1.2
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	59	3.4	54	3.2	5	7.2	0	0.0
Moderate	221	12.6	210	12.5	11	15.9	0	0.0
Middle	481	27.5	456	27.1	25	36.2	0	0.0
Upper	984	56.2	956	56.8	28	40.6	0	0.0
Unknown	6	0.3	6	0.4	0	0.0	0	0.0
Total AA	1,751	100.0	1,682	100.0	69	100.0	0	0.0
Percentage of Total Farms:				96.1		3.9		0.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-5

2021 Denver Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	9.8	47,570	8.9	13,712	28.8	127,116	23.8
Moderate	147	28.2	143,321	26.9	20,270	14.1	100,110	18.8
Middle	176	33.7	186,942	35.1	10,363	5.5	110,424	20.7
Upper	140	26.8	155,166	29.1	4,500	2.9	195,366	36.7
Unknown	8	1.5	17	0.0	0	0.0	0	0.0
Total AA	522	100.0	533,016	100.0	48,845	9.2	533,016	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	5.7	33.0	54,410	60.0	6,354	7.0
Moderate	255,389	120,985	23.1	47.4	120,634	47.2	13,770	5.4
Middle	331,797	194,734	37.1	58.7	121,419	36.6	15,644	4.7
Upper	245,147	178,536	34.1	72.8	55,911	22.8	10,700	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	923,149	524,256	100.0	56.8	352,417	38.2	46,476	5.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	12,456	8.4	10,995	8.1	1,357	13.4	104	7.6
Moderate	33,142	22.4	30,619	22.4	2,316	23.0	207	15.0
Middle	50,328	34.0	46,833	34.3	3,052	30.2	443	32.2
Upper	51,397	34.7	47,588	34.9	3,196	31.7	613	44.5
Unknown	615	0.4	435	0.3	170	1.7	10	0.7
Total AA	147,938	100.0	136,470	100.0	10,091	100.0	1,377	100.0
Percentage of Total Businesses:				92.2		6.8		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	91	8.9	83	8.3	8	32.0	0	0.0
Moderate	204	19.9	200	20.0	4	16.0	0	0.0
Middle	336	32.8	331	33.1	5	20.0	0	0.0
Upper	375	36.6	368	36.8	7	28.0	0	0.0
Unknown	18	1.8	17	1.7	1	4.0	0	0.0
Total AA	1,024	100.0	999	100.0	25	100.0	0	0.0
Percentage of Total Farms:				97.6		2.4		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table D-6

2020 Denver Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	51	9.8	47,570	8.9	13,712	28.8	127,116	23.8
Moderate	147	28.2	143,321	26.9	20,270	14.1	100,110	18.8
Middle	176	33.7	186,942	35.1	10,363	5.5	110,424	20.7
Upper	140	26.8	155,166	29.1	4,500	2.9	195,366	36.7
Unknown	8	1.5	17	0.0	0	0.0	0	0.0
Total AA	522	100.0	533,016	100.0	48,845	9.2	533,016	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	90,749	29,985	5.7	33.0	54,410	60.0	6,354	7.0
Moderate	255,389	120,985	23.1	47.4	120,634	47.2	13,770	5.4
Middle	331,797	194,734	37.1	58.7	121,419	36.6	15,644	4.7
Upper	245,147	178,536	34.1	72.8	55,911	22.8	10,700	4.4
Unknown	67	16	0.0	23.9	43	64.2	8	11.9
Total AA	923,149	524,256	100.0	56.8	352,417	38.2	46,476	5.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	12,372	8.4	10,901	8.1	1,378	13.4	93	7.3
Moderate	32,939	22.4	30,372	22.4	2,377	23.1	190	15.0
Middle	50,151	34.1	46,614	34.4	3,135	30.5	402	31.7
Upper	50,918	34.6	47,126	34.8	3,220	31.3	572	45.1
Unknown	579	0.4	401	0.3	168	1.6	10	0.8
Total AA	146,959	100.0	135,414	100.0	10,278	100.0	1,267	100.0
Percentage of Total Businesses:				92.1		7.0		0.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	99	9.5	90	8.9	9	32.1	0	0.0
Moderate	208	19.9	204	20.1	4	14.3	0	0.0
Middle	345	33.0	337	33.2	6	21.4	2	100.0
Upper	377	36.1	369	36.4	8	28.6	0	0.0
Unknown	16	1.5	15	1.5	1	3.6	0	0.0
Total AA	1,045	100.0	1,015	100.0	28	100.0	2	100.0
Percentage of Total Farms:				97.1		2.7		0.2
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 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

2021 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	9.7	10,765	6.8	4,413	41.0	34,942	22.1
Moderate	54	30.7	39,165	24.8	8,290	21.2	26,742	16.9
Middle	52	29.5	50,452	31.9	4,440	8.8	31,099	19.7
Upper	53	30.1	57,640	36.5	2,300	4.0	65,239	41.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	176	100.0	158,022	100.0	19,443	12.3	158,022	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	4.5	29.1	12,302	53.7	3,930	17.2
Moderate	77,468	30,109	20.3	38.9	36,618	47.3	10,741	13.9
Middle	89,953	49,646	33.5	55.2	32,248	35.8	8,059	9.0
Upper	86,986	61,760	41.7	71.0	18,945	21.8	6,281	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	277,310	148,186	100.0	53.4	100,113	36.1	29,011	10.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,578	4.1	1,364	3.9	202	6.3	12	4.3
Moderate	8,563	22.0	7,510	21.2	1,004	31.2	49	17.4
Middle	13,674	35.2	12,393	35.0	1,188	36.9	93	33.1
Upper	15,061	38.7	14,109	39.9	825	25.6	127	45.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	38,876	100.0	35,376	100.0	3,219	100.0	281	100.0
Percentage of Total Businesses:				91.0		8.3		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	2.4	7	2.2	1	16.7	0	0.0
Moderate	39	11.7	38	11.7	1	16.7	0	0.0
Middle	122	36.7	119	36.7	3	50.0	0	0.0
Upper	163	49.1	160	49.4	1	16.7	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	332	100.0	324	100.0	6	100.0	2	100.0
Percentage of Total Farms:				97.6		1.8		0.6
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E-2

2020 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	17	9.7	10,765	6.8	4,413	41.0	34,942	22.1
Moderate	54	30.7	39,165	24.8	8,290	21.2	26,742	16.9
Middle	52	29.5	50,452	31.9	4,440	8.8	31,099	19.7
Upper	53	30.1	57,640	36.5	2,300	4.0	65,239	41.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	176	100.0	158,022	100.0	19,443	12.3	158,022	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	4.5	29.1	12,302	53.7	3,930	17.2
Moderate	77,468	30,109	20.3	38.9	36,618	47.3	10,741	13.9
Middle	89,953	49,646	33.5	55.2	32,248	35.8	8,059	9.0
Upper	86,986	61,760	41.7	71.0	18,945	21.8	6,281	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	277,310	148,186	100.0	53.4	100,113	36.1	29,011	10.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,572	4.0	1,357	3.8	202	6.0	13	4.7
Moderate	8,714	21.9	7,630	21.1	1,034	30.9	50	18.2
Middle	13,950	35.1	12,616	34.9	1,250	37.4	84	30.5
Upper	15,560	39.1	14,573	40.3	859	25.7	128	46.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	39,796	100.0	36,176	100.0	3,345	100.0	275	100.0
Percentage of Total Businesses:				90.9		8.4		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	2.3	7	2.0	1	16.7	0	0.0
Moderate	41	11.6	41	11.9	0	0.0	0	0.0
Middle	124	35.2	122	35.5	2	33.3	0	0.0
Upper	179	50.9	174	50.6	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	352	100.0	344	100.0	6	100.0	2	100.0
Percentage of Total Farms:				97.7		1.7		0.6
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

Table E-3

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Tulsa Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	1.4	0	0.0	0.5	0	0.0	1.6	0	0.0	0.7	4.5
Moderate	0	0.0	13.0	0	0.0	8.0	1	25.0	14.5	59	11.2	9.0	20.3
Middle	1	50.0	34.3	242	41.9	29.5	2	50.0	34.8	263	50.1	30.6	33.5
Upper	1	50.0	51.3	336	58.1	62.0	1	25.0	49.1	203	38.7	59.7	41.7
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	2	100.0	100.0	578	100.0	100.0	4	100.0	100.0	525	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.5	0	0.0	0.3	0	0.0	0.8	0	0.0	0.4	4.5
Moderate	1	12.5	8.0	36	2.1	4.7	1	50.0	10.0	130	34.0	6.3	20.3
Middle	1	12.5	29.6	168	9.8	24.4	0	0.0	33.3	0	0.0	27.6	33.5
Upper	6	75.0	62.0	1,519	88.2	70.6	1	50.0	55.9	252	66.0	65.7	41.7
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	1,723	100.0	100.0	2	100.0	100.0	382	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.5	0	0.0	0.7	0	0.0	2.8	0	0.0	1.9	4.5
Moderate	0	0.0	14.2	0	0.0	11.3	0	0.0	13.4	0	0.0	11.7	20.3
Middle	0	0.0	29.7	0	0.0	25.2	0	0.0	32.4	0	0.0	28.0	33.5
Upper	0	0.0	54.7	0	0.0	62.8	0	0.0	51.4	0	0.0	58.4	41.7
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	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	0	0.0	15.8	0	0.0	4.6	0	0.0	5.9	0	0.0	3.0	10.3
Moderate	0	0.0	44.2	0	0.0	50.5	1	100.0	42.4	444	100.0	41.0	36.3
Middle	0	0.0	30.0	0	0.0	36.8	0	0.0	37.3	0	0.0	36.2	31.4
Upper	0	0.0	10.0	0	0.0	8.1	0	0.0	14.4	0	0.0	19.8	22.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	444	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	1.1	0	0.0	0.6	0	0.0	1.3	0	0.0	0.7	4.5
Moderate	1	10.0	11.3	36	1.6	8.4	3	42.9	12.7	633	46.9	10.0	20.3
Middle	2	20.0	32.2	410	17.8	27.5	2	28.6	34.2	263	19.5	29.8	33.5
Upper	7	70.0	55.4	1,855	80.6	63.5	2	28.6	51.8	455	33.7	59.5	41.7
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	10	100.0	100.0	2,301	100.0	100.0	7	100.0	100.0	1,351	100.0	100.0	100.0
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
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-4

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Tulsa Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	1	1.7	3.2	154	1.7	4.0	1	2.6	3.7	21	0.6	4.5	4.1
Moderate	31	53.4	20.7	4,020	44.8	23.8	14	35.9	21.2	1,510	42.2	25.4	22.0
Middle	6	10.3	35.5	849	9.5	37.8	9	23.1	34.2	873	24.4	35.7	35.2
Upper	20	34.5	40.2	3,957	44.1	34.3	15	38.5	40.2	1,178	32.9	34.3	38.7
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	0.4	0	0.0	0.1	0	0.0	0.7	0	0.0	0.1	
Total	58	100.0	100.0	8,980	100.0	100.0	39	100.0	100.0	3,582	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Table E-5

Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography													
Assessment Area: Tulsa Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	1.3	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	2.4
Moderate	0	0.0	13.9	0	0.0	6.8	0	0.0	8.5	0	0.0	4.9	11.7
Middle	0	0.0	35.4	0	0.0	31.1	0	0.0	34.0	0	0.0	35.2	36.7
Upper	0	0.0	48.1	0	0.0	61.7	0	0.0	54.7	0	0.0	59.0	49.1
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	1.3	0	0.0	0.2	0	0.0	2.8	0	0.0	0.8	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Table E-6

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Tulsa Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	5.2	0	0.0	2.9	0	0.0	6.1	0	0.0	3.5	22.1
Moderate	0	0.0	19.4	0	0.0	14.0	0	0.0	17.8	0	0.0	13.2	16.9
Middle	0	0.0	20.3	0	0.0	18.4	0	0.0	18.3	0	0.0	17.1	19.7
Upper	1	50.0	38.5	242	41.9	50.1	0	0.0	31.8	0	0.0	41.6	41.3
Unknown	1	50.0	16.5	336	58.1	14.6	4	100.0	25.9	525	100.0	24.6	0.0
Total	2	100.0	100.0	578	100.0	100.0	4	100.0	100.0	525	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.0	0	0.0	1.4	0	0.0	5.4	0	0.0	2.9	22.1
Moderate	0	0.0	10.7	0	0.0	6.4	1	50.0	14.4	130	34.0	9.7	16.9
Middle	1	12.5	16.1	64	3.7	11.8	0	0.0	17.6	0	0.0	14.5	19.7
Upper	5	62.5	49.4	1,455	84.4	59.6	0	0.0	37.6	0	0.0	46.8	41.3
Unknown	2	25.0	20.8	204	11.8	20.8	1	50.0	25.1	252	66.0	26.2	0.0
Total	8	100.0	100.0	1,723	100.0	100.0	2	100.0	100.0	382	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.6	0	0.0	3.4	0	0.0	5.5	0	0.0	2.9	22.1
Moderate	0	0.0	12.8	0	0.0	9.8	0	0.0	14.2	0	0.0	10.4	16.9
Middle	0	0.0	18.8	0	0.0	14.7	0	0.0	17.8	0	0.0	14.5	19.7
Upper	0	0.0	52.9	0	0.0	60.4	0	0.0	50.5	0	0.0	59.4	41.3
Unknown	0	0.0	9.9	0	0.0	11.7	0	0.0	12.1	0	0.0	12.7	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	4.2	0	0.0	2.2	0	0.0	5.8	0	0.0	3.2	22.1
Moderate	0	0.0	14.8	0	0.0	10.2	1	16.7	16.0	130	14.3	11.7	16.9
Middle	1	10.0	17.7	64	2.8	14.9	0	0.0	17.7	0	0.0	15.8	19.7
Upper	6	60.0	42.6	1,697	73.8	53.6	0	0.0	34.8	0	0.0	43.9	41.3
Unknown	3	30.0	20.7	540	23.5	19.1	5	83.3	25.7	777	85.7	25.3	0.0
Total	10	100.0	100.0	2,301	100.0	100.0	6	100.0	100.0	907	100.0	100.0	100.0
<p>Source: 2021 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis. Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table</p>													

Table E-7

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Tulsa Metropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	9	15.5	31.9	2,115	23.6	22.1	7	17.9	41.2	1,485	41.5	26.1	91.0
Over \$1 Million	13	22.4		2,818	31.4		1	2.6		250	7.0		8.3
Revenue Unknown	36	62.1		4,047	45.1		31	79.5		1,847	51.6		0.7
Total	58	100.0		8,980	100.0		39	100.0		3,582	100.0		100.0
By Loan Size													
\$100,000 or Less	37	63.8	87.0	1,290	14.4	27.8	30	76.9	90.4	907	25.3	30.2	
\$100,001 - \$250,000	9	15.5	6.6	1,454	16.2	17.3	5	12.8	4.9	895	25.0	16.9	
\$250,001 - \$1 Million	12	20.7	6.4	6,236	69.4	54.9	4	10.3	4.8	1,780	49.7	52.9	
Total	58	100.0	100.0	8,980	100.0	100.0	39	100.0	100.0	3,582	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	5	55.6		255	12.1		4	57.1		229	15.4		
\$100,001 - \$250,000	1	11.1		150	7.1		1	14.3		102	6.9		
\$250,001 - \$1 Million	3	33.3		1,710	80.9		2	28.6		1,154	77.7		
Total	9	100.0		2,115	100.0		7	100.0		1,485	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Table E-8

Distribution of 2020 and 2021 Small Farm Lending By Revenue Size of Farms													
Assessment Area: Tulsa Metropolitan													
	Bank And Aggregate Loans By Year												Total Farms %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	%	\$ (000)	%	#	%	#	%	\$ (000)	%	
By Revenue													
\$1 Million or Less	0	0.0	70.9	0	0.0	88.3	0	0.0	57.5	0	0.0	61.1	97.6
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		1.8
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		0.6
Total	0	0.0		0	0.0		0	0.0		0	0.0		100.0
By Loan Size													
\$100,000 or Less	0	0.0	91.1	0	0.0	50.3	0	0.0	89.6	0	0.0	54.6	
\$100,001 - \$250,000	0	0.0	7.6	0	0.0	40.4	0	0.0	9.4	0	0.0	38.6	
\$250,001 - \$500,000	0	0.0	1.3	0	0.0	9.3	0	0.0	0.9	0	0.0	6.7	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$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	0	0.0		0	0.0		0	0.0		0	0.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

APPENDIX 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.