



## **PUBLIC DISCLOSURE**

MARCH 11, 2019

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

**CENTRAL BANK OF OKLAHOMA  
RSSD# 2826316**

**8908 SOUTH YALE AVENUE, SUITE 100  
TULSA, OKLAHOMA 74137**

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

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

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### INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING:

<i>Central Bank of Oklahoma is rated:</i>	<b>Satisfactory</b>
<i>The Lending Test is rated:</i>	<b>Satisfactory</b>
<i>The Community Development Test is rated:</i>	<b>Outstanding</b>

### SUMMARY OF MAJOR FACTORS SUPPORTING RATING

#### Lending Test

- Central Bank of Oklahoma's (the bank's) average net loan-to-deposit (NLTD) ratio is more than reasonable given the bank's size, financial condition, and the assessment area's (AA's) credit needs.
- A majority of the bank's loans are originated within its delineated AAs.
- The bank's distribution of Home Mortgage Disclosure Act (HMDA), small business, and small business loans secured by residential real estate by income level of geography (geographic distribution) is reasonable.
- The bank's distribution of HMDA, small business, and small business loans secured by residential real estate among individuals of different income levels and businesses of different revenue size (borrower distribution) is reasonable.

#### Community Development Test

- The bank demonstrates excellent responsiveness to the community development (CD) needs of its AAs through CD loans, qualified investments, donations, and services considering the bank's capacity to lend, the need and availability of such opportunities, and the level of competition for such activities in the bank's AAs.

### SCOPE OF EXAMINATION

The bank's Community Reinvestment Act (CRA) performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC) *Interagency Examination Procedures for Intermediate Small Institutions*, which assigns an overall rating based on an assessment of the bank's performance under two equally weighted tests: the lending test and the CD test. Under the CRA, a financial institution's performance is evaluated within the context of each delineated AA. The evaluation included full-scope reviews of the bank's performance within its Tulsa and Oklahoma City Metropolitan AAs and a limited-scope review of its Payne County AA.

Under the lending test, the evaluation considered contextual information about the bank and its AAs, such as asset size, financial condition, economic and demographic characteristics, and competition. Four out of the five criteria used to evaluate an intermediate small bank's lending performance under the CRA were relevant to this review, including the following: the bank's NLTD ratio, lending concentration inside its AAs, distribution of loans by income level of geographies, and distribution of lending to borrowers of different income levels and businesses of different revenue sizes. The bank's responsiveness to CRA-related complaints, the fifth core lending test criterion used to assess lending performance, was not evaluated as neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) has received any CRA-related complaints since the previous evaluation.

Conclusions regarding the lending test were based on two of the bank's major product lines: residential real estate loans and commercial loans. The major product lines were determined through discussions with bank management, a review of the September 30, 2018 Reports of Condition and Income, and a review of the numbers of outstanding loan originations since the prior CRA evaluation. The lending test evaluation was based on a review of all small business loans and small business loans secured by residential real estate originated and purchased from January 1, 2016 to December 31, 2017. The evaluation also included the universe of originated and purchased loans reported on the bank's 2016 and 2017 HMDA Loan/Application Registers, which includes home purchase, home refinance, home improvement, and multifamily loans. As defined under the CRA, small business loans included those with loan amounts of \$1 million (MM) or less.

The bank's average NLTD ratio was calculated based on the 12-quarter average since the previous evaluation and compared to the ratios of eight similarly situated financial institutions that operate within the bank's AAs. The geographic distribution analysis was based on the bank's loan penetration within different geographic income levels in the AAs, particularly low- and moderate-income (LMI) geographies. Geographies were classified based on 2016 and 2017 FFIEC census tract definitions. The borrower distribution analysis was based on the bank's lending to individuals of different income levels and to businesses of different sizes, particularly those with gross annual revenues of \$1MM or less. Borrower income levels were calculated using figures from the FFIEC's estimated median family income (MFI) data for the applicable Metropolitan or statewide Nonmetropolitan Statistical Area AAs. Both the number and dollar volume of loans were evaluated for each lending test performance criterion. Additionally, only loans made inside the bank's AAs were analyzed with respect to the geographic and borrower distribution analyses. The bank's primary lending focus is commercial lending, thus, greater emphasis was placed on the bank's small business lending performance under the lending test.

For evaluative purposes, the bank's lending was compared with applicable area demographic data, including the 2006-2010 and the 2011-2015 five-year American Community Survey estimate data (2010 ACS and 2015 ACS), as well as 2016 and 2017 Dun and Bradstreet (D&B) data. Comparisons were also made with the 2016 and 2017 aggregate lending data reported by all HMDA and CRA-reporting financial institutions with loan originations and purchases in the bank's AAs. While small business data is only required to be collected and reported by financial institutions with asset sizes greater than \$1.226 billion as of January 1, 2017, the bank voluntarily

collects its small business lending data; therefore, aggregate lending data was utilized as performance context and to assess the level of credit demand in the AAs.

Under the CD test, the analysis considered the number, dollar volume, and nature of the bank's CD loans, qualified investments, donations, and services as well as the responsiveness of these activities in meeting the needs of its AAs. Conclusions derived from this test were based on a review of the bank's activities from January 1, 2016 through December 31, 2018.

To further augment the evaluation, four interviews with members of the communities within the bank's two full-scope review AAs were referenced to ascertain the credit needs of the community, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. These interviews were conducted previously by the Reserve Bank and other regulatory agencies as part of public evaluations for other area financial institutions. Contacts included representatives from economic development agencies, a chamber of commerce, and a local economic development authority providing economic empowerment to citizens and communities.

**DESCRIPTION OF INSTITUTION**

The bank is a \$696MM intrastate bank, headquartered in Tulsa, Oklahoma. The bank is wholly owned by Twenty-First Century Financial Services Company (Century Financial), a middle-tier bank holding company. In turn, Century Financial is a wholly owned subsidiary of Central Bancompany Inc., of Jefferson City, Missouri, (a multibank holding company). The bank's business strategy has historically focused on commercial loans as well as residential real estate lending. Commercial and residential real estate lending together represent 99.6 percent of the bank's total loan portfolio, with 82.1 percent attributed to commercial lending.

Table 1 shows a breakdown of the bank's loan portfolio as of September 30, 2018.

<b>TABLE 1 CENTRAL BANK OF OKLAHOMA LOAN PORTFOLIO AS OF SEPTEMBER 30, 2018</b>		
<b>Loan Type</b>	<b>Amount \$(000)</b>	<b>Percent of Total</b>
Commercial	499,036	82.1
Residential Real Estate	106,030	17.5
Agricultural	758	0.3
Consumer	2,003	0.1
Other	252	0.1
<b>Gross Loans</b>	<b>608,079</b>	<b>100.0</b>

In addition to its headquarters, the bank operates five full-service and one limited-service branch in the Tulsa Metropolitan AA. The bank also operates an additional full-service branch in the Oklahoma City Metropolitan AA and one full-service branch in the Payne County AA. The bank has full-service automated teller machines at each of its branches in the Tulsa Metropolitan AA.

There are no known legal, financial, or other factors impeding the bank's ability to meet the credit needs of the communities it serves. The bank received a Satisfactory rating at its previous CRA evaluation conducted by the Reserve Bank on May 16, 2016.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

The bank's performance under the CRA is Satisfactory. The overall rating and conclusions were based on its performance in each AA. Greater weight was placed on the bank's performance in the Tulsa Metropolitan AA. This weighting was determined based on the bank's loan and deposit volume as well as its presence in each AA in which it operates. Small business loans received the greatest weight in determining the bank's lending performance, as this product is the primary business focus of the bank and comprises the largest component of the bank's overall loan portfolio.

While conclusions with respect to lending performance were evaluated for both years, only 2017 lending tables for AAs that received full-scope reviews are reflected in the body of this report. The bank's 2016 lending data, as well as the lending data for the limited-scope review AA, can be found in the tables in the Appendix of this report.

The evaluation first discusses the bank's overall performance based on the NLTD ratio and level of lending within its delineated AAs. This is followed by a more in-depth discussion of the bank's record of lending in the full-scope AAs.

## **LENDING TEST**

The bank's performance under the lending test is rated Satisfactory.

### **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, and the demographic and economic factors present in the AAs. The bank's NLTD ratio reflects a more than reasonable effort to extend credit based on its size, financial condition, and the credit needs of the AAs in comparison to the NLTD ratios of other local, similarly situated banks.

As of September 30, 2018, the bank's NLTD ratio averaged 108.9 percent, which was higher than each of the NLTD ratios of the eight similarly situated banks within the bank's AAs. The NLTD ratios of the comparable institutions ranged from 79.5 percent to 99.5 percent over the same 12-quarter period. The bank's NLTD ratio has gradually increased during this timeframe and is above the average NLTD ratio of 101.6 percent reflected in the previous CRA evaluation.

**Assessment Area Concentration:**

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. The evaluation analyzes both the number and dollar volume of originations and purchases.

As illustrated in Table 2, a majority of the bank’s HMDA, small business, and small business loans secured by residential real estate, by number and dollar volume, are within its delineated AAs. This performance indicates a reasonable effort by the bank to serve the credit needs of the communities in which it operates.

Bank Loans	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	231	37,346	87.5	85.4	33	6,381	12.5	14.6
Home Refinance	62	13,599	84.9	87.0	11	2,026	15.1	13.0
Home Improvement	34	6,640	89.5	93.9	4	429	10.5	6.1
Multifamily	7	11,904	87.5	78.3	1	3,300	12.5	21.7
<b>Total HMDA Loans</b>	<b>334</b>	<b>69,489</b>	<b>87.2</b>	<b>85.1</b>	<b>49</b>	<b>12,136</b>	<b>12.8</b>	<b>14.9</b>
Small Business Loans	822	119,834	84.1	80.0	155	29,966	15.9	20.0
Small Business Loans Secured by Residential Real Estate	295	43,780	88.3	91.5	39	4,047	11.7	8.5
<b>Total Small Business Loans</b>	<b>1,117</b>	<b>163,614</b>	<b>85.2</b>	<b>82.8</b>	<b>194</b>	<b>34,013</b>	<b>14.8</b>	<b>17.2</b>
<b>Total Loans</b>	<b>1,451</b>	<b>233,103</b>	<b>85.7</b>	<b>83.5</b>	<b>243</b>	<b>46,149</b>	<b>14.3</b>	<b>16.5</b>

The remaining loan distribution analyses discussed in this performance evaluation will consider only those loans originated within the bank’s AAs. Furthermore, all analyses place greater weight on the percentage by number of originations, as opposed to the percentage by dollar volume, as this data category better demonstrates the number of affected borrowers.

**Geographic and Borrower Distribution:**

The geographic distribution of HMDA, small business, and small business loans secured by residential real estate reflect reasonable dispersion overall. A low volume of HMDA lending occurred in LMI census tracts in both the Tulsa and Oklahoma City Metropolitan AAs; however, higher volume of small business lending was noted in those tracts, particularly in the Tulsa Metropolitan AA. Additionally, more weight was given to small business lending performance, as commercial lending is the bank’s primary strategic focus.

The distribution of lending among borrowers of different income levels and businesses of different revenue sizes was also reasonable. Notably, the bank’s HMDA loan distribution was considered poor due to a high number of loans with unknown borrower income levels, as the bank originates nonowner-occupied, or investment property, loans.

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the CD test is Outstanding. The bank’s CD performance demonstrates excellent responsiveness to the CD needs of its AAs based on a review of CD loans, qualified investments, donations, and services. Table 3 summarizes the number and dollar volume of CD activities conducted by the bank during the CRA evaluation period. To qualify for CRA CD credit, the activity must serve a CD purpose specifically related to one or more of the following areas: affordable housing for LMI individuals; CD services targeted to LMI individuals; economic development by financing small businesses or small farms while assisting in the creation or retention of jobs for LMI individuals or in LMI census tracts; or, revitalization or stabilization of LMI areas, designated disaster areas, or distressed or underserved nonmetropolitan middle-income census tracts.

As illustrated in Table 3, the bank originated 16 CD loans inside the AAs totaling approximately \$36.1MM. The bank also made six qualified investments totaling approximately \$3.5MM, and 16 charitable donations totaling \$115,000, to various organizations that provide services targeted to LMI individuals and that provide resources for small businesses. Finally, several bank officers and bank personnel serve on the boards as chair persons for organizations that support LMI citizens and provide financial literacy education. Several of the bank’s employees participated in 331 community services. The bank’s level of CD activity was compared to the availability of such opportunities in the AAs.

<b>TABLE 3 COMMUNITY DEVELOPMENT ACTIVITIES CENTRAL BANK OF OKLAHOMA ALL AAs</b>									
<b>Community Development Purpose</b>	<b>Community Development Loans</b>		<b>Qualified Investments</b>						<b>Community Development Services</b>
	<b>#</b>	<b>\$(000)</b>	<b>Investments</b>		<b>Donations</b>		<b>Total Investments</b>		
			<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	<b>#</b>	<b>\$(000)</b>	
<b>Affordable Housing</b>	6	7,805	5	2,757	0	0	5	2,757	0
<b>Community Services</b>	5	5,541	1	750	6	33	7	783	326
<b>Economic Development</b>	3	20,461	0	0	9	55	9	55	5
<b>Revitalization and Stabilization</b>	2	2,290	0	0	1	27	1	27	0
<b>Totals</b>	<b>16</b>	<b>36,097</b>	<b>6</b>	<b>3,507</b>	<b>16</b>	<b>115</b>	<b>22</b>	<b>3,622</b>	<b>331</b>

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

An evaluation of the bank’s fair lending activities was conducted to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discrimination was identified. Furthermore, the bank has not engaged in any other illegal credit practices inconsistent with helping to meet the credit needs of the communities it serves.



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

**DESCRIPTION OF THE BANK'S OPERATIONS IN THE TULSA METROPOLITAN AA<sup>1</sup>**

The bank's Tulsa Metropolitan AA includes Tulsa County in its entirety, and portions of Creek, Rogers, and Osage Counties. These counties are four of the seven counties that comprise the entire Tulsa-Broken Arrow-Owasso, Oklahoma Metropolitan Statistical Area (MSA). The bank's AA delineation has not changed since the previous evaluation.

According to the 2017 FFIEC census tract definitions, the AA contains 17 low-, 58 moderate-, 62 middle-, and 58 upper-income census tracts. Two of the bank's branches in the AA are located in moderate-income census tracts; two branches are located in middle-income census tracts; and the bank's headquarters and two additional branches are located in upper-income census tracts.

The Tulsa Metropolitan AA is the bank's primary operating market and contains seven of the bank's nine banking offices, including its headquarters in Tulsa. According to the FDIC Market Share Report as of June 30, 2018, the bank had 2.0 percent of the market share in the Tulsa Metropolitan AA, ranking 14<sup>th</sup> out of 51 financial institutions within the AA. The bank operates with significant competition in this AA from large, nationally-recognized financial institutions, regional banks, and local banks and credit unions.

Due to significant bank presence, in terms of both lending and deposit volumes, the Tulsa Metropolitan AA received the greatest weighting in the overall rating for this performance evaluation.

*Population Trends and Characteristics*

Based on 2015 ACS data, the total population of the Tulsa Metropolitan AA was 698,829, up 3.2 percent from 2010 ACS data. Tulsa County was home to 89.2 percent of the AA's population with 623,335 residents. The next populous county in the AA was Rogers County with 89,190 residents. The combined populations of Tulsa and Rogers Counties accounted for 74.0 percent of the total Tulsa MSA population.

The age, family, and household demographic data of the MSA closely resembles those of the state of Oklahoma as a whole and does not provide any significant contextual basis for lending patterns outside of expected norms.

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<sup>1</sup> Sources of economic and demographic data include the Commerce Department's Bureau of Economic Analysis (BEA), Department of Labor's Bureau of Labor Statistics, FFIEC Census Online, 2010 U.S. Census data, 2015 ACS five-year average, and Moody's Economy.com.

*Economic and Employment Characteristics*

Tulsa has experienced above-average economic performance during 2017 and the first quarter of 2018, with job growth exceeding state, regional, and national rates. Growth is primarily attributed to goods-producing industries which have contributed over half of the area's jobs in the past year. Scarcity of labor has resulted in higher wages, with averages outpacing the rest of the state and remaining above national figures. Tulsa has strong ties to the energy sector, which experienced significant growth during 2017, particularly centered around oil production and electricity producing turbines. The MSA's leading employment sectors include government (20.3 percent), education and health services (15.8 percent), professional and business services (13.4 percent), government (13.0 percent), and retail trade (10.9 percent). Local government agencies include city and county governments and Tulsa Public Schools. The largest private employers include American Airlines, Saint Francis Health System, QuikTrip, and Bank of Oklahoma.

Exhibit 1 details annual unemployment rates (not seasonally adjusted) for each county in the Tulsa Metropolitan AA, the Tulsa MSA, the state of Oklahoma and the nation. The unemployment rates for Tulsa and Rogers Counties are comparable to the MSA, state, and national averages. Creek and Osage Counties generally had higher rates than the Tulsa MSA, the state, and national figures. These counties are more rural in nature and lack the level of manufacturing and industry that is most prevalent in the more densely populated AA counties.

<b>EXHIBIT 1 UNEMPLOYMENT RATES TULSA METROPOLITAN AA</b>			
<b>Area</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Tulsa County	4.1	4.7	4.3
Creek County	5.0	5.8	5.0
Rogers County	4.4	5.0	4.4
Osage County	5.3	5.8	5.1
Tulsa MSA	4.4	5.0	4.5
Oklahoma	4.4	4.8	4.3
United States	5.3	4.9	4.4

*Income Characteristics*

The Tulsa Metropolitan AA had a MFI of \$62,092, which was similar to the Tulsa MSA at \$61,182. The Tulsa Metropolitan AA's median household income (MHI) at \$50,273 was similar to that of the Tulsa MSA at \$50,023. Of all AA families, 21.6 percent were classified as low-income, followed by 17.1 percent as moderate-, 19.8 percent as middle-, and 41.6 percent as upper-income. These figures were generally consistent with the overall figures of the Tulsa MSA. The percentage of families below the poverty level for the AA was 11.9 percent, which was also similar to the Tulsa MSA figure of 11.4 percent and slightly below the statewide figure of 12.4 percent.

*Housing Characteristics*

The Tulsa Metropolitan AA had an owner-occupancy rate of 55.2 percent, which was below the rates for the entire Tulsa MSA, at 58.3 percent, and the state of Oklahoma, at 56.9 percent. The AA had a higher rental unit rate of 34.5 percent, compared to 30.7 percent in the Tulsa MSA and 29.2 percent statewide. The percent of multifamily units was significantly higher in the Tulsa

Metropolitan AA, at 18.7 percent, compared to 14.6 percent for the entire Tulsa MSA and 11.0 percent statewide.

The median housing value for the Tulsa Metropolitan AA was \$138,548, which was greater than the Tulsa MSA value of \$131,392 and significantly higher than the statewide value of \$117,900. However, the median age of housing in the Tulsa Metropolitan AA was 45 years, which was older than both the MSA and the state figures; both with a median age of 38 years. Furthermore, the affordability ratio<sup>2</sup> in the AA, at 36.3 percent, was lower than both the MSA and state ratios of 38.1 percent and 39.8 percent, respectively. With the older housing stock and lower affordability ratios, there could be a need for home improvement lending in the AA, as more individuals may opt to repair their residences instead of purchasing a home in a less affordable market.

#### *Census Tract Income Levels/Characteristics*

As Table 4 indicates, the AA's low-income census tracts have lower concentrations of businesses and owner-occupied housing units. In low-income census tracts, 53.7 percent of the units were classified as rentals, and in moderate-income census tracts, 46.1 percent of the units were classified as rentals. Additionally, 41.0 percent of families residing in the AA's low-income census tracts and 20.7 percent residing in the moderate-income tracts fell below the poverty level for the AA. These factors all suggest that lending opportunities in the AA's LMI census tracts may be limited. Absent special credit programs, income considerations in area LMI census tracts may prohibit many residents from affording amounts of credit sufficient to purchase a home.

#### *Community Contacts*

Community members provided additional insight into the community needs and the economic characteristics of the AA. A community member stated that Tulsa is at full employment and economic conditions in the area are flourishing. Several large employers in energy, healthcare, aerospace, and engineering, as well as many entrepreneurial and small businesses, impact the local Tulsa economy in a positive way. According to the contact, credit needs in the community are adequately addressed by several financial institutions.

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<sup>2</sup> The housing affordability ratio is calculated by dividing the MHI by the median housing value. A lower ratio reflects less affordable housing.

Table 4 illustrates additional demographic data for the Tulsa Metropolitan AA.

TABLE 4 TULSA METROPOLITAN AA 2017 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	17	8.7	10,765	6.1	4,413	41.0	38,217	21.6
Moderate	58	29.7	42,374	23.9	8,785	20.7	30,227	17.1
Middle	62	31.8	60,217	34.0	5,341	8.9	35,073	19.8
Upper	58	29.7	63,897	36.0	2,481	3.9	73,736	41.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>195</b>	<b>100.0</b>	<b>177,253</b>	<b>100.0</b>	<b>21,020</b>	<b>11.9</b>	<b>177,253</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	22,903	6,671	4.0	29.1	12,302	53.7	3,930	17.2
Moderate	82,955	33,186	19.7	40.0	38,263	46.1	11,506	13.9
Middle	104,713	60,129	35.7	57.4	35,158	33.6	9,426	9.0
Upper	94,879	68,548	40.7	72.2	19,659	20.7	6,672	7.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>305,450</b>	<b>168,534</b>	<b>100.0</b>	<b>55.2</b>	<b>105,382</b>	<b>34.5</b>	<b>31,534</b>	<b>10.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,310	3.8	1,084	3.5	223	6.1	3	1.5
Moderate	7,834	22.5	6,694	21.6	1,106	30.3	34	17.2
Middle	12,584	36.1	11,083	35.7	1,422	38.9	79	39.9
Upper	13,130	37.7	12,147	39.2	901	24.7	82	41.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>34,858</b>	<b>100.0</b>	<b>31,008</b>	<b>100.0</b>	<b>3,652</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.0</b>		<b>10.5</b>		<b>0.6</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
	#	%	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	5	1.8	4	1.5	1	16.7	0	0.0
Moderate	33	11.9	33	12.2	0	0.0	0	0.0
Middle	111	40.1	109	40.2	2	33.3	0	0.0
Upper	128	46.2	125	46.1	3	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>277</b>	<b>100.0</b>	<b>271</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.8</b>		<b>2.2</b>		<b>0.0</b>

Based on 2017 FFIEC census tract definitions, 2015 ACS five-year estimate data, and 2017 D&B data.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

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

### LENDING TEST

The bank's performance under the lending test in the Tulsa Metropolitan AA is reasonable.

#### **Distribution by Income Level of Geographies:**

The geographic distribution is reasonable. The geographic distribution of HMDA loans is excellent, while the distribution of small business and small business loans secured by residential real estate is reasonable.

For evaluative purposes, the bank's HMDA lending was compared to aggregate lending data reported by other HMDA-reporting financial institutions, as well as the percentage of owner-occupied housing units in each census tract income category in the AA (demographic figure for HMDA loans). Small business lending was compared to aggregate lending data reported by CRA-reporting financial institutions, as well as the percentage of businesses operating in each census tract income category in the AA (demographic figure for small business and small business loans secured by residential real estate). Small business loans secured by residential real estate were not compared to aggregate lending data as it is not a CRA-reportable loan type.

Due to the bank's overall low volume of HMDA loans, these products were evaluated collectively rather than by individual product to provide a more meaningful analysis.

The lending tables that follow reflect data for 2017, with narrative explaining how 2016 lending performance compared to the 2017 data.

#### Total HMDA Loans

The geographic distribution of total HMDA loans reflects excellent dispersion throughout the AA. As noted in Table 5, the bank's lending in low-income census tracts, at 4.8 percent by number and 0.9 percent by dollar, exceeded aggregate lending data by number, at 1.3 percent, but was below by dollar, at 2.2 percent. The bank's performance was comparable to the demographic figure of 4.0 percent. Lending in moderate-income census tracts, at 22.2 percent by number and 8.4 percent by dollar, also exceeded the aggregate lending data, at 14.3 percent by number, though was comparable by dollar, at 9.0 percent. The bank's performance was also comparable to the demographic figure of 19.7 percent.

The bank's lending in middle-income census tracts was above aggregate lending data and was also above the demographic figure. The bank's lending in upper-income census tracts was below aggregate lending data and the demographic figure.

The distribution of total HMDA lending in 2017 was slightly better than that of 2016. The bank's lending in low-income census tracts was comparable to aggregate lending data, yet below the demographic figure, whereas the bank's lending in moderate-income census tracts compared similarly to its 2017 demographic figure and significantly exceeded the aggregate figure.

**TABLE 5  
DISTRIBUTION OF 2017 HMDA LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Owner- Occupied Units <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	3	109	4.8	0.9	1.3	2.2	4.0
Moderate	14	1,042	22.2	8.4	14.3	9.0	19.7
Middle	24	4,858	38.1	39.3	36.0	30.0	35.7
Upper	22	6,342	34.9	51.3	48.4	58.9	40.7
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	1	47	2.8	0.8	1.1	0.5	4.0
Moderate	8	778	22.2	13.2	14.1	8.2	19.7
Middle	15	1,889	41.7	32.1	35.9	30.7	35.7
Upper	12	3,179	33.3	53.9	49.0	60.6	40.7
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	2	62	11.8	1.6	1.2	0.5	4.0
Moderate	3	202	17.6	5.1	14.5	9.2	19.7
Middle	8	2,966	47.1	75.6	35.4	30.1	35.7
Upper	4	693	23.5	17.7	48.9	60.3	40.7
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	2.5	0.9	4.0
Moderate	3	62	33.3	9.4	15.5	9.9	19.7
Middle	1	3	11.1	0.5	40.3	33.6	35.7
Upper	5	596	55.6	90.2	41.7	55.6	40.7
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							% of Multifamily Units <sup>2</sup>
Low	0	0	0.0	0.0	13.8	23.0	
Moderate	0	0	0.0	0.0	34.5	14.8	
Middle	0	0	0.0	0.0	31.0	22.4	
Upper	1	1,874	100.0	100.0	20.7	39.8	
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of owner-occupied housing and multifamily units by census tract is based on 2017 FFIEC census tract definitions and 2015 ACS five-year estimate data.

<sup>3</sup> Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans

The geographic distribution of small business loans is reasonable. As Table 6 illustrates, the bank originated 2.0 percent of loans by number and 1.6 percent by dollar in low-income census tracts, which was comparable to aggregate lending data at 3.4 percent by number and 3.2 percent by dollar, but was below the demographic figure of 3.8 percent. Within moderate-income census tracts, the bank originated 21.1 percent of loans by number and 19.3 percent by dollar, which was comparable to aggregate lending data at 21.7 percent by number and 25.7 percent by dollar, and also comparable to the demographic figure at 22.5 percent.

The bank’s lending in middle-income census tracts was below aggregate lending data and the demographic figure, while it exceeded aggregate lending data and the demographic figure in upper-income census tracts.

The distribution of small business lending in 2017 compared similarly to the distribution of small business lending in 2016.

<b>TABLE 6 DISTRIBUTION OF 2017 SMALL BUSINESS LOANS BY INCOME LEVEL OF GEOGRAPHY TULSA METROPOLITAN AA</b>							
<b>Census Tract Income Level</b>	<b>Small Business Loans</b>				<b>Aggregate CRA Data<sup>1</sup></b>		<b>% of Businesses<sup>2</sup></b>
	<b>#</b>	<b>\$(000)</b>	<b>#%</b>	<b>\$%</b>	<b>#%</b>	<b>\$%</b>	
<b>Low</b>	6	579	2.0	1.6	3.4	3.2	3.8
<b>Moderate</b>	62	6,790	21.1	19.3	21.7	25.7	22.5
<b>Middle</b>	83	15,450	28.2	43.9	35.2	35.4	36.1
<b>Upper</b>	143	12,338	48.6	35.1	38.5	35.3	37.7
<b>Unknown<sup>3</sup></b>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Not Reported<sup>4</sup></b>	0	0	0.0	0.0	1.3	0.4	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank’s AA reported by all CRA filers.  
<sup>2</sup> The percentage of businesses by census tract is based on 2017 D&B data and 2017 FFIEC census tract definitions.  
<sup>3</sup> Includes census tracts where the income level is unknown.  
<sup>4</sup> Includes loans where census tract locations were not reported by the lender.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans Secured by Residential Real Estate

The geographic distribution of small business loans secured by residential real estate is reasonable. As Table 7 illustrates, the bank originated 2.6 percent by number and 0.6 percent by dollar of its loans in low-income census tracts. This performance was comparable to the demographic figure of 3.8 percent. Within moderate-income census tracts, the bank originated 18.2 percent by number and 12.3 percent by dollar. This lending was below the demographic figure of 22.5 percent.

The bank’s lending in middle-income census tracts was below the demographic figure, while lending in upper-income census tracts exceeded the demographic figure.

The distribution of small business loans secured by residential real estate in 2017 compared similarly to the performance in 2016.

**TABLE 7  
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				% of Businesses <sup>1</sup>
	#	\$(000)	#%	\$%	
Low	2	73	2.6	0.6	3.8
Moderate	14	1,487	18.2	12.3	22.5
Middle	19	2,072	24.7	17.1	36.1
Upper	42	8,474	54.5	70.0	37.7
Unknown <sup>2</sup>	0	0	0.0	0.0	0.0

<sup>1</sup> The percentage of businesses by census tract is based on 2017 FFIEC census tract definitions and 2017 D&B data.  
<sup>2</sup> Includes census tracts where the income level is unknown.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**Distribution by Borrower Income and Revenue Size of the Businesses:**

The borrower distribution is reasonable. The borrower distribution of HMDA loans is poor, while the distribution of small business and small business loans secured by residential real estate is reasonable.

For evaluative purposes, the bank’s HMDA lending was compared to aggregate lending data reported by other HMDA-reporting financial institutions, as well as the percentage of low-, moderate-, middle-, and upper-income families in the AA (demographic figure for HMDA loans). Small business lending was compared to aggregate lending data reported by CRA-reporting financial institutions, as well as the percentage businesses in the bank’s AA with revenues of \$1MM or less (demographic figure for small business and small business loans secured by residential real estate). Small business loans secured by residential real estate were not compared to aggregate lending data as it is not a CRA-reportable loan type.

Due to the bank’s overall low volume of HMDA loans, these products were evaluated collectively rather than by individual product to provide a more meaningful analysis.

The lending tables that follow reflect data for 2017, with narrative explaining how 2016 lending performance compared to the 2017 data.



### Total HMDA Loans

The borrower distribution of total HMDA loans is considered poor.

Lending to low-income borrowers, at 1.6 percent by number and 0.1 percent by dollar, was below aggregate lending data, at 5.8 percent by number and 2.8 percent by dollar, and significantly below the demographic figure of 21.6 percent. Lending to moderate-income borrowers, at 4.8 percent by number and 2.6 percent by dollar, was below aggregate lending data, at 15.9 percent by number and 10.3 percent by dollar, and also below the demographic figure of 17.1 percent.

The bank's lending to middle- and upper-income borrowers was also below the aggregate lending data, as well as the demographic figure.

As noted in Table 8, well over half of the bank's lending (41 loans, or 65.1 percent) was made to borrowers of unknown income. These loans are generally representative of those used in association with rental properties. This circumstance is consistent with the large composition of commercial loans in the bank's portfolio, as well as the bank's strategic focus on commercial lending. In comparison to aggregate lending data, the bank had a much higher volume of HMDA loans with unknown income reported (65.1 percent compared to 20.2 percent). A closer review of the geographic distribution of HMDA originations revealed that many of the nonowner-occupied loans were originated in LMI tracts, which aligns with the rental housing needs of residents in those areas and could also correlate with meeting the housing needs of LMI borrowers. Bank management conducts target marketing to LMI areas by zip code, in order to help increase lending performance to LMI borrowers and areas.

The distribution of total HMDA loans in 2017 compared similarly to the distribution of total HMDA loans in 2016.

**TABLE 8  
DISTRIBUTION OF 2017 HMDA LOANS  
BY BORROWER INCOME LEVELS  
TULSA METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Families <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	1	9	1.6	0.1	5.8	2.8	21.6
Moderate	3	326	4.8	2.6	15.9	10.3	17.1
Middle	5	935	7.9	7.6	19.6	15.5	19.8
Upper	13	3,595	20.6	29.1	38.5	46.5	41.6
Unknown	41	7,486	65.1	60.6	20.2	24.9	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	5.7	3.0	21.6
Moderate	2	212	5.6	3.6	16.9	12.0	17.1
Middle	4	872	11.1	14.8	20.0	17.6	19.8
Upper	5	722	13.9	12.3	36.5	49.1	41.6
Unknown	25	4,087	69.4	69.4	21.0	18.3	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	6.0	3.0	21.6
Moderate	1	114	5.9	2.9	13.7	8.6	17.1
Middle	1	63	5.9	1.6	18.8	14.3	19.8
Upper	5	2,817	29.4	71.8	41.3	52.9	41.6
Unknown	10	929	58.8	23.7	20.2	21.2	0.0
<b>Home Improvement Loans</b>							
Low	1	9	11.1	1.4	6.7	2.5	21.6
Moderate	0	0	0.0	0.0	15.2	11.0	17.1
Middle	0	0	0.0	0.0	19.6	13.4	19.8
Upper	3	56	33.3	8.5	50.3	59.6	41.6
Unknown	5	596	55.6	90.2	8.3	13.4	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	21.6
Moderate	0	0	0.0	0.0	0.0	0.0	17.1
Middle	0	0	0.0	0.0	0.0	0.0	19.8
Upper	0	0	0.0	0.0	0.0	0.0	41.6
Unknown	1	1,874	100.0	100.0	100.0	100.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of families and households is based on 2015 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans

The borrower distribution of small business loans is reasonable. As noted in Table 9, the bank's lending to small businesses, or those with gross annual revenues of \$1MM or less, exceeded aggregate lending data at 48.6 percent by number and 57.8 percent by dollar, exceeded aggregate lending data at 43.6 percent by number and 39.1 percent by dollar, although it was significantly less than the demographic figure at 89.0 percent. While the bank's loan volume was significantly less than the demographic figure, the bank originated 68.4 percent of loans to AA businesses in

increments of \$100,000 or less, which are typically amounts needed by smaller business entities. Additionally, one community contact indicated competition for lending in the area is high and believes there are better alternatives to traditional financing including, venture capitalist financing where a portion of the business' equity is given in return for funding.

The bank's 2016 small business lending performance was slightly below aggregate lending data, although higher by dollar volume. The bank's lending was still below the demographic figure in 2016.

<b>TABLE 9 DISTRIBUTION OF 2017 SMALL BUSINESS LOANS BY REVENUE SIZE OF BUSINESSES TULSA METROPOLITAN AA</b>							
<b>Business Revenue By Size</b>	<b>Small Business Loans</b>				<b>Aggregate CRA Data<sup>1</sup></b>		<b>% of Businesses<sup>2</sup></b>
	<b>#</b>	<b>\$(000)</b>	<b>#%</b>	<b>\$%</b>	<b>#%</b>	<b>\$%</b>	
<b>\$1MM or less</b>	143	20,311	48.6	57.8	43.6	39.1	89.0
<b>Over \$1MM</b>	141	14,510	48.0	41.3	Not Reported		10.5
<b>Not Known</b>	10	336	3.4	0.9	Not Reported		0.6

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.  
<sup>2</sup> The percentage of businesses by revenue size is based on 2017 D&B data.  
 (NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**Small Business Loans Secured by Residential Real Estate**

The borrower distribution of small business loans secured by residential real estate is reasonable. A majority of the bank's loans were originated to small businesses, or those with revenues of \$1MM or less. The bank's lending to small businesses, at 77.9 percent by number and 54.5 percent by dollar, was below the demographic figure of 89.0 percent. While the bank's loan volume was below the demographic figure, the bank originated 57.1 percent of loans to AA businesses in increments of \$100,000 or less, which are typically amounts needed by smaller business entities.

In 2016, the bank's small business loans secured by residential real estate performance was consistent with 2017.

**TABLE 10  
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY REVENUE SIZE OF BUSINESSES  
TULSA METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				% of Businesses <sup>1</sup>
	#	\$(000)	#%	\$%	
\$1MM or less	60	6,601	77.9	54.5	89.0
Over \$1MM	16	5,355	20.8	44.2	10.5
Not Known	1	150	1.3	1.2	0.6

<sup>1</sup> The percentage of businesses by revenue size is based on 2017 D&B data.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

### COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates excellent responsiveness to the CD needs within the Tulsa Metropolitan AA. The bank's level of CD activity was compared to the availability of such opportunities. Examples of CD activities include:

- Seven operating lines of credit totaling \$2.2MM were made to nonprofit agencies and investment companies to fund housing and home improvements for multiple apartment complexes that offer Section 8 and rental housing below fair market rent values.
- Two community service loans were made for improvements to an adoption shelter for homeless children in the state's care awaiting foster care or adoption.
- The bank's officers and employees are actively involved as board members and in classrooms of schools located in LMI areas, teaching and assisting LMI students in achieving workforce readiness and financial literacy.
- The bank donated \$27,000 in leased property to an organization that is restoring and revitalizing an area zoned for improvements by the state and local municipality.

**TABLE 11  
COMMUNITY DEVELOPMENT ACTIVITIES  
TULSA METROPOLITAN AA**

Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
<b>Affordable Housing</b>	4	1,759	4	2,200	0	0	4	2,200	0
<b>Community Services</b>	5	5,541	1	750	5	31	6	781	309
<b>Economic Development</b>	0	0	0	0	8	53	8	53	5
<b>Revitalization and Stabilization</b>	0	0	0	0	1	27	1	27	0
<b>Totals</b>	<b>9</b>	<b>7,300</b>	<b>5</b>	<b>2,950</b>	<b>14</b>	<b>111</b>	<b>19</b>	<b>3,061</b>	<b>314</b>

**OKLAHOMA CITY METROPOLITAN ASSESSMENT AREA  
(Full Review)**

**DESCRIPTION OF THE BANK'S OPERATIONS IN THE OKLAHOMA CITY METROPOLITAN  
AA<sup>3</sup>**

The bank has one full-service branch location in the Oklahoma City Metropolitan AA, which includes Oklahoma County in its entirety. Oklahoma County is one of seven counties that comprise the entire Oklahoma City, Oklahoma MSA. According to 2017 FFIEC census tract definitions, the AA contained 28 low- and 85 moderate-income census tracts in the bank's delineated AA, compared to 29 low- and 106 moderate-income census tracts in the entire MSA. The bank's AA delineation has not changed since the previous evaluation.

The market is highly competitive among financial service providers with a total of 56 FDIC-insured institutions operating within the AA, according to the June 30, 2018 FDIC Deposit Market Share Report. The bank's competitors include nationally-recognized financial institutions, regional banks, local banks, and credit unions. With a market share of .07 percent, the bank ranked 50<sup>th</sup> out of the 56 financial institutions within the MSA.

*Population Trends and Characteristics*

Based on 2015 ACS data, the total population of the Oklahoma City Metropolitan AA was 754,480 up 4.8 percent from 2010 ACS data. The total population of the AA makes up over 57.2 percent of the entire Oklahoma City MSA population as a whole.

The age, family, and household demographic of data of the MSA closely resemble those of the state of Oklahoma as a whole and does not provide any significant contextual basis for lending patterns outside of expected norms.

*Economic and Employment Characteristics*

The MSA's leading industries are government (20.3 percent), education and health services (14.5 percent), professional and business services (12.8 percent), leisure and hospitality (11.3 percent), and retail trade (10.5 percent). As these statistics suggest, the MSA's largest employers are heavily centered around government and include Tinker Air Force Base (24,000 employees), University of Oklahoma (12,700), Federal Aviation Administration Mike Monroney Aeronautical Center (7,000), INTEGRIS Health (6,000), Hobby Lobby Stores, Inc. (5,100), University of Oklahoma Health Sciences Center (5,000), Mercy Hospital (4,500), OGE Energy Corporation (3,400), and the University of Oklahoma Medical Center (3,300).

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<sup>3</sup> Sources of economic and demographic data include the Commerce Department's Bureau of Economic Analysis (BEA), Department of Labor's Bureau of Labor Statistics, FFIEC Census Online, 2010 U.S. Census data, 2015 ACS five-year average, and Moody's Economy.com.

Exhibit 2 details annual unemployment rates (not seasonally adjusted) for Oklahoma County, as well as the Oklahoma City MSA, state of Oklahoma, and the nation. The unemployment rates for Oklahoma County are consistent with the MSA figures, though consistently lower than both the state and national figures.

<b>EXHIBIT 2 UNEMPLOYMENT RATES OKLAHOMA CITY METROPOLITAN AA</b>			
<b>Area</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Oklahoma County	3.9	4.3	4.0
Oklahoma City MSA	3.9	4.2	3.9
Oklahoma	4.4	4.8	4.3
United States	5.3	4.9	4.4

The Oklahoma City economy has performed well, and job growth has increased at its highest rate since 2015. Growth is largely contributed to performance in the energy sector, as well as a rebound in the manufacturing and construction industries. The unemployment rate is low, after recent increases due to previous slumps in oil prices. Growth in the oil industry is anticipated to continue to increase as the amount of drilling and oil rigs in the state of Oklahoma are also in high demand.

*Income Characteristics*

The Oklahoma City Metropolitan AA contains an MFI of \$60,364, which is lower than the Oklahoma City MSA, at \$64,058, and higher than the state of Oklahoma, at \$58,029. The Oklahoma City Metropolitan AA also has a lower MHI, at \$47,474, than that of the Oklahoma City MSA, at \$51,461, and higher than the state of Oklahoma, at \$46,879. Of all AA families, 24.7 percent are classified as low-, 17.9 percent as moderate-, 19.1 percent as middle-, and 38.3 percent are considered upper-income. The number of households below poverty in the AA, at 16.3 percent, is greater than that of the Oklahoma City MSA, at 14.3 percent, and the state of Oklahoma, at 15.9 percent. Also, the number of families below poverty level is slightly higher in the Oklahoma Metropolitan AA, at 13.8 percent, while the Oklahoma City MSA and state figure reflect 11.2 percent and 12.4 percent, respectively.

*Housing Characteristics*

The Oklahoma City Metropolitan AA had an owner-occupancy rate of 52.3 percent, which was below the entire Oklahoma City MSA, at 57.6 percent, and the state of Oklahoma, at 56.9 percent. The Oklahoma City Metropolitan AA had a higher rental unit rate of 36.8 percent, compared to 32.1 percent for the Oklahoma City MSA, and the state of Oklahoma, at 29.2 percent. The lower rate of owner-occupied housing units in the Oklahoma City MSA may be partially attributed to the number of colleges and universities in the county that rely on privately-owned rental units to meet student housing demands.

*Census Tract Income Levels/Characteristics*

The bank's single Oklahoma City branch office is located in Edmond, Oklahoma, which is in a middle-income census tract. The low-income tracts in Oklahoma County contain a small portion of the AA's population, at 6.2 percent; families, at 5.3 percent; housing units, at 5.7 percent; and

businesses, at 4.7 percent. Based on these demographic figures, the bank may have minimal lending penetration in the area's low-income tracts.

*Community Contacts*

Community members provided additional insight into the needs and economic characteristics of the AA. A community member involved in small business development and building relationships between lenders and entrepreneurs stated one of the biggest challenges specific to the LMI communities is the lack of response and trouble engaging LMI individuals, possibly due to mistrust and lack of education of the resources available in these underserved communities.

Insufficient credit history is often a challenge with entrepreneurs looking to qualify for small business loans. The contact stated the region is extremely "small business friendly" and the business resources provided are typically being taken advantage of by middle- and upper-aged professionals who are engaging in small business endeavors, often after retirement from their longtime careers. In terms of the personal banking environment, a contact in the community indicated that there are plenty of banks in the MSA, and the banks are well-dispersed in both LMI and upper-income communities.



Table 12 illustrates additional demographic data for the Oklahoma City Metropolitan AA.

TABLE 12 OKLAHOMA CITY METROPOLITAN 2017 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	28	11.6	17,042	9.4	6,224	36.5	44,754	24.7
Moderate	85	35.3	54,259	29.9	11,442	21.1	32,453	17.9
Middle	70	29.0	54,266	29.9	5,243	9.7	34,687	19.1
Upper	50	20.7	55,524	30.6	1,982	3.6	69,537	38.3
Unknown	8	3.3	340	0.2	119	35.0	0	0.0
<b>Total AA</b>	<b>241</b>	<b>100.0</b>	<b>181,431</b>	<b>100.0</b>	<b>25,010</b>	<b>13.8</b>	<b>181,431</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	33,484	10,466	6.1	31.3	17,502	52.3	5,516	16.5
Moderate	111,111	44,169	25.8	39.8	51,942	46.7	15,000	13.5
Middle	97,850	55,577	32.5	56.8	32,775	33.5	9,498	9.7
Upper	82,988	60,607	35.4	73.0	17,094	20.6	5,287	6.4
Unknown	1,552	195	0.1	0.1	1,063	68.5	294	18.9
<b>Total AA</b>	<b>326,985</b>	<b>171,014</b>	<b>100.0</b>	<b>52.3</b>	<b>120,376</b>	<b>36.8</b>	<b>35,595</b>	<b>10.9</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	2,314	7.0	1,881	6.4	417	11.6	16	5.1
Moderate	8,936	27.0	7,752	26.5	1,089	30.3	95	30.3
Middle	10,326	31.2	9,151	31.3	1,097	30.5	78	24.8
Upper	10,096	30.5	9,340	31.9	667	18.5	89	28.3
Unknown	1,473	4.4	1,110	3.8	327	9.1	36	11.5
<b>Total AA</b>	<b>33,145</b>	<b>100.0</b>	<b>29,234</b>	<b>100.0</b>	<b>3,597</b>	<b>100.0</b>	<b>314</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			88.2		10.9		0.9	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	7	2.3	5	1.7	2	20.0	0	0.0
Moderate	41	13.4	39	13.1	2	20.0	0	0.0
Middle	77	25.1	75	25.3	2	20.0	0	0.0
Upper	177	57.7	175	58.9	2	20.0	0	0.0
Unknown	5	1.6	3	1.0	2	20.0	0	0.0
<b>Total AA</b>	<b>307</b>	<b>100.0</b>	<b>297</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			96.7		3.3		0.0	

Based on 2017 FFIEC Census tract definitions, 2015 ACS five-year estimate data, and 2017 D&B data.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

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

### LENDING TEST

The bank's performance under the lending test in the Oklahoma City Metropolitan AA is reasonable.

#### **Distribution by Income Level of Geographies:**

The geographic distribution of HMDA and small business loans secured by residential real estate is reasonable, while the geographic distribution of small business loans is poor.

For evaluative purposes, the bank's HMDA lending was compared to aggregate lending data reported by other HMDA-reporting financial institutions, as well as the percentage of owner-occupied housing units in each census tract income category in the AA (demographic figure for HMDA loans). Small business lending was compared to aggregate lending data reported by CRA-reporting financial institutions, as well as the percentage of businesses operating in each census tract income category in the AA (demographic figure for small business and small business loans secured by residential real estate). Small business loans secured by residential real estate were not compared to aggregate lending data as it is not a CRA-reportable loan type.

Due to the bank's overall low volume of HMDA loans, these products were evaluated collectively rather than by individual product to provide a more meaningful analysis.

The lending tables that follow reflect data for 2017, with narrative explaining how 2016 lending performance compared to 2017.

#### Total HMDA Loans

The geographic distribution of total HMDA loans reflects reasonable dispersion throughout the AA. As noted in Table 13, the bank's lending in low-income census tracts, at 3.1 percent by number and 1.3 percent by dollar, was comparable to the aggregate lending data, at 3.5 percent by number and 2.3 percent by dollar, but lower than the demographic, at 6.1 percent. Lending in moderate-income census tracts, at 26.5 percent by number and 16.0 by dollar, is higher than the aggregate lending data, at 21.0 percent by number and 14.4 percent by dollar, and comparable to the demographic, at 25.8 percent.

The bank's lending in middle-income census tracts was higher than the aggregate lending data by number and dollar, and also higher than the demographic figure. In the upper-income census tracts, the bank's lending was lower than the aggregate lending data as well as the demographic figure.

The distribution of total HMDA lending in 2017 was consistent with the bank's performance in 2016.

**TABLE 13  
DISTRIBUTION OF 2017 HMDA LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
OKLAHOMA CITY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Owner- Occupied Units <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	3	193	3.1	1.3	3.5	2.3	6.1
Moderate	26	2,412	26.5	16.0	21.0	14.4	25.8
Middle	38	4,993	38.8	33.2	32.4	26.8	32.5
Upper	31	7,445	31.6	49.5	42.8	55.0	35.4
Unknown <sup>3</sup>	0	0	0.0	0.0	0.3	1.6	0.1
<b>Home Purchase Loans</b>							
Low	1	92	1.4	0.8	3.1	1.5	6.1
Moderate	16	1,378	22.9	12.5	20.6	12.3	25.8
Middle	30	4,272	42.9	38.7	32.0	26.5	32.5
Upper	23	5,302	32.9	48.0	44.0	59.1	35.4
Unknown <sup>3</sup>	0	0	0.0	0.0	0.3	0.7	0.1
<b>Home Refinance Loans</b>							
Low	1	55	5.6	1.9	3.8	2.2	6.1
Moderate	7	742	38.9	25.0	19.3	16.1	25.8
Middle	3	428	16.7	14.4	32.6	24.3	32.5
Upper	7	1,744	38.9	58.7	44.0	57.0	35.4
Unknown <sup>3</sup>	0	0	0.0	0.0	0.2	0.4	0.1
<b>Home Improvement Loans</b>							
Low	1	46	10.0	4.5	5.1	2.8	6.1
Moderate	3	292	30.0	28.3	26.3	15.7	25.8
Middle	5	293	50.0	28.4	35.3	29.8	32.5
Upper	1	399	10.0	38.7	33.1	51.6	35.4
Unknown <sup>3</sup>	0	0	0.0	0.0	0.1	0.2	0.1
<b>Multifamily Loans</b>							<b>% of Multifamily Units<sup>2</sup></b>
Low	0	0	0.0	0.0	7.5	7.8	11.4
Moderate	0	0	0.0	0.0	43.4	23.6	43.7
Middle	0	0	0.0	0.0	31.1	34.6	28.7
Upper	0	0	0.0	0.0	17.0	22.2	14.4
Unknown <sup>3</sup>	0	0	0.0	0.0	0.9	11.8	1.8

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of owner-occupied housing and multifamily units by tract is based on 2017 FFIEC Census tract definitions and 2015 ACS five-year estimate data.

<sup>3</sup> Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans

The bank's geographic distribution of small business loans is poor. As noted in Table 14, the bank originated 5.7 percent by number and 1.9 percent by dollar of its small business loans to borrowers within low-income census tracts. These figures were comparable to the aggregate lending data, at 6.7 percent by number, but below by dollar at 7.7 percent, and also below the

demographic, at 7.0 percent. Within moderate-income census tracts, the bank originated 11.3 percent of loans by number and 13.5 percent by dollar, which was significantly below the aggregate lending data, at 24.5 percent by number and 25.8 percent by dollar, and below the demographic figure of 27.0 percent.

The bank's lending in middle-income census tracts exceeded the aggregate lending data by number, and was below aggregate lenders by dollar and comparable to the demographic figure. In the upper-income census tracts, the bank significantly exceeded the aggregate lending data by both number and dollar, as well as the demographic figure.

The distribution of small business lending in 2017 compared similarly to the performance in 2016.

**TABLE 14  
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
OKLAHOMA CITY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
Low	3	221	5.7	1.9	6.7	7.7	7.0
Moderate	6	1,578	11.3	13.5	24.5	25.8	27.0
Middle	16	3,033	30.2	26.0	28.9	30.1	31.2
Upper	27	6,718	50.9	57.5	34.3	30.6	30.5
Unknown <sup>3</sup>	1	125	1.9	1.1	3.9	5.4	4.4
Not Reported <sup>4</sup>	0	0	0.0	0.0	1.8	0.4	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.

<sup>2</sup> The percentage of businesses by census tract is based on 2017 FFIEC census tract definitions and 2017 D&B data.

<sup>3</sup> Includes census tracts where the income level is unknown.

<sup>4</sup> Includes loans where census tract locations were not reported by the lender.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans Secured by Residential Real Estate

The bank's geographic distribution of small business loans secured by residential real estate is reasonable. Within low-income census tracts, the bank originated 3.4 percent by number, and 1.2 percent by dollar, which was below the demographic figure of 7.0 percent. In moderate-income census tracts, the bank's lending, at 31.0 percent by number and 20.3 percent by dollar, exceeded the demographic figure of 27.0 percent.

The bank's lending in middle-income census tracts was below the demographic figure while lending in the upper-income census tracts exceeded the demographic figure.

**TABLE 15  
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY INCOME LEVEL OF GEOGRAPHY  
OKLAHOMA CITY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				% of Businesses <sup>1</sup>
	#	\$(000)	#%	\$%	
<b>Low</b>	1	46	3.4	1.2	7.0
<b>Moderate</b>	9	762	31.0	20.3	27.0
<b>Middle</b>	7	528	24.1	14.1	31.2
<b>Upper</b>	12	2,419	41.4	64.4	30.5
<b>Unknown<sup>2</sup></b>	0	0	0.0	0.0	4.4

<sup>1</sup> The percentage of businesses by census tract is based on 2017 FFIEC census tract definitions and 2017 D&B data.

<sup>2</sup> Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**Distribution by Borrower Income Level and Revenue Size of Businesses:**

The borrower distribution is reasonable. The borrower distribution of HMDA loans is poor, while the distribution of small business and small business loans secured by residential real estate is reasonable.

For evaluative purposes, the bank’s HMDA lending was compared to aggregate lending data reported by other HMDA-reporting financial institutions, as well as the percentage of low-, moderate-, middle-, and upper-income families in the AA (demographic figure for HMDA loans). Small business lending was compared to aggregate lending data reported by CRA-reporting financial institutions, as well as the percentage of businesses in the bank’s AA with revenues of \$1MM or less (demographic figure for small business and small business loans secured by residential real estate). As previously noted, small business loans secured by residential real estate were not compared to aggregate lending data as it is not a CRA-reportable loan type.

Due to the bank’s overall low volume of HMDA loans, these products were evaluated collectively rather than by individual product to provide a more meaningful analysis.

The lending tables that follow reflect data for 2017, with narrative explaining how 2016 lending performance compared to 2017.

Total HMDA Loans

The borrower distribution of total HMDA loans is considered poor.

Lending to low-income borrowers, at 3.1 percent by number and 1.5 percent by dollar, was below aggregate lending data, at 6.9 percent by number and 3.1 percent by dollar, and significantly below the demographic figure of 24.7 percent. There was no lending to moderate-income borrowers, though aggregate lending data reported 17.7 percent by number, and 10.3 percent by dollar, consistent with the demographic, at 17.9 percent.

The bank's lending to middle- and upper-income borrowers was also significantly below both the aggregate lending data and the demographic figure.

As noted in Table 16, over 80.0 percent of the bank's total HMDA lending (82 loans) was made to borrowers of unknown income, due to the high volume of nonowner-occupied, investment property lending. These loans are generally representative of those used in association with rental properties. This circumstance is consistent with the large composition of commercial loans in the bank's portfolio, as well as the bank's strategic focus on commercial lending. In comparison to aggregate lending data, the bank had a much higher volume of HMDA loans with unknown income reported (83.7 percent compared to 23.5 percent). A closer review of the geographic distribution of HMDA originations revealed that many of the nonowner-occupied loans were originated in LMI tracts, which aligns with the rental housing needs of residents in those areas and could also correlate with meeting the housing needs of LMI borrowers. However, additional opportunities exist for the bank to enhance its responsiveness to LMI borrowers.

The distribution of total HMDA loans in 2016 compared similarly to the distribution of total HMDA loans in 2017.

TABLE 16 DISTRIBUTION OF 2017 HMDA LOANS BY BORROWER INCOME LEVELS OKLAHOMA CITY METROPOLITAN AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Families <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	3	224	3.1	1.5	6.9	3.1	24.7
Moderate	0	0	0.0	0.0	17.0	10.3	17.9
Middle	3	352	3.1	2.3	17.7	13.7	19.1
Upper	10	2,666	10.2	17.7	34.7	44.2	38.3
Unknown	82	11,801	83.7	78.4	23.5	28.7	0.0
<b>Home Purchase Loans</b>							
Low	1	45	1.4	0.4	6.8	3.6	24.7
Moderate	0	0	0.0	0.0	17.6	12.7	17.9
Middle	3	352	4.3	3.2	17.8	16.4	19.1
Upper	5	1,280	7.1	11.6	33.3	47.1	38.3
Unknown	61	9,367	87.1	84.8	24.5	20.2	0.0
<b>Home Refinance Loans</b>							
Low	1	55	5.6	1.9	6.6	2.8	24.7
Moderate	0	0	0.0	0.0	14.6	8.1	17.9
Middle	0	0	0.0	0.0	16.1	11.7	19.1
Upper	4	1,301	22.2	43.8	37.2	52.5	38.3
Unknown	13	1,613	72.2	54.3	25.6	24.9	0.0
<b>Home Improvement Loans</b>							
Low	1	124	10.0	12.0	9.4	3.4	24.7
Moderate	0	0	0.0	0.0	20.2	10.3	17.9
Middle	0	0	0.0	0.0	22.3	14.2	19.1
Upper	1	85	10.0	8.3	39.7	55.1	38.3
Unknown	8	821	80.0	79.7	8.3	17.1	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	24.7
Moderate	0	0	0.0	0.0	0.0	0.0	17.9
Middle	0	0	0.0	0.0	0.0	0.0	19.1
Upper	0	0	0.0	0.0	0.0	0.0	38.3
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.  
<sup>2</sup> The percentage of families and households is based on 2015 ACS five-year estimate data.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans

The borrower distribution of small business loans is reasonable. As noted in Table 17, the bank's lending to small businesses at 67.9 percent by number and 59.6 percent by dollar exceeded aggregate lending data at 46.3 percent by number and 39.1 percent by dollar, but was below

the demographic figure of 88.2 percent. While bank performance was below the demographic figure by 20.3 percent by number, bank performance exceeded aggregate data by 21.6 percent. Aggregate lending data is considered a better comparative measure as it reflects the level of lending by all CRA reporters and the actual loan demand met by traditional banking institutions. Additionally, the bank originated 49.1 percent of loans to AA businesses in increments of \$100,000 or less, which are typically amounts needed by smaller business entities.

The bank's 2017 small business lending performance was similar to the performance in 2016.

Business Revenue By Size	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>\$1MM or less</b>	36	6,960	67.9	59.6	46.3	39.1	88.2
<b>Over \$1MM</b>	17	4,715	32.1	40.4	Not Reported		10.9
<b>Not Known</b>	0	0	0.0	0.0			0.9

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.  
<sup>2</sup> The percentage of businesses by revenue size is based on 2017 D&B data.  
 (NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Small Business Loans Secured by Residential Real Estate

The borrower distribution of small business loans secured by residential real estate is reasonable. A majority of the bank's loans were originated to small businesses, or those with revenues of \$1MM or less. The bank's penetration to small businesses, at 82.8 percent by number and 84.7 percent by dollar, was slightly below the 88.2 percent of small businesses in the AA. Further, the bank originated 58.6 percent of loans to AA businesses in increments of \$100,000 or less, which are typically amounts needed by smaller business entities.

The bank's distribution of small business loans secured by residential real estate in 2017 was comparable to 2016 lending performance.

Business Revenue By Size	Small Business Loans				% of Businesses <sup>1</sup>
	#	\$(000)	#%	\$%	
<b>\$1MM or less</b>	24	3,181	82.8	84.7	88.2
<b>Over \$1MM</b>	4	525	13.8	14.0	10.9
<b>Not Known</b>	1	49	3.4	1.3	0.9

<sup>1</sup> The percentage of businesses by revenue size is based on 2017 D&B data.  
 (NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)



**COMMUNITY DEVELOPMENT TEST**

The bank’s CD performance demonstrates excellent responsiveness to the CD needs within the Oklahoma City Metropolitan AA. The bank’s level of CD activity was compared to the availability of such opportunities. Examples of qualified CD activities include:

- Two loans totaling \$6.0MM were originated to fund the renovation of several apartment complexes that offer rents below the fair market rent values, catering to LMI individuals.
- Three loans totaling \$20.5MM were made to fund a warehouse project creating jobs in a designated enterprise zone.
- Two renewed loans totaling \$2.3MM were made to revitalize a blighted city neighborhood.
- Donations of \$4,000 were given to organizations that promote financial education programs to LMI schools in Oklahoma City and programs that promote small businesses.
- The bank partnered with a program that provides financial education to students, the majority of whom are LMI.

**TABLE 19  
COMMUNITY DEVELOPMENT ACTIVITIES  
OKLAHOMA CITY METROPOLITAN AA**

Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	2	6,046	1	557	0	0	1	557	0
Community Services	0	0	0	0	1	2	1	2	6
Economic Development	3	20,461	0	0	1	2	1	2	0
Revitalization and Stabilization	2	2,290	0	0	0	0	0	0	0
<b>Totals</b>	<b>7</b>	<b>28,797</b>	<b>1</b>	<b>557</b>	<b>2</b>	<b>4</b>	<b>3</b>	<b>561</b>	<b>6</b>

**PAYNE COUNTY ASSESSMENT AREA  
(Limited Review)**

**DESCRIPTION OF BANK'S OPERATIONS IN THE PAYNE COUNTY AA**

The bank's Payne County AA is comprised of portions of Payne County and its delineated AA remains unchanged since the prior examination. The AA contains two low-, four moderate-, three middle-, and four upper-income tracts. All middle-income tracts in this AA were listed by the FFIEC as distressed tracts in 2016 and 2017. The bank operates one full-service branch office in the Payne County AA, located in the city of Stillwater, Oklahoma, in a moderate-income tract. The June 30, 2018 FDIC market share data showed the bank represented less than one percent of the market share and ranked 15<sup>th</sup> out of 17 financial institutions within the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PAYNE COUNTY AA**

The bank's performance in the Payne County AA was reviewed using the limited-scope examination procedures; the tables for this review are displayed in Appendix C and Appendix D of this report.

**LENDING TEST**

The lending performance in this AA was consistent with the results detailed in the Tulsa and Oklahoma City Metropolitan AAs. The bank's 2017 lending performance in this AA was slightly higher than the bank's lending performance in 2016, particularly the geographic distribution performance in the LMI tracts.

**COMMUNITY DEVELOPMENT TEST**

Conclusions regarding the bank's CD performance in the AA were rated below those noted in the full-scope AAs, as no CD loans, qualified investments, or donations were made. However, performance in this AA did not alter the overall institution rating and some services, such as donations and services to Junior Achievement, benefit the greater area, including Payne County and the city of Stillwater.

Because the greatest weight has been assigned to the Tulsa and Oklahoma City Metropolitan AA activities, the performance in the Payne County AA does not materially alter performance conclusions.

**COMMUNITY REINVESTMENT ACT  
APPENDICES**

- A. Tulsa Metropolitan Assessment Area (Full Scope) – 2016 Demographics and Lending Tables
- B. Oklahoma City Metropolitan Assessment Area (Full Scope) – 2016 Demographics and Lending Tables
- C. Payne County Assessment Area (Limited Scope) – 2016 Demographics and Lending Tables
- D. Payne County Assessment Area (Limited Scope) – 2017 Demographics and Lending Tables

A. Tulsa Metropolitan Assessment Area (Full Scope) – 2016 Demographics and Lending Tables

TABLE A-1 TULSA METROPOLITAN 2016 AA DEMOGRAPHICS									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	19	9.7	12,018	7	4,647	38.7	35,112	20.6	
Moderate	56	28.7	38,143	22.3	7,218	18.9	29,821	17.5	
Middle	60	30.8	56,617	33.2	4,433	7.8	33,904	19.9	
Upper	60	30.8	63,957	37.5	2,292	3.6	71,898	42.1	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>195</b>	<b>100.0</b>	<b>170,735</b>	<b>100.0</b>	<b>18,590</b>	<b>10.9</b>	<b>170,735</b>	<b>100.0</b>	
	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied		Rental		Vacant			
		#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	25,646	7,934	4.7	30.9	13,062	50.9	4,650	18.1	
Moderate	76,855	33,814	19.9	44.0	33,844	44.0	9,197	12.0	
Middle	97,066	58,822	34.6	60.6	29,792	30.7	8,452	8.7	
Upper	94,486	69,205	40.8	73.2	19,546	20.7	5,735	6.1	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>294,053</b>	<b>169,775</b>	<b>100.0</b>	<b>57.7</b>	<b>96,244</b>	<b>32.7</b>	<b>28,034</b>	<b>9.5</b>	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	2,448	6.3	1,997	5.7	439	11.9	12	5.4	
Moderate	8,950	23.1	7,630	21.9	1,267	34.4	53	24.0	
Middle	11,697	30.1	10,626	30.5	1,009	27.4	62	28.1	
Upper	15,703	40.5	14,643	42.0	966	26.2	94	42.5	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>38,798</b>	<b>100.0</b>	<b>34,896</b>	<b>100.0</b>	<b>3,681</b>	<b>100.0</b>	<b>221</b>	<b>100.0</b>	
<b>Percentage of Total Businesses:</b>				<b>89.9</b>		<b>9.5</b>		<b>0.6</b>	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	5	1.6	5	1.7	0	0.0	0	0.0	
Moderate	32	10.4	31	10.3	1	16.7	0	0.0	
Middle	125	40.7	123	40.9	2	33.3	0	0.0	
Upper	145	47.2	142	47.2	3	50.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
<b>Total AA</b>	<b>307</b>	<b>100.0</b>	<b>301</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	
<b>Percentage of Total Farms:</b>				<b>98.0</b>		<b>2.0</b>		<b>0.0</b>	

Based on 2016 FFIEC census tract definitions, 2010 ACS five-year estimate data, and 2016 D&B data.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE A-2  
DISTRIBUTION OF 2016 HMDA LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Owner- Occupied Units <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	1	56	1.6	0.5	1.7	1.1	4.7
Moderate	13	980	21.3	8.4	12.0	7.0	19.9
Middle	20	1,998	32.8	17.1	36.4	31.3	34.6
Upper	27	8,629	44.3	74.0	49.9	60.6	40.8
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	1.5	0.8	4.7
Moderate	8	417	22.9	8.3	12.3	6.7	19.9
Middle	12	1,087	34.3	21.6	37.7	33.5	34.6
Upper	15	3,523	42.9	70.1	48.5	59.0	40.8
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	1	56	6.3	2.2	1.7	1.0	4.7
Moderate	3	462	18.8	17.8	10.7	5.6	19.9
Middle	6	904	37.5	34.9	33.6	27.4	34.6
Upper	6	1,170	37.5	45.1	54.0	66.0	40.8
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	2.7	1.5	4.7
Moderate	2	101	22.2	2.5	14.4	6.4	19.9
Middle	2	7	22.2	0.2	37.1	26.7	34.6
Upper	5	3,906	55.6	97.3	45.8	65.4	40.8
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units<sup>2</sup></b>
Low	0	0	0.0	0.0	18.2	5.5	10.7
Moderate	0	0	0.0	0.0	32.7	20.5	34.0
Middle	0	0	0.0	0.0	30.9	29.6	29.3
Upper	1	30	100.0	100.0	18.2	44.4	26.0
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of owner-occupied housing and multifamily units by census tract is based on 2016 FFIEC census tract definitions and 2010 ACS five-year estimate data.

<sup>3</sup> Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE A-3  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
Low	17	3,107	4.8	6.7	6.3	9.5	6.3
Moderate	77	11,688	21.6	25.4	21.1	26.6	23.1
Middle	61	10,082	17.1	21.9	28.2	24.7	30.1
Upper	202	21,195	56.6	46.0	43.1	38.9	40.5
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported <sup>4</sup>	0	0	0.0	0.0	1.3	0.4	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.

<sup>2</sup> The percentage of businesses by census tract is based on 2016 FFIEC census tract definitions and 2016 D&B data.

<sup>3</sup> Includes census tracts where the income level is unknown.

<sup>4</sup> Includes loans where census tract locations were not reported by the lender. (NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE A-4  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY INCOME LEVEL OF GEOGRAPHY  
TULSA METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				% of Businesses <sup>1</sup>
	#	\$(000)	#%	\$%	
Low	3	442	3.2	3.0	6.3
Moderate	19	2,581	20.2	17.8	23.1
Middle	26	1,589	27.7	10.9	30.1
Upper	46	9,900	48.9	68.2	40.5
Unknown <sup>2</sup>	0	0	0.0	0.0	0.0

<sup>1</sup> The percentage of businesses by census tract is based on 2016 FFIEC census tract definitions and 2016 D&B data.

<sup>2</sup> Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE A-5  
DISTRIBUTION OF 2016 HMDA LOANS  
BY BORROWER INCOME LEVELS  
TULSA METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Families <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	2	119	3.3	1.0	4.8	2.2	20.6
Moderate	7	458	11.5	3.9	16.0	10.2	17.5
Middle	0	0	0.0	0.0	19.5	15.1	19.9
Upper	19	6,816	31.1	58.4	40.8	50.2	42.1
Unknown	33	4,270	54.1	36.6	18.8	22.3	0.0
<b>Home Purchase Loans</b>							
Low	1	61	2.9	1.2	4.8	2.5	20.6
Moderate	4	337	11.4	6.7	18.1	12.4	17.5
Middle	0	0	0.0	0.0	20.5	17.5	19.9
Upper	9	2,367	25.7	47.1	37.5	49.5	42.1
Unknown	21	2,262	60.0	45.0	19.1	18.2	0.0
<b>Home Refinance Loans</b>							
Low	1	58	6.3	2.2	4.3	2.0	20.6
Moderate	1	105	6.3	4.1	12.4	7.4	17.5
Middle	0	0	0.0	0.0	17.7	12.7	19.9
Upper	6	1,257	37.5	48.5	45.6	58.0	42.1
Unknown	8	1,172	50.0	45.2	20.0	19.9	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	7.1	3.2	20.6
Moderate	2	16	22.2	0.4	15.0	7.5	17.5
Middle	0	0	0.0	0.0	19.5	13.1	19.9
Upper	4	3,192	44.4	79.5	50.8	67.7	42.1
Unknown	3	806	33.3	20.1	7.6	8.5	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	20.6
Moderate	0	0	0.0	0.0	0.0	0.0	17.5
Middle	0	0	0.0	0.0	0.0	0.0	19.9
Upper	0	0	0.0	0.0	0.0	0.0	42.1
Unknown	1	30	100.0	100.0	100.0	100.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of families and households is based on 2010 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE A-6  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
BY REVENUE SIZE OF BUSINESSES  
TULSA METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
\$1MM or less	146	23,736	40.9	51.5	44.8	40.7	89.9
Over \$1MM	199	21,378	55.7	46.4	Not Reported		9.5
Not Known	12	958	3.4	2.1			0.6

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.

<sup>2</sup> The percentage of businesses by revenue size is based on 2016 D&B data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE A-7  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY REVENUE SIZE OF BUSINESSES  
TULSA METROPOLITAN AA**

Business Revenue	Small Business Loans				% of Businesses by Revenue <sup>1</sup>
	#	\$(000)	#%	\$%	
\$1MM or less	77	8,868	81.9	61.1	89.9
Over \$1MM	15	5,275	16.0	36.4	9.5
Not Known	2	369	2.1	2.5	0.6

<sup>1</sup> The percentage of businesses by revenue size is based on 2016 D&B data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)



B. Oklahoma City Metropolitan Assessment Area Review (Full Scope)–2016 Demographics and Lending Tables

**TABLE B-1  
OKLAHOMA CITY METROPOLITAN 2016 AA DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	30	12.4	13,892	8.0	4,860	35.0	42,443	24.4
Moderate	78	32.4	51,024	29.4	9,698	19.0	32,060	18.5
Middle	75	31.1	55,265	31.8	5,674	10.3	33,787	19.5
Upper	55	22.8	53,452	30.8	1,722	3.2	65,353	37.6
Unknown	3	1.2	10	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>241</b>	<b>100.0</b>	<b>173,643</b>	<b>100.0</b>	<b>21,954</b>	<b>12.6</b>	<b>173,643</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	27,568	9,658	5.6	35.0	12,731	46.2	5,179	18.8
Moderate	107,292	43,324	25.1	40.4	47,332	44.1	16,636	15.5
Middle	99,158	59,144	34.3	59.6	29,802	30.1	10,212	10.3
Upper	83,377	60,140	34.9	72.1	17,173	20.6	6,064	7.3
Unknown	205	10	0.0	4.9	120	58.5	75	36.6
<b>Total AA</b>	<b>317,600</b>	<b>172,276</b>	<b>100.0</b>	<b>54.2</b>	<b>107,158</b>	<b>33.7</b>	<b>38,166</b>	<b>12.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3,126	8.4	2,522	7.6	566	15.7	38	11.1
Moderate	8,963	24.1	7,926	23.8	976	27.0	61	17.8
Middle	11,760	31.6	10,485	31.5	1,161	32.1	114	33.3
Upper	12,762	34.3	11,870	35.7	783	21.7	109	31.9
Unknown	611	1.6	465	1.4	126	3.5	20	5.8
<b>Total AA</b>	<b>37,222</b>	<b>100.0</b>	<b>33,268</b>	<b>100.0</b>	<b>3,612</b>	<b>100.0</b>	<b>342</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.4</b>			<b>9.7</b>	<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	15	4.5	12	3.7	3	30.0	0	0.0
Moderate	34	10.1	32	9.8	2	20.0	0	0.0
Middle	101	30.1	98	30.1	3	30.0	0	0.0
Upper	185	55.1	183	56.1	2	20.0	0	0.0
Unknown	1	0.3	1	0.3	0	0.0	0	0.0
<b>Total AA</b>	<b>336</b>	<b>100.0</b>	<b>326</b>	<b>100.0</b>	<b>10</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.0</b>			<b>3.0</b>	<b>0.0</b>

Based on 2016 FFIEC census tract definitions, 2010 ACS five-year estimate data, and 2016 D&B data.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE B-2  
DISTRIBUTION OF 2016 HMDA LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
OKLAHOMA CITY METROPOLITAN AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Owner- Occupied Units <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	2	81	2.3	0.5	2.3	0.9	5.6
Moderate	18	2,251	20.7	14.6	17.9	11.1	25.1
Middle	29	5,404	33.3	35.1	33.0	25.9	34.3
Upper	38	7,657	43.7	49.7	46.8	62.1	34.9
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	2	81	2.7	0.9	1.9	0.9	5.6
Moderate	15	1,075	20.5	12.0	18.6	10.8	25.1
Middle	23	2,561	31.5	28.6	33.2	27.0	34.3
Upper	33	5,233	45.2	58.5	46.3	61.1	34.9
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.1	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	1.7	0.8	5.6
Moderate	2	673	33.3	21.9	14.5	7.6	25.1
Middle	1	250	16.7	8.1	31.1	23.0	34.3
Upper	3	2,151	50.0	70.0	52.7	68.6	34.9
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	5.6	1.5	5.6
Moderate	0	0	0.0	0.0	22.5	11.2	25.1
Middle	3	446	60.0	62.0	36.8	26.0	34.3
Upper	2	273	40.0	38.0	35.1	61.3	34.9
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units<sup>2</sup></b>
Low	0	0	0.0	0.0	4.5	0.6	6.6
Moderate	1	503	33.3	19.0	52.3	35.4	47.6
Middle	2	2,147	66.7	81.0	30.7	31.0	27.1
Upper	0	0	0.0	0.0	12.5	33.0	18.5
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.2

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of owner-occupied housing and multifamily units by census tract is based on 2016 FFIEC census tract definitions and 2010 ACS five-year estimate data.

<sup>3</sup> Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE B-3  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
OKLAHOMA CITY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
Low	7	1,264	9.9	6.6	8.9	11.9	8.4
Moderate	10	2,255	14.1	11.7	21.9	21.1	24.1
Middle	18	5,554	25.4	28.9	27.7	27.1	31.6
Upper	35	9,441	49.3	49.2	38.3	37.0	34.3
Unknown <sup>3</sup>	1	689	1.4	3.6	1.5	2.4	1.6
Not Reported <sup>4</sup>	0	0	0.0	0.0	1.7	0.4	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.  
<sup>2</sup> The percentage of businesses by census tract is based on 2016 FFIEC census tract definitions and 2016 D&B data.  
<sup>3</sup> Includes census tracts where the income level is unknown.  
<sup>4</sup> Includes loans where census tract locations were not reported by the lender.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE B-4  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY INCOME LEVEL OF GEOGRAPHY  
OKLAHOMA CITY METROPOLITAN AA**

Census Tract Income Level	Small Business Loans				% of Businesses <sup>1</sup>
	#	\$(000)	#%	\$%	
Low	1	41	2.7	1.2	8.4
Moderate	10	739	27.0	21.4	24.1
Middle	15	1,032	40.5	29.8	31.6
Upper	11	1,647	29.7	47.6	34.3
Unknown <sup>2</sup>	0	0	0.0	0.0	1.6

<sup>1</sup> The percentage of businesses by census tract is based on 2016 FFIEC census tract definitions and 2016 D&B data.  
<sup>2</sup> Includes census tracts where the income level is unknown.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE B-5  
DISTRIBUTION OF 2016 HMDA LOANS  
BY BORROWER INCOME LEVELS  
OKLAHOMA CITY METROPOLITAN AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Families <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	5.8	2.4	24.4
Moderate	0	0	0.0	0.0	15.9	9.5	18.5
Middle	1	200	1.1	1.3	19.0	14.9	19.5
Upper	10	3,313	11.5	21.5	37.6	48.6	37.6
Unknown	76	11,880	87.4	77.2	21.7	24.5	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	5.9	3.0	24.4
Moderate	0	0	0.0	0.0	17.0	11.9	18.5
Middle	1	200	1.4	2.2	19.7	17.9	19.5
Upper	6	986	8.2	11.0	35.3	48.9	37.6
Unknown	66	7,764	90.4	86.7	22.1	18.3	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	4.2	1.7	24.4
Moderate	0	0	0.0	0.0	12.4	6.8	18.5
Middle	0	0	0.0	0.0	16.1	11.7	19.5
Upper	3	2,151	50.0	70.0	41.4	54.5	37.6
Unknown	3	923	50.0	30.0	25.9	25.4	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	9.2	2.6	24.4
Moderate	0	0	0.0	0.0	19.7	8.1	18.5
Middle	0	0	0.0	0.0	23.8	15.2	19.5
Upper	1	176	20.0	24.5	40.6	62.3	37.6
Unknown	4	543	80.0	75.5	6.7	11.8	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	24.4
Moderate	0	0	0.0	0.0	0.0	0.0	18.5
Middle	0	0	0.0	0.0	0.0	0.0	19.5
Upper	0	0	0.0	0.0	0.0	0.0	37.6
Unknown	3	2,650	100.0	100.0	100.0	100.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of families and households is based on 2010 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE B-6  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
BY REVENUE SIZE OF BUSINESSES  
OKLAHOMA CITY METROPOLITAN AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses by Revenue <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
\$1MM or less	50	10,974	70.4	57.1	42.3	35.8	89.4
Over \$1MM	20	7,312	28.2	38.1	Not Reported		9.7
Not Known	1	917	1.4	4.8			0.9

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.  
<sup>2</sup> The percentage of businesses by revenue size is based on 2016 D&B data.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE B-7  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY REVENUE SIZE OF BUSINESSES  
OKLAHOMA CITY METROPOLITAN AA**

Business Revenue	Small Business Loans				% of Businesses by Revenue <sup>1</sup>
	#	\$(000)	#%	\$%	
\$1MM or less	36	3,334	97.3	96.4	89.4
Over \$1MM	0	0	0.0	0.0	9.7
Not Known	1	125	2.7	3.6	0.9

<sup>1</sup> The percentage of businesses by revenue size is based on 2016 D&B data.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

C. Payne County Assessment Area (Limited Scope) – 2016 Demographics and Lending Tables

TABLE C-1 PAYNE COUNTY AA 2016 AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	7.7	87	0.7	26	29.9	2,096	16.9
Moderate	0	0.0	0	0.0	0	0.0	1,998	16.1
Middle	9	69.2	8,431	67.8	967	11.5	2,088	16.8
Upper	3	23.1	3,909	31.5	245	6.3	6,245	50.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>13</b>	<b>100.0</b>	<b>12,427</b>	<b>100.0</b>	<b>1,238</b>	<b>10.0</b>	<b>12,427</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	524	21	0.2	4.0	356	67.9	147	28.1
Moderate	0	0.0	0.0	0.0	0	0.0	0	0.0
Middle	19,786	7,578	65.7	38.3	9,531	48.2	2,677	13.5
Upper	6,587	3,936	34.1	59.8	1,948	29.6	703	10.7
Unknown	0	0.0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>26,897</b>	<b>11,535</b>	<b>100.0</b>	<b>42.9</b>	<b>11,835</b>	<b>44.0</b>	<b>3,527</b>	<b>13.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	43	1.8	36	1.7	7	4.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	1,677	71.7	1,528	71.1	135	76.7	14	87.5
Upper	620	26.5	584	27.2	34	19.3	2	12.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>2,340</b>	<b>100.0</b>	<b>2,148</b>	<b>100.0</b>	<b>176</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>91.8</b>		<b>7.5</b>		<b>0.7</b>	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1	1.4	1	1.4	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	42	56.8	42	56.8	0	0.0	0	0.0
Upper	31	41.9	31	41.9	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>74</b>	<b>100.0</b>	<b>74</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>100.0</b>		<b>0.0</b>		<b>0.0</b>	

Based on 2016 FFIEC census tract definitions, 2010 ACS five-year estimate data, and 2016 D&B data.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-2  
DISTRIBUTION OF 2016 HMDA LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
PAYNE COUNTY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Owner- Occupied Units <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.2
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	8	2,299	61.5	57.5	57.9	50.5	65.7
Upper	5	1,698	38.5	42.5	42.1	49.5	34.1
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.2
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	4	1,386	44.4	44.9	59.0	48.4	65.7
Upper	5	1,698	55.6	55.1	41.0	51.6	34.1
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.2
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	3	697	100.0	100.0	54.5	45.5	65.7
Upper	0	0	0.0	0.0	45.5	54.5	34.1
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	0.2
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	1	216	100.0	100.0	60.9	52.5	65.7
Upper	0	0	0.0	0.0	39.1	47.5	34.1
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							<b>% of Multifamily Units<sup>2</sup></b>
Low	0	0	0.0	0.0	0.0	0.0	6.3
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	0	0	0.0	0.0	75.0	91.6	81.7
Upper	0	0	0.0	0.0	25.0	8.4	12.0
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.  
<sup>2</sup> The percentage of owner-occupied housing and multifamily units by census tract is based on 2016 FFIEC census tract definitions and 2010 ACS five-year estimate data.  
<sup>3</sup> Includes census tracts where the income level is unknown.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-3  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
PAYNE COUNTY AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	0.6	1.0	1.8
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	14	2,316	58.3	74.3	71.8	75.7	71.7
Upper	10	800	41.7	25.7	27.6	23.3	26.5
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported <sup>4</sup>	0	0	0.0	0.0	0.0	0.0	0.0

- <sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.  
<sup>2</sup> The percentage of businesses by census tract is based on 2016 FFIEC census tract definitions and 2016 D&B data.  
<sup>3</sup> Includes census tracts where the income level is unknown.  
<sup>4</sup> Includes loans where census tract locations were not reported by the lender.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-4  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY INCOME LEVEL OF GEOGRAPHY  
PAYNE COUNTY AA**

Census Tract Income Level	Small Business Loans				% of Businesses <sup>1</sup>
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	1.8
Moderate	0	0	0.0	0.0	0.0
Middle	16	2,946	45.7	47.8	71.7
Upper	19	3,212	54.3	52.2	26.5
Unknown <sup>2</sup>	0	0	0.0	0.0	0.0

- <sup>1</sup> The percentage of businesses by census tract is based on 2016 FFIEC census tract definitions and 2016 D&B data.  
<sup>2</sup> Includes census tracts where the income level is unknown.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)



**TABLE C-5  
DISTRIBUTION OF 2016 HMDA LOANS  
BY BORROWER INCOME LEVELS  
PAYNE COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Families <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	1.6	0.5	16.9
Moderate	0	0	0.0	0.0	7.7	4.4	16.1
Middle	2	296	15.4	7.4	17.2	12.2	16.8
Upper	2	536	15.4	13.4	52.2	55.8	50.3
Unknown	9	3,165	69.2	79.2	21.3	27.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	1.2	0.5	16.9
Moderate	0	0	0.0	0.0	8.8	5.5	16.1
Middle	0	0	0.0	0.0	15.3	12.9	16.8
Upper	2	536	22.2	17.4	50.6	57.7	50.3
Unknown	7	2,548	77.8	82.6	24.1	23.5	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	2.0	0.7	16.9
Moderate	0	0	0.0	0.0	5.2	3.3	16.1
Middle	2	296	66.7	42.5	20.9	13.7	16.8
Upper	0	0	0.0	0.0	53.7	63.2	50.3
Unknown	1	401	33.3	57.5	18.2	19.1	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	3.5	0.8	16.9
Moderate	0	0	0.0	0.0	8.7	3.0	16.1
Middle	0	0	0.0	0.0	19.1	11.2	16.8
Upper	0	0	0.0	0.0	60.0	68.3	50.3
Unknown	1	216	100.0	100.0	8.7	16.6	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	16.9
Moderate	0	0	0.0	0.0	0.0	0.0	16.1
Middle	0	0	0.0	0.0	0.0	0.0	16.8
Upper	0	0	0.0	0.0	0.0	0.0	50.3
Unknown	0	0	0.0	0.0	100.0	100.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of families and households is based on 2010 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-6  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
BY REVENUE SIZE OF BUSINESSES  
PAYNE COUNTY AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses by Revenue <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
\$1MM or less	18	2,731	75.0	87.6	46.4	45.6	91.8
Over \$1MM	3	200	12.5	6.4	Not Reported		7.5
Not Known	3	185	12.5	5.9	Not Reported		0.7

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.

<sup>2</sup> The percentage of businesses by revenue size is based on 2016 D&B data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE C-7  
DISTRIBUTION OF 2016 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY REVENUE SIZE OF BUSINESSES  
PAYNE COUNTY AA**

Business Revenue	Small Business Loans				% of Businesses by Revenue <sup>1</sup>
	#	\$(000)	#%	\$%	
\$1MM or less	14	2,907	40.0	47.2	91.8
Over \$1MM	18	2,983	51.4	48.4	7.5
Not Known	3	268	8.6	4.4	0.7

<sup>1</sup> The percentage of businesses by revenue size is based on 2016 D&B data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

D. Payne County Assessment Area (Limited Scope)- 2017 Demographics and Lending Tables

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	15.4	404	3.1	96	23.8	2,606	20.0
Moderate	4	30.8	2,561	19.7	641	25.0	2,129	16.4
Middle	3	23.1	4,672	35.9	704	15.1	2,245	17.3
Upper	4	30.8	5,373	41.3	444	8.3	6,030	46.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>13</b>	<b>100.0</b>	<b>13,010</b>	<b>100.0</b>	<b>1,885</b>	<b>14.5</b>	<b>13,010</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,906	85	0.7	2.9	2,155	74.2	666	22.9
Moderate	7,857	2,275	19.7	29.0	4,679	59.6	903	11.5
Middle	8,041	4,016	34.7	49.9	3,274	40.7	751	9.3
Upper	9,536	5,201	44.9	54.5	3,254	34.1	1,081	11.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>28,340</b>	<b>11,577</b>	<b>100.0</b>	<b>40.9</b>	<b>13,362</b>	<b>47.1</b>	<b>3,401</b>	<b>12.0</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	237	11.4	201	10.7	36	20.0	0	0.0
Moderate	704	34.0	635	33.8	64	35.6	5	33.3
Middle	472	22.8	434	23.1	33	18.3	5	33.3
Upper	659	31.8	607	32.3	47	26.1	5	33.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>2,072</b>	<b>100.0</b>	<b>1,877</b>	<b>100.0</b>	<b>180</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.6</b>			<b>8.7</b>	<b>0.7</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1	1.5	1	1.5	0	0.0	0	0.0
Moderate	8	12.3	8	12.3	0	0.0	0	0.0
Middle	29	44.6	29	44.6	0	0.0	0	0.0
Upper	27	41.5	27	41.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>65</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>			<b>0.0</b>	<b>0.0</b>

Based on 2017 FFIEC census tract definitions, 2015 ACS five-year estimate data, and 2017 D&B data.  
(NOTE: Total percentages may vary by 0.1 percent due to automated rounding differences.)

**TABLE D-2  
DISTRIBUTION OF 2017 HMDA LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
PAYNE COUNTY AA**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Owner- Occupied Units <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	1	850	8.3	7.7	1.2	1.0	0.7
Moderate	0	0	0.0	0.0	22.3	14.3	19.7
Middle	4	868	33.3	7.9	25.2	19.2	34.7
Upper	7	9,324	58.3	84.4	51.3	65.5	44.9
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	1.0	0.8	0.7
Moderate	0	0	0.0	0.0	24.0	16.5	19.7
Middle	2	524	25.0	15.7	25.3	22.5	34.7
Upper	6	2,824	75.0	84.3	49.7	60.3	44.9
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	1.0	0.5	0.7
Moderate	0	0	0.0	0.0	20.6	9.4	19.7
Middle	2	344	100.0	100.0	24.2	16.5	34.7
Upper	0	0	0.0	0.0	54.2	73.7	44.9
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	1.6	2.5	0.7
Moderate	0	0	0.0	0.0	14.8	13.9	19.7
Middle	0	0	0.0	0.0	26.2	24.6	34.7
Upper	0	0	0.0	0.0	57.4	59.1	44.9
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
<b>Multifamily Loans</b>							
Low	1	850	50.0	11.6	22.2	3.1	24.1
Moderate	0	0	0.0	0.0	11.1	13.2	31.6
Middle	0	0	0.0	0.0	33.3	7.2	29.2
Upper	1	6,500	50.0	88.4	33.3	76.5	15.2
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of owner-occupied housing and multifamily units by tract is based on 2017 FFIEC census tract definitions and 2015 ACS five-year estimate data.

<sup>3</sup> Includes census tracts where the income level is unknown.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE D-3  
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS  
BY INCOME LEVEL OF GEOGRAPHY  
PAYNE COUNTY AA**

Census Tract Income Level	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
Low	2	367	8.7	8.0	9.6	8.0	11.4
Moderate	4	1,700	17.4	36.9	27.5	36.5	34.0
Middle	3	303	13.0	6.6	23.9	19.3	22.8
Upper	14	2,241	60.9	48.6	39.0	36.1	31.8
Unknown <sup>3</sup>	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported <sup>4</sup>	0	0	0.0	0.0	0.0	0.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.  
<sup>2</sup> The percentage of businesses by census tract is based on 2017 FFIEC census tract definitions and 2017 D&B data.  
<sup>3</sup> Includes census tracts where the income level is unknown.  
<sup>4</sup> Includes loans where census tract locations were not reported by the lender.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE D-4  
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY INCOME LEVEL OF GEOGRAPHY  
PAYNE COUNTY AA**

Census Tract Income Level	Small Business Loans				% of Businesses <sup>1</sup>
	#	\$(000)	#%	\$%	
Low	3	1,162	13.0	30.7	11.4
Moderate	5	263	21.7	6.9	34.0
Middle	0	0	0.0	0.0	22.8
Upper	15	2,365	65.2	62.4	31.8
Unknown <sup>2</sup>	0	0	0.0	0.0	0.0

<sup>1</sup> The percentage of businesses by census tract is based on 2017 FFIEC census tract definitions and 2017 D&B data.  
<sup>2</sup> Includes census tracts where the income level is unknown.  
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE D-5  
DISTRIBUTION OF 2017 HMDA LOANS  
BY BORROWER INCOME LEVELS  
PAYNE COUNTY AA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data <sup>1</sup>		% of Families <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
<b>Total Home Mortgage Loans</b>							
Low	0	0	0.0	0.0	1.5	0.5	20.0
Moderate	0	0	0.0	0.0	9.1	5.1	16.4
Middle	0	0	0.0	0.0	13.6	11.9	17.3
Upper	5	1,091	41.7	9.9	57.2	53.1	46.3
Unknown	7	9,951	58.3	90.1	18.5	29.4	0.0
<b>Home Purchase Loans</b>							
Low	0	0	0.0	0.0	1.3	0.6	20.0
Moderate	0	0	0.0	0.0	9.4	6.6	16.4
Middle	0	0	0.0	0.0	13.7	11.8	17.3
Upper	3	747	37.5	22.3	56.3	63.2	46.3
Unknown	5	2,601	62.5	77.7	19.3	17.7	0.0
<b>Home Refinance Loans</b>							
Low	0	0	0.0	0.0	2.0	0.6	20.0
Moderate	0	0	0.0	0.0	7.5	3.5	16.4
Middle	0	0	0.0	0.0	12.1	17.1	17.3
Upper	2	344	100.0	100.0	59.5	53.4	46.3
Unknown	0	0	0.0	0.0	19.0	25.3	0.0
<b>Home Improvement Loans</b>							
Low	0	0	0.0	0.0	2.5	0.3	20.0
Moderate	0	0	0.0	0.0	11.5	7.9	16.4
Middle	0	0	0.0	0.0	17.2	17.0	17.3
Upper	0	0	0.0	0.0	63.1	55.2	46.3
Unknown	0	0	0.0	0.0	5.7	19.6	0.0
<b>Multifamily Loans</b>							
Low	0	0	0.0	0.0	0.0	0.0	20.0
Moderate	0	0	0.0	0.0	0.0	0.0	16.4
Middle	0	0	0.0	0.0	0.0	0.0	17.3
Upper	0	0	0.0	0.0	0.0	0.0	46.3
Unknown	2	7,350	100.0	100.0	100.0	100.0	0.0

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all HMDA filers.

<sup>2</sup> The percentage of families and households are based on 2015 ACS five-year estimate data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE D-6  
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS  
BY REVENUE SIZE OF BUSINESSES  
PAYNE COUNTY AA**

Business Revenue By Size	Small Business Loans				Aggregate CRA Data <sup>1</sup>		% of Businesses by Revenue <sup>2</sup>
	#	\$(000)	#%	\$%	#%	\$%	
\$1MM or less	20	4,419	87.0	95.8	47.5	46.4	90.6
Over \$1MM	2	167	8.7	3.6	Not Reported		8.7
Not Known	1	25	4.3	0.5	Not Reported		0.7

<sup>1</sup> Aggregate loan data reflects all loan originations and purchases in the bank's AA reported by all CRA filers.

<sup>2</sup> The percentage of businesses by revenue size is based on 2017 D&B data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

**TABLE D-7  
DISTRIBUTION OF 2017 SMALL BUSINESS LOANS  
SECURED BY RESIDENTIAL REAL ESTATE  
BY REVENUE SIZE OF BUSINESSES  
PAYNE COUNTY AA**

Business Revenue	Small Business Loans				% of Businesses by Revenue <sup>1</sup>
	#	\$(000)	#%	\$%	
\$1MM or less	6	1,067	26.1	28.2	90.6
Over \$1MM	14	2,658	60.9	70.1	8.7
Not Known	3	65	13.0	1.7	0.7

<sup>1</sup> The percentage of businesses by revenue size is based on 2017 D&B data.

(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)