



PUBLIC DISCLOSURE

February 7, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Oklahoma Capital Bank
RSSD# 284154

8080 South Yale Avenue
Tulsa, Oklahoma 74136

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

Oklahoma Capital 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 more than reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A substantial majority of the bank's loans are originated inside the AA.
- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

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

- The bank's 17-quarter average NLTD ratio,
- A statistical sample of 43 small business loans from a universe of 54 loans originated from December 5, 2017 to December 31, 2020.

DESCRIPTION OF INSTITUTION

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

- The bank is a wholly owned subsidiary of Sooner Southwest Bankshares, Incorporated, which acquired the bank in October 2021. The bank was previously a subsidiary of Capital Bank Holdings, Incorporated.
- The bank has total assets of \$155.3 million as of September 30, 2021.
- In addition to its main office in Tulsa, the bank operates two branch offices. The bank converted its loan production office in south Tulsa to a full-service branch in April 2018; management subsequently transferred the main branch from the north Tulsa location to the south Tulsa location and retained the north Tulsa

location as a branch. The bank operates a second branch in Skiatook, Oklahoma.

- The bank operates two cash-only automated teller machines, one at the main office and one at the Skiatook Branch.
- As shown in the table below, the bank’s primary business focus is commercial lending, including commercial real estate lending.

Table 1

Composition of Loan Portfolio as of September 30, 2021		
Loan Type	\$(000)	%
Construction and Land Development	26,694	25.9
Farmland	566	0.5
1-4 Family Residential Real Estate	10,783	10.5
Multifamily Residential Real Estate	947	0.9
Non-Farm Non-Residential Real Estate	33,285	32.3
Agricultural	2.00	0.0
Commercial and Industrial	29,262	28.4
Consumer	1,489	1.4
Other	0.00	0.0
Gross Loans	103,028	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the CRA at its December 4, 2017 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

DESCRIPTION OF ASSESSMENT AREA

The bank’s Tulsa Metropolitan AA consists of Tulsa and Osage Counties in their entireties (see Appendix A for an AA map and Appendix B for additional demographic data), which are two of the seven counties that comprise the Tulsa Metropolitan Statistical Area (MSA).

- The AA is comprised of 17 low-, 55 moderate-, 61 middle-, and 53 upper-income census tracts. Although the AA remains unchanged, at the previous evaluation, the AA was comprised of 19 low-, 56 moderate-, 55 middle-, and 56 upper-income census tracts.
- According to the June 30, 2021 Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank has a deposit market share of 0.4 percent which ranked 35th out of 50 FDIC-insured institutions with branch offices operating in the AA.
- One interview with a community member was conducted to ascertain the credit needs of the communities within the AA, the responsiveness of area banks in

meeting those credit needs, and the local economic conditions. The community member represented an organization specializing in economic and community development in the AA.

Table 2

Population Change			
Assessment Area: Tulsa Metropolitan AA			
Area	2010 Population	2015 Population	Percent Change
Tulsa Metropolitan AA	650,875	671,389	3.2
Osage County, OK	47,472	48,054	1.2
Tulsa County, OK	603,403	623,335	3.3
Tulsa, OK MSA	937,478	962,676	2.7
Oklahoma	3,751,351	3,849,733	2.6

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

- According to population estimates from the U.S. Census Bureau, the population in Osage County decreased between 2010 and 2020 while the population in Tulsa County increased during the same time-period.
- The city of Tulsa, Oklahoma, is the largest population center in the AA. According to 2020 U.S. Census Bureau data, Tulsa has a population of 413,066 which accounts for over 57.8 percent of the AA's total population.

Table 3

Median Family Income Change			
Assessment Area: Tulsa Metropolitan AA			
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Tulsa Metropolitan AA	63,325	61,503	(2.9)
Osage County, OK	55,854	57,170	2.4
Tulsa County, OK	64,052	61,809	(3.5)
Tulsa, OK MSA	63,201	61,182	(3.2)
Oklahoma	58,375	58,029	(0.6)

*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.

- The percentage of families living below poverty in Osage County is 11.1 percent compared to 12.3 percent in Tulsa County; both are comparable to the statewide percentage of 12.4 percent.

Table 4

Housing Cost Burden						
Assessment Area: Tulsa Metropolitan AA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Tulsa Metropolitan AA	74.4	38.0	40.4	58.8	34.0	17.9
Osage County, OK	58.0	25.3	34.0	44.1	24.2	17.0
Tulsa County, OK	75.2	38.6	40.7	61.0	35.3	17.9
Tulsa, OK MSA	72.3	36.8	39.2	55.5	31.3	17.2
Oklahoma	71.4	33.9	38.3	54.0	27.6	16.7

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2013-2017 Comprehensive Housing Affordability Strategy

- The median housing value of the AA is \$135,434, which is largely driven by the higher median housing value in Tulsa County at \$138,500, and is higher than the statewide median housing value of \$117,900.
- The AA’s affordability ratio of 36.5 percent is lower than the statewide percentage of 39.8 percent, indicating the AA is less affordable than the state overall. Tulsa County has the lowest percentage at 35.9 percent.
- A member of the community stated there is significant need for affordable housing in the city of Tulsa, along with an overall shortage of approximately 4,500 housing units.

Table 5

Unemployment Rates					
Assessment Area: Tulsa Metropolitan AA					
Area	2016	2017	2018	2019	2020
Tulsa Metropolitan AA	4.6	4.1	3.3	3.0	6.6
Osage County, OK	5.6	4.9	4.1	3.6	6.4
Tulsa County, OK	4.5	4.0	3.2	3.0	6.6
Tulsa, OK MSA	4.8	4.2	3.3	3.1	6.4
Oklahoma	4.6	4.0	3.3	3.1	6.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The AA’s unemployment figures are comparable to MSA and statewide rates. A member of the community stated that businesses are having difficulty filling open positions.
- A member of the community indicated the major industries in the AA include aerospace, education, manufacturing, and petroleum.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

The bank’s overall performance under the lending test is reasonable. All applicable criteria were equally weighted in the evaluation. All data from 2017 to 2020 for the evaluations of the geographic distribution of loans and the lending to businesses of different revenue sizes was analyzed together due to limited volume.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank’s average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank’s capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, similar lending portfolio compositions, and geographic proximity to the bank. The bank’s NLTD ratio is more than reasonable as the bank’s 17-quarter NLTD ratio is above all four similarly situated institutions.

Table 6

Comparative NLTD Ratios September 30, 2017 – September 30, 2021			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			17 Quarter Average
Oklahoma Capital Bank	Tulsa, OK	155,340	94.0
Similarly Situated Institutions			
The First National Bank and Trust of Broken Arrow	Broken Arrow, OK	242,115	79.8
Bank of Commerce	Chelsea, OK	194,297	76.3
Triad Bank, National Association	Tulsa, OK	237,918	89.0
The Exchange Bank	Skiatook, OK	142,375	55.8

Assessment Area Concentration

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

Table 7

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Small Business	41	95.3	11,339	97.0	2	4.7	354	3.0
Total Small Business related	41	95.3	11,339	97.0	2	4.7	354	3.0
Total Loans	41	95.3	11,339	97.0	2	4.7	354	3.0

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

Geographic Distribution of Loans

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

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank did not make any loans in the low-income census tracts during the review period. However, the bank’s product sample has limited volume and the demographic figure at 3.8 percent is very low, signifying limited opportunity for the bank to lend in these census tracts. The bank’s lending in moderate-income census tracts at 39.0 percent by number and 65.6 percent by dollar is above the demographic figure of 21.7 percent. The bank has one lending relationship that accounts for 10 of the 16 loans made in moderate-income census tracts, which skews overall performance.

Loan dispersion was also evaluated. Though there were some gaps in small business lending identified, they did not impact conclusions. Due to the bank’s limited volume, it is not able to serve all low- and moderate-income (LMI) tracts in the AA given the large numbers of tracts in the AA.

Table 8

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: Tulsa Metropolitan AA									
Geographic Income Level	Bank Loans By Year								Total Businesses %
	2019				2020				
	#	#%	\$ (000)	%	#	#%	\$ (000)	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	3.8
Moderate	3	30.0	735	33.1	13	48.1	6,702	75.8	21.7
Middle	1	10.0	600	27.0	7	25.9	1,058	12.0	36.6
Upper	6	60.0	886	39.9	7	25.9	1,080	12.2	37.8
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	10	100.0	2,221	100.0	27	100.0	8,840	100.0	100.0

Source: 2020 FFIEC Census Data
2020 Data & 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

This performance criterion evaluates the bank’s lending to businesses of different revenue sizes. The bank’s lending has a reasonable distribution among businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is reasonable. Although the bank’s lending to small businesses at 51.2 percent by number and 53.2 percent by dollar volume is below the demographic at 90.9 percent, bank performance is reasonable as there is significant competition in the AA that limits the bank’s opportunity for substantial penetration. In addition, a community member stated that there are several alternative funding sources available in the Tulsa market that provide funding for small businesses. These organizations have established themselves as a resource for operational funding. Finally, a review of aggregate lending data reported by CRA filers in 2020 indicated that peer lenders in the AA were lending to small businesses at a rate of 32.2 percent by number and 22.2 percent by dollar volume. Aggregate data from 2018 and 2019 was above 2020 levels, but still below the bank’s performance. While aggregate lending is not a direct comparator as the bank is not a CRA reporter, these aggregate lending levels are indicative of the overall demand for small business credit from banks in the AA.

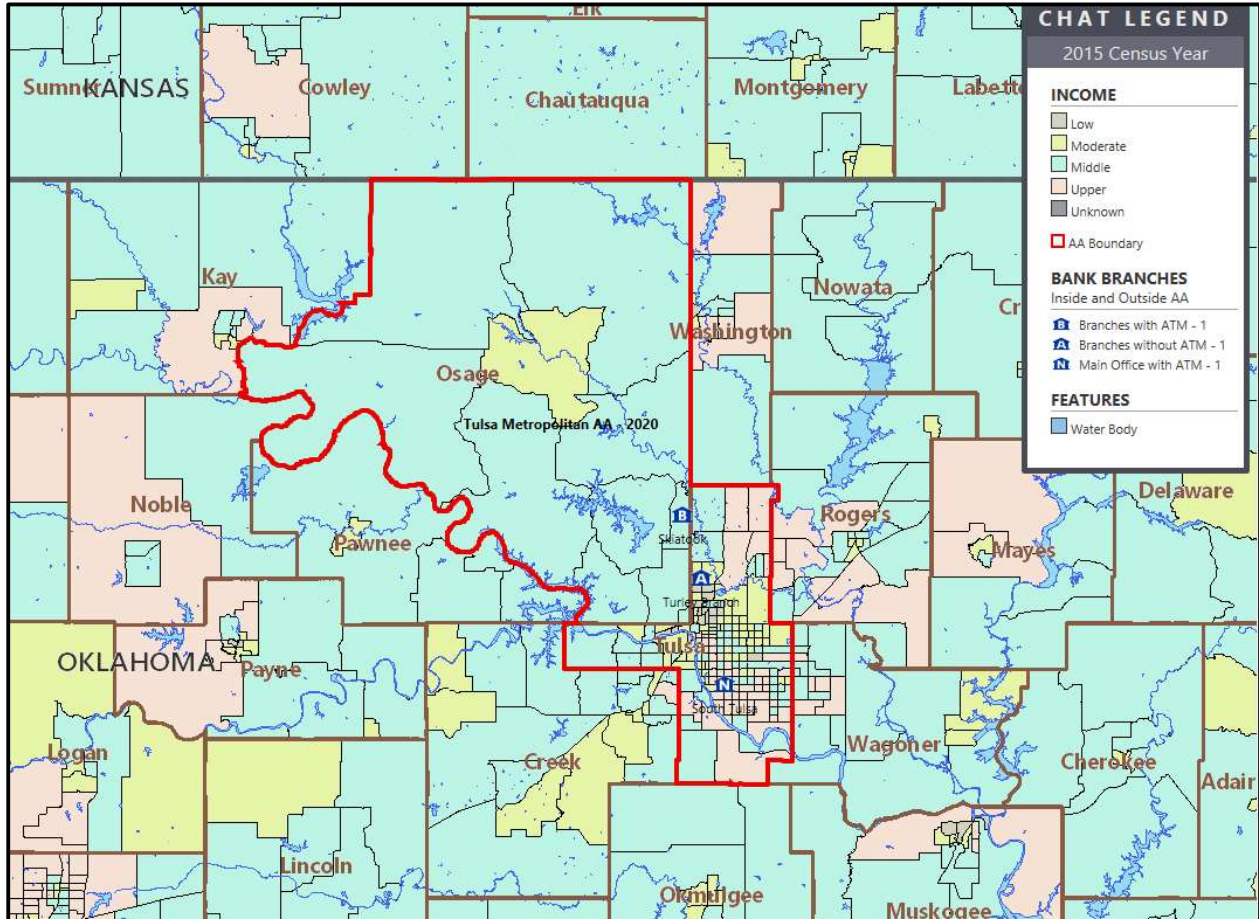
Table 9

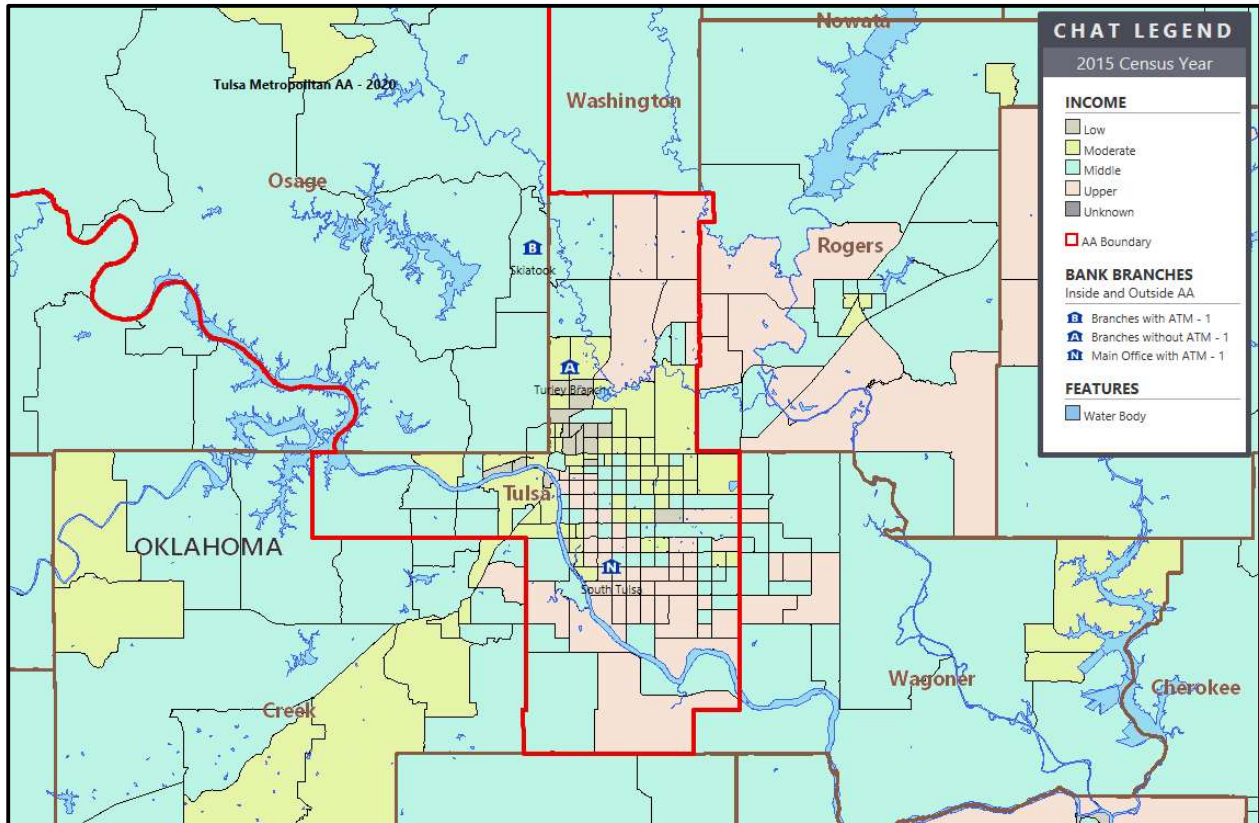
Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses									
Assessment Area: Tulsa Metropolitan AA									
	Bank Loans By Year								Total Businesses %
	2019				2020				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	
By Revenue									
\$1 Million or Less	5	50.0	851	38.3	14	51.9	5,111	57.8	90.9
Over \$1 Million	5	50.0	1,370	61.7	13	48.1	3,729	42.2	8.3
Revenue Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.8
Total	10	100.0	2,221	100.0	27	100.0	8,840	100.0	100.0
By Loan Size									
\$100,000 or Less	5	50.0	213	9.6	10	37.0	560	6.3	
\$100,001 - \$250,000	2	20.0	423	19.0	4	14.8	805	9.1	
\$250,001 - \$1 Million	3	30.0	1,585	71.4	13	48.1	7,475	84.6	
Total	10	100.0	2,221	100.0	27	100.0	8,840	100.0	
By Loan Size and Revenue \$1 Million or Less									
\$100,000 or Less	3	60.0	156	18.3	7	50.0	314	6.1	
\$100,001 - \$250,000	1	20.0	210	24.7	1	7.1	221	4.3	
\$250,001 - \$1 Million	1	20.0	485	57.0	6	42.9	4,576	89.5	
Total	5	100.0	851	100.0	14	100.0	5,111	100.0	
<i>Source: 2020 FFIEC Census Data 2020 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>									

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

APPENDIX A – MAP OF THE ASSESSMENT AREA





APPENDIX B – DEMOGRAPHIC INFORMATION
Table B-1

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	9.1	10,765	6.4	4,413	41.0	37,220	22.0
Moderate	55	29.6	40,360	23.9	8,419	20.9	28,969	17.1
Middle	61	32.8	60,385	35.7	5,460	9.0	33,420	19.8
Upper	53	28.5	57,640	34.1	2,300	4.0	69,541	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	186	100.0	169,150	100.0	20,592	12.2	169,150	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	4.1	29.1	12,302	53.7	3,930	17.2
Moderate	79,964	31,495	19.6	39.4	37,318	46.7	11,151	13.9
Middle	106,419	61,070	37.9	57.4	34,790	32.7	10,559	9.9
Upper	86,986	61,760	38.4	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	296,272	160,996	100.0	54.3	103,355	34.9	31,921	10.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,572	3.8	1,357	3.6	202	5.9	13	4.2
Moderate	8,926	21.7	7,817	20.9	1,050	30.6	59	19.1
Middle	15,060	36.6	13,635	36.5	1,316	38.4	109	35.3
Upper	15,560	37.8	14,573	39.0	859	25.1	128	41.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	41,118	100.0	37,382	100.0	3,427	100.0	309	100.0
Percentage of Total Businesses:				90.9		8.3		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	8	1.9	7	1.7	1	16.7	0	0.0
Moderate	48	11.4	48	11.6	0	0.0	0	0.0
Middle	187	44.3	185	44.7	2	33.3	0	0.0
Upper	179	42.4	174	42.0	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	422	100.0	414	100.0	6	100.0	2	100.0
Percentage of Total Farms:				98.1		1.4		0.5
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 B-2

2019 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	9.1	10,765	6.4	4,413	41.0	37,220	22.0
Moderate	55	29.6	40,360	23.9	8,419	20.9	28,969	17.1
Middle	61	32.8	60,385	35.7	5,460	9.0	33,420	19.8
Upper	53	28.5	57,640	34.1	2,300	4.0	69,541	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	186	100.0	169,150	100.0	20,592	12.2	169,150	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	4.1	29.1	12,302	53.7	3,930	17.2
Moderate	79,964	31,495	19.6	39.4	37,318	46.7	11,151	13.9
Middle	106,419	61,070	37.9	57.4	34,790	32.7	10,559	9.9
Upper	86,986	61,760	38.4	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	296,272	160,996	100.0	54.3	103,355	34.9	31,921	10.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,562	3.9	1,338	3.7	211	6.1	13	4.6
Moderate	8,759	21.7	7,650	20.9	1,058	30.4	51	17.9
Middle	14,783	36.6	13,349	36.4	1,333	38.3	101	35.4
Upper	15,288	37.8	14,289	39.0	879	25.3	120	42.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	40,392	100.0	36,626	100.0	3,481	100.0	285	100.0
Percentage of Total Businesses:				90.7		8.6		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3	0.7	2	0.5	1	16.7	0	0.0
Moderate	45	11.1	45	11.4	0	0.0	0	0.0
Middle	181	44.8	179	45.2	2	33.3	0	0.0
Upper	175	43.3	170	42.9	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	404	100.0	396	100.0	6	100.0	2	100.0
Percentage of Total Farms:				98.0		1.5		0.5
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table B-3

2018 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	9.1	10,765	6.4	4,413	41.0	37,220	22.0
Moderate	55	29.6	40,360	23.9	8,419	20.9	28,969	17.1
Middle	61	32.8	60,385	35.7	5,460	9.0	33,420	19.8
Upper	53	28.5	57,640	34.1	2,300	4.0	69,541	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	186	100.0	169,150	100.0	20,592	12.2	169,150	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	4.1	29.1	12,302	53.7	3,930	17.2
Moderate	79,964	31,495	19.6	39.4	37,318	46.7	11,151	13.9
Middle	106,419	61,070	37.9	57.4	34,790	32.7	10,559	9.9
Upper	86,986	61,760	38.4	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	296,272	160,996	100.0	54.3	103,355	34.9	31,921	10.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,542	3.8	1,311	3.6	219	6.2	12	3.5
Moderate	8,716	21.7	7,578	20.9	1,072	30.4	66	19.0
Middle	14,705	36.7	13,239	36.6	1,341	38.0	125	36.0
Upper	15,133	37.7	14,092	38.9	897	25.4	144	41.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	40,096	100.0	36,220	100.0	3,529	100.0	347	100.0
Percentage of Total Businesses:				90.3		8.8		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	1.1	3	0.8	1	16.7	0	0.0
Moderate	38	10.3	38	10.6	0	0.0	0	0.0
Middle	163	44.3	161	44.7	2	33.3	0	0.0
Upper	163	44.3	158	43.9	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	368	100.0	360	100.0	6	100.0	2	100.0
Percentage of Total Farms:				97.8		1.6		0.5
<i>Source: 2018 FFIEC Census Data 2018 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau; American Community Survey Note: Percentages may not total 100.0 percent due to rounding.</i>								

Table B-4

2017 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	9.1	10,765	6.4	4,413	41.0	37,220	22.0
Moderate	55	29.6	40,360	23.9	8,419	20.9	28,969	17.1
Middle	61	32.8	60,385	35.7	5,460	9.0	33,420	19.8
Upper	53	28.5	57,640	34.1	2,300	4.0	69,541	41.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	186	100.0	169,150	100.0	20,592	12.2	169,150	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	4.1	29.1	12,302	53.7	3,930	17.2
Moderate	79,964	31,495	19.6	39.4	37,318	46.7	11,151	13.9
Middle	106,419	61,070	37.9	57.4	34,790	32.7	10,559	9.9
Upper	86,986	61,760	38.4	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	296,272	160,996	100.0	54.3	103,355	34.9	31,921	10.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	1,310	3.9	1,084	3.6	223	6.4	3	1.4
Moderate	7,507	22.3	6,405	21.4	1,066	30.8	36	17.1
Middle	12,294	36.5	10,907	36.4	1,293	37.3	94	44.5
Upper	12,551	37.3	11,589	38.6	884	25.5	78	37.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	33,662	100.0	29,985	100.0	3,466	100.0	211	100.0
Percentage of Total Businesses:				89.1	10.3	0.6		
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low	5	1.7	4	1.4	1	16.7	0	0.0
Moderate	36	12.0	36	12.3	0	0.0	0	0.0
Middle	141	47.2	139	47.4	2	33.3	0	0.0
Upper	117	39.1	114	38.9	3	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	299	100.0	293	100.0	6	100.0	0	0.0
Percentage of Total Farms:				98.0	2.0	0.0		
<i>Source: 2017 FFIEC Census Data 2017 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>								

Table B-5

Distribution of 2017 and 2018 Small Business Lending By Income Level of Geography									
Assessment Area: Tulsa Metropolitan AA									
Geographic Income Level	Bank Loans By Year								Total Businesses %
	2017				2018				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	3.8
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	21.7
Middle	1	100.0	183	100.0	2	66.7	60	62.5	36.7
Upper	0	0.0	0	0.0	1	33.3	36	37.5	37.7
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	1	100.0	183	100.0	3	100.0	96	100.0	100.0

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

Table B-6

Distribution of 2017 and 2018 Small Business Lending By Revenue Size of Businesses									
Assessment Area: Tulsa Metropolitan AA									
	Bank Loans By Year								Total Businesses %
	2017				2018				
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%	
By Revenue									
\$1 Million or Less	0	0.0	0	0.0	2	66.7	76	79.2	90.3
Over \$1 Million	1	100.0	183	100.0	1	33.3	20	20.8	8.8
Revenue Unknown	0	0.0	0	0.0	0	0.0	0	0.0	0.9
Total	1	100.0	183	100.0	3	100.0	96	100.0	100.0
By Loan Size									
\$100,000 or Less	0	0.0	0	0.0	3	100.0	96	100.0	
\$100,001 - \$250,000	1	100.0	183	100.0	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	0	0.0	0	0.0	
Total	1	100.0	183	100.0	3	100.0	96	100.0	
By Loan Size and Revenue \$1 Million or Less									
\$100,000 or Less	0	0.0	0	0.0	2	100.0	76	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	0	0.0	0	0.0	
Total	0	0.0	0	0.0	2	100.0	76	100.0	

Source: 2018 FFIEC Census Data
2018 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

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

APPENDIX C – GLOSSARY

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

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

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

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

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

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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