

## **PUBLIC DISCLOSURE**

June 24, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

AllNations Bank RSSD# 146056

114 East Main Street Calumet, Oklahoma 73014

Federal Reserve Bank of Kansas City 1 Memorial Drive Kansas City, Missouri 64198

NOTE:

This document is an evaluation of this bank's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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#### INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

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

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas (AAs) credit needs.
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

#### SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs.

Performance was assessed within the bank's two AAs, the Central Oklahoma AA and the Oklahoma City Metropolitan AA. Both AAs were assessed using a full-scope review. Greater weight was placed on the Central Oklahoma AA as a majority of the bank's lending occurred within this area. Examiners reviewed the following data:

- The bank's 16-quarter average NLTD ratio;
- A statistical sample of 50 small business loans selected from a universe of 67 loans originated between August 25, 2020 and December 31, 2023; and
- A statistical sample of 67 small farm loans selected from a universe of 100 loans originated between August 25, 2020 and December 31, 2023.

In addition, available aggregate data for the most recent three years (2020, 2021, and 2022) was referenced for additional perspective to gauge credit demand within the bank's AAs. For this evaluation, the bank's small farm lending was given greater weight in the analysis given the number of loan originations and the bank's loan portfolio composition.

While the evaluation assessed small business and small farm lending over a four-year period between 2020 and 2023, loan data was assessed for two separate time periods for the geographic and borrower distribution analyses based on changes to American Community Survey (ACS) data during the evaluation period. Loan data for 2020 and 2021

were combined and evaluated aggregately, as was loan data for 2022 and 2023. All loans from the sample were reviewed, however, greater emphasis was placed on the more recent lending from 2022 and 2023 given the greater volume of lending during this time period.

#### **DESCRIPTION OF INSTITUTION**

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

- The bank is a wholly owned subsidiary of AllNations Bancorporation, Inc.
- The bank has total assets of \$54.3 million as of December 31, 2023.
- In addition to its full-service main office in Calumet, the bank operates a full-service branch in Shawnee, Oklahoma. The bank has automated teller machines (ATMs) at each location.
- As illustrated in Table 1, the bank's primary business strategy remains in its agricultural lending portfolio, followed by commercial lending.

Table 1

Table 1								
Composition of Loan Portfolio as of December 31, 2023								
Loan Type	\$(000)	%						
Construction and Land Development	662	2.0						
Farmland	11,473	34.2						
1- to 4-Family Residential Real Estate	2,063	6.2						
Multifamily Residential Real Estate	0	0.0						
Nonfarm Nonresidential Real Estate	4,092	12.2						
Agricultural	6,555	19.6						
Commercial and Industrial	8,213	24.5						
Consumer	441	1.3						
Other	3	0.0						
Gross Loans	33,502	100.0						
Note: Percentages may not total 100.0 percent due to roun	ding.							

The bank was rated Satisfactory under the CRA at its August 24, 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.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA<sup>1</sup>

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Central Oklahoma and Oklahoma City Metropolitan (full-scope reviews). The bank's overall lending test performance is Satisfactory. The conclusion was derived from a reasonable NLTD ratio, a majority of loans being originated within the bank's AAs, a reasonable geographic distribution of loans, and a reasonable borrower distribution of loans.

### **Net Loan-to-Deposit Ratio**

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending considering performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison, to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, loan portfolio composition, market conditions, and geographic proximity.

The bank's NLTD ratio is reasonable. The bank's NLTD ratio is within the range of NLTD ratios for the similarly situated institutions.

Comparative NLTD Ratios March 31, 2020 - December 31, 2023 NLTD Ratio (%) Institution Location Asset Size \$(000) 16 Quarter Average **AllNations Bank** Calumet, OK 54,330 55.6 **Similarly Situated Institutions** Peoples Bank & Trust Company Ryan, OK 44,045 103.3 Bank of the West Thomas, OK 95.3 161,307 First Bank of Okarche Okarche, OK 137,800 31.2 Farmers Bank Carnegie, OK 80,082 85.0

Table 2

#### **Assessment Area Concentration**

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. As illustrated on Table 3, the bank originated a majority of its small business and small farm loans, by number, inside its AAs. However, a majority of the bank's loans by dollar volume are extended outside of its AAs. The discrepancy is attributed to the bank offering Farm Service Agency loans, which draws customers from adjacent counties located just outside its AAs.

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The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

Table 3

Lending Inside and Outside the Assessment Areas												
Loon Tymo		Ins	ide		Outside							
Loan Type	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%				
Small Business	24	48.0	2,612	24.3	26	52.0	8,149	75.7				
Small Farm	36	53.7	2,981	38.9	31	46.3	4,676	61.1				
Total Loans	60	51.3	5,593	30.4	57	48.7	12,825	69.6				
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.

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

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs. While some gaps or lapses in lending were identified within the AAs, this was explained by performance context as described within the individual AA sections below.

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

This performance criterion evaluates the bank's lending to businesses and farms of different revenue sizes. The bank's lending has an overall reasonable distribution among businesses and farms of different sizes with reasonable distribution noted within each AA.

#### 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.

## CENTRAL OKLAHOMA ASSESSMENT AREA NONMETROPOLITAN AREA

(Full-Scope Review)

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

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

- Since the previous evaluation, the bank added Seminole County to the AA.
- The AA consists of 29 tracts; 2 low-, 4 moderate-, 18 middle-, and 5 upper-income census tracts.
- Since the previous evaluation, the AA increased by a total of 13 census tracts, which includes an increase of 1 low-, 1 moderate-, 9 middle-, and 2 upperincome census tracts.
- The bank operates from one office in Shawnee, Oklahoma. The bank has one cash-only ATM in the AA, located at the branch office.
- According to the June 30, 2023, FDIC Summary of Deposits Market Share Report, the bank held a market share of 0.1 percent, ranking 13<sup>th</sup> out of 13 institutions operating from 27 offices in the AA.
- One previously conducted interview with a member of the community was used to ascertain relevant area credit needs, the responsiveness of area banks in meeting those credit needs, and local economic conditions. The community member represents an area organization with knowledge of the area's economic development needs and challenges.

Table 4

Population Change										
Assessment Area: Central Oklahoma										
Area 2015 Population 2020 Population Percent Chang										
Central Oklahoma	96,617	96,010	(0.6)							
Pottawatomie County, OK	71,136	72,454	1.9							
Seminole County, OK	25,481	23,556	(7.6)							
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)							
Oklahoma	3,849,733	2.8								
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey										

- A majority of the AA's population, 75.5 percent, resides in Pottawatomie County, which includes the bank's branch in Shawnee.
- The AA's population decreased between 2015 and 2020, while the state of Oklahoma experienced growth.

#### Table 5

Median Family Income Change										
Assessment Area: Central Oklahoma										
2015 Median 2020 Median										
Area	Family Income	Family Income	Percent Change							
Central Oklahoma	56,122	58,828	4.8							
Pottawatomie County, OK	58,196	63,813	9.7							
Seminole County, OK	49,648	(9.7)								
NonMSA Oklahoma	56,258	58,565	4.1							
Oklahoma	63,401	67,511	6.5							
Source: 2011-2014 U.S. Census Bureau: Am	erican Community Survey									
2016-2020 U.S. Census Bureau: Am	erican Community Survey									
Note: Median family incomes have been inf	lation-adjusted and are expresse	d in 2020 dollars.								

- Seminole County had a higher percentage of families living below poverty, at 19.9 percent, compared to Pottawatomie County at 12.2 percent and the state of Oklahoma at 11.3 percent.
- Pottawatomie County, which holds the majority of the population in the AA, experienced a MFI growth of 9.7 percent, significantly higher than Seminole County at negative 9.7 percent and the state of Oklahoma at 6.5 percent.

Table 6

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Housing Cost Burden												
Assessment Area: Central Oklahoma												
Cost Burden – Renters Cost Burden – Owne												
Area	Low	Moderate	All	Low	Moderate	All						
	Income	Income	Renters	Income	Income	Owners						
Central Oklahoma	61.3	23.2	32.9	44.6	21.0	15.2						
Pottawatomie County, OK	63.5	24.9	34.4	44.7	21.7	14.3						
Seminole County, OK	55.8	18.4	29.2	44.5	19.2	17.9						
NonMSA Oklahoma	65.0	27.9	34.8	46.6	21.0	14.8						
Oklahoma	Oklahoma 71.3 30.7 37.7 50.0 24.0 15.2											
Cost Burden is housing cost that equals 30	,			shansiwa Housina	r Affordahilitu Str	atemi						

- The AA had a higher affordability ratio at 42.7 percent compared to the state of Oklahoma at 37.8 percent.
- The AA had a comparable percentage of owner-occupied units, at 59.9 percent, compared to the state of Oklahoma at 55.3 percent.

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Unemployment Rates Assessment Area: Central Oklahoma											
Area 2018 2019 2020 2021 2022											
Central Oklahoma	3.8	3.7	6.6	4.3	3.6						
Pottawatomie County, OK	3.6	3.5	6.3	4.0	3.4						
Seminole County, OK	4.6	4.6	7.6	5.3	4.2						
NonMSA Oklahoma	3.5	3.4	6.1	4.0	3.2						
Oklahoma 3.3 3.1 6.3 4.0 3.											
Source: Bureau of Labor Statistics: Local Area Unen	ıployment Statisti	cs									

- The AA's unemployment rate has remained comparable to the statewide figures since the previous examination.
- Major industries in Pottawatomie County, where the bank's branch office is located, include manufacturing, government, trade, transportation, and utilities.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE CENTRAL OKLAHOMA AA

The bank's performance under the lending test in the Central Oklahoma AA is reasonable. Lending test conclusions for small business and small farm lending were reasonable for the geographic and borrower distribution tests.

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

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

### Small Business Lending

The geographic distribution of small business lending is reasonable. In 2022 and 2023, the bank originated one small business loan in the AA's low-income census tracts. At 6.7 percent, this was below the percentage of total area businesses operating in these tracts (demographic figure), at 11.7 percent. The bank originated three loans in moderate-income census tracts during this time, at 20.0 percent, which was above the demographic figure of 13.9 percent. During 2020 and 2021, none of the seven small business loan originations were in LMI census tracts. As indicated earlier in the report, greater emphasis was placed on the more recent lending from 2022 and 2023, resulting in a conclusion of reasonable for small business lending.

Table 8

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Central Oklahoma													
Geographic	Bank Loans By Year												
Income		20	22			20	23		Businesses				
Level	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	%				
Low	0	0.0	0	0.0	1	11.1	860	64.9	11.7				
Moderate	1	16.7	440	48.3	2	22.2	263	19.8	13.9				
Middle	5	83.3	471	51.7	6	66.7	202	15.2	51.3				
Upper	0	0.0	0	0.0	0	0.0	0	0.0	23.1				
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0				
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0					
Total	6	100.0	911	100.0	9	100.0	1,326	100.0	100.0				

Source: 2023 FFIEC Census Data

2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

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

### Small Farm Lending

The geographic distribution of small farm lending is reasonable. In 2022 and 2023, the bank did not originate any small farm loans in the AA's low-income census tracts. However, the low percentage of total farms operating in the AA's low-income census tracts, at 0.7 percent, indicates a lack of opportunity for small farm lending. The bank originated three loans in moderate-income census tracts, at 20.0 percent, which was above the demographic figure of 6.6 percent. During 2020 and 2021, neither of the two small farm loan originations were in LMI census tracts; however, the opportunity for small farm loans in these tracts was limited due to only 0.7 percent of farms operating in the low-income census tract and 2.8 percent operating in the moderate-income census tracts.

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Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography Assessment Area: Central Oklahoma													
Geographic		Bank Loans By Year											
Income		20	22			20	23		Total Farms %				
Level	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	raints /0				
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.7				
Moderate	1	14.3	15	5.3	2	25.0	42	27.5	6.6				
Middle	6	85.7	269	94.7	6	75.0	112	73.2	73.7				
Upper	0	0.0	0	0.0	0	0.0	0	0.0	19.0				
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0				
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0					
Total	7	100.0	284	100.0	8	100.0	153	100.0	100.0				

Source: 2023 FFIEC Census Data

2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

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

### Lending to Businesses and Farms of Different Sizes

The bank's lending has a reasonable distribution among businesses and farms of different sizes. The borrower distribution was reasonable for both small business and small farm lending.

### **Small Business Lending**

The borrower distribution of small business lending is reasonable. In 2022 and 2023, the bank's lending to businesses with \$1MM or less in gross annual revenue, at 80.0 percent, was comparable to the percent of total business operating in the AA with revenues of \$1MM or less (demographic figure) by number volume. During 2020 and 2021, 100.0 percent of the bank's small business lending was to businesses with revenues of \$1MM or less.

Table 10

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses														
Assessment Area: Central Oklahoma														
			В	ank Loar	ıs By Yea	r			Total					
		20	22			20	23		Businesses					
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	%					
	By Revenue													
\$1 Million or Less	5	83.3	471	51.7	7	77.8	237	17.9	90.2					
Over \$1 Million	1	16.7	440	48.3	2	22.2	1,089	82.1	7.7					
Revenue Unknown	0	0.0	0	0.0	0	0.0	0	0.0	2.1					
Total	6	100.0	911	100.0	9	100.0	1,326	100.0	100.0					
			By I	Loan Size	:									
\$100,000 or Less	3	50.0	144	15.8	7	77.8	237	17.9						
\$100,001 - \$250,000	2	33.3	327	35.9	1	11.1	229	17.3						
\$250,001 - \$1 Million	1	16.7	440	48.3	1	11.1	860	64.9						
Total	6	100.0	911	100.0	9	100.0	1,326	100.0						
	Ву	Loan Si	ze and Ro	evenue \$7	1 Million	or Less								
\$100,000 or Less	3	60.0	144	30.6	7	100.0	237	100.0						
\$100,001 - \$250,000	2	40.0	327	69.4	0	0.0	0	0.0						
\$250,001 - \$1 Million	0	0.0	0	0.0	0	0.0	0	0.0						
Total	5	100.0	471	100.0	7	100.0	237	100.0						
Source: 2023 FFIEC Census Dat	а													

2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

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

#### Small Farm Lending

The borrower distribution of small farm lending is reasonable. In 2022 and 2023, all fifteen of the bank's small farm loans were to farms with \$1MM or less in gross annual revenue, which was comparable to percent of total farms operating in the AA with revenues of \$1MM or less (demographic figure). During 2020 and 2021, both small farm loan originations were also to farms with revenues of \$1MM or less.

Table 11

Distribut	ion of 202	22 and 20	23 Small	Farm Le	nding By	Revenue	e Size of l	Farms					
					al Oklaho								
Bank Loans By Year													
		2022				20	23		Total Farms %				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	rarilis /o				
	By Revenue												
\$1 Million or Less	7	100.0	285	100.4	8	100.0	153	100.0	100.0				
Over \$1 Million	0	0.0	0	0.0	0	0.0	0	0.0	0.0				
Revenue Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0				
Total	7	100.0	284	100.0	8	100.0	153	100.0	100.0				
			By l	Loan Size									
\$100,000 or Less	6	85.7	167	58.8	8	100.0	153	100.0					
\$100,001 - \$250,000	1	14.3	118	41.5	0	0.0	0	0.0					
\$250,001 - \$500,000	0	0.0	0	0.0	0	0.0	0	0.0					
Total	7	100.0	284	100.0	8	100.0	153	100.0					
	Ву	Loan Si	ze and R	evenue \$	1 Million	or Less							
\$100,000 or Less	6	85.7	167	58.6	8	100.0	153	100.0					
\$100,001 - \$250,000	1	14.3	118	41.4	0	0.0	0	0.0					
\$250,001 - \$500,000	0	0.0	0	0.0	0	0.0	0	0.0					
Total	7	100.0	285	100.0	8	100.0	153	100.0					

Source: 2023 FFIEC Census Data

2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

## OKLAHOMA CITY METROPOLITAN ASSESSMENT AREA METROPOLITAN AREA

(Full-Scope Review)

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

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

- There have been no changes to the AA delineation since the prior evaluation.
- The AA is comprised of a total of 37 census tracts, including 1 low-, 5 moderate-, 12 middle-, and 19 upper-income census tracts.
- Since the previous evaluation, the AA increased by a total of 8 census tracts, which includes an increase of 1 low-, 2 moderate-, and 13 upper-income census tracts. The AA decreased by 8 middle-income census tracts.
- The bank operates from one office in Calumet, Oklahoma. The bank has one cash-only ATM in the AA, located at the main branch.
- According to the June 30, 2023, FDIC Summary of Deposits Market Share Report, the bank held a market share of 1.6 percent, ranking 15<sup>th</sup> out of 19 institutions operating from 38 offices in the AA.
- One previously conducted interview with a member of the community was used to ascertain relevant area credit needs, the responsiveness of area banks in meeting those credit needs, and local economic conditions. The community member represents an area organization with knowledge of the area's economic development needs and challenges.

Table 12

	Population Char	nge								
Assessment Area: Oklahoma City Metropolitan										
Area 2015 Population 2020 Population Percent Change										
Oklahoma City Metropolitan	126,193	154,405	22.4							
Oklahoma City, OK MSA	1,318,408	1,425,695	8.1							
Oklahoma	3,849,733	3,959,353	2.8							
Source: 2020 U.S. Census Bureau Decennial	Census									
2011-2015 U.S. Census Bureau: Am	erican Community Survey									

- The Oklahoma City Metropolitan AA experienced a significant population increase at 22.4 percent, compared to the Oklahoma City MSA at 8.1 percent and the state of Oklahoma at 2.8 percent.
- Canadian County represents only 10.8 percent of the entire Oklahoma City MSA population and 3.9 percent of the state of Oklahoma population.

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		Median Family Incom	e Change								
	Assessment Area: Oklahoma City Metropolitan										
	2015 Median 2020 Median										
	Area	Family Income	Family Income	Percent Change							
Oklahoma City Metropolitan 79,529 85,700											
Oklaho	oma City, OK MSA	69,988	75,170	7.4							
Oklaho	oma	63,401	67,511	6.5							
Source:	2011-2014 U.S. Census Bureau: Am	erican Community Survey									
	2016-2020 U.S. Census Bureau: Am	erican Community Survey									
Note:	Median family incomes have been inf	lation-adjusted and are expresse	d in 2020 dollars.								

- The AA median family income (MFI) grew at a comparable rate to the Oklahoma City MSA at 7.4 percent and the state of Oklahoma at 6.5 percent.
- According to the 2020 American Community Survey (ACS), the AA had a significantly lower percentage of families living below poverty at 4.9 percent, compared to Oklahoma City MSA at 11.3 percent and the state of Oklahoma at 9.5 percent.

Table 14

		Tubic 14									
Housing Cost Burden											
Assessment Area: Oklahoma City Metropolitan											
Cost Burden – Renters Cost Burden – Owners											
Area	Low Moderate All			Low	All						
	Income	Income	Renters	Income	Income	Owners					
Oklahoma City Metropolitan	73.3	30.8	32.6	50.7	32.7	13.4					
Oklahoma City, OK MSA	75.0	30.2	39.9	52.0	26.4	15.3					
Oklahoma	71.3	30.7	37.7	50.0	24.0	15.2					
Cost Burden is housing cost that equals 30 p	,										
Source: 11 S Department of Housing and	l Urhan Develom	ment (HUD). 2010	5-2020 Compre	hensive Housing	r Affordahilitu Str	ateou					

- The AA had a higher affordability ratio at 42.8 percent compared to the Oklahoma City MSA figure of 37.2 percent, suggesting that housing is more affordable in the AA.
- The AA had a significantly higher percentage of owner-occupied units at 71.2 percent compared to the Oklahoma City MSA at 58.2 percent and the state of Oklahoma at 56.7 percent.

Table 15

Unemployment Rates											
Assessment Area: Oklahoma City Metropolitan											
Area 2018 2019 2020 2021 2022											
Oklahoma City Metropolitan	2.7	2.7	6.0	3.4	2.5						
Oklahoma City, OK MSA	3.0	2.9	6.2	3.9	2.8						
Oklahoma	3.3	3.1	6.3	4.0	3.0						
Source: Bureau of Labor Statistics: Local Area Unen	nployment Statisti	cs									

- The AA's unemployment rate has remained comparable to the Oklahoma City MSA and statewide figures since the previous examination.
- The community member stated that some major employers in the AA include the civilian side of the Tinker Air Force Base, the oil industry, Amazon, hospitals, school, and state and local governments.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE OKLAHOMA CITY METROPOLITAN AA

The bank's performance under the lending test in the Oklahoma City Metropolitan AA is reasonable. Small business lending was not evaluated for either test in the AA due to insufficient loan volume to conduct a meaningful analysis. The geographic distribution of small farm loans is excellent, while the borrower distribution of small farm loans is reasonable.

### **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 Farm Lending**

The geographic distribution of small farm lending is excellent. In 2022 and 2023, the bank did not originate any small farm loans in the AA's low-income census tract. However, the percentage of total farms in the AA located in the low-income census tract (demographic figure), at 0.6 percent, indicates a lack of opportunity for small farm lending in this geography. The bank's lending in moderate-income census tracts, at 76.9 percent, was above the demographic figure. During 2020 and 2021, the AA did not include any low-income census tracts. While the bank had no originations in the moderate-income census tracts, only 2.2 percent of area farms operated in these tracts.

An analysis of the dispersion of lending across the AA revealed a conspicuous gap that included LMI census tracts; however, this did not impact the conclusion given the distance from these tracts to the nearest branch, along with limited opportunity to lend in the low-income census tract in 2022 and 2023 and in the moderate-income census tracts in 2020 and 2021.

#### Table 16

Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography Assessment Area: Oklahoma City Metropolitan														
Geographic		Bank Loans By Year												
Income		2022 2023												
Level	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	Farms %					
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.6					
Moderate	4	66.7	925	91.6	6	85.7	263	82.7	16.2					
Middle	0	0.0	0	0.0	0	0.0	0	0.0	18.6					
Upper	2	33.3	85	8.4	1	14.3	55	17.3	64.7					
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0					
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0						
Total	6	100.0	1,010	100.0	7	100.0	318	100.0	100.0					

Source: 2023 FFIEC Census Data

2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

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

#### **Lending to Businesses and Farms of Different Sizes**

The bank's lending has a reasonable distribution among farms of different sizes.

#### **Small Farm Lending**

The borrower distribution of small farm lending is reasonable. In 2022 and 2023, the bank's lending to farms with gross annual revenues of \$1MM or less was comparable to the percentage of farms in the assessment area with gross annual revenues of \$1MM or less (demographic figure).

Furthermore, while aggregate CRA data is not a direct comparison as the bank is not a CRA reporter, aggregate lending volumes are reflective of the overall demand for small farm lending in the AA. A review of aggregate CRA data submitted by CRA reporters in the AA for 2020, 2021, and 2022 noted average lending to farms with \$1MM or less in gross annual revenue was 71.3 percent by number volume and 73.6 percent by dollar volume. This is reflective of loan demand that is lower than the demographic figure.

During 2020 and 2021, all six of the bank's small farm loans were originated to farms with revenue of \$1MM or less.

Table 17

Distribut	Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms										
	Ass	essment	Area: Ol	klahoma	City Met	ropolitar	ı				
Bank Loans By Year											
		2022				2023					
	#	#%	\$(000)	\$%	#	#% \$(000) \$%			Farms %		
			By	Revenue							
\$1 Million or Less	4	66.7	411	40.7	6	85.7	168	52.8	95.8		
Over \$1 Million	2	33.3	599	59.3	1	14.3	150	47.2	3.6		
Revenue Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.6		
Total	6	100.0	1,010	100.0	7	100.0	318	100.0	100.0		
			By l	Loan Size	)						
\$100,000 or Less	3	50.0	185	18.3	6	85.7	168	52.8			
\$100,001 - \$250,000	2	33.3	326	32.3	1	14.3	150	47.2			
\$250,001 - \$500,000	1	16.7	499	49.4	0	0.0	0	0.0			
Total	6	100.0	1,010	100.0	7	100.0	318	100.0			
	Ву	Loan Si	ze and R	evenue \$	1 Million	or Less					
\$100,000 or Less	2	50.0	85	20.7	6	100.0	168	100.0			
\$100,001 - \$250,000	2	50.0	326	79.3	0	0.0	0	0.0			
\$250,001 - \$500,000	0	0.0	0	0.0	0	0.0	0	0.0			
Total	4	100.0	411	100.0	6	100.0	168	100.0			

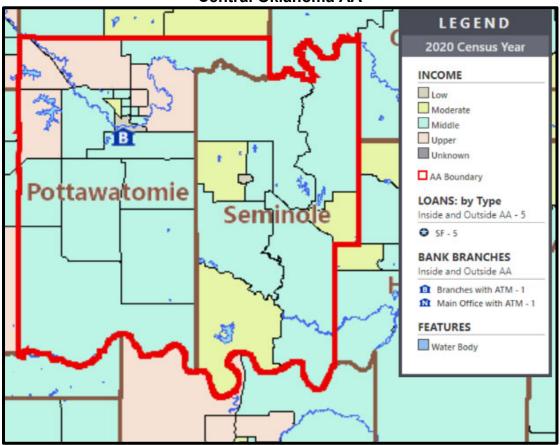
Source: 2023 FFIEC Census Data

2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

#### MAPS OF THE ASSESSMENT AREAS

Map A-1 Central Oklahoma AA



LEGEND
2020 Census Year
INCOME
Low
Moderate
Upper
Unknown
AB Bounday
LANs by Type
Ireda and Outside AA - 51
In 39 - 18
O 37 - 23
BANK BRANCHES
Ireda and Outside AA
In Branches with AM - 1
IN Main Office with AM

Map A-2 Oklahoma City Metropolitan AA

### APPENDIX B – DEMOGRAPHIC INFORMATION Central Oklahoma AA Table B-1

			rabie					
	_	2023 Cent	ral Oklahon	na AA Demo				
Income Categories	Tract Dist	ribution	Families Inc	by Tract ome	Families < Po as % of Fa Tra	milies by		by Family ome
	#	%	#	%	#	%	#	%
Low	2	6.9	1,110	4.5	460	41.4	5,601	22.6
Moderate	4	13.8	3,699	14.9	926	25.0	4,055	16.3
Middle	18	62.1	13,766	55.5	1,695	12.3	4,997	20.1
Upper	5	17.2	6,240	25.1	439	7.0	10,162	41.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	24,815	100.0	3,520	14.2	24,815	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	О	wner-occupie	ed	Rer	ıtal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,503	635	2.6	25.4	1,457	58.2	411	16.4
Moderate	7,016	3,382	13.6	48.2	2,265	32.3	1,369	19.5
Middle	23,039	14,004	56.3	60.8	5,463	23.7	3,572	15.5
Upper	9,028	6,870	27.6	76.1	1,347	14.9	811	9.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	41,586	24,891	100.0	59.9	10,532	25.3	6,163	14.8
	T-1-1 D			Busir	nesses by Tra	ct & Revenu	e Size	
		Гotal Businesses by Tract		an or = illion	Over \$1	Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	339	11.7	303	11.6	28	12.6	8	13.3
Moderate	400	13.9	336	12.9	52	23.3	12	20.0
Middle	1,480	51.3	1,347	51.7	102	45.7	31	51.7
Upper	668	23.1	618	23.7	41	18.4	9	15.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,887	100.0	2,604	100.0	223	100.0	60	100.0
Perce	entage of Total	Businesses:		90.2		7.7		2.1
				Fai	ms by Tract	& Revenue S	ize	
	Total Farm	s by Tract	Less Th	ian or = illion	Over \$1	Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	1	0.7	1	0.7	0	0.0	0	0.0
Moderate	9	6.6	9	6.6	0	0.0	0	0.0
Middle	101	73.7	101	73.7	0	0.0	0	0.0
Upper	26	19.0	26	19.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	137	100.0	137	100.0	0	0.0	0	0.0
	Percentage of T	Total Farms:		100.0		0.0		0.0

Source: 2023 FFIEC Census Data

2023 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Table B-2

			rabie					
		2022 Centr	al Oklahom	a AA Dem				
Income Categories	Tract Dis	tribution	Families Inco	by Tract ome	as % of F	overty Level amilies by act	Families	by Family ome
	#	%	#	%	#	%	#	%
Low	2	6.9	1,110	4.5	460	41.4	5,601	22.6
Moderate	4	13.8	3,699	14.9	926	25.0	4,055	16.3
Middle	18	62.1	13,766	55.5	1,695	12.3	4,997	20.1
Upper	5	17.2	6,240	25.1	439	7.0	10,162	41.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	24,815	100.0	3,520	14.2	24,815	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	0	wner-occupi	ed	Re	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,503	635	2.6	25.4	1,457	58.2	411	16.4
Moderate	7,016	3,382	13.6	48.2	2,265	32.3	1,369	19.5
Middle	23,039	14,004	56.3	60.8	5,463	23.7	3,572	15.5
Upper	9,028	6,870	27.6	76.1	1,347	14.9	811	9.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	41,586	41,586     24,891     100.0     59.9     10,532     25.3		6,163	14.8			
	Total Busi	naceae hy		Busir	esses by Tra	ct & Revenu	e Size	
		Tract		ian or = illion	Over \$1	Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	343	11.4	309	11.3	26	11.8	8	12.9
Moderate	411	13.6	348	12.7	51	23.2	12	19.4
Middle	1,548	51.4	1,414	51.8	101	45.9	33	53.2
Upper	712	23.6	661	24.2	42	19.1	9	14.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,014	100.0	2,732	100.0	220	100.0	62	100.0
Percen	tage of Total	Businesses:		90.6		7.3		2.1
				Fai	ms by Tract	& Revenue S	Size	
	Total Farm	s by Tract		ian or = illion	Over \$1	Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	1	0.7	1	0.7	0	0.0	0	0.0
Moderate	8	5.5	8	5.5	0	0.0	0	0.0
Middle	107	73.8	107	73.8	0	0.0	0	0.0
Upper	29	20.0	29	20.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	145	100.0	145	100.0	0	0.0	0	0.0
Pe	ercentage of	Γotal Farms:		100.0		0.0		0.0

Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Table B-3

		2021 Cent	ral Oklahon		ographics			
Income Categories	Tract Dis		Families	by Tract	Families < Po as % of Fa	overty Level amilies by act	Families I	
	#	%	#	%	#	%	#	%
Low	1	4.0	703	2.9	306	43.5	5,034	20.7
Moderate	5	20.0	3,715	15.2	804	21.6	4,511	18.5
Middle	16	64.0	15,572	63.9	2,004	12.9	5,079	20.8
Upper	3	12.0	4,374	18.0	250	5.7	9,740	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	25	100.0	24,364	100.0	3,364	13.8	24,364	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	0	wner-occupie	ed	Rer	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,582	357	1.5	22.6	924	58.4	301	19.0
Moderate	7,896	3,236	13.2	41.0	3,023	38.3	1,637	20.7
Middle	25,560	16,028	65.3	62.7	5,963	23.3	3,569	14.0
Upper	6,162	4,942	20.1	80.2	725	11.8	495	8.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	41,200	24,563	100.0	59.6	10,635	25.8	6,002	14.6
	Total Businesses by			Busin	nesses by Tra	ct & Revenu	e Size	
	Tra	•		ian or = illion	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	226	7.4	200	7.3	20	9.2	6	9.7
Moderate	489	16.1	432	15.7	42	19.4	15	24.2
Middle	1,749	57.6	1,594	57.8	120	55.3	35	56.5
Upper	571	18.8	530	19.2	35	16.1	6	9.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,035	100.0	2,756	100.0	217	100.0	62	100.0
Percer	ntage of Total	Businesses:		90.8		7.1		2.0
				Far	rms by Tract	& Revenue S	ize	
	Total Farm	ns by Tract		ian or = illion	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	1	0.7	1	0.7	0	0.0	0	0.0
Moderate	4	2.8	4	2.8	0	0.0	0	0.0
Middle	110	76.9	110	76.9	0	0.0	0	0.0
Upper	28	19.6	28	19.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	143	100.0	143	100.0	0	0.0	0	0.0
I	Percentage of	Total Farms:		100.0		0.0		0.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Table B-4

		2020 6		# D-4				
	T	2020 Cent	ral Oklahon					
Income Categories	Tract Dis	tribution		by Tract ome		Poverty Level nilies by Tract		by Family ome
	#	%	#	%	#	%	#	%
Low	1	4.0	703	2.9	306	43.5	5,034	20.7
Moderate	5	20.0	3,715	15.2	804	21.6	4,511	18.5
Middle	16	64.0	15,572	63.9	2,004	12.9	5,079	20.8
Upper	3	12.0	4,374	18.0	250	5.7	9,740	40.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	25	100.0	24,364	100.0	3,364	13.8	24,364	100.0
	Housing			Hou	sing Type by	y Tract		
	Units by	O	wner-occupi	ed	Re	ental	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,582	357	1.5	22.6	924	58.4	301	19.0
Moderate	7,896	3,236	13.2	41.0	3,023	38.3	1,637	20.7
Middle	25,560	16,028	65.3	62.7	5,963	23.3	3,569	14.0
Upper	6,162	4,942	20.1	80.2	725	11.8	495	8.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	41,200	24,563	100.0	59.6	10,635	25.8	6,002	14.6
Businesses by Tract & Re					act & Revenue	Size		
	Total Busi	-	Less Th	an or =	Over &	1 Million	Payanua N	at Papartad
	110	act	\$1 M	illion	Over 5	1 WIIIIION	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	241	7.8	213	7.6	23	10.0	5	8.2
Moderate	507	16.3	445	15.8	46	19.9	16	26.2
Middle	1,786	57.5	1,623	57.7	129	55.8	34	55.7
Upper	573	18.4	534	19.0	33	14.3	6	9.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,107	100.0	2,815	100.0	231	100.0	61	100.0
Percer	ntage of Total	Businesses:		90.6		7.4		2.0
				Fa	rms by Tract	& Revenue Si	ize	
	Total Farm	s by Tract		ian or =	Over \$	1 Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	1	0.7	1	0.7	0	0.0	0	0.0
Moderate	4	2.8	4	2.8	0	0.0	0	0.0
Middle	108	75.5	108	75.5	0	0.0	0	0.0
Upper	30	21.0	30	21.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	143	100.0	143	100.0	0	0.0	0	0.0
P	ercentage of	Γotal Farms:		100.0		0.0		0.0
Source: 2020 FFIEC Census Da								1

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

## Oklahoma City Metropolitan AA Table B-5

	202	3 Oklahoma	City Metro	politan AA	Demograph	ice		
Income Categories	Tract Dis	tribution	Families Inco	by Tract	Families < Po as % of Fa	overty Level amilies by act	Inco	by Family ome
	#	%	#	%	#	%	#	%
Low	1	2.7	367	1.1	165	45.0	4,665	13.9
Moderate	5	13.5	3,552	10.6	333	9.4	5,549	16.5
Middle	12	32.4	11,337	33.7	489	4.3	7,606	22.6
Upper	19	51.4	18,403	54.7	669	3.6	15,839	47.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	37	100.0	33,659	100.0	1,656	4.9	33,659	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	0	wner-occupio	ed	Rer	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	561	178	0.5	31.7	330	58.8	53	9.4
Moderate	6,363	2,963	8.5	46.6	2,315	36.4	1,085	17.1
Middle	17,624	11,970	34.3	67.9	4,593	26.1	1,061	6.0
Upper	24,464	19,798	56.7	80.9	3,577	14.6	1,089	4.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	49,012	34,909	100.0	71.2	10,815	22.1	3,288	6.7
	Businesses by Tract & Rev		ct & Revenu	ue Size				
		Total Businesses by Tract		an or = illion	Over \$1	Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	26	0.6	23	0.5	0	0.0	3	6.5
Moderate	439	9.8	408	9.7	22	9.6	9	19.6
Middle	1,349	30.2	1,258	30.0	82	35.8	9	19.6
Upper	2,654	59.4	2,504	59.7	125	54.6	25	54.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,468	100.0	4,193	100.0	229	100.0	46	100.0
Perce	ntage of Total	Businesses:		93.8		5.1		1.0
				Fai	ms by Tract	& Revenue S	ize	
	Total Farm	s by Tract		ian or = illion	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	1	0.6	1	0.6	0	0.0	0	0.0
Moderate	27	16.2	26	16.3	0	0.0	1	100.0
Middle	31	18.6	31	19.4	0	0.0	0	0.0
Upper	108	64.7	102	63.8	6	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	167	100.0	160	100.0	6	100.0	1	100.0
]	Percentage of	Total Farms:		95.8		3.6		0.6

Source: 2023 FFIEC Census Data

2023 Dun & Bradstreet Data

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

Table B-6

			Table					
	2022	Oklahoma	City Metro	politan AA	Demograpl	hics		
Income Categories	Tract Dis	tribution	Families Inc	by Tract ome		Poverty Level ilies by Tract	Families l Inco	,
	#	%	#	%	#	%	#	%
Low	1	2.7	367	1.1	165	45.0	4,665	13.9
Moderate	5	13.5	3,552	10.6	333	9.4	5,549	16.5
Middle	12	32.4	11,337	33.7	489	4.3	7,606	22.6
Upper	19	51.4	18,403	54.7	669	3.6	15,839	47.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	37	100.0	33,659	100.0	1,656	4.9	33,659	100.0
	Housing		-	Hou	sing Type by	Tract		
	Units by	0	wner-occupi	ed	Re	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	561	178	0.5	31.7	330	58.8	53	9.4
Moderate	6,363	2,963	8.5	46.6	2,315	36.4	1,085	17.1
Middle	17,624	11,970	34.3	67.9	4,593	26.1	1,061	6.0
Upper	24,464	19,798	56.7	80.9	3,577	14.6	1,089	4.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	49,012	34,909	100.0	71.2	10,815	22.1	3,288	6.7
	Total Businesses by			Busin	nesses by Tra	act & Revenue	Size	
	Total Busi	-	Less Th	an or =	Over \$1	Million	Rayanua N	at Rapartad
			\$1 Million Over \$1 Million		I WIIIIOII	Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	23	0.5	20	0.4	0	0.0	3	5.5
Moderate	484	10.0	452	9.9	21	8.9	11	20.0
Middle	1,457	30.0	1,361	29.8	85	36.0	11	20.0
Upper	2,891	59.5	2,731	59.8	130	55.1	30	54.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,855	100.0	4,564	100.0	236	100.0	55	100.0
Percen	tage of Total	Businesses:		94.0		4.9		1.1
				Fa	rms by Tract	& Revenue S	ize	
	Total Farm	s by Tract	Less Th	ian or = illion	Over \$1	1 Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	1	0.6	1	0.6	0	0.0	0	0.0
Moderate	29	16.1	28	16.3	0	0.0	1	100.0
Middle	34	18.9	34	19.8	0	0.0	0	0.0
Upper	116	64.4	109	63.4	7	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	180	100.0	172	100.0	7	100.0	1	100.0
Pe	ercentage of T	Γotal Farms:		95.6		3.9		0.6
Source: 2022 FFIEC Census Dat								1

Source: 2022 FFIEC Census Data

2022 Dun & Bradstreet Data

2016-2020 U.S. Census Bureau: American Community Survey

Table B-7

			rabie					
	202	1 Oklahoma	a City Metro	politan AA	Demograph			
Income Categories	Tract Dis	tribution	Families Inc	by Tract ome	Families < Po as % of Fa	nmilies by	Families l Inco	,
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,775	11.9
Moderate	3	10.3	1,880	5.9	272	14.5	5,433	17.1
Middle	20	69.0	19,708	61.9	1,152	5.8	7,614	23.9
Upper	6	20.7	10,256	32.2	242	2.4	15,022	47.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	31,844	100.0	1,666	5.2	31,844	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	0	wner-occupi	ed	Rer	ıtal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,702	1,824	5.5	49.3	1,387	37.5	491	13.3
Middle	29,873	20,549	62.0	68.8	6,687	22.4	2,637	8.8
Upper	13,178	10,755	32.5	81.6	1,861	14.1	562	4.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	46,753	33,128	100.0	70.9	9,935	21.2	3,690	7.9
	Total Ruci	inaceae by		Busin	nesses by Tra	ct & Revenue	Size	
	Total Businesses by Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	264	5.4	249	5.4	10	4.3	5	11.9
Middle	2,960	60.5	2,770	59.9	163	70.0	27	64.3
Upper	1,672	34.2	1,602	34.7	60	25.8	10	23.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,896	100.0	4,621	100.0	233	100.0	42	100.0
Percer	ntage of Total	Businesses:		94.4		4.8		0.9
				Fa	rms by Tract	& Revenue S	ize	
	Total Farm	is by Tract	Less Th \$1 M	ian or = illion	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	2.2	4	2.3	0	0.0	0	0.0
Middle	143	78.1	139	79.0	3	50.0	1	100.0
Upper	36	19.7	33	18.8	3	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	183	100.0	176	100.0	6	100.0	1	100.0
P	ercentage of	Total Farms:		96.2		3.3		0.5

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Table B-8

		0111	Table					
	2020	Oklahoma	City Metrop	olitan AA			1	
	Tract Dist	ribution	Families	by Tract		< Poverty of Families	Families 1	by Family
Income Categories	Tract Dist	TIDUCTOR	Inco	ome	by T		Inc	ome
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,775	11.9
Moderate	3	10.3	1,880	5.9	272	14.5	5,433	17.1
Middle	20	69.0	19,708	61.9	1,152	5.8	7,614	23.9
Upper	6	20.7	10,256	32.2	242	2.4	15,022	47.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	31,844	100.0	1,666	5.2	31,844	100.0
	Housing			Hous	ing Type by	Tract		
	Units by	O	wner-occupi	ed	Rer	ıtal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,702	1,824	5.5	49.3	1,387	37.5	491	13.3
Middle	29,873	20,549	62.0	68.8	6,687	22.4	2,637	8.8
Upper	13,178	10,755	32.5	81.6	1,861	14.1	562	4.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	46,753	33,128	100.0	70.9	9,935	21.2	3,690	7.9
	Tr. ( 1 Pr 1			Busin	esses by Tra	ct & Revenu	e Size	
		Total Businesses by Tract		an or =	Over \$1 Million Revenue Not Reported			
				\$1 Million		1VIIIIIOII		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	281	5.6	263	5.5	15	6.3	3	8.3
Middle	3,043	60.5	2,852	60.0	165	69.0	26	72.2
Upper	1,703	33.9	1,637	34.4	59	24.7	7	19.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,027	100.0	4,752	100.0	239	100.0	36	100.0
Perce	ntage of Total	Businesses:		94.5		4.8		0.7
				Far	ms by Tract	& Revenue S	Size	
	Total Farm	s by Tract	Less Th		Over \$1	Million	Revenue N	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	5	2.5	5	2.6	0	0.0	0	0.0
Middle	155	78.3	150	78.9	4	57.1	1	100.0
Upper	38	19.2	35	18.4	3	42.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	198	100.0	190	100.0	7	100.0	1	100.0
1	Percentage of T	Total Farms:		96.0		3.5		0.5

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

#### APPENDIX C - ADDITIONAL FULL-SCOPE REVIEW ASSESSMENT AREA TABLES

#### Central Oklahoma AA

Table C-1

Distrib	Distribution of 2021 Small Business Lending By Income Level of Geography										
Assessment Area: Central Oklahoma											
Geographic		Bank Loans Total									
Income Level	#	#%	\$(000)	\$%	Businesses %						
Low	0	0.0	0	0.0	7.4						
Moderate	0	0.0	0	0.0	16.1						
Middle	7	100.0	330	100.0	57.6						
Upper	0	0.0	0	0.0	18.8						
Unknown	0	0.0	0	0.0	0.0						
Tract-Unk	0	0.0	0	0.0							
Total	7	100.0	330	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.

No small business loans where originated in 2020.

Table C-2

Dis	Distribution of 2021 Small Farm Lending By Income Level of Geography									
	Assessment Area: Central Oklahoma									
Geographic		Bank Loans								
Income Level	#	#%	\$(000)	\$%	Total Farms %					
Low	0	0.0	0	0.0	0.7					
Moderate	0	0.0	0	0.0	2.8					
Middle	2	100.0	435	100.0	76.9					
Upper	0	0.0	0	0.0	19.6					
Unknown	0	0.0	0	0.0	0.0					
Tract-Unk	0	0.0	0	0.0						
Total	2	100.0	435	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.

No small farm loans where originated in 2020.

Table C-3

Distribution of 2021 Small Business Lending By Revenue Size of Businesses										
Assessment Area: Central Oklahoma										
		Bank	Loans		Total					
	#	#%	\$(000)	<b>\$%</b>	Businesses %					
		By Revenu	ie							
\$1 Million or Less	7	100.0	330	100.0	90.8					
Over \$1 Million	0	0.0	0	0.0	7.1					
Revenue Unknown	0	0.0	0	0.0	2.0					
Total	7	100.0	330	100.0	100.0					
	By Loan Size									
\$100,000 or Less	6	85.7	228	69.1						
\$100,001 - \$250,000	1	14.3	102	30.9						
\$250,001 - \$1 Million	0	0.0	0	0.0						
Total	7	100.0	330	100.0						
	By Loan Size and Revenues \$1 Million or Less									
\$100,000 or Less	6	85.7	228	69.1						
\$100,001 - \$250,000	1	14.3	102	30.9						
\$250,001 - \$1 Million	0	0.0	0	0.0						
Total	7	100.0	330	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.

No small business loans where originated in 2020.

Table C-4

Distribution of 2021 Small Farm Lending By Revenue Size of Farms									
Assessment Area: Central Oklahoma									
		Bank Loans Total Farms							
	#	# #% \$(000) \$%							
By Revenue									
\$1 Million or Less	2	100.0	435	100.0	100.0				
Over \$1 Million	0	0.0	0	0.0	0.0				
Revenue Unknown	0	0.0	0	0.0	0.0				
Total	2	100.0	435	100.0	100.0				
By Loan Size									
\$100,000 or Less	1	50.0	20	4.6					
\$100,001 - \$250,000	0	0.0	0	0.0					
\$250,001 - \$500,000	1	50.0	415	95.4					
Total	2	100.0	435	100.0					
	By Loan Size and Revenues \$1 Million or Less								
\$100,000 or Less	1	50.0	20	4.6					
\$100,001 - \$250,000	0	0.0	0	0.0					
\$250,001 - \$500,000	1	50.0	415	95.4					
Total	2	100.0	435	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.

No small farm loans where originated in 2020.

# Oklahoma City Metropolitan AA Table C-5

	Distribution of 2020 and 2021 Small Farm Lending By Income Level of Geography Assessment Area: Oklahoma City Metropolitan										
Geographic		Bank Loans By Year									
Income		20	20			20	21		Total Farms %		
Level	#	#%	\$(000)	\$%	#	Farms /0					
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.0		
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	2.2		
Middle	4	100.0	678	100.0	2	100.0	102	100.0	78.1		
Upper	0	0.0	0	0.0	0	0.0	0	0.0	19.7		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.0		
Tract-Unk	0	0.0	0	0.0	0	0.0	0	0.0			
Total	4	100.0	678	100.0	2	100.0	102	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 C-6

Over \$1 Million         0         0.0         0         0.0         0         0.0         0         0.0         3.3           Revenue Unknown         0         0.0         0         0.0         0         0.0         0         0.0         0.5           Total         4         100.0         678         100.0         2         100.0         102         100.0         100.0           By Loan Size           \$100,000 or Less         2         50.0         133         19.6         2         100.0         102         100.0           \$100,001 - \$250,000         1         25.0         193         28.5         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352         51.9         0         0.0         0         0.0           Total         4         100.0         678         100.0         2         100.0         102         100.0           By Loan Size and Revenue \$1 Million or Less           \$100,000 or Less         2         50.0         133         19.6         2         100.0         102         100.0           \$100,001 - \$250,000         1 <th< th=""><th></th><th></th><th></th><th></th><th>DIC 0-0</th><th><u> </u></th><th></th><th></th><th></th><th></th></th<>					DIC 0-0	<u> </u>				
Bank Loans By Year   Total   Farms %	Distribut					0 5			Farms	
Total Farms %   Total Farms %   Fa										
#   #%   \$(000)   \$%   #   #%   \$(000)   \$%			20		ank Loai	by rea		21		
\$1 Million or Less		#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	rathis /o
Over \$1 Million         0         0.0         0         0         0.0         0         0         0.0         0 <th></th> <th></th> <th></th> <th>By</th> <th>Revenue</th> <th></th> <th></th> <th></th> <th></th> <th></th>				By	Revenue					
Revenue Unknown         0         0.0         0         0.0         0         0.0         0.0         0.5           Total         4         100.0         678         100.0         2         100.0         102         100.0         100.0           By Loan Size           \$100,000 or Less         2         50.0         133         19.6         2         100.0         102         100.0           \$100,001 - \$250,000         1         25.0         193         28.5         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352         51.9         0         0.0         0         0.0           By Loan Size and Revenue \$1 Million or Less           \$100,000 or Less         2         50.0         133         19.6         2         100.0         102         100.0           \$100,001 - \$250,000         1         25.0         193         28.5         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352         51.9         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352	\$1 Million or Less	4	100.0	678	100.0	2	100.0	102	100.0	96.2
Total         4         100.0         678         100.0         2         100.0         102         100.0         100.0           By Loan Size           \$100,000 or Less         2         50.0         133         19.6         2         100.0         102         100.0           \$100,001 - \$250,000         1         25.0         193         28.5         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352         51.9         0         0.0         0         0.0           By Loan Size and Revenue \$1         Million or Less           \$100,000 or Less         2         50.0         133         19.6         2         100.0         102         100.0           \$100,001 - \$250,000         1         25.0         193         28.5         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352         51.9         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352         51.9         0         0.0         0         0.0           \$250,001 - \$0.0         0         0 <t< th=""><th>Over \$1 Million</th><th>0</th><th>0.0</th><th>0</th><th>0.0</th><th>0</th><th>0.0</th><th>0</th><th>0.0</th><th>3.3</th></t<>	Over \$1 Million	0	0.0	0	0.0	0	0.0	0	0.0	3.3
Signature   Sign	Revenue Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.5
\$100,000 or Less	Total	4	100.0	678	100.0	2	100.0	102	100.0	100.0
\$100,001 - \$250,000				By l	Loan Size	2				
\$250,001 - \$500,000	\$100,000 or Less	2	50.0	133	19.6	2	100.0	102	100.0	
Total         4         100.0         678         100.0         2         100.0         102         100.0           By Loan Size and Revenue \$1 Million or Less           \$100,000 or Less         2         50.0         133         19.6         2         100.0         102         100.0           \$100,001 - \$250,000         1         25.0         193         28.5         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352         51.9         0         0.0         0         0.0           Total         4         100.0         678         100.0         2         100.0         102         100.0	\$100,001 - \$250,000	1	25.0	193	28.5	0	0.0	0	0.0	
By Loan Size and Revenue \$1 Million or Less           \$100,000 or Less         2         50.0         133         19.6         2         100.0         102         100.0           \$100,001 - \$250,000         1         25.0         193         28.5         0         0.0         0         0.0           \$250,001 - \$500,000         1         25.0         352         51.9         0         0.0         0         0.0           Total         4         100.0         678         100.0         2         100.0         102         100.0	\$250,001 - \$500,000	1	25.0	352	51.9	0	0.0	0	0.0	
\$100,000 or Less 2 50.0 133 19.6 2 100.0 102 100.0 \$100,001 - \$250,000 1 25.0 193 28.5 0 0.0 0 0.0 0 0.0 \$250,001 - \$500,000 1 25.0 352 51.9 0 0.0 0 0.0 Total 4 100.0 678 100.0 2 100.0 102 100.0	Total	4	100.0	678	100.0	2	100.0	102	100.0	
\$100,001 - \$250,000	By Loan Size and Revenue \$1 Million or Less									
\$250,001 - \$500,000	\$100,000 or Less	2	50.0	133	19.6	2	100.0	102	100.0	
Total 4 100.0 678 100.0 2 100.0 102 100.0	\$100,001 - \$250,000	1	25.0	193	28.5	0	0.0	0	0.0	
	\$250,001 - \$500,000	1	25.0	352	51.9	0	0.0	0	0.0	
		4	100.0	678	100.0	2	100.0	102	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.

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#### APPENDIX D - GLOSSARY

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

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

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

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

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

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

## ALLNATIONS BANK CALUMET, OKLAHOMA

**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.

## ALLNATIONS BANK CALUMET, OKLAHOMA

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

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

**Other products**: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-occupied units**: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified investment**: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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

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

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