

# Community Reinvestment Act

## Public File

### §25.43 Content and availability of Public File

(a) Information available to the public: A bank shall maintain a public file, in either paper or digital format, that includes the following information:

1) All written comments received from the public for the current year (updated on a quarterly basis for the prior quarter by March 31, June 30, September 30, and December 31) and each of the prior two calendar years that specifically relate to the bank's performance in helping meet the community credit needs, and any response to the comments by the bank, if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication of which would violate specific provisions of law;

**No written comments were received.**

2) A copy of the public section of the bank's most recent CRA Performance Evaluation prepared by the Board. The bank must include this copy in the public file within 30 business days after its receipt from the Board.

**Please see Attached Copy of the 2024 Performance Evaluation.**

3) A list of bank's branches, their street addresses, and geographies;

#### Oklahoma: State Code 40

Branch	County	County Code	MSA Code
Shawnee - Main Office	Pottawatomie	125	NA
Oklahoma City	Oklahoma	109	36420
Edmond	Oklahoma	109	36420
Midwest City	Oklahoma	109	36420
Mangum	Greer	055	NA
Lawton-Quanah Parker	Comanche	031	30020
Holdenville	Hughes	063	NA
Granite	Greer	055	NA
Canute	Washita	149	NA

### Oklahoma State Code 40

LOCATION	ADDRESS	HOURS OF OPERATION	CENSUS TRACT
Shawnee - Main Office	130 E MacArthur Shawnee, OK 74804	Lobby M-F 9AM - 5PM Drive Thru M-F 8AM - 6PM and Saturday 9AM - 1PM	5007.00
Oklahoma City	3030 NW Expressway, Ste 13 Oklahoma City, OK 73112	Lobby M-F 9AM - 5PM Drive Thru M-F 8AM - 6PM	1066.04
Edmond	3856 S. Boulevard Suite 260 Edmond, OK 73013	Lobby M-F 9AM - 5PM	1083.20
Midwest City	2600 S Douglas Blvd Midwest City, OK 73130	Lobby M-F 8AM - 5PM Drive Thru M-F 8PM - 6PM	1076.06
Mangum	204 N Oklahoma Mangum, OK 73554	Lobby M-F 8AM - 3PM Drive Thru M-F 8PM - 4:30PM	9672.00
Lawton Quanah Parker	6702 Quanah Parker Trailway Lawton, OK 73505	Lobby M-F 9AM - 5PM Drive Thru M-F 8AM - 5:30PM	0004.02
Holdenville	821 E Highway Holdenville, OK 74848	Lobby M-F 9AM - 4PM Drive Thru M-F 8AM - 5:30PM and Saturday 8AM - 12PM	0007.00
Granite	104 E 1st St Granite, OK 73547	Lobby M-F 8AM - 3PM Drive Thru M-F 8AM - 4PM	9671.00
Canute	620 Highway 66 Canute, OK 73626	Lobby M-F 9AM - 3PM Drive Thru M-F 8:30AM - 4PM	9649.00

4) A list of branches opened or closed by the bank during the current year (updated on a quarterly basis for the prior quarter by March 31, June 30, September 30, and December 31) and each of the prior two calendar years, their street addresses, and census tracts. Edmond Branch located at 3856 S.Boulevard Suite 260 Edmond, OK 73013 (census tract 1083.20) opened September 3, 2024. Closure of Lawton Sheridan location on 702 NW Sheridan Rd, Lawton, OK 73505 as of 1/17/2025.

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5) A list of retail banking services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the bank's branches and descriptions of material differences in the availability or cost of services at particular branches, if any. A bank may elect to include information regarding the availability of other systems for delivering retail banking services (for example, mobile or online banking, loan production offices, and bank-at-work or mobile branch programs);

**Please refer to the attached Community Reinvestment Act Statement for details regarding bank services. The attached fee schedule is accurate as of February 2025.**

6) A map of each facility-based assessment area and, as applicable, each retail lending assessment area showing the boundaries of the area and identifying the census tracts contained in the area, either on the map or in a separate list; and

**Please refer to the attached mps and census tract information shown below.**

7) Any other information the bank chooses. **N/A**

### (b) Additional information available to the public

1) Banks subject to data reporting requirements pursuant to §228.42. **N/A**

2) Banks required to report HMDA data

#### (i) HMDA Disclosure Statement

Home Mortgage Disclosure Act Notice. The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's website: [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)

Institution name; Sovereign Bank

LEI: 549300CKJ4DTUYAZX11

HMDA data for many other financial institutions are also available at this website.

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(i) Availability of bank HMDA data. A large bank required to report home mortgage loan data pursuant to 12 CFR part 1003 must include in its public file a written notice that the home mortgage loan data published by the Board under §228.42(j) are available at the Board's website. **N/A**

3) A small bank, or a bank that was a small bank during the prior calendar year, must include in its public file the bank's loan-to-deposit ratio for each quarter of the prior calendar year and, at its option, additional data on its loan-to-deposit ratio.

### 2024 Loan to Deposit Ratio

1Q	Ratio	95.99%
2Q	Ratio	96.26%
3Q	Ratio	97.92%
4Q	Ratio	89.05%

4) Banks with strategic plans. **N/A**

5) Banks with less than satisfactory ratings. **N/A**

(c) Location of Public Information. A bank shall make available to the public for inspection upon request and at no cost the information required in this section as follows:

1) For banks that maintain a website, all information required for the bank's public file under this section must be maintained on the bank's website.

# Community Reinvestment Act

## Public File

2) For banks that do not maintain a website:

- (i) All the information required for the bank's public file must be maintained at the main office and, if an interstate bank, at one branch office in each State; and
- (ii) At each branch, the following must be maintained:
  - (A) A copy of the public section of the bank's most recent CRA performance evaluation and a list of services provided by the branch; and
  - (B) Within five calendar days of the request, all the information that the bank is required to maintain under this section in the public file relating to the facility-based assessment area in which the branch is located.

Our public file may be accessed on our website <https://banksovereign.com> and a paper copy can be provided upon request

(d) Copies. Upon request, a bank shall provide copies, either on paper or in digital form acceptable to the person making the request, of the information in its public file. The bank may charge a reasonable fee not to exceed the cost of copying (if not provided in digital form).

(e) Timing requirements. Except as otherwise provided in this section, a bank must ensure that its public file contains the information required by this section for each of the previous three calendar years, with the most recent calendar year included in its file annually by April 1 of the current calendar year.

# Community Reinvestment Act

## Public File

**Affirmed by the Board of Directors April 2025**

### **CRA Policy Statement**

Sovereign Bank has nine branch locations in the state of Oklahoma. The main bank is located in Shawnee, OK. The Bank has branches in the towns of Holdenville, Mangum, Granite, Canute, Lawton, Midwest City, Oklahoma City, and Edmond, OK. Sovereign Bank is a full-service bank which is firmly committed to providing its community with a full range of quality products and services.

It is the policy of Sovereign Bank to ensure proper adherence to the provisions and intent of the Community Reinvestment Act (CRA) in order that the goals of meeting the credit needs of the communities the Bank services, including low and moderate income areas, are met. The Bank will make reasonable efforts to ascertain the credit needs of the community and to develop and market products and services to meet those needs. The Board of Directors will approve the Bank's CRA Policy and review periodic self-assessments of the Bank's CRA compliance efforts, including reasonableness of the delineated assessment area. All of the Bank's directors, officers and employees are encouraged to be familiar with the Bank's CRA goals and responsibilities. The Bank will develop and apply flexible underwriting for loans that benefit low or moderate income geographies or individuals which are consistent with safe and sound banking practices. Nondiscrimination Policy Statement. It is the policy of Sovereign Bank to comply with the letter and spirit of all applicable federal and state consumer protection, civil rights, and fair housing laws and regulations. Sovereign Bank's lending policies, procedures, and practices shall not discriminate against any person on the basis of race, color, religion, national origin, sex, actual or perceived sexual orientation, gender identity, marital status, age (provided the applicant has the capacity to enter into a contract) or other prohibited basis. This policy of nondiscrimination covers all aspects of bank services including, in particular, the application for, consideration of, granting, servicing, and collection of extensions of credit.

### **Nondiscrimination Policy Statement**

It is the policy of Sovereign Bank to comply with the letter and spirit of all applicable federal and state consumer protection, civil rights, and fair housing laws and regulations. Sovereign Bank's lending policies, procedures, and practices shall not discriminate against any person on the basis of race, color, religion, national origin, sex, actual or perceived sexual orientation, gender identity, marital status, age (provided the applicant has the capacity to enter into a contract) or other prohibited basis. This policy of nondiscrimination covers all aspects of bank services including, in particular, the application for, consideration of, granting, servicing, and collection of extensions of credit.

### **Assessment Area(s)**

Sovereign Bank has four assessment area(s) comprised of two partial Metropolitan Statistical Areas (MSA), 20 counties, and 455 census tracts. The combined area(s) consists of 147 Low-to-Moderate Income (LMI) census tracts.

The assessment area(s) are defined as:

**Central Assessment Area Non-MSA** which consists of Hughes, OK, Pottawatomie, OK, and Seminole, OK counties;

**SW Assessment Area Non-MSA** which consists of Greer OK, Kiowa OK, and Washita, OK counties;

**Oklahoma City MSA** which consists of Canadian, OK, Cleveland, OK, and Oklahoma, OK counties; and

**Lawton MSA** which consists of Comanche, OK county.

# Community Reinvestment Act

## Public File

### **CRA Compliance Officer**

Sovereign Bank maintains a program to document its efforts to determine the community development, credit, investment, and service needs of its delineated communities. The Board of Directors and senior management, with the guidance and assistance of the CRA Compliance Officer, intends to ensure that the Bank complies with CRA regulations. The CRA Compliance Officer will report periodically to the Board of Directors via the Compliance Committee concerning the Bank's CRA efforts, and if appropriate, areas for improvement.

### **CRA Notice**

The Bank will provide in the lobby of its main office and each of its branches a public CRA Notice which conforms in form and substance with the regulatory requirements.

### **CRA Public File**

The Bank will maintain a public file of all information and documentation required by CRA regulations applicable to the Bank. The public file will be current as of April 1st of each year.

# Sovereign Bank Locations

## SHAWNEE - MAIN OFFICE

24/7 ATM  
130 E MacArthur Shawnee, OK 74804  
(405) 275-8830

## CANUTE

24/7 ATM  
620 Highway 66 Canute, OK 73626  
(833) 782-6500

## EDMOND

3856 S Boulevard, Suite 260 Edmond, OK 73013  
(405) 471-5400

## GRANITE

24/7 ATM  
104 E 1st Street Granite, OK 73547  
(580) 535-4848

## HOLDENVILLE

24/7 ATM  
821 E Highway Holdenville, OK 74848  
(405) 379-3902

## LAWTON - QUANAH PARKER

24/7 ATM  
6702 NW Quanah Parker Trailway Lawton, OK 73505  
(580) 536-8800

## MANGUM

24/7 ATM  
204 N Oklahoma Mangum, OK 73554  
(580) 782-3365

## MIDWEST CITY

24/7 ATM  
2600 S Douglas Boulevard Midwest City, OK 73130  
(833) 782-6500

## OKLAHOMA CITY

24/7 ATM  
3030 NW Expressway, Suite 130  
Oklahoma City, OK 7311

# Fee Schedule

The following are fees and charges that you may incur and may be assessed to your account. Fees are subject to change at any time.

Effective February 1, 2025

DEPOSIT ACCOUNT FEES		
Stop Payment	When you request to refuse payment for a check or ACH transaction in person or by phone	\$30.00
Online Stop Payment	When you request to refuse payment for a check or ACH transaction online	\$20.00
Research / Account Reconciliation	For requested account research	First hour \$25.00 Add'l per Hour \$20.00
Dormant	Monthly fee charged after 18 consecutive months of transactional account inactivity	\$5.00
Incoming & Outgoing Collection Item	An item for payment via collection (check not drawn on domestic bank)	\$25.00
Chargeback Fee (Deposit Item Returned)	Cashed or deposited item returned unpaid to the Bank, for any reason	\$7.00

OVERDRAFT AND NSF FEES		
Returned Item Fee <sup>2,4</sup>	Returned debit due to insufficient funds in your account	\$30.00
Paid Item Fee <sup>1,3</sup>	To pay a debit that overdraws your account	\$30.00

DEBIT CARD FEES		
1st Debit Card Replacement	Replace a lost/stolen or damaged debit card	\$5.00
PIN Replacement Fee		Free
Additional Replacement Card		\$10.00
Non-Signer Debit Card <sup>7</sup>		\$10.00

# Fee Schedule

## Public File

WIRE FEES		
Domestic Incoming Wire <sup>6</sup>	Receiving a domestic wire transfer	\$10.00
Domestic Outgoing Wire <sup>6</sup>	Sending a domestic wire transfer	\$20.00
International Incoming Wire <sup>6</sup>	Receiving an international wire transfer	\$15.00
International Outgoing Wire <sup>6</sup>	Sending an international wire transfer	\$45.00
MISCELLANEOUS FEES		
Cashier's Check	For the purchase of a cashier's check	\$5.00
Money Order	For the purchase of a money order	\$2.00
Visa Gift Card	Purchase of a gift card	\$3.00
Notary	Notary services for a non-account holder	\$5.00
Tax Levy/Garnishment	For the processing of any garnishment or tax levy, or other court administrative order on your account, whether or not the funds are actually paid	Maximum allowed by law
Bank Bag	With lock	\$45.00
Bank Bag	With zipper	\$10.00
Foreign Currency <sup>5</sup>	Buying and selling currency	Varies
Counter Checks	10 Checks	\$3.00
Counter Slips	10 Slips	\$3.00
Safe Deposit Boxes	Size varies by branch Available at: Shawnee, Holdenville, Granite, Mangum, Canute and Lawton Quannah Parker	Price varies by branch

1 This fee applies to overdrafts created by check, in-person withdrawal, ATM withdrawals, or other electronic means, as applicable.

2 This fee applies to NSF's created by check, in-person withdrawal, ATM withdrawals, or other electronic means, as applicable.

3 A maximum of 4 overdraft fees can be charged per day.

4 Because we may charge a Returned Item Fee each time a debit is presented, you could receive a Return Item Fee more than once for any given returned item or represented item.

5 The fees may include an exchange rate that is current at the time of the transaction.

6 Other banks accepting or sending wire transfers may charge additional fees.

7 This fee applies to non-signer debit cards for business accounts only.

# Community Reinvestment Act

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### Commercial Loans

Quick and convenient access to credit is the lifeblood of any business. Whether you are looking to expand your business, improve cash flow, or purchase equipment, our commercial lending experts can explain the full range of loans and credit line products to meet your business banking needs. We offer a variety of commercial loan types that are extended to support business activity such as:

**Lines Of Credit**

**Term Loans**

**Agriculture Loans**

**Commercial Real Estate (CRE) Construction Loans**

**Standby Letters of Credit**

**SBA Loans**

**Origination Fees: \$350 Documentation Fee and 0% to 1.50% of Principal Balance for Origination Fee**

### Secondary Market Mortgage Loans

Sovereign is your trusted mortgage expert. With 50 years of combined mortgage experience, our mortgage team is equipped with the skills and knowledge to find the right loan product for you. Whether you are buying a home or looking to refinance an existing loan, our professionally trained staff are ready to help. The mortgage products offered include:

**Conventional**

**FHA**

**Jumbo**

**VA**

**USDA Rural Home Loans**

**HUD 184 (Indian Home Loan Guarantee Program) loans**

**Origination Fees: \$1,195 loan origination fee with variance contributed to down payment assistance or borrower's purchase of rate discount points**

# Community Reinvestment Act

## Public File

### In-House Consumer Mortgage Loans

Sovereign Bank offers a full range of financing options. Our in-house processing, underwriting, closing and funding departments simplify and accelerate the loan process. Our expertise, knowledge, and outstanding customer service distinguish us among other lenders. We have many in-house mortgage options available to help you meet your financial goals, such as:

**Bridge Loans** are a short-term interest-only “Gap Loan” between the sale of the borrower’s existing home and the purchase of a new home. The Bridge Loan will pay off when the customer sells their existing home.

**Temporary Loans** are short-term loans up to one year that allows the borrower to borrow against the equity in their home. The Temporary Loan will be replaced by permanent financing or paid off using the proceeds from the sale of their existing home.

**Home Equity Loans** enable the borrower to borrow money against the equity in their home. This loan type has a variety of purposes, such as home improvement, debt consolidation, personal expenses, etc.

**Mortgage Purchase/Refinance** offer financing for a home purchase or refinance of a single-family residential home.

#### LOAN ORIGINATOR FEES

<\$25,000	\$300 origination fee
>\$25,000 = <\$75,000	\$450 origination fee
>\$75,000 = <\$150,000	\$600 origination fee
\$150,000 or Greater	0.50% origination fee OR \$750 Minimum

**Construction Loans** are temporary loans with interest-only payments up to one year. Used for the primary purpose of providing interim construction financing for a single-family residence.

Origination Fees for Construction Loans: Range from 0.50% to 1.00%

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### Consumer Lending

Whether buying a new car, recreational vehicle, or boat, Sovereign Bank offers loans designed to meet your needs, such as:

**Automobiles/Motor Home Loans** are extended to purchase or refinance automobiles or motor homes.

**Recreational Vehicles and Equipment Loans** are extended to the borrower to purchase or refinance a recreational vehicle such as boats, campers, jet skis, side by sides, motorcycles, etc. or equipment such as trailers, lawn mowers.

**Cash Secured Loans** are secured by a savings, money market, certificate of deposit accounts extended to the borrower for any legal purpose.

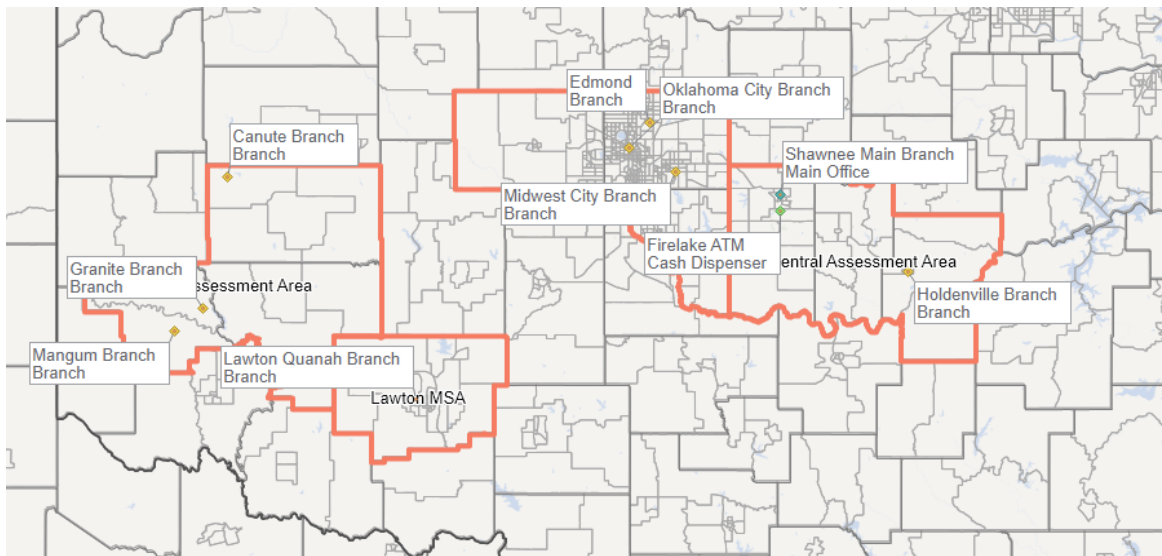
**Unsecured Loans** are provided to a borrower without any legal claim to the borrower's assets in case of default. These loans are made to borrowers that have the financial capacity and adequate creditworthiness for repayment.

#### Origination Fees

\$175 loan amounts  $\geq$  \$2001

\$75 for loan amounts  $\leq$  \$2000

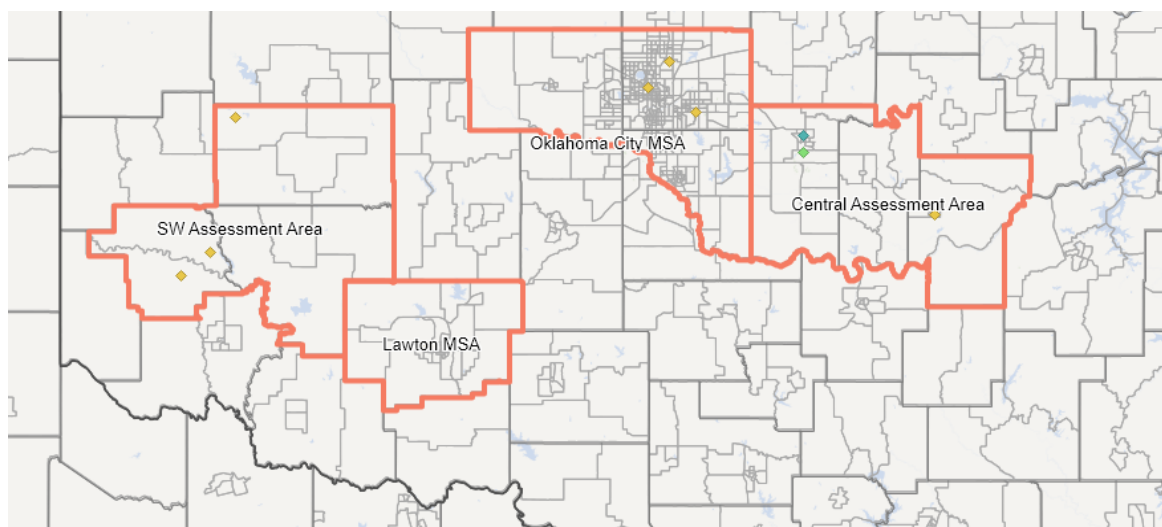
# Combined Assessment Area(s)



## Map Legend

- State
- County
- Census Tract
- Zip Code
- Assessment Area
- ◆ Branch
- ◆ Limited Service Branch
- ◆ Main Office
- ◆ Cash Dispenser
- ◆ Deposit ATM or ITM
- ◆ Other

## Branches



## Map Legend

- State
- County
- Census Tract
- Zip Code
- Assessment Area
- ◆ Branch
- ◆ Limited Service Branch
- ◆ Main Office
- ◆ Cash Dispenser
- ◆ Deposit ATM or ITM
- ◆ Other

## Assessment Area Names



# 2024 FFIEC CENSUS REPORT

## Summary Census Demographic Information

### Hughes, Pottawatomie, & Seminole County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Hughes OK	4846.00	Mod	2,469	\$69,000	48.81%	1,348	47.92%
Hughes OK	4847.00	Middle	2,291	\$69,000	31.51%	1,301	59.49%
Hughes OK	4848.00	Mod	3,759	\$69,000	47.78%	1,190	37.39%
Hughes OK	4849.00	Middle	2,511	\$69,000	36.92%	1,138	47.36%
Hughes OK	4850.00	Middle	2,337	\$69,000	27.56%	1,286	46.81%
Pottawatomie OK	5002.00	Low	2,993	\$69,000	44.64%	1,510	22.12%
Pottawatomie OK	5003.01	Middle	3,424	\$69,000	43.43%	1,476	53.25%
Pottawatomie OK	5003.02	Middle	2,696	\$69,000	43.18%	1,236	46.04%
Pottawatomie OK	5004.00	Middle	3,386	\$69,000	34.47%	1,759	39.62%
Pottawatomie OK	5005.00	Mod	4,582	\$69,000	39.35%	1,673	44.59%
Pottawatomie OK	5006.00	Middle	3,400	\$69,000	30.65%	1,656	54.41%
Pottawatomie OK	5007.00	Middle	3,645	\$69,000	42.61%	1,292	51.63%
Pottawatomie OK	5008.00	Upper*	4,279	\$69,000	24.12%	1,768	73.87%
Pottawatomie OK	5009.01	Upper*	5,050	\$69,000	30.55%	2,148	82.12%
Pottawatomie OK	5009.02	Middle	2,538	\$69,000	26.91%	898	83.52%
Pottawatomie OK	5010.03	Upper*	4,776	\$69,000	23.66%	1,861	86.08%
Pottawatomie OK	5010.04	Middle	4,060	\$69,000	25.67%	1,540	63.90%
Pottawatomie OK	5010.05	Upper*	6,009	\$69,000	31.89%	1,961	67.72%
Pottawatomie OK	5010.06	Upper*	3,375	\$69,000	29.60%	1,290	67.44%
Pottawatomie OK	5011.01	Middle	5,923	\$69,000	34.98%	2,367	59.78%
Pottawatomie OK	5011.03	Middle	1,547	\$69,000	25.21%	577	70.54%
Pottawatomie OK	5011.04	Middle	4,380	\$69,000	29.25%	1,790	69.78%
Pottawatomie OK	5011.05	Middle	1,994	\$69,000	29.09%	680	65.15%
Pottawatomie OK	5012.01	Middle	1,681	\$69,000	24.69%	771	67.44%
Pottawatomie OK	5013.00	Middle	2,716	\$69,000	24.34%	1,620	74.20%
Seminole OK	5831.00	Middle	1,594	\$69,000	30.24%	944	61.97%
Seminole OK	5832.00	Middle	3,198	\$69,000	31.74%	1,462	70.31%
Seminole OK	5833.00	Middle	2,466	\$69,000	33.58%	1,088	57.54%
Seminole OK	5834.00	Mod	4,266	\$69,000	44.77%	1,752	51.20%
Seminole OK	5835.00	Low	1,938	\$69,000	42.88%	993	30.31%
Seminole OK	5836.00	Mod	3,832	\$69,000	52.35%	2,106	42.97%
Seminole OK	5837.00	Middle	2,008	\$69,000	30.58%	971	68.80%
Seminole OK	5838.00	Mod	2,632	\$69,000	42.29%	1,485	56.16%
Seminole OK	5839.00	Middle	1,622	\$69,000	39.95%	912	55.59%

# 2024 FFIEC CENSUS REPORT

## Summary Census Demographic Information

### Comanche County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Comanche OK	0001.00	Low	3,601	\$71,200	54.18%	1,978	34.88%
Comanche OK	0002.00	Mod	2,224	\$71,200	57.10%	1,245	32.85%
Comanche OK	0003.00	Middle	5,101	\$71,200	54.17%	2,410	41.91%
Comanche OK	0004.02	Middle	3,841	\$71,200	51.31%	1,992	41.87%
Comanche OK	0004.03	Upper*	4,637	\$71,200	46.22%	1,874	64.19%
Comanche OK	0004.04	Mod	3,857	\$71,200	56.34%	2,139	28.19%
Comanche OK	0004.05	Middle	1,957	\$71,200	54.52%	854	32.55%
Comanche OK	0005.03	Mod	3,549	\$71,200	54.69%	1,337	60.66%
Comanche OK	0005.04	Middle	3,689	\$71,200	49.28%	1,796	40.81%
Comanche OK	0005.05	Middle	3,831	\$71,200	59.41%	1,470	48.16%
Comanche OK	0005.06	Middle	4,075	\$71,200	55.44%	1,657	54.56%
Comanche OK	0006.00	Upper*	2,409	\$71,200	42.80%	1,152	52.08%
Comanche OK	0007.00	Mod	2,486	\$71,200	50.88%	1,499	33.96%
Comanche OK	0008.00	N/A	2,169	\$71,200	52.97%	1,245	19.60%
Comanche OK	0009.00	Middle	1,842	\$71,200	40.07%	884	58.03%
Comanche OK	0010.00	Mod	1,744	\$71,200	48.51%	1,087	28.33%
Comanche OK	0011.00	Middle	1,544	\$71,200	49.81%	1,142	25.13%
Comanche OK	0014.00	Mod	1,109	\$71,200	53.11%	455	27.03%
Comanche OK	0015.00	Low	2,298	\$71,200	53.70%	1,316	21.12%
Comanche OK	0016.00	Low	1,605	\$71,200	71.90%	1,063	25.49%
Comanche OK	0017.00	Mod	1,873	\$71,200	44.85%	1,217	19.56%
Comanche OK	0019.01	Middle	1,578	\$71,200	51.08%	772	45.08%
Comanche OK	0019.02	Mod	1,424	\$71,200	70.15%	1,004	35.46%
Comanche OK	0020.01	Upper*	5,802	\$71,200	47.59%	2,193	50.11%
Comanche OK	0020.03	Upper*	2,055	\$71,200	18.73%	1,166	90.05%
Comanche OK	0020.04	Middle	3,894	\$71,200	47.25%	1,552	65.91%
Comanche OK	0020.05	Middle	5,735	\$71,200	48.09%	1,812	32.17%
Comanche OK	0021.01	Middle	4,082	\$71,200	35.74%	1,170	56.50%
Comanche OK	0021.02	Middle	4,489	\$71,200	21.16%	1,969	75.22%
Comanche OK	0022.01	Upper*	2,935	\$71,200	34.34%	955	61.36%
Comanche OK	0022.02	Upper*	3,969	\$71,200	27.41%	1,486	66.76%
Comanche OK	0023.01	Upper*	6,374	\$71,200	35.03%	2,454	74.94%
Comanche OK	0023.02	Middle	4,939	\$71,200	38.47%	1,894	66.53%
Comanche OK	0024.01	N/A	295	\$71,200	45.76%	3	0.00%
Comanche OK	0024.03	N/A	2,142	\$71,200	53.22%	0	
Comanche OK	0024.05	Middle	2,786	\$71,200	45.26%	507	0.00%
Comanche OK	0024.06	Mod	6,587	\$71,200	47.26%	1,178	0.25%
Comanche OK	0025.00	Mod	2,598	\$71,200	60.70%	1,738	13.81%

# 2024 FFIEC CENSUS REPORT

## Summary Census Demographic Information

### Canadian County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Canadian OK	3001.00	Mod	2,422	\$89,100	23.78%	1,167	53.98%
Canadian OK	3002.01	Middle	6,406	\$89,100	20.64%	2,637	88.36%
Canadian OK	3002.02	Upper*	4,347	\$89,100	26.71%	1,860	71.02%
Canadian OK	3003.00	Mod	3,286	\$89,100	42.33%	1,438	40.82%
Canadian OK	3004.00	Low	1,183	\$89,100	63.23%	561	31.73%
Canadian OK	3005.00	Middle	2,958	\$89,100	38.10%	1,764	52.95%
Canadian OK	3006.00	Mod	3,385	\$89,100	31.79%	1,488	57.59%
Canadian OK	3007.01	Middle	1,848	\$89,100	37.07%	479	45.93%
Canadian OK	3007.02	Upper*	5,034	\$89,100	33.81%	1,213	69.41%
Canadian OK	3008.02	Upper*	3,606	\$89,100	23.24%	890	86.07%
Canadian OK	3008.03	Upper*	3,313	\$89,100	17.42%	841	92.87%
Canadian OK	3008.04	Upper*	3,769	\$89,100	33.24%	665	74.59%
Canadian OK	3008.05	Upper*	7,091	\$89,100	27.19%	1,675	87.52%
Canadian OK	3008.06	Upper*	4,604	\$89,100	33.34%	1,006	92.25%
Canadian OK	3009.01	Middle	6,764	\$89,100	30.09%	2,344	65.27%
Canadian OK	3009.02	Upper*	2,423	\$89,100	27.86%	889	80.65%
Canadian OK	3009.04	Mod	5,945	\$89,100	43.45%	1,481	52.46%
Canadian OK	3009.05	Upper*	5,998	\$89,100	27.36%	1,585	79.75%
Canadian OK	3010.01	Middle	1,061	\$89,100	33.65%	246	64.23%
Canadian OK	3010.03	Middle	7,086	\$89,100	29.59%	1,784	80.94%
Canadian OK	3010.06	Middle	3,313	\$89,100	37.16%	809	89.37%
Canadian OK	3010.10	Middle	3,624	\$89,100	38.41%	908	73.46%
Canadian OK	3010.11	Middle	5,883	\$89,100	31.23%	1,310	65.42%
Canadian OK	3010.12	Upper*	2,674	\$89,100	41.74%	552	95.83%
Canadian OK	3010.13	Upper*	6,444	\$89,100	36.50%	1,614	74.10%
Canadian OK	3010.14	Upper*	5,218	\$89,100	37.54%	1,177	71.71%
Canadian OK	3010.15	Mod	2,227	\$89,100	37.00%	789	14.20%
Canadian OK	3011.00	Upper*	6,059	\$89,100	24.23%	2,416	73.05%
Canadian OK	3012.01	Middle	3,766	\$89,100	24.99%	1,871	48.21%
Canadian OK	3012.02	Upper*	2,460	\$89,100	20.73%	1,189	77.29%
Canadian OK	3013.01	Upper*	2,830	\$89,100	27.81%	624	92.47%
Canadian OK	3013.02	Upper*	5,444	\$89,100	23.25%	1,357	94.40%
Canadian OK	3014.06	Upper*	5,268	\$89,100	26.67%	2,030	81.82%
Canadian OK	3014.07	Upper*	6,348	\$89,100	22.84%	2,279	82.54%
Canadian OK	3014.08	Upper*	2,055	\$89,100	18.44%	602	93.69%
Canadian OK	3014.09	Middle	2,763	\$89,100	29.21%	1,000	62.40%
Canadian OK	3014.10	Middle	5,500	\$89,100	26.84%	2,472	63.96%

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## Summary Census Demographic Information

### Cleveland County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Cleveland OK	2001.00	N/A	338	\$89,100	31.36%	175	3.43%
Cleveland OK	2002.00	Mod	1,724	\$89,100	34.22%	947	41.71%
Cleveland OK	2003.00	Mod	3,512	\$89,100	39.27%	1,627	54.09%
Cleveland OK	2004.00	Middle	1,795	\$89,100	34.54%	977	41.56%
Cleveland OK	2005.00	Middle	3,573	\$89,100	26.00%	2,110	19.62%
Cleveland OK	2006.02	N/A	3,302	\$89,100	35.49%	1,767	30.11%
Cleveland OK	2006.03	Low	2,996	\$89,100	46.70%	1,246	15.81%
Cleveland OK	2006.04	Middle	3,191	\$89,100	37.92%	1,669	30.56%
Cleveland OK	2007.00	N/A	245	\$89,100	36.33%	46	0.00%
Cleveland OK	2008.00	Middle	7,444	\$89,100	34.32%	2,850	69.96%
Cleveland OK	2009.00	Middle	4,069	\$89,100	32.10%	1,915	56.24%
Cleveland OK	2010.00	Middle	5,895	\$89,100	36.93%	2,618	38.73%
Cleveland OK	2011.02	Upper*	2,871	\$89,100	21.66%	1,425	49.96%
Cleveland OK	2011.03	Middle	3,643	\$89,100	30.41%	1,656	46.98%
Cleveland OK	2011.04	Upper*	2,110	\$89,100	28.44%	1,243	28.72%
Cleveland OK	2012.01	Low	2,258	\$89,100	30.91%	1,067	10.31%
Cleveland OK	2012.02	N/A	6,015	\$89,100	30.51%	133	12.03%
Cleveland OK	2012.04	Mod	3,850	\$89,100	40.21%	1,261	0.00%
Cleveland OK	2012.05	Middle	4,705	\$89,100	38.68%	1,837	42.62%
Cleveland OK	2013.02	Middle	3,988	\$89,100	44.73%	1,966	7.07%
Cleveland OK	2013.03	Mod	4,941	\$89,100	39.87%	1,689	28.12%
Cleveland OK	2014.03	Upper*	6,463	\$89,100	29.35%	2,876	73.54%
Cleveland OK	2014.04	Middle	4,215	\$89,100	33.26%	2,016	25.64%
Cleveland OK	2014.05	Upper*	6,593	\$89,100	33.32%	2,468	73.95%
Cleveland OK	2015.05	Upper*	5,791	\$89,100	25.44%	2,718	68.43%
Cleveland OK	2015.08	Middle	3,052	\$89,100	35.35%	1,370	42.70%
Cleveland OK	2015.09	Upper*	5,428	\$89,100	32.52%	1,726	79.20%
Cleveland OK	2015.11	Middle	2,801	\$89,100	31.31%	1,497	46.43%
Cleveland OK	2015.12	Middle	3,724	\$89,100	28.20%	2,134	69.68%
Cleveland OK	2015.13	Upper*	2,981	\$89,100	28.45%	893	87.35%
Cleveland OK	2015.14	Upper*	5,334	\$89,100	29.96%	1,793	74.57%
Cleveland OK	2016.02	Middle	2,920	\$89,100	36.82%	1,159	67.99%
Cleveland OK	2016.03	Mod	3,845	\$89,100	37.09%	1,574	46.70%
Cleveland OK	2016.04	Middle	3,910	\$89,100	40.72%	1,582	40.27%
Cleveland OK	2016.07	Upper*	6,721	\$89,100	38.46%	2,383	65.13%
Cleveland OK	2016.09	Upper*	5,027	\$89,100	38.95%	1,602	85.33%
Cleveland OK	2016.10	Upper*	4,338	\$89,100	37.07%	1,204	96.35%
Cleveland OK	2016.11	Upper*	2,264	\$89,100	33.17%	697	84.79%
Cleveland OK	2016.12	Middle	5,340	\$89,100	32.81%	2,122	64.04%
Cleveland OK	2017.00	Upper*	5,060	\$89,100	31.46%	1,298	91.76%
Cleveland OK	2018.01	Upper*	4,409	\$89,100	35.63%	2,208	93.61%

# 2024 FFIEC CENSUS REPORT

## Summary Census Demographic Information

### Oklahoma County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Oklahoma OK	1001.00	Mod	3,040	\$89,100	43.75%	1,880	48.09%
Oklahoma OK	1002.01	Middle	1,570	\$89,100	33.69%	775	53.94%
Oklahoma OK	1002.02	Middle	1,639	\$89,100	52.65%	729	44.72%
Oklahoma OK	1002.03	Middle	2,538	\$89,100	53.03%	1,174	50.43%
Oklahoma OK	1003.00	Upper*	2,681	\$89,100	23.69%	1,448	73.96%
Oklahoma OK	1004.00	Low	1,955	\$89,100	93.15%	1,125	29.87%
Oklahoma OK	1005.00	Low	1,898	\$89,100	86.72%	1,037	25.84%
Oklahoma OK	1008.00	Mod	2,260	\$89,100	54.56%	1,355	33.28%
Oklahoma OK	1009.00	Upper*	1,532	\$89,100	33.81%	733	72.99%
Oklahoma OK	1010.00	Low	2,892	\$89,100	54.91%	992	14.72%
Oklahoma OK	1011.00	Mod	832	\$89,100	35.82%	672	30.06%
Oklahoma OK	1012.00	Middle	1,107	\$89,100	35.14%	888	25.11%
Oklahoma OK	1013.00	Low	2,886	\$89,100	92.41%	1,444	31.93%
Oklahoma OK	1014.00	N/A	1,055	\$89,100	87.68%	749	53.14%
Oklahoma OK	1015.00	Mod	1,912	\$89,100	64.02%	1,105	36.20%
Oklahoma OK	1018.00	Upper*	1,499	\$89,100	26.08%	873	46.96%
Oklahoma OK	1019.00	Upper*	2,623	\$89,100	36.45%	1,529	45.52%
Oklahoma OK	1020.00	Middle	2,798	\$89,100	44.85%	1,422	45.57%
Oklahoma OK	1021.00	Mod	2,112	\$89,100	49.67%	960	59.17%
Oklahoma OK	1022.00	Mod	2,693	\$89,100	66.77%	1,136	47.62%
Oklahoma OK	1023.00	Mod	3,166	\$89,100	60.87%	1,598	39.55%
Oklahoma OK	1024.00	Mod	2,906	\$89,100	70.37%	1,240	34.84%
Oklahoma OK	1025.00	Upper*	1,594	\$89,100	33.69%	1,033	0.39%
Oklahoma OK	1032.00	Upper*	2,633	\$89,100	50.63%	882	10.66%
Oklahoma OK	1033.00	Mod	1,445	\$89,100	76.40%	576	34.55%
Oklahoma OK	1039.00	Mod	3,788	\$89,100	84.05%	1,406	42.96%
Oklahoma OK	1041.00	Low	3,001	\$89,100	78.47%	1,392	21.55%
Oklahoma OK	1042.00	Mod	2,209	\$89,100	88.55%	765	47.45%
Oklahoma OK	1043.00	Low	3,266	\$89,100	86.04%	1,502	51.26%
Oklahoma OK	1044.00	Mod	3,491	\$89,100	88.20%	1,410	36.03%
Oklahoma OK	1045.00	Mod	3,333	\$89,100	86.20%	1,102	42.01%
Oklahoma OK	1046.00	Low	985	\$89,100	82.94%	392	43.88%
Oklahoma OK	1047.00	Mod	1,198	\$89,100	70.87%	731	11.22%
Oklahoma OK	1048.00	Mod	3,323	\$89,100	81.91%	1,161	45.82%
Oklahoma OK	1049.00	Low	3,734	\$89,100	81.71%	1,465	56.93%
Oklahoma OK	1050.00	N/A	2,269	\$89,100	84.09%	755	49.40%
Oklahoma OK	1051.01	Middle	2,347	\$89,100	46.78%	1,296	21.84%
Oklahoma OK	1052.01	Low	1,576	\$89,100	93.27%	1,024	52.64%
Oklahoma OK	1052.02	Low	1,194	\$89,100	94.39%	525	38.10%
Oklahoma OK	1053.00	Mod	3,223	\$89,100	75.61%	1,104	36.68%
Oklahoma OK	1054.00	Low	2,021	\$89,100	75.01%	785	44.59%
Oklahoma OK	1055.00	Mod	3,060	\$89,100	82.25%	1,209	44.58%
Oklahoma OK	1056.00	Low	4,731	\$89,100	82.20%	1,641	31.51%

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## Summary Census Demographic Information

### Oklahoma County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Oklahoma OK	1059.03	Mod	2,804	\$89,100	57.45%	1,502	48.40%
Oklahoma OK	1059.04	Mod	4,027	\$89,100	65.31%	1,630	47.24%
Oklahoma OK	1059.05	Mod	2,978	\$89,100	60.58%	1,439	51.84%
Oklahoma OK	1059.06	Mod	2,938	\$89,100	58.37%	1,332	62.31%
Oklahoma OK	1059.07	Low	4,607	\$89,100	72.00%	1,832	30.73%
Oklahoma OK	1060.00	Middle	2,281	\$89,100	71.81%	982	74.95%
Oklahoma OK	1061.00	Middle	3,214	\$89,100	81.21%	1,371	73.38%
Oklahoma OK	1062.00	Mod	1,462	\$89,100	88.58%	884	71.72%
Oklahoma OK	1063.01	Low	3,512	\$89,100	82.60%	1,490	27.58%
Oklahoma OK	1063.02	Mod	4,589	\$89,100	81.74%	1,971	35.57%
Oklahoma OK	1063.03	Middle	3,530	\$89,100	57.79%	2,007	30.54%
Oklahoma OK	1064.01	Upper*	2,167	\$89,100	14.26%	942	78.56%
Oklahoma OK	1064.02	Upper*	2,127	\$89,100	21.34%	1,051	81.07%
Oklahoma OK	1064.03	Mod	4,818	\$89,100	27.65%	2,507	65.06%
Oklahoma OK	1065.01	Upper*	2,872	\$89,100	25.66%	1,802	62.32%
Oklahoma OK	1065.02	Mod	3,850	\$89,100	46.44%	2,075	38.51%
Oklahoma OK	1065.03	Upper*	1,758	\$89,100	27.19%	915	66.23%
Oklahoma OK	1066.01	Mod	3,148	\$89,100	46.06%	1,709	43.30%
Oklahoma OK	1066.02	Mod	2,575	\$89,100	46.87%	1,277	34.14%
Oklahoma OK	1066.06	Middle	1,983	\$89,100	38.38%	855	68.54%
Oklahoma OK	1066.07	Mod	3,384	\$89,100	48.14%	1,679	49.02%
Oklahoma OK	1066.08	Middle	3,189	\$89,100	29.23%	1,550	65.87%
Oklahoma OK	1066.09	Middle	1,033	\$89,100	31.46%	572	62.94%
Oklahoma OK	1066.10	N/A	1,235	\$89,100	38.22%	1,189	42.89%
Oklahoma OK	1066.11	Mod	2,583	\$89,100	56.14%	1,325	10.49%
Oklahoma OK	1067.02	Mod	4,006	\$89,100	56.32%	1,498	65.09%
Oklahoma OK	1067.04	Middle	2,434	\$89,100	37.96%	917	58.78%
Oklahoma OK	1067.05	Middle	2,677	\$89,100	46.25%	1,089	70.80%
Oklahoma OK	1067.06	N/A	3,635	\$89,100	50.01%	2,425	36.95%
Oklahoma OK	1067.08	Upper*	3,203	\$89,100	46.49%	1,013	97.04%
Oklahoma OK	1067.09	Mod	2,480	\$89,100	72.78%	1,050	26.67%
Oklahoma OK	1067.10	Mod	4,258	\$89,100	59.09%	2,210	25.16%
Oklahoma OK	1068.01	Mod	1,774	\$89,100	35.91%	517	40.62%
Oklahoma OK	1068.02	Middle	2,001	\$89,100	38.18%	718	54.32%
Oklahoma OK	1068.03	Mod	3,261	\$89,100	47.90%	1,285	41.09%
Oklahoma OK	1068.04	Mod	3,848	\$89,100	57.56%	1,494	44.98%
Oklahoma OK	1069.02	Mod	2,492	\$89,100	51.97%	853	60.73%
Oklahoma OK	1069.03	Middle	6,139	\$89,100	38.20%	2,360	57.54%
Oklahoma OK	1069.06	Middle	3,283	\$89,100	61.86%	1,078	56.40%
Oklahoma OK	1069.07	Middle	2,106	\$89,100	56.84%	890	52.58%
Oklahoma OK	1069.09	Middle	1,790	\$89,100	50.00%	768	60.68%
Oklahoma OK	1069.10	Mod	2,663	\$89,100	50.32%	1,252	52.40%
Oklahoma OK	1069.11	Middle	1,893	\$89,100	50.18%	809	77.75%
Oklahoma OK	1069.12	Low	3,198	\$89,100	65.20%	1,239	32.61%

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## Summary Census Demographic Information

### Oklahoma County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Oklahoma OK	1069.13	Mod	4,556	\$89,100	68.22%	1,921	29.57%
Oklahoma OK	1069.14	Middle	4,311	\$89,100	63.72%	2,448	19.69%
Oklahoma OK	1069.16	Mod	2,481	\$89,100	73.16%	1,077	19.03%
Oklahoma OK	1069.17	Low	3,359	\$89,100	80.47%	1,224	27.94%
Oklahoma OK	1070.01	Mod	5,918	\$89,100	77.02%	2,168	41.37%
Oklahoma OK	1070.02	Mod	2,108	\$89,100	61.62%	1,118	34.35%
Oklahoma OK	1071.01	N/A	1,243	\$89,100	70.31%	0	
Oklahoma OK	1071.03	Mod	2,031	\$89,100	75.87%	612	57.03%
Oklahoma OK	1071.04	Low	2,880	\$89,100	71.35%	1,500	42.93%
Oklahoma OK	1072.06	Mod	4,555	\$89,100	60.15%	1,999	37.12%
Oklahoma OK	1072.07	Middle	2,191	\$89,100	53.13%	1,057	29.04%
Oklahoma OK	1072.12	Mod	5,979	\$89,100	56.82%	2,474	42.28%
Oklahoma OK	1072.13	Mod	4,913	\$89,100	68.59%	2,195	30.16%
Oklahoma OK	1072.14	Middle	3,184	\$89,100	68.15%	1,297	66.38%
Oklahoma OK	1072.15	Low	4,293	\$89,100	74.73%	1,317	41.53%
Oklahoma OK	1072.16	Mod	3,096	\$89,100	74.26%	1,184	25.34%
Oklahoma OK	1072.17	Mod	2,134	\$89,100	79.10%	881	74.12%
Oklahoma OK	1072.18	Mod	3,107	\$89,100	76.18%	1,368	40.06%
Oklahoma OK	1072.19	Mod	3,257	\$89,100	80.17%	1,013	59.13%
Oklahoma OK	1072.20	Mod	3,840	\$89,100	78.13%	1,570	30.00%
Oklahoma OK	1072.21	Mod	2,395	\$89,100	69.02%	856	65.07%
Oklahoma OK	1072.22	Mod	1,869	\$89,100	71.43%	880	36.70%
Oklahoma OK	1072.23	Mod	2,867	\$89,100	74.12%	1,872	59.88%
Oklahoma OK	1072.24	Middle	3,676	\$89,100	53.48%	1,479	64.30%
Oklahoma OK	1072.25	Mod	2,976	\$89,100	73.32%	1,090	53.94%
Oklahoma OK	1072.26	Mod	3,178	\$89,100	69.70%	1,365	36.12%
Oklahoma OK	1073.02	Low	2,979	\$89,100	70.93%	1,093	51.88%
Oklahoma OK	1073.03	Mod	1,544	\$89,100	44.11%	509	44.01%
Oklahoma OK	1073.05	N/A	1,312	\$89,100	67.23%	618	22.49%
Oklahoma OK	1073.06	Low	3,739	\$89,100	67.21%	1,363	38.44%
Oklahoma OK	1074.01	Middle	5,990	\$89,100	71.25%	2,931	58.03%
Oklahoma OK	1074.04	Middle	3,376	\$89,100	62.26%	1,559	48.36%
Oklahoma OK	1074.05	Mod	4,997	\$89,100	53.85%	2,160	59.63%
Oklahoma OK	1074.06	Middle	7,600	\$89,100	53.24%	2,874	37.58%
Oklahoma OK	1074.07	Middle	553	\$89,100	33.09%	502	33.27%
Oklahoma OK	1076.01	Mod	2,148	\$89,100	49.39%	1,315	15.59%
Oklahoma OK	1076.04	Mod	2,025	\$89,100	42.86%	919	45.16%
Oklahoma OK	1076.05	Mod	2,150	\$89,100	39.91%	955	28.27%
Oklahoma OK	1076.08	Middle	3,991	\$89,100	42.40%	1,628	70.45%
Oklahoma OK	1077.03	Middle	3,645	\$89,100	36.32%	1,482	64.24%
Oklahoma OK	1077.04	Mod	1,657	\$89,100	48.46%	684	64.91%
Oklahoma OK	1077.05	Mod	1,998	\$89,100	38.44%	974	53.70%
Oklahoma OK	1077.06	Mod	2,770	\$89,100	46.68%	1,186	50.34%
Oklahoma OK	1077.07	Mod	1,282	\$89,100	38.38%	522	40.23%

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## Summary Census Demographic Information

### Oklahoma County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Oklahoma OK	1078.01	Middle	3,603	\$89,100	62.25%	1,449	40.86%
Oklahoma OK	1078.04	Mod	2,395	\$89,100	41.75%	1,005	53.83%
Oklahoma OK	1078.05	Mod	2,580	\$89,100	54.34%	1,057	51.84%
Oklahoma OK	1078.06	Mod	4,101	\$89,100	45.92%	1,879	58.91%
Oklahoma OK	1078.07	Mod	2,866	\$89,100	48.60%	1,509	62.89%
Oklahoma OK	1078.08	Middle	1,932	\$89,100	53.31%	916	41.59%
Oklahoma OK	1078.09	Middle	1,734	\$89,100	49.54%	674	52.23%
Oklahoma OK	1078.10	Mod	2,660	\$89,100	45.45%	1,181	42.76%
Oklahoma OK	1079.00	Mod	1,608	\$89,100	89.05%	894	42.84%
Oklahoma OK	1080.03	Low	3,765	\$89,100	72.24%	1,993	16.81%
Oklahoma OK	1080.05	Middle	2,449	\$89,100	68.19%	1,222	55.56%
Oklahoma OK	1080.06	Middle	4,039	\$89,100	48.25%	2,194	55.15%
Oklahoma OK	1080.07	Middle	3,330	\$89,100	40.39%	1,308	73.85%
Oklahoma OK	1080.08	Mod	4,277	\$89,100	58.73%	1,971	41.45%
Oklahoma OK	1080.09	Mod	3,003	\$89,100	58.04%	1,317	64.39%
Oklahoma OK	1080.10	Mod	3,127	\$89,100	57.12%	1,304	38.65%
Oklahoma OK	1080.11	Mod	3,959	\$89,100	79.39%	1,632	41.54%
Oklahoma OK	1081.01	Upper*	4,298	\$89,100	23.96%	1,600	96.06%
Oklahoma OK	1081.06	Upper*	6,494	\$89,100	19.85%	2,585	93.23%
Oklahoma OK	1081.07	Upper*	3,416	\$89,100	16.57%	1,123	89.85%
Oklahoma OK	1081.09	Upper*	5,852	\$89,100	18.80%	2,105	89.83%
Oklahoma OK	1081.10	Upper*	4,343	\$89,100	24.08%	1,602	88.14%
Oklahoma OK	1081.13	Upper*	5,001	\$89,100	31.33%	1,930	53.63%
Oklahoma OK	1081.14	Upper*	4,837	\$89,100	30.49%	2,001	43.08%
Oklahoma OK	1082.01	Middle	3,763	\$89,100	27.88%	1,559	46.95%
Oklahoma OK	1082.03	Mod	3,247	\$89,100	38.10%	1,543	35.13%
Oklahoma OK	1082.04	Middle	2,916	\$89,100	52.71%	1,226	43.47%
Oklahoma OK	1082.07	Low	1,031	\$89,100	46.36%	514	1.36%
Oklahoma OK	1082.08	Mod	3,836	\$89,100	43.74%	1,970	22.03%
Oklahoma OK	1082.15	Middle	4,741	\$89,100	29.32%	2,309	84.54%
Oklahoma OK	1082.16	Middle	3,158	\$89,100	33.72%	1,270	52.83%
Oklahoma OK	1082.17	Middle	4,073	\$89,100	31.18%	1,672	64.83%
Oklahoma OK	1082.22	Upper*	1,899	\$89,100	17.17%	557	91.20%
Oklahoma OK	1082.23	Upper*	5,227	\$89,100	18.54%	1,776	93.69%
Oklahoma OK	1082.24	Upper*	3,500	\$89,100	21.97%	1,341	62.57%
Oklahoma OK	1082.25	Upper*	3,252	\$89,100	25.58%	1,239	80.06%
Oklahoma OK	1082.26	Middle	2,549	\$89,100	50.18%	851	44.42%
Oklahoma OK	1082.27	Upper*	2,272	\$89,100	33.76%	774	100.00%
Oklahoma OK	1082.28	Upper*	1,988	\$89,100	23.19%	581	76.59%
Oklahoma OK	1082.29	Upper*	3,417	\$89,100	30.44%	1,330	63.53%
Oklahoma OK	1082.30	Middle	2,478	\$89,100	40.76%	877	64.42%
Oklahoma OK	1082.31	Upper*	2,350	\$89,100	20.00%	589	88.62%
Oklahoma OK	1082.32	Upper*	3,228	\$89,100	17.81%	1,118	85.69%
Oklahoma OK	1082.33	Upper*	4,320	\$89,100	39.17%	1,636	73.59%

# 2024 FFIEC CENSUS REPORT

## Summary Census Demographic Information

### Oklahoma County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Oklahoma OK	1082.34	Upper*	5,086	\$89,100	32.01%	1,868	82.23%
Oklahoma OK	1082.35	Upper*	2,620	\$89,100	41.68%	919	87.38%
Oklahoma OK	1082.36	Middle	2,023	\$89,100	39.05%	898	51.45%
Oklahoma OK	1082.37	Upper*	3,156	\$89,100	38.12%	981	83.69%
Oklahoma OK	1082.38	Middle	2,176	\$89,100	37.36%	727	81.98%
Oklahoma OK	1083.01	Mod	2,162	\$89,100	72.34%	1,198	76.04%
Oklahoma OK	1083.02	Middle	5,293	\$89,100	40.36%	2,267	42.61%
Oklahoma OK	1083.04	Middle	4,894	\$89,100	26.95%	1,939	61.63%
Oklahoma OK	1083.07	Middle	4,811	\$89,100	59.51%	2,235	54.32%
Oklahoma OK	1083.09	Low	2,278	\$89,100	83.89%	960	48.02%
Oklahoma OK	1083.10	Mod	3,026	\$89,100	68.27%	1,721	25.57%
Oklahoma OK	1083.14	Mod	2,911	\$89,100	59.05%	1,893	13.84%
Oklahoma OK	1083.17	Upper*	3,910	\$89,100	36.06%	1,798	72.02%
Oklahoma OK	1083.18	Upper*	5,748	\$89,100	42.47%	2,109	76.01%
Oklahoma OK	1083.19	Middle	3,947	\$89,100	40.99%	1,944	22.38%
Oklahoma OK	1083.20	Middle	3,492	\$89,100	21.65%	1,127	47.38%
Oklahoma OK	1083.21	Mod	1,500	\$89,100	65.27%	712	5.62%
Oklahoma OK	1083.22	Mod	4,147	\$89,100	64.79%	2,725	10.17%
Oklahoma OK	1083.23	Upper*	4,272	\$89,100	46.21%	2,015	35.83%
Oklahoma OK	1083.24	Upper*	1,987	\$89,100	24.81%	747	76.31%
Oklahoma OK	1083.25	Upper*	5,623	\$89,100	45.53%	1,952	74.08%
Oklahoma OK	1083.26	Mod	3,149	\$89,100	42.58%	1,663	15.27%
Oklahoma OK	1084.02	Middle	1,373	\$89,100	21.78%	645	81.24%
Oklahoma OK	1084.03	Middle	1,946	\$89,100	28.21%	946	72.41%
Oklahoma OK	1084.04	Middle	3,430	\$89,100	33.79%	1,737	56.36%
Oklahoma OK	1085.06	Middle	3,333	\$89,100	27.69%	1,712	61.33%
Oklahoma OK	1085.07	Upper*	1,227	\$89,100	20.70%	646	70.43%
Oklahoma OK	1085.08	Middle	1,817	\$89,100	40.84%	742	65.63%
Oklahoma OK	1085.13	Upper*	3,699	\$89,100	40.55%	1,536	71.42%
Oklahoma OK	1085.14	Middle	4,972	\$89,100	52.47%	2,029	43.57%
Oklahoma OK	1085.15	Middle	5,029	\$89,100	33.35%	2,291	42.30%
Oklahoma OK	1085.20	Upper*	2,048	\$89,100	23.54%	889	67.49%
Oklahoma OK	1085.21	Middle	1,408	\$89,100	61.08%	683	31.77%
Oklahoma OK	1085.23	Upper*	6,118	\$89,100	45.05%	2,424	71.86%
Oklahoma OK	1085.24	Middle	5,056	\$89,100	38.03%	1,921	92.97%
Oklahoma OK	1085.25	Middle	2,135	\$89,100	46.89%	774	71.19%
Oklahoma OK	1085.26	Middle	4,986	\$89,100	49.42%	1,996	51.60%
Oklahoma OK	1085.27	Middle	5,716	\$89,100	41.95%	2,775	44.07%
Oklahoma OK	1085.28	Upper*	2,285	\$89,100	40.88%	999	62.66%
Oklahoma OK	1085.29	Upper*	2,781	\$89,100	27.58%	921	94.57%
Oklahoma OK	1085.30	Upper*	3,963	\$89,100	44.11%	1,703	49.74%
Oklahoma OK	1085.31	Upper*	5,237	\$89,100	29.94%	1,575	85.71%
Oklahoma OK	1085.32	Upper*	1,493	\$89,100	21.97%	549	95.63%
Oklahoma OK	1085.33	Upper*	1,676	\$89,100	21.66%	602	88.87%

# 2024 FFIEC CENSUS REPORT

## Summary Census Demographic Information

### Oklahoma County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Oklahoma OK	1085.34	Upper*	5,155	\$89,100	38.00%	1,895	44.85%
Oklahoma OK	1085.35	Upper*	11,132	\$89,100	34.11%	3,148	84.82%
Oklahoma OK	1085.36	Upper*	4,907	\$89,100	32.79%	2,390	65.15%
Oklahoma OK	1085.37	Upper*	3,412	\$89,100	25.73%	1,902	54.99%
Oklahoma OK	1085.38	Upper*	2,656	\$89,100	35.32%	1,519	52.21%
Oklahoma OK	1086.03	Upper*	5,155	\$89,100	40.04%	1,681	68.59%
Oklahoma OK	1086.04	Middle	4,966	\$89,100	47.54%	2,276	67.88%
Oklahoma OK	1087.01	Upper*	2,625	\$89,100	29.83%	862	85.50%
Oklahoma OK	1087.06	Middle	2,894	\$89,100	32.14%	1,081	78.26%
Oklahoma OK	1087.07	Middle	4,377	\$89,100	36.99%	1,635	79.33%
Oklahoma OK	1087.08	Middle	4,431	\$89,100	22.43%	1,785	80.06%
Oklahoma OK	1087.09	Upper*	3,510	\$89,100	21.68%	1,486	87.21%
Oklahoma OK	1087.10	Upper*	3,925	\$89,100	30.47%	1,352	81.95%
Oklahoma OK	1087.11	Upper*	3,275	\$89,100	21.01%	1,118	86.76%
Oklahoma OK	1087.12	Upper*	2,388	\$89,100	28.64%	734	94.14%
Oklahoma OK	1087.13	Upper*	3,882	\$89,100	24.86%	1,237	80.11%
Oklahoma OK	1088.02	Middle	5,208	\$89,100	25.90%	2,232	82.30%
Oklahoma OK	1088.03	Low	940	\$89,100	93.19%	479	69.52%
Oklahoma OK	1088.04	Middle	2,981	\$89,100	41.80%	1,136	76.32%
Oklahoma OK	1088.05	Mod	3,590	\$89,100	36.41%	1,646	62.70%
Oklahoma OK	1088.06	Upper*	1,787	\$89,100	27.31%	562	81.49%
Oklahoma OK	1088.07	Upper*	1,414	\$89,100	33.24%	484	87.19%
Oklahoma OK	1089.00	Mod	3,712	\$89,100	34.86%	1,587	57.66%
Oklahoma OK	1090.01	Middle	2,138	\$89,100	26.99%	748	84.36%
Oklahoma OK	1090.03	Middle	4,696	\$89,100	22.76%	2,095	63.15%
Oklahoma OK	1090.04	Upper*	3,642	\$89,100	24.41%	1,549	80.50%
Oklahoma OK	1092.02	Middle	2,908	\$89,100	25.72%	1,281	83.14%
Oklahoma OK	1092.03	Upper*	4,017	\$89,100	22.45%	1,210	84.21%
Oklahoma OK	1092.04	Upper*	2,440	\$89,100	17.87%	735	97.28%
Oklahoma OK	1092.05	Upper*	2,713	\$89,100	24.77%	1,219	95.49%
Oklahoma OK	1093.00	Middle	2,047	\$89,100	32.39%	1,307	44.38%
Oklahoma OK	1094.00	Upper*	1,775	\$89,100	26.65%	857	49.24%
Oklahoma OK	1095.00	Low	3,337	\$89,100	87.50%	1,923	29.12%
Oklahoma OK	1096.00	N/A	793	\$89,100	40.61%	297	1.35%
Oklahoma OK	1097.00	Upper*	2,418	\$89,100	45.08%	1,392	17.89%
Oklahoma OK	1098.00	Mod	686	\$89,100	70.55%	165	37.58%
Oklahoma OK	1099.00	Middle	1,564	\$89,100	46.23%	340	14.41%
Oklahoma OK	1100.00	Low	1,552	\$89,100	67.33%	706	28.33%

# 2024 FFIEC CENSUS REPORT

## Summary Census Demographic Information

### Oklahoma County, Greer County, Kiowa County, Washita County

County	Census Tract	Tract Income	Total Population	Median Family Income	Minority Percent	Total Housing Units	Owner Occupancy
Oklahoma OK	9800.01	N/A	61	\$89,100	55.74%	0	10.98%
Oklahoma OK	9800.02	N/A	0	\$89,100	0.00%	0	
Oklahoma OK	9800.03	N/A	42	\$89,100	80.95%	0	
Oklahoma OK	9800.04	N/A	14	\$89,100	35.71%	0	
Oklahoma OK	9800.05	N/A	1	\$89,100	100.00%	0	
Oklahoma OK	9800.06	N/A	44	\$89,100	43.18%	0	
Oklahoma OK	9800.07	Upper*	192	\$89,100	30.73%	173	
Oklahoma OK	9800.08	N/A	6	\$89,100	33.33%	0	
Oklahoma OK	9800.09	N/A	58	\$89,100	67.24%	0	
Greer OK	9671.00	Middle	2,119	\$69,000	28.79%	991	57.01%
Greer OK	9672.00	Middle	3,372	\$69,000	26.25%	1,706	54.34%
Kiowa OK	9636.00	Middle	1,402	\$69,000	28.89%	861	52.26%
Kiowa OK	9637.00	Middle	3,828	\$69,000	32.52%	2,152	46.61%
Kiowa OK	9642.00	Middle	3,279	\$69,000	21.65%	2,109	52.30%
Washita OK	9649.00	Middle	3,776	\$69,000	20.82%	1,896	51.69%
Washita OK	9650.00	Upper*	1,989	\$69,000	21.77%	1,149	65.71%
Washita OK	9651.00	Middle	3,409	\$69,000	15.58%	1,621	51.14%
Washita OK	9654.00	Middle	1,750	\$69,000	20.34%	746	68.50%



## **PUBLIC DISCLOSURE**

November 18, 2024

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

Sovereign Bank  
RSSD# 396253

130 East MacArthur  
Shawnee, Oklahoma 74804

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

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

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## **INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING**

This institution is rated: ***Satisfactory.***  
The Lending Test is rated: ***Satisfactory.***  
The Community Development Test is rated: ***Outstanding.***

Sovereign Bank (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria under the lending and community development tests:

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

## **SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. In addition, available aggregate data for the most recent three years (2020, 2021, and 2022) was referenced for additional perspective to gauge credit demand within the bank's AAs. Performance was assessed within the bank's four AAs. The Oklahoma City Metropolitan and Central Oklahoma AAs were assessed using a full-scope review. The Lawton Metropolitan and Southwest Oklahoma AAs were assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 22-quarter average NLTD ratio;
- A statistical sample of 123 small business loans from a universe of 312 loans originated January 1, 2023, through December 31, 2023;
- The universe of 444 home mortgage loans reported on the bank's 2023 Home Mortgage Disclosure Act (HMDA) Loan/Application Register (LAR); and

- CD loans, qualified investments, and CD services from August 15, 2019, through June 20, 2024.

For this evaluation, more weight was placed on the bank's performance within the Oklahoma City Metropolitan AA when determining the overall institution rating given the bank's loan and deposit volumes and deposit market share within that AA. In terms of products, more weight was placed on commercial loans in the analysis due to the bank's strategic focus on commercial lending.

## DESCRIPTION OF INSTITUTION

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

- Sovereign Bank is the result of a rebranding of the former First National Bank and Trust Company (FNB), Shawnee, Oklahoma following a merger with The First State Bank, Oklahoma City, Oklahoma on July 17, 2021.
- The bank is a wholly owned subsidiary of Sovereign Bancorp, Inc., which is owned by the Citizen Potawatomi Nation (CPN), Shawnee, Oklahoma.
- The bank has total assets of \$1.1 billion as of June 30, 2024.
- The bank operates 10 full-service branch offices, all located in Oklahoma. In addition to the headquarters in Shawnee, the bank also has two offices in Lawton, and one office location each in Oklahoma City, Midwest City, Mangum, Holdenville, Granite, Canute, and Edmond.
- All branch offices have an automated teller machine (ATM) except the Edmond location, and the Oklahoma City branch office has two ATMs.
- As shown in the table below, the bank's primary business focus is commercial and residential real estate lending.

**Table 1**

Composition of Loan Portfolio as of June 30, 2024		
Loan Type	\$(000)	%
Construction and Land Development	141,564	16.4
Farmland	24,422	2.8
1- to 4-Family Residential Real Estate	154,625	17.9
Multifamily Residential Real Estate	21,560	2.5
Nonfarm Nonresidential Real Estate	348,357	40.3
Agricultural	4,370	0.5
Commercial and Industrial	152,463	17.7
Consumer	4,346	0.5
Other	11,947	1.4
<b>Gross Loans</b>	<b>863,654</b>	<b>100.0</b>
Note: Percentages may not total 100.0 percent due to rounding.		

The bank was rated Satisfactory under the CRA at its August 14, 2019, performance evaluation conducted by the Office of the Comptroller of the Currency (OCC). There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

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

### **LENDING TEST**

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in the Oklahoma City Metropolitan and Central Oklahoma AAs (full-scope review); and a brief discussion of performance in the Lawton Metropolitan and Southwest Oklahoma AAs (limited-scope review).

The bank's overall lending test performance is Satisfactory. This conclusion was based on a reasonable NLTD ratio, a majority of loans originated within the bank's AAs, and a reasonable geographic and borrower distribution of lending. More consideration was given to the volume of loan originations than the dollar amount, as this represents the number of individuals or entities served.

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

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and performance compared to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and the area where they are located. The bank's NLTD ratio is reasonable. The bank's NLTD ratio is below the ratios of similarly situated financial institutions. However, the bank's NLTD ratio was significantly impacted by the merger in 2021. During the 12 quarters subsequent to the merger, the bank's NLTD ratio averaged 89.6 percent which is in line with the similarly situated institutions.

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<sup>1</sup> The net loan-to-deposit ratio and percentage of loans and other lending-related activity in the assessment area only apply to the institution overall. No discussion of these performance criteria applies to sections of the performance evaluation related to assessment areas.

**Table 2**

Comparative NLTD Ratios March 31, 2019 – June 30, 2024			
Institution	Location	Asset Size \$(000)	NLTD Ratio (%)
			22 Quarter Average
<b>Sovereign Bank</b>	Shawnee, OK	1,098,902	72.6
<b>Similarly Situated Institutions</b>			
Liberty National Bank	Lawton, OK	1,247,819	73.5
First Oklahoma Bank	Jenks, OK	1,099,215	94.1
Regent Bank	Tulsa, OK	1,619,859	98.3
Firststar Bank	Sallisaw, OK	1,166,564	89.2
Great Plains National Bank	Elk City, OK	1,696,152	92.5

### Assessment Area Concentration

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

**Table 3**

Lending Inside and Outside the Assessment Area								
Loan Type	Inside				Outside			
	#	#%	\$(000)	\$%	#	#%	\$(000)	\$%
Home Improvement	10	71.4	499	74.9	4	28.6	167	25.1
Home Purchase - Conventional	199	79.6	52,920	73.7	51	20.4	18,839	26.3
Home Purchase - FHA	57	85.1	12,166	82.8	10	14.9	2,524	17.2
Home Purchase - VA	36	87.8	12,966	91.0	5	12.2	1,290	9.0
Multifamily Housing	10	90.9	8,171	28.0	1	9.1	21,000	72.0
Other Purpose Closed-End	2	100.0	162	100.0	0	0.0	0	0.0
Refinancing	53	89.8	12,071	89.6	6	10.2	1,395	10.4
<b>Total HMDA related</b>	<b>367</b>	<b>82.7</b>	<b>98,955</b>	<b>68.6</b>	<b>77</b>	<b>17.3</b>	<b>45,215</b>	<b>31.4</b>
Small Business	97	78.9	17,995	75.9	26	21.1	5,702	24.1
<b>TOTAL LOANS</b>	<b>464</b>	<b>81.8</b>	<b>116,950</b>	<b>69.7</b>	<b>103</b>	<b>18.2</b>	<b>50,917</b>	<b>30.3</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

### Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs. Performance in the Oklahoma City Metropolitan and Central Oklahoma AAs were both rated reasonable.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has an overall reasonable distribution among individuals of different income levels and businesses of different sizes. Performance in the Oklahoma City Metropolitan and Central Oklahoma AAs was consistent with the overall rating.

## **COMMUNITY DEVELOPMENT TEST**

The CD test evaluates the bank's responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of such opportunities in the bank's AAs.

The bank's overall CD test performance is Outstanding and demonstrates excellent responsiveness to area CD needs. The bank's CD activity reflected excellent responsiveness in the Oklahoma City Metropolitan AA and adequate responsiveness in the Central Oklahoma AA. It is noted that the Southwest Oklahoma AA, which received a limited-scope analysis, had a significant volume of CD activities when considering the volume of loan and deposit concentration in the AA relative to other bank markets. The performance in this AA had a positive influence on the overall CD test conclusion.

**Table 4**

Community Development Activity - All									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	6	8,212	0	0	0	0	0	0	0
Community Services	3	2,675	1	160	7	165	8	325	33
Economic Development	5	7,926	0	0	2	501	2	501	3
Revitalization and Stabilization	3	29,399	3	4,810	1	100	4	4,910	3
Outside Activities	0	0	0	0	0	0	0	0	0
Totals	17	48,212	4	4,971	10	766	14	5,737	39

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

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

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

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

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

- This AA includes three of seven counties that comprise the Oklahoma City, Oklahoma MSA. This assessment area was added in 2021 with the acquisition of First State Bank.
- The composition of the AA consists of a total of 374 census tracts, including 29 low-, 97 moderate-, 123 middle-, 106 upper-, and 19 unknown-income tracts based on 2016-2020 American Community Survey (ACS) data.
- The bank operates three branches in the AA located in the cities of Oklahoma City, Midwest City, and Edmond. The Edmond branch was a de novo branch that opened on September 3, 2024, and previously operated as a Loan Production Office (LPO).
- The Oklahoma City branch has two ATMs, and the Midwest City branch has one ATM. Currently, the Edmond branch does not have an ATM.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 0.7 percent market share of deposits, ranking 27<sup>th</sup> of 67 FDIC-insured financial institutions operating from 337 offices in the AA.
- An interview of one community member conducted as part of the CRA evaluation of another financial institution with offices in the AA was reviewed to ascertain the credit needs of the area, responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The community member represents a housing authority organization with an office in the AA.

**Table 5**

<b>Population Change</b>			
<b>Assessment Area: Oklahoma City Metropolitan</b>			
<b>Area</b>	<b>2015 Population</b>	<b>2020 Population</b>	<b>Percent Change</b>
Oklahoma City Metropolitan	1,149,287	1,246,225	8.4
Canadian County, OK	126,193	154,405	22.4
Cleveland County, OK	268,614	295,528	10.0
Oklahoma County, OK	754,480	796,292	5.5
Oklahoma City, OK MSA	1,318,408	1,425,695	8.1
Oklahoma	3,849,733	3,959,353	2.8
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- The AA's 2020 population accounts for 87.4 percent of the Oklahoma City MSA and 31.5 percent of the Oklahoma statewide population.
- Population growth in the AA aligns with growth in the Oklahoma City MSA and is significantly greater than the population increase in the state of Oklahoma.
- Canadian County, the least populous county in the AA, had the highest growth rate and contains 12.4 percent of the total AA population.

**Table 6**

<b>Median Family Income Change</b>			
<b>Assessment Area: Oklahoma City Metropolitan</b>			
<b>Area</b>	<b>2015 Median Family Income</b>	<b>2020 Median Family Income</b>	<b>Percent Change</b>
Oklahoma City Metropolitan	69,959	74,922	7.1
Canadian County, OK	79,529	85,700	7.8
Cleveland County, OK	76,689	80,924	5.5
Oklahoma County, OK	65,933	70,629	7.1
Oklahoma City, OK MSA	69,988	75,170	7.4
Oklahoma	63,401	67,511	6.5
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- Based on 2020 ACS data, the portion of AA families living below the poverty level, at 9.8 percent, was slightly above the Oklahoma City MSA figure of 9.5 percent and below to the state of Oklahoma figure of 11.3 percent. The portion of AA families living below the poverty level ranged from 4.9 percent in Canadian County to 11.7 percent in Oklahoma County.

**Table 7**

Housing Cost Burden Assessment Area: Oklahoma City Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Oklahoma City Metropolitan	75.9	31.2	40.2	54.5	27.0	15.6
Canadian County, OK	73.3	30.8	32.6	50.7	32.7	13.4
Cleveland County, OK	76.6	35.1	39.4	61.3	31.5	14.8
Oklahoma County, OK	75.9	29.9	41.1	53.2	24.7	16.3
Oklahoma City, OK MSA	75.0	30.2	39.9	52.0	26.4	15.3
Oklahoma	71.3	30.7	37.7	50.0	24.0	15.2
Cost Burden is housing cost that equals 30 percent or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy						

- The housing affordability ratio<sup>2</sup> in the AA was in alignment with the state of Oklahoma, at 36.7 percent and 37.8 percent, respectively. Housing affordability ratios varied among the four AA counties, ranging from a high of 43.1 percent in Canadian County to a low of 35.3 percent in Oklahoma County.
- Rent prices are generally higher in the AA with 40.2 percent of renters paying rent greater than 30.0 percent of their income. This is above the Oklahoma statewide figure of 37.7 percent.
- The community contact considered the lack of affordable housing, worsening interest rates, and lack of housing for the homeless population to be the most pressing concerns.

**Table 8**

Unemployment Rates Assessment Area: Oklahoma City Metropolitan					
Area	2018	2019	2020	2021	2022
Oklahoma City Metropolitan	3.0	2.9	6.3	3.9	2.8
Canadian County, OK	2.7	2.7	6.0	3.4	2.5
Cleveland County, OK	2.8	2.7	5.7	3.4	2.5
Oklahoma County, OK	3.2	3.0	6.6	4.2	2.9
Oklahoma City, OK MSA	3.0	2.9	6.2	3.9	2.8
Oklahoma	3.3	3.1	6.3	4.0	3.0
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- As noted in Table 8, unemployment rates have recovered from the upsurge in 2020 that resulted from the Coronavirus Disease 2019 pandemic.
- Despite a wide geographic area with counties of varying populations, the unemployment rate showed little variance across the AA counties.

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

- The community contact stated the driving forces in the community included local government. The major employers in the area are the University of Oklahoma (18,000) and Oklahoma Postal Training Center (100) which is operated by the University of Oklahoma.

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

### **LENDING TEST**

The bank's performance in the Oklahoma City Metropolitan AA is reasonable. Overall, the bank's geographic distribution of loans is reasonable, and the borrower distribution of loans among individuals of different income levels and business of different sizes is reasonable. The review in this AA consisted of an evaluation of 284 home mortgage loans and 59 small business loans.

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. The geographic distribution of home mortgage lending is reasonable, and the distribution of small business lending is reasonable.

#### Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The distribution of home mortgage loans among low-income census tracts was comparable to aggregate lending data by number and dollar volume, and comparable to the demographic figure, which represents the percentage of owner-occupied housing units in each census tract income level. Lending in moderate-income census tracts was also comparable to aggregate and the demographic figure. An evaluation of the dispersion of home mortgage loans identified gaps and lapses that included LMI census tracts, but this did not impact the conclusion. Further evaluation revealed concentrations of lending in and around areas where the bank's branches are located, with gaps noted in areas further away from the branches. The bank's HMDA origination volume within the AA is too low to conduct a meaningful analysis for home improvement and multifamily loan product categories; thus, analysis focused primarily on home purchase and home refinance lending.

#### Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. The bank's home purchase lending in the AA's low-income census tracts was comparable to aggregate lending data, by number and dollar volume, and comparable to the demographic figure.

Lending in moderate-income census tracts was also comparable to the aggregate and demographic figures. Dispersion was noted but it did not impact the conclusion.

Home Refinance Lending

The geographic distribution of home refinance lending is reasonable. The bank's home refinance lending in the AA's low-income census tracts was comparable to aggregate lending data, by number and dollar volume, and comparable to the demographic figure. Lending in moderate-income census tracts was also comparable to the aggregate and demographic figures. As noted above, lending gaps were noted that included LMI census tracts, but this did not impact the conclusion.

**Table 9**

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Oklahoma City Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	5	2.2	3.9	854	1.2	2.5	3.9
Moderate	40	17.4	16.7	9,085	13.2	11.5	19.0
Middle	74	32.2	34.2	16,598	24.2	29.9	37.5
Upper	109	47.4	44.5	41,625	60.7	55.5	38.5
Unknown	2	0.9	0.7	418	0.6	0.6	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	230	100.0	100.0	68,580	100.0	100.0	100.0
Refinance Loans							
Low	1	2.3	3.6	91	0.8	2.0	3.9
Moderate	10	22.7	19.1	2,129	18.6	13.3	19.0
Middle	12	27.3	37.1	2,247	19.6	31.7	37.5
Upper	21	47.7	39.6	6,998	61.0	52.5	38.5
Unknown	0	0.0	0.6	0	0.0	0.5	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	44	100.0	100.0	11,465	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.5	0	0.0	3.4	3.9
Moderate	1	20.0	14.6	61	27.0	10.3	19.0
Middle	3	60.0	36.5	84	37.2	32.2	37.5
Upper	1	20.0	44.5	81	35.8	53.3	38.5
Unknown	0	0.0	1.0	0	0.0	0.8	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	226	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	1	20.0	8.4	2,529	61.0	6.6	
Moderate	2	40.0	36.5	455	11.0	37.9	35.3
Middle	1	20.0	30.5	464	11.2	26.6	36.6
Upper	1	20.0	24.0	700	16.9	26.9	17.5
Unknown	0	0.0	0.6	0	0.0	2.0	3.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	4,148	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	7	2.5	3.7	3,474	4.1	2.7	
Moderate	53	18.7	16.7	11,730	13.9	13.3	19.0
Middle	90	31.7	35.0	19,393	23.0	29.9	37.5
Upper	132	46.5	43.9	49,404	58.5	53.4	38.5
Unknown	2	0.7	0.7	418	0.5	0.6	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	284	100.0	100.0	84,419	100.0	100.0	100.0
Source: 2023 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

### Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of loans among low-income census tracts was comparable to the percent of AA businesses operating in these tracts (demographic figure), while the distribution of loans among moderate-income census tracts was below the demographic figure. However, a review of the bank's market share at 0.7 percent with the top 26 competing financial institution having approximately 229 branches makes the market a competitive lending market.

The dispersion of small business loans throughout the AA revealed no conspicuous gaps or lapses in lending.

**Table 10**

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Oklahoma City Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
<b>Low</b>	2	3.4	348	2.7	5.0
<b>Moderate</b>	8	13.6	2,503	19.4	22.3
<b>Middle</b>	21	35.6	4,074	31.6	33.3
<b>Upper</b>	28	47.5	5,951	46.2	36.3
<b>Unknown</b>	0	0.0	0	0.0	3.2
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	59	100.0	12,876	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

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

The bank's lending has a reasonable distribution among individuals of different income levels and businesses of different sizes. The borrower distribution of home mortgage lending is reasonable, and the borrower distribution for small business lending is reasonable.

### Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of home mortgage lending to low-income borrowers was comparable to aggregate lending data, but below demographic figure, which represents the percent of families by family income level. Lending to moderate-income borrowers was comparable to the aggregate and demographic figures.

Home Purchase Lending

The borrower distribution of home purchase lending is reasonable. The bank's lending to low-income borrowers was comparable to aggregate lending data, by number and dollar volume, and below the demographic figure. Lending to moderate-income borrowers was comparable to the aggregate and demographic figures.

Home Refinance Lending

The borrower distribution of home refinance lending is poor. The bank's lending to low-income borrowers was comparable to aggregate lending data by number volume but below dollar volume, and below the demographic figure. Lending to moderate-income borrowers was below aggregate lending data by number and dollar volume, and below the demographic figure.

**Table 11**

Distribution of 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Oklahoma City Metropolitan							
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		\$%
Home Purchase Loans							
Low	9	3.9	4.8	1,223	1.8	2.5	21.3
Moderate	38	16.5	16.4	6,825	10.0	11.6	17.7
Middle	50	21.7	18.6	11,772	17.2	16.9	20.3
Upper	102	44.3	30.5	38,669	56.4	41.1	40.7
Unknown	31	13.5	29.7	10,091	14.7	27.9	0.0
Total	230	100.0	100.0	68,580	100.0	100.0	100.0
Refinance Loans							
Low	3	6.8	6.9	176	1.5	3.6	21.3
Moderate	1	2.3	15.7	11	0.1	10.3	17.7
Middle	2	4.5	18.2	425	3.7	15.2	20.3
Upper	18	40.9	31.9	3,574	31.2	41.4	40.7
Unknown	20	45.5	27.3	7,279	63.5	29.5	0.0
Total	44	100.0	100.0	11,465	100.0	100.0	100.0
Home Improvement Loans							
Low	1	20.0	6.8	50	22.1	4.0	21.3
Moderate	0	0.0	17.8	0	0.0	11.9	17.7
Middle	0	0.0	21.0	0	0.0	16.4	20.3
Upper	1	20.0	46.8	81	35.8	55.9	40.7
Unknown	3	60.0	7.7	95	42.0	11.8	0.0
Total	5	100.0	100.0	226	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	13	4.7	5.3	1,449	1.8	2.7	21.3
Moderate	39	14.0	16.4	6,836	8.5	11.5	17.7
Middle	52	18.6	18.9	12,197	15.2	16.6	20.3
Upper	121	43.4	32.7	42,324	52.7	41.8	40.7
Unknown	54	19.4	26.8	17,465	21.8	27.4	0.0
Total	279	100.0	100.0	80,271	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Small Business Lending

The borrower distribution of small business lending is reasonable. The distribution of loans to businesses with annual revenues of \$1MM or less (small businesses) reflects performance below the demographic figure, which reflects the percentage of businesses in the AA by revenue size. A three-year analysis of aggregate small business lending data noted an average lending distribution to small business of 40.7 percent by number volume and 31.4 percent by dollar volume. While aggregate small business data is not a direct comparison as the bank is not a CRA reporter, aggregate lending volumes are reflective of a more limited demand than depicted by the demographic figure. In addition, 67.8 percent of the bank's lending was in amounts of \$250,000 or less, which demonstrates a willingness to meet the credit demands of smaller business operations.

**Table 12**

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Oklahoma City Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	32	54.2	6,582	51.1	91.1
Over \$1 Million	24	40.7	5,615	43.6	7.8
Revenue Unknown	3	5.1	678	5.3	1.1
Total	59	100.0	12,876	100.0	100.0
By Loan Size					
\$100,000 or Less	23	39.0	1,351	10.5	
\$100,001 - \$250,000	17	28.8	2,935	22.8	
\$250,001 - \$1 Million	19	32.2	8,589	66.7	
Total	59	100.0	12,876	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	12	37.5	792	12.0	
\$100,001 - \$250,000	10	31.3	1,907	29.0	
\$250,001 - \$1 Million	10	31.3	3,883	59.0	
Total	32	100.0	6,582	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

**COMMUNITY DEVELOPMENT TEST**

The bank's CD performance demonstrates excellent responsiveness.

- The bank originated nine community development loans totaling \$39.3 million (MM) supporting community service, economic development, affordable housing, and revitalization and stabilization of LMI tracts in the AA.
- \$4.3MM in investments went towards a plan for improving utilities infrastructure benefitting LMI areas.
- Bank officers served on the board of directors of two organizations which provide community services and economic development to LMI individuals and families.

**Table 13**

Community Development Activity Assessment Area: Oklahoma City Metropolitan									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	3	6,561	0	0	0	0	0	0	0
Community Services	2	2,279	0	0	2	15	2	15	19
Economic Development	3	1,926	0	0	0	0	0	0	3
Revitalization and Stabilization	1	28,500	2	4,310	0	0	2	4,310	0
Totals	9	39,265	2	4,310	2	15	4	4,325	22

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

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

The bank delineates the entirety of Comanche County as its Lawton Metropolitan AA (see Appendix A for an AA map and Appendix C for additional demographic data). The AA is comprised of a portion of the two-county Lawton, Oklahoma MSA, which is situated southwest of the greater Oklahoma City, Oklahoma MSA.

- The composition of the AA consisted of a total of 38 census tracts, including 3 low-, 10 moderate-, 15 middle-, 7 upper-, and 3 unknown-income tracts based on 2016-2020 ACS data.
- There were no changes to the AA delineation since the prior evaluation; however, the composition has changed. Previously, the AA consisted of 3 low-, 10 moderate-, 11 middle-, 7 upper-, and 1 unknown-income tract.
- The AA consisted of 6.6 percent of families in low-, 22.5 percent in moderate-, 43.5 percent in middle-, 26.1 in upper-, and 1.3 in unknown-percent income tracts.
- The bank operates two full services branches in the AA, including one branch in a moderate-income tract and the remaining branch in a middle-income tract. Each branch contains an ATM on its premises.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 1.0 percent market share of deposits, ranking 9<sup>th</sup> of 10 FDIC-insured financial institutions operating from 34 offices in the AA.

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

The institution's lending test performance in the AA is consistent with the overall institution's lending test performance, while community development performance in the AA is below the conclusion for the overall institution.

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

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

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

- The composition of the AA consists of a total of 34 census tracts, including 2 low-, 6 moderate-, 21 middle-, and 5 upper-income tracts based on 2016-2020 ACS data. The AA's composition has changed since the prior evaluation, at which time the AA consisted of 1 low-, 7 moderate-, 18 middle-, and 4 upper-income tracts.
- At the prior evaluation the AA contained a total of 30 tracts 1 low-, 7 moderate-, 18 middle-, and 4 upper-income tracts.
- The bank operates two branches in the AA located in the cities of Shawnee and Holdenville and each branch has one ATM.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 15.0 percent market share of deposits, ranking 3<sup>rd</sup> of 14 FDIC-insured financial institutions operating from 31 offices in the AA.
- One community member was interviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The community member is a member of an affordable housing department in the AA.

**Table 14**

Population Change Assessment Area: Central Oklahoma			
Area	2015 Population	2020 Population	Percent Change
Central Oklahoma	110,402	109,377	(0.9)
Hughes County, OK	13,785	13,367	(3.0)
Pottawatomie County, OK	71,136	72,454	1.9
Seminole County, OK	25,481	23,556	(7.6)
NonMSA Oklahoma	1,333,350	1,289,548	(3.3)
Oklahoma	3,849,733	3,959,353	2.8
Source: 2020 U.S. Census Bureau: Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey			

- Pottawatomie County, the most populous county in the AA, had the highest growth rate and contains 66.2 percent of the total AA population.
- The town of Shawnee, in Pottawatomie County where the bank is headquartered, had a population of 31,377.
- A community contact indicated that the population has been stagnant.
- According to 2020 US Census Bureau data, the AA's population of resident's accounts for 8.5 percent of the total nonmetropolitan population in the state of Oklahoma and 2.8 percent of the total statewide population.

**Table 15**

Median Family Income Change Assessment Area: Central Oklahoma			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Central Oklahoma	55,646	57,811	3.9
Hughes County, OK	52,104	47,059	(9.7)
Pottawatomie County, OK	58,196	63,813	9.7
Seminole County, OK	49,648	44,826	(9.7)
NonMSA Oklahoma	56,258	58,565	4.1
Oklahoma	63,401	67,511	6.5
Source: 2011-2015 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey			
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- The increase in median family income in the AA was below the statewide nonmetropolitan rate, and below the state of Oklahoma.
- Based on 2016-2020 ACS data, the portion of AA families living below the poverty level, at 14.2 percent, was slightly above the statewide nonmetropolitan figure of 13.5 percent and above the state of Oklahoma figure of 11.3 percent.
- The portion of AA families living below the poverty level ranged from 12.1 percent in Pottawatomie County to 19.9 percent in Seminole County.

**Table 16**

Housing Cost Burden Assessment Area: Central Oklahoma						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Central Oklahoma	59.6	21.9	31.9	43.1	20.3	14.8
Hughes County, OK	44.0	11.3	22.7	31.7	14.5	11.3
Pottawatomie County, OK	63.5	24.9	34.4	44.7	21.7	14.3
Seminole County, OK	55.8	18.4	29.2	44.5	19.2	17.9
NonMSA Oklahoma	65.0	27.9	34.8	46.6	21.0	14.8
Oklahoma	71.3	30.7	37.7	50.0	24.0	15.2
Cost Burden is housing cost that equals 30 percent or more of household income. Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy						

- As illustrated in Table 6 above, the percentage of renters considered cost burdened in the AA were slightly below the statewide nonmetropolitan rate while the percent of cost burdened owners mirrored the statewide nonmetropolitan rate.
- The median housing value for the AA is \$106,370 which is lower than the median statewide value of \$142,400.
- Rent prices are generally lower in the AA with 31.9 percent of renters paying rent greater than 30.0 percent of their income. This is lower than the Oklahoma statewide figure of 37.7 percent.

**Table 17**

Unemployment Rates Assessment Area: Central Oklahoma					
Area	2018	2019	2020	2021	2022
Central Oklahoma	3.8	3.8	6.7	4.4	3.6
Hughes County, OK	4.0	4.6	7.7	5.3	3.9
Pottawatomie County, OK	3.6	3.5	6.3	4.0	3.4
Seminole County, OK	4.6	4.6	7.6	5.3	4.2
NonMSA Oklahoma	3.5	3.4	6.1	4.0	3.2
Oklahoma	3.3	3.1	6.3	4.0	3.0
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- AA unemployment rates held steady from 2018 to 2019, before experiencing an increase in 2020 throughout the AA due to the pandemic. Unemployment rates returned to levels at or below pre-pandemic levels in 2021 and 2022.
- The AA unemployment rate is slightly higher than the statewide nonmetropolitan rate and the Oklahoma statewide rate.
- Major industries in the AA include, manufacturing, aviation and aerospace, and agriculture.

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

### **LENDING TEST**

The bank's performance in the Central Oklahoma AA is reasonable. Overall, the bank's geographic distribution of loans is reasonable, and the borrower distribution of loans is reasonable. The review in this AA consisted of an evaluation of 33 home mortgage loans and 24 small business loans.

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

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA. The geographic distribution of home mortgage lending is reasonable, and the distribution of small business lending is reasonable.

#### Home Mortgage Lending

The bank's HMDA origination volume within the AA is too low to conduct a meaningful analysis of the individual loan product categories; thus, the product categories were combined and analyzed at the total HMDA level.

The geographic distribution of home mortgage lending is reasonable. The distribution of home mortgage loans among low-income census tracts was comparable to aggregate lending data by number and dollar volume and comparable to the demographic figure. Lending in moderate-income census tracts was comparable to aggregate lending data by number volume, above aggregate by dollar volume, and below the demographic figure. An evaluation of the dispersion of home mortgage loans identified gaps and lapses that included LMI census tracts, but this did not impact the conclusion. Further evaluation revealed concentrations of lending in and around areas where the bank's branches are located, with gaps often noted in areas extending beyond where the bank could reasonably be expected to serve.

**Table 18**

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Central Oklahoma							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.2	0	0.0	1.5	2.3
Moderate	0	0.0	10.4	0	0.0	8.0	16.0
Middle	16	69.6	55.3	2,700	58.5	51.7	57.1
Upper	7	30.4	31.0	1,919	41.5	38.8	24.6
Unknown	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	4,619	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.0	0	0.0	1.9	2.3
Moderate	1	20.0	13.6	220	55.1	9.6	16.0
Middle	3	60.0	56.1	147	36.8	55.7	57.1
Upper	1	20.0	27.3	32	8.0	32.7	24.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	399	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.7	0	0.0	0.6	2.3
Moderate	0	0.0	16.4	0	0.0	15.0	16.0
Middle	2	100.0	53.7	188	100.0	49.8	57.1
Upper	0	0.0	29.1	0	0.0	34.7	24.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	188	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	35.3	0	0.0	15.9	19.0
Moderate	1	100.0	17.6	1,139	100.0	10.8	17.1
Middle	0	0.0	41.2	0	0.0	70.8	46.9
Upper	0	0.0	5.9	0	0.0	2.5	17.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	1,139	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	3.2	0	0.0	2.2	2.3
Moderate	3	9.1	11.7	1,495	23.0	8.7	16.0
Middle	21	63.6	54.9	3,035	46.6	53.3	57.1
Upper	9	27.3	30.2	1,977	30.4	35.8	24.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	33	100.0	100.0	6,507	100.0	100.0	100.0
Source: 2023 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

### Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of loans among low-income census tracts was below the percent of AA businesses operating in these tracts (demographic figure), while the distribution of loans among moderate-income census tracts was above the demographic figure. However, a review of the bank's market share at 15.0 percent with the top two competing financial institutions having approximately 14 branches makes the market a competitive lending market.

The dispersion of small business loans among the various geographic income levels revealed no conspicuous gaps or lapses in lending.

**Table 19**

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Central Oklahoma					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
Low	1	4.2	8	0.3	10.5
Moderate	8	33.3	1,559	66.5	16.2
Middle	12	50.0	472	20.1	52.5
Upper	3	12.5	308	13.1	20.8
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>24</b>	<b>100.0</b>	<b>2,346</b>	<b>100.0</b>	<b>100.0</b>
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

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

The bank's lending has a reasonable distribution among individuals of different income levels and businesses of different sizes. The borrower distribution of home mortgage lending was reasonable, while the borrower distribution for small business lending was excellent.

### Home Mortgage Lending

The bank's HMDA origination volume within the AA is too low to conduct a meaningful analysis of the individual loan product categories; thus, the product categories were combined and analyzed at the total HMDA level.

The borrower distribution of home mortgage lending is reasonable. The bank's lending to low-income borrowers was comparable to aggregate lending data by number but was below aggregate lending by dollar volume, and below the demographic figure. Lending to moderate-income borrowers was below aggregate lending data by number, comparable by dollar volume, and below the demographic figure. Further analysis revealed that the difference between below and comparable to aggregate by dollar and demographic was one loan.

**Table 20**

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Central Oklahoma							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	3.2	0	0.0	1.6	23.2
Moderate	2	8.7	14.1	341	7.4	9.1	16.7
Middle	9	39.1	22.8	1,446	31.3	19.7	19.8
Upper	9	39.1	34.1	2,424	52.5	45.8	40.2
Unknown	3	13.0	25.7	408	8.8	23.9	0.0
Total	23	100.0	100.0	4,619	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.3	0	0.0	2.1	23.2
Moderate	1	20.0	16.4	32	8.0	9.7	16.7
Middle	0	0.0	22.1	0	0.0	19.1	19.8
Upper	2	40.0	39.1	270	67.7	47.7	40.2
Unknown	2	40.0	19.1	97	24.3	21.4	0.0
Total	5	100.0	100.0	399	100.0	100.0	100.0
Home Improvement Loans							
Low	1	50.0	6.0	18	9.6	4.3	23.2
Moderate	0	0.0	9.7	0	0.0	5.9	16.7
Middle	1	50.0	29.1	170	90.4	33.5	19.8
Upper	0	0.0	45.5	0	0.0	45.5	40.2
Unknown	0	0.0	9.7	0	0.0	10.8	0.0
Total	2	100.0	100.0	188	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	3.1	3.6	18	0.3	1.8	23.2
Moderate	3	9.4	14.4	373	6.9	9.3	16.7
Middle	12	37.5	22.9	1,778	33.1	19.9	19.8
Upper	11	34.4	37.2	2,694	50.2	46.5	40.2
Unknown	5	15.6	21.9	505	9.4	22.6	0.0
Total	32	100.0	100.0	5,368	100.0	100.0	100.0
Source: 2023 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.							

Small Business Lending

The borrower distribution of small business lending is excellent. The distribution of loans originated to small businesses reflects performance comparable to the demographic figure. In addition, 91.7 percent loans were in amounts of \$250,000 or less, which demonstrates a willingness to meet the credit demands of smaller business operations. A three-year analysis of aggregate small business lending data noted an average lending distribution to small business of 46.6 percent by number volume and 41.3 percent by dollar volume. While aggregate small business data is not a direct comparison as the bank is not a CRA reporter, aggregate lending volumes are reflective of a more limited demand than depicted by the demographic figure which supports the bank's excellent rating.

**Table 21**

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Central Oklahoma					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	19	79.2	899	38.3	89.9
Over \$1 Million	1	4.2	81	3.5	7.8
Revenue Unknown	4	16.7	1,367	58.3	2.3
Total	24	100.0	2,346	100.0	100.0
By Loan Size					
\$100,000 or Less	20	83.3	716	30.5	
\$100,001 - \$250,000	2	8.3	368	15.7	
\$250,001 - \$1 Million	2	8.3	1,263	53.8	
Total	24	100.0	2,346	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	17	89.5	531	59.1	
\$100,001 - \$250,000	2	10.5	368	40.9	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	19	100.0	899	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

## COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates adequate responsiveness.

- The bank originated three community development loans totaling \$1.3MM where \$898,813 served part of Oklahoma's Disaster Declaration under FEMA serving several schools and helping with storm impacted buildings throughout the AA.
- Community development investments and donations totaled \$1.4MM, which included a \$500,000 donation for economic development benefiting under-served Native Americans.
- Bank officers and staff volunteered and served as board members of several organizations which provide community services and economic development to LMI individuals and families.

**Table 22**

Community Development Activity Assessment Area: Central Oklahoma									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	1	396	1	160	5	150	6	310	12
Economic Development	0	0	0	0	2	501	2	501	0
Revitalization and Stabilization	2	899	1	500	1	100	2	600	3
Totals	3	1,295	2	660	8	751	10	1,411	15

**SOUTHWEST OKLAHOMA ASSESSMENT AREA  
NONMETROPOLITAN AREA  
(Limited-Scope Review)**

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

The bank delineates the entireties of Greer, Jackson, Kiowa, and Washita Counties as its Southwest Oklahoma AA (see Appendix A for an AA map and Appendix C for additional demographic data).

- Since the prior evaluation, the bank expanded this AA as a result of acquisition activities to include the entirety of Washita County.
- The composition of the AA consists of a total of 17 census tracts, including 3 moderate-, 11 middle-, and 3 upper-income tracts based on 2016-2020 ACS data. This represents a change from the prior evaluation when the composition included 3 moderate-, 7 middle-, and 3 upper-income tracts.
- The AA consists of 16.5 percent moderate-, 60.6 percent middle-, and 22.9 percent upper-income families.
- The bank operates three branches in the rural communities of Mangum (Greer County), Granite (Greer County), and Canute (Washita County) with the Canute branch being obtained during the acquisition. Each of the branches operate with an ATM on the premises.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank held 3.8 percent market share of deposits, ranking 9<sup>th</sup> of 18 FDIC-insured financial institutions operating from 33 offices in the AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTHWEST OKLAHOMA AA**

The institution's lending and community development performance in this AA is consistent with the institution's overall performance conclusion.

APPENDIX A – MAP OF THE ASSESSMENT AREAS

Map A-1  
Oklahoma City Metropolitan AA

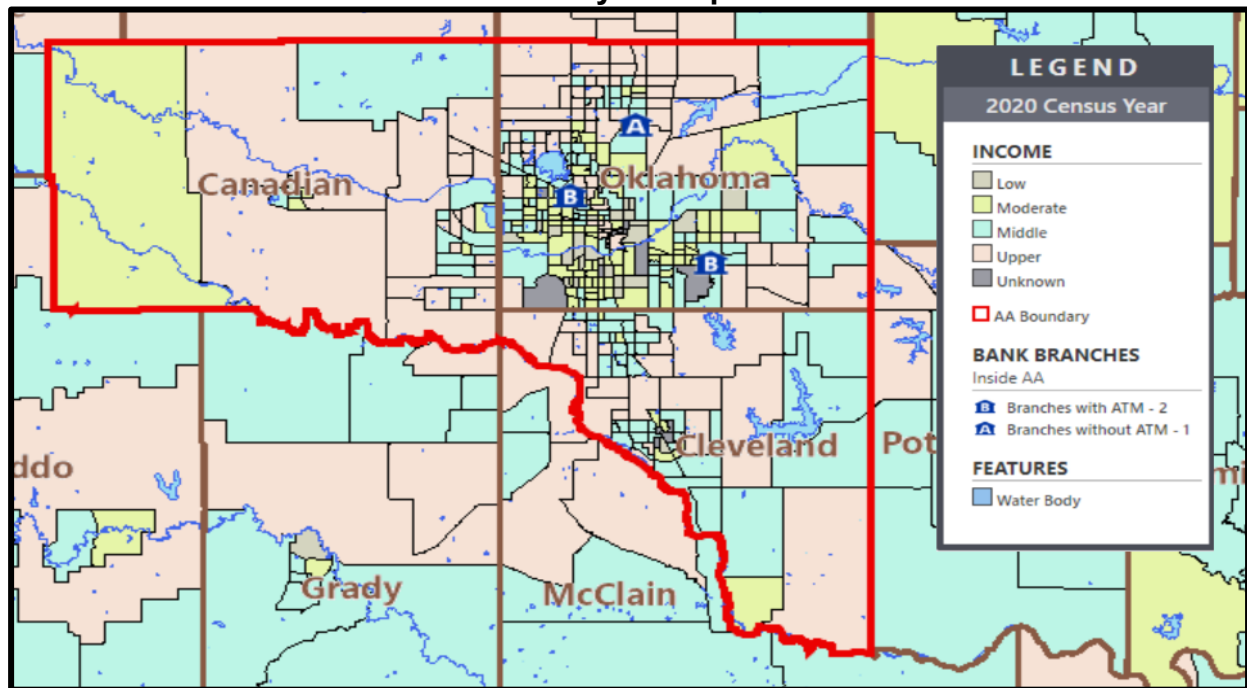
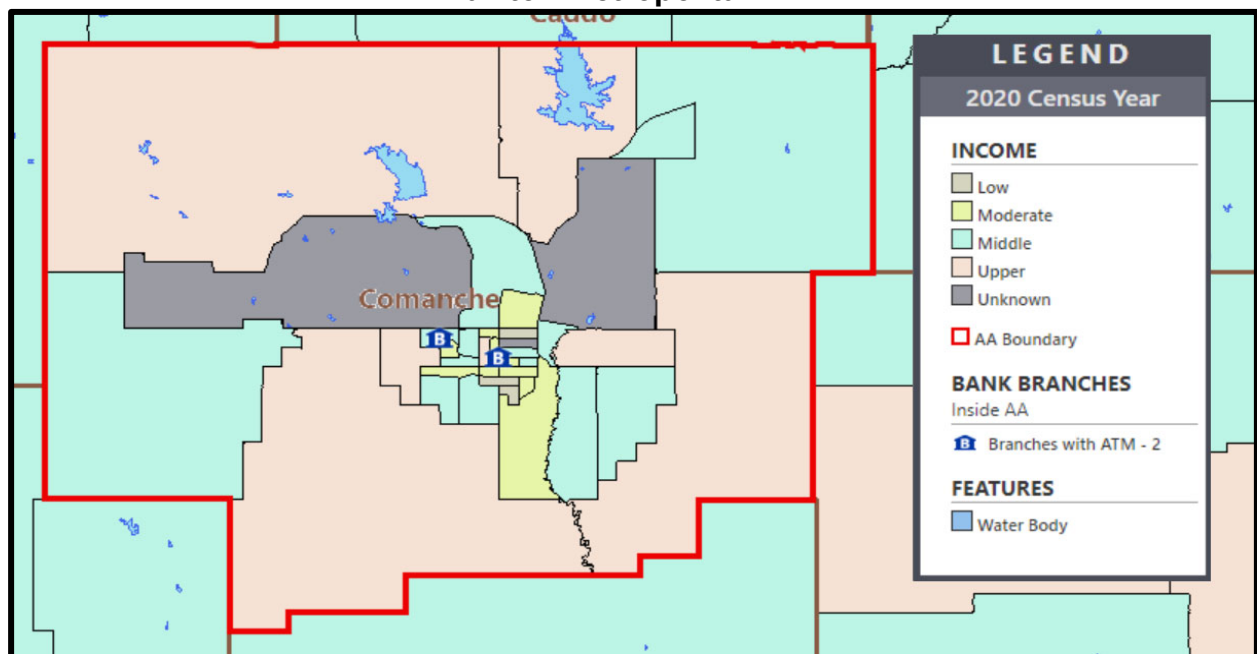
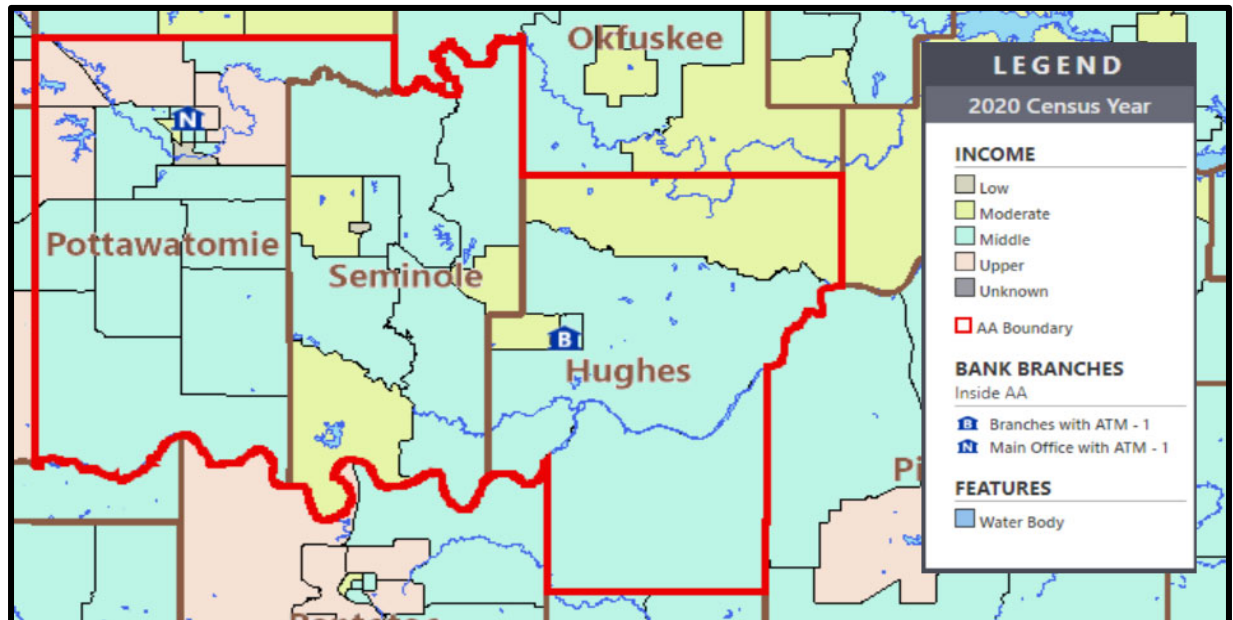


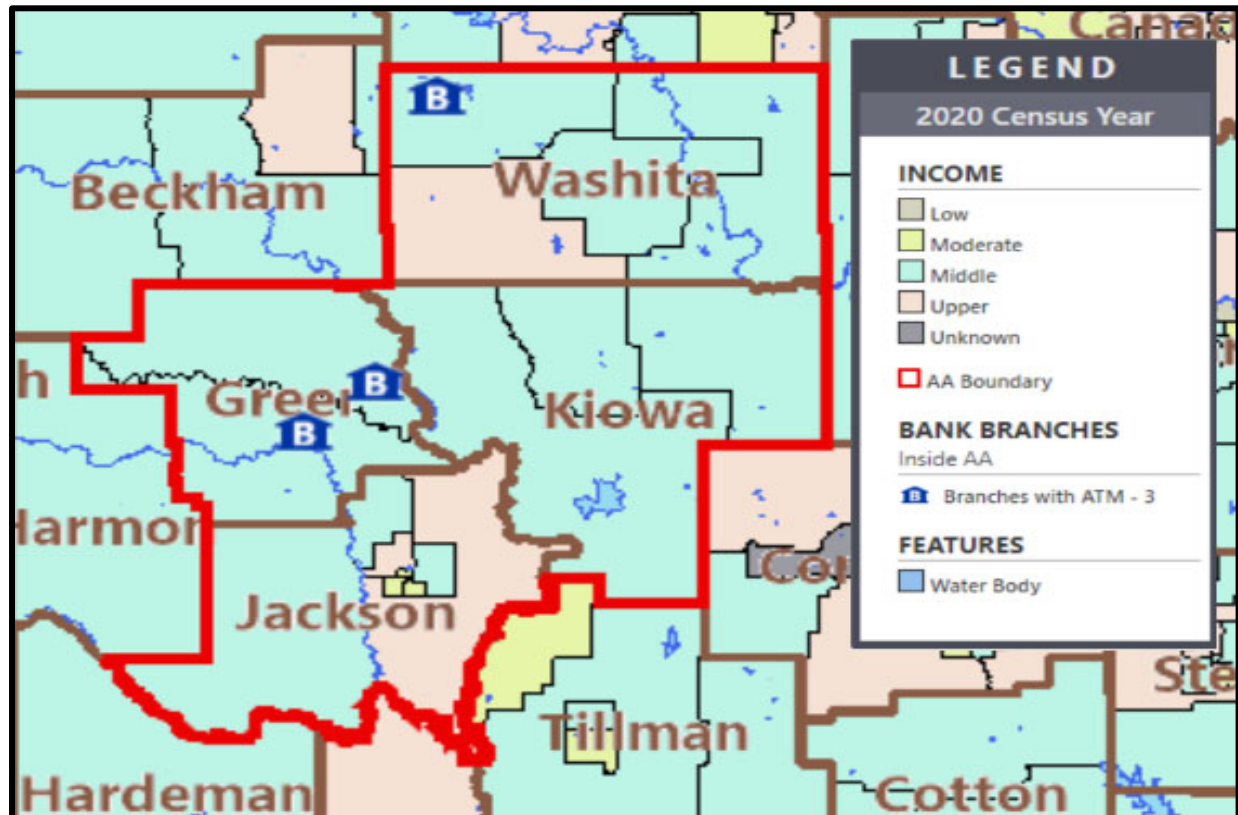
Table A-2  
Lawton Metropolitan AA



Map A-3  
Central Oklahoma AA



Map A-4  
Southwest Oklahoma AA



**APPENDIX B – DEMOGRAPHIC INFORMATION**

**Table B-1**

2023 Oklahoma City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	29	7.8	16,097	5.5	5,159	32.0	61,848	21.3
Moderate	97	25.9	63,679	21.9	10,492	16.5	51,509	17.7
Middle	123	32.9	105,875	36.4	7,988	7.5	59,150	20.3
Upper	106	28.3	101,244	34.8	3,310	3.3	118,168	40.7
Unknown	19	5.1	3,780	1.3	1,426	37.7	0	0.0
<b>Total AA</b>	<b>374</b>	<b>100.0</b>	<b>290,675</b>	<b>100.0</b>	<b>28,375</b>	<b>9.8</b>	<b>290,675</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	33,831	11,276	3.9	33.3	17,373	51.4	5,182	15.3
Moderate	130,701	54,451	19.0	41.7	59,851	45.8	16,399	12.5
Middle	186,075	107,241	37.5	57.6	63,490	34.1	15,344	8.2
Upper	147,772	110,177	38.5	74.6	28,733	19.4	8,862	6.0
Unknown	8,154	2,874	1.0	35.2	4,108	50.4	1,172	14.4
<b>Total AA</b>	<b>506,533</b>	<b>286,019</b>	<b>100.0</b>	<b>56.5</b>	<b>173,555</b>	<b>34.3</b>	<b>46,959</b>	<b>9.3</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,592	5.0	2,255	4.8	303	7.5	34	5.8
Moderate	11,532	22.3	10,324	21.9	1,077	26.6	131	22.4
Middle	17,233	33.3	15,804	33.5	1,275	31.5	154	26.3
Upper	18,815	36.3	17,353	36.8	1,216	30.1	246	42.0
Unknown	1,647	3.2	1,453	3.1	173	4.3	21	3.6
<b>Total AA</b>	<b>51,819</b>	<b>100.0</b>	<b>47,189</b>	<b>100.0</b>	<b>4,044</b>	<b>100.0</b>	<b>586</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>91.1</b>		<b>7.8</b>		<b>1.1</b>
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	19	2.9	16	2.5	3	20.0	0	0.0
Moderate	97	15.0	93	14.7	3	20.0	1	100.0
Middle	196	30.2	195	30.9	1	6.7	0	0.0
Upper	331	51.1	323	51.1	8	53.3	0	0.0
Unknown	5	0.8	5	0.8	0	0.0	0	0.0
<b>Total AA</b>	<b>648</b>	<b>100.0</b>	<b>632</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>97.5</b>		<b>2.3</b>		<b>0.2</b>
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-2**

2023 Central Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	2	5.9	1,110	4.0	460	41.4	6,387	23.2
Moderate	6	17.6	4,685	17.0	1,129	24.1	4,609	16.7
Middle	21	61.8	15,496	56.3	1,889	12.2	5,456	19.8
Upper	5	14.7	6,240	22.7	439	7.0	11,079	40.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>34</b>	<b>100.0</b>	<b>27,531</b>	<b>100.0</b>	<b>3,917</b>	<b>14.2</b>	<b>27,531</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	2,503	635	2.3	25.4	1,457	58.2	411	16.4
Moderate	9,554	4,473	16.0	46.8	2,821	29.5	2,260	23.7
Middle	26,764	15,919	57.1	59.5	6,007	22.4	4,838	18.1
Upper	9,028	6,870	24.6	76.1	1,347	14.9	811	9.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>47,849</b>	<b>27,897</b>	<b>100.0</b>	<b>58.3</b>	<b>11,632</b>	<b>24.3</b>	<b>8,320</b>	<b>17.4</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	339	10.5	303	10.5	28	11.2	8	10.7
Moderate	521	16.2	437	15.1	66	26.4	18	24.0
Middle	1,690	52.5	1,535	53.1	115	46.0	40	53.3
Upper	668	20.8	618	21.4	41	16.4	9	12.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,218</b>	<b>100.0</b>	<b>2,893</b>	<b>100.0</b>	<b>250</b>	<b>100.0</b>	<b>75</b>	<b>100.0</b>
Percentage of Total Businesses:				89.9		7.8		2.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1	0.6	1	0.6	0	0.0	0	0.0
Moderate	18	10.1	18	10.1	0	0.0	0	0.0
Middle	133	74.7	133	74.7	0	0.0	0	0.0
Upper	26	14.6	26	14.6	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>178</b>	<b>100.0</b>	<b>178</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				100.0		0.0		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**APPENDIX C – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES**

**Lawton Metropolitan AA**

**Table C-1**

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Lawton Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	2	6.5	3.2	225	5.1	1.4	5.4
Moderate	6	19.4	14.2	672	15.4	9.3	15.6
Middle	19	61.3	50.6	2,627	60.0	48.0	46.0
Upper	4	12.9	30.7	853	19.5	40.4	31.9
Unknown	0	0.0	1.3	0	0.0	0.9	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	4,377	100.0	100.0	100.0
Refinance Loans							
Low	2	100.0	5.3	134	100.0	2.2	5.4
Moderate	0	0.0	14.5	0	0.0	8.6	15.6
Middle	0	0.0	45.3	0	0.0	42.7	46.0
Upper	0	0.0	33.8	0	0.0	46.0	31.9
Unknown	0	0.0	1.1	0	0.0	0.5	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	134	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.6	0	0.0	4.1	5.4
Moderate	0	0.0	19.0	0	0.0	13.1	15.6
Middle	0	0.0	40.9	0	0.0	44.1	46.0
Upper	0	0.0	32.1	0	0.0	37.8	31.9
Unknown	0	0.0	1.5	0	0.0	0.9	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	2	50.0	16.7	1,718	59.6	10.1	8.5
Moderate	1	25.0	37.5	536	18.6	7.0	35.3
Middle	1	25.0	25.0	630	21.8	46.3	43.3
Upper	0	0.0	16.7	0	0.0	36.2	12.1
Unknown	0	0.0	4.2	0	0.0	0.4	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	2,884	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	6	16.2	3.7	2,077	28.1	2.0	5.4
Moderate	7	18.9	14.6	1,208	16.3	9.1	15.6
Middle	20	54.1	49.1	3,257	44.0	47.1	46.0
Upper	4	10.8	31.4	853	11.5	40.9	31.9
Unknown	0	0.0	1.3	0	0.0	0.8	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	7,395	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C-2**

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Lawton Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
<b>Low</b>	0	0.0	0	0.0	6.8
<b>Moderate</b>	3	37.5	1,923	87.6	34.9
<b>Middle</b>	2	25.0	71	3.2	34.0
<b>Upper</b>	3	37.5	201	9.2	21.6
<b>Unknown</b>	0	0.0	0	0.0	2.7
<b>Tract-Unk</b>	0	0.0	0	0.0	
<b>Total</b>	8	100.0	2,195	100.0	100.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

**Table C-3**

Distribution of 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Lawton Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans							
Low	1	3.2	3.5	50	1.1	1.5	22.1
Moderate	3	9.7	13.6	493	11.3	9.1	17.5
Middle	2	6.5	22.5	219	5.0	20.5	18.8
Upper	11	35.5	35.2	2,110	48.2	45.4	41.6
Unknown	14	45.2	25.2	1,505	34.4	23.5	0.0
Total	31	100.0	100.0	4,377	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.8	0	0.0	1.4	22.1
Moderate	0	0.0	7.5	0	0.0	4.1	17.5
Middle	0	0.0	14.2	0	0.0	12.8	18.8
Upper	1	50.0	39.7	68	50.7	48.5	41.6
Unknown	1	50.0	35.8	66	49.3	33.2	0.0
Total	2	100.0	100.0	134	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.6	0	0.0	2.5	22.1
Moderate	0	0.0	13.9	0	0.0	9.8	17.5
Middle	0	0.0	16.8	0	0.0	10.8	18.8
Upper	0	0.0	54.0	0	0.0	63.6	41.6
Unknown	0	0.0	11.7	0	0.0	13.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	3.0	3.4	50	1.1	1.5	22.1
Moderate	3	9.1	12.7	493	10.9	8.5	17.5
Middle	2	6.1	20.6	219	4.9	19.2	18.8
Upper	12	36.4	37.4	2,178	48.3	46.2	41.6
Unknown	15	45.5	25.9	1,571	34.8	24.6	0.0
Total	33	100.0	100.0	4,511	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

**Table C-4**

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Lawton Metropolitan					
	Bank Loans				Total
	#	#%	\$(000)	%	Businesses %
By Revenue					
\$1 Million or Less	4	50.0	1,050	47.8	92.4
Over \$1 Million	4	50.0	1,146	52.2	6.1
Revenue Unknown	0	0.0	0	0.0	1.5
Total	8	100.0	2,195	100.0	100.0
By Loan Size					
\$100,000 or Less	5	62.5	189	8.6	
\$100,001 - \$250,000	1	12.5	105	4.8	
\$250,001 - \$1 Million	2	25.0	1,902	86.7	
Total	8	100.0	2,195	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	3	75.0	98	9.3	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	1	25.0	952	90.7	
Total	4	100.0	1,050	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

**Table C-5**

2023 Lawton Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.9	1,853	6.6	470	25.4	6,178	22.1
Moderate	10	26.3	6,290	22.5	1,194	19.0	4,894	17.5
Middle	15	39.5	12,153	43.5	1,027	8.5	5,247	18.8
Upper	7	18.4	7,288	26.1	490	6.7	11,622	41.6
Unknown	3	7.9	357	1.3	128	35.9	0	0.0
Total AA	38	100.0	27,941	100.0	3,309	11.8	27,941	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	4,357	1,239	5.4	28.4	2,058	47.2	1,060	24.3
Moderate	12,899	3,600	15.6	27.9	6,998	54.3	2,301	17.8
Middle	21,881	10,623	46.0	48.5	7,803	35.7	3,455	15.8
Upper	11,280	7,369	31.9	65.3	2,568	22.8	1,343	11.9
Unknown	1,248	244	1.1	19.6	739	59.2	265	21.2
Total AA	51,665	23,075	100.0	44.7	20,166	39.0	8,424	16.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	248	6.8	231	6.9	16	7.3	1	1.8
Moderate	1,267	34.9	1,149	34.2	99	45.0	19	34.5
Middle	1,233	34.0	1,163	34.7	57	25.9	13	23.6
Upper	785	21.6	724	21.6	41	18.6	20	36.4
Unknown	98	2.7	89	2.7	7	3.2	2	3.6
Total AA	3,631	100.0	3,356	100.0	220	100.0	55	100.0
Percentage of Total Businesses:				92.4		6.1		1.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.6	2	1.7	0	0.0	0	0.0
Moderate	13	10.6	12	10.0	1	50.0	0	0.0
Middle	40	32.5	38	31.7	1	50.0	1	100.0
Upper	68	55.3	68	56.7	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	123	100.0	120	100.0	2	100.0	1	100.0
Percentage of Total Farms:				97.6		1.6		0.8
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Southwest Oklahoma AA**

**Table C-6**

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Southwest Oklahoma							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	7.7	11.6	87	13.7	8.2	15.7
Middle	12	92.3	56.0	547	86.3	47.5	60.7
Upper	0	0.0	32.3	0	0.0	44.2	23.6
Unknown	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>634</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2023 FFIEC Census Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Table C-7**

Distribution of 2023 Small Business Lending By Income Level of Geography Assessment Area: Southwest Oklahoma					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	18.8
Middle	6	100.0	578	100.0	59.2
Upper	0	0.0	0	0.0	22.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>578</b>	<b>100.0</b>	<b>100.0</b>
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

**Table C-8**

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Southwest Oklahoma							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Total Home Mortgage Loans							
Low	2	15.4	4.5	65	10.3	1.8	18.5
Moderate	4	30.8	11.0	231	36.4	6.3	16.4
Middle	3	23.1	20.1	170	26.8	17.0	23.3
Upper	4	30.8	33.5	168	26.5	43.6	41.8
Unknown	0	0.0	30.8	0	0.0	31.3	0.0
Total	13	100.0	100.0	634	100.0	100.0	100.0
Source: 2023 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

**Table C-9**

Distribution of 2023 Small Business Lending By Revenue Size of Businesses					
Assessment Area: Southwest Oklahoma					
	Bank Loans				Total Businesses %
	#	%	\$(000)	%	
By Revenue					
\$1 Million or Less	4	66.7	24	4.2	88.0
Over \$1 Million	1	16.7	54	9.3	7.7
Revenue Unknown	1	16.7	500	86.5	4.2
Total	6	100.0	578	100.0	100.0
By Loan Size					
\$100,000 or Less	5	83.3	78	13.5	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	1	16.7	500	86.5	
Total	6	100.0	578	100.0	
By Loan Size and Revenues \$1 Million or Less					
\$100,000 or Less	4	100.0	24	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	4	100.0	24	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.					

**Table C-10**

2023 Southwest Oklahoma AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	2,400	18.5
Moderate	3	17.6	2,146	16.5	445	20.7	2,131	16.4
Middle	11	64.7	7,886	60.6	1,031	13.1	3,036	23.3
Upper	3	17.6	2,972	22.9	83	2.8	5,437	41.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>17</b>	<b>100.0</b>	<b>13,004</b>	<b>100.0</b>	<b>1,559</b>	<b>12.0</b>	<b>13,004</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	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	4,789	2,047	15.7	42.7	1,567	32.7	1,175	24.5
Middle	15,812	7,919	60.7	50.1	3,894	24.6	3,999	25.3
Upper	4,766	3,087	23.6	64.8	1,126	23.6	553	11.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>25,367</b>	<b>13,053</b>	<b>100.0</b>	<b>51.5</b>	<b>6,587</b>	<b>26.0</b>	<b>5,727</b>	<b>22.6</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	280	18.8	250	19.1	27	23.5	3	4.8
Middle	882	59.2	761	58.0	69	60.0	52	82.5
Upper	327	22.0	300	22.9	19	16.5	8	12.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>1,489</b>	<b>100.0</b>	<b>1,311</b>	<b>100.0</b>	<b>115</b>	<b>100.0</b>	<b>63</b>	<b>100.0</b>
Percentage of Total Businesses:				88.0		7.7		4.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	8	3.8	8	3.9	0	0.0	0	0.0
Middle	133	63.6	132	64.4	1	25.0	0	0.0
Upper	68	32.5	65	31.7	3	75.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>209</b>	<b>100.0</b>	<b>205</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
Percentage of Total Farms:				98.1		1.9		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

## APPENDIX D – GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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