



# **First Fidelity Bank**

**CRA Public File**

# **Performance Evaluation**



## **PUBLIC DISCLOSURE**

March 6, 2023

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

First Fidelity Bank  
RSSD# 106359

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

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

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

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**INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING**

This institution is rated: **Satisfactory**

The following table indicates the performance level of First Fidelity Bank (the bank) with respect to the lending, investment, and service tests.

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	X		
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

Major factors supporting the rating include:

**Lending Test**

- Lending levels reflect good responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- A substantial majority of the bank’s loans are originated within its delineated AAs.
- The bank’s distribution of loans by income level of geography (geographic distribution) is good.
- The bank’s distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes (borrower distribution) is adequate.
- The bank is a leader in making community development (CD) loans.

**Investment Test**

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

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels in its AAs.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.
- The bank is a leader in providing CD services and is responsive to the available service opportunities of its AAs.

**INSTITUTION**

**DESCRIPTION OF INSTITUTION**

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

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

**Table 1**

Composition of Loan Portfolio as of September 30, 2022		
Loan Type	\$(000)	%
Construction and Land Development	160,373	9.5
Farmland	138	0.0
1-4 Family Residential Real Estate	193,321	11.4
Multifamily Residential Real Estate	54,183	3.2
Non-Farm Non-Residential Real Estate	832,010	49.1
Agricultural	128	0.0
Commercial and Industrial	145,789	8.6
Consumer	280,819	16.6
Other	26,359	1.6
<b>Gross Loans</b>	<b>1,693,120</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The bank was rated Satisfactory under the Community Reinvestment Act (CRA) at its November 30, 2020 performance evaluation. There are no known legal, financial, or other factors impeding the bank’s ability to help meet the credit needs in its communities.

**SCOPE OF EXAMINATION**

Examiners utilized the Federal Financial Institutions Examination Council’s (FFIEC’s) *Interagency Examination Procedures for Large Institutions* to evaluate the bank’s CRA performance. The evaluation considered CRA performance context, including the bank’s asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics and credit needs. Performance was assessed within the bank’s four AAs. The Oklahoma City Metropolitan Statistical Area (MSA) AA, the Phoenix Metropolitan AA, and the Denver Metropolitan AA were assessed using a full-scope review. The Tulsa Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank’s home purchase, home refinance, home improvement, and multi-family loans reported on the bank’s 2020 and 2021 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- The bank’s small business and small farm loans reported on the bank’s 2020 and 2021 CRA LARs;
- CD loans originated from January 1, 2020 through December 31, 2021;
- Qualified investments, grants, and donations that were made from January 1, 2020 to December 31, 2021, including those made prior to but still outstanding during this period; and,
- Retail banking services and CD services from January 1, 2020 to December 31, 2021.

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

Table 2 illustrates the bank’s presence in each AA by number of branches, the percentage of lending and deposits compared to the bank-wide and the state level totals, and the bank’s June 30, 2022 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions operating in each AA.

**Table 2**

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

<sup>1</sup> Based on the bank’s HMDA, small business, and small farm lending used in the analysis.  
<sup>2</sup> Based on the June 30, 2022 FDIC’s Deposit Market Share Report.  
<sup>3</sup> Based on the bank’s ranking among FDIC-insured financial institutions in each AA.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

This performance evaluation first discusses the bank’s overall performance, followed by an in-depth analysis of the bank’s record of lending, investment, and service activities in each state and specific AAs. Lending data for the AA that received a limited-scope review is located in Appendix E. Conclusions with respect to the lending test were evaluated for 2020 and 2021 lending data and are reflected in the body of the report.



## **LENDING TEST**

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

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

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

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

### **Lending Activity**

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect good responsiveness to AA credit needs. The bank's overall loan distribution for small business lending has increased significantly since the previous evaluation, driven primarily by the bank's participation in the U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP) in response to the Coronavirus Disease 2019 pandemic (pandemic).

**Table 3**

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

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

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

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

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

**Assessment Area Concentration**

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

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

**Table 4**

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

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

The remaining loan distribution analyses discussed in this performance evaluation considered only those loans originated within the bank’s AAs. As mentioned previously, small farm loans were not evaluated given the low volume of only eight loans originated within the bank’s four delineated AAs.

**Geographic Distribution of Loans**

This performance criterion evaluates the bank’s distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank’s overall geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AAs. The state ratings for Oklahoma and Arizona are consistent with the overall rating, while performance in Colorado is rated excellent.

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

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

**Community Development Lending**

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

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

**Table 5**

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

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

## **INVESTMENT TEST**

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

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

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

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

**Table 6**

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

**SERVICE TEST**

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

**Retail Banking Services**

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

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

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank’s expansion into the Denver, Colorado market in May 2020 occurred in a middle-

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

The bank’s products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. In the Oklahoma markets, the bank’s branches generally operate under the same hours of operation, Monday through Friday from 9:00 a.m. until 5:00 p.m. Two branch locations in Oklahoma City offer only deposit services Monday through Friday from 8:30 a.m. to 5:30 p.m. Within the Oklahoma City MSA AA, drive-through services, with the exception of the limited-service branches, are available Monday through Friday from 8:00 a.m. to 6:00 p.m. and on Saturday from 9:00 a.m. to 12:00 p.m. at 18 of the 20 branches. The lone location in the Tulsa Metropolitan AA is open from 9:00 a.m. to 5:00 p.m. Monday through Friday but closed on Saturday. In the Arizona market, the bank’s branches are open from 9:00 a.m. until 5:00 p.m. Monday through Thursday and until 6:00 p.m. on Friday. Two of the six Arizona market locations provide drive-through services that mirror the bank’s lobby hours. The de novo location in Colorado is open from 8:00 a.m. to 5:00 p.m. Monday through Friday, but closed on Saturdays.

**Table 7**

<b>Retail Banking and Community Development Services – All</b>												
<b>Branch Accessibility</b>	<b>Location of Branches by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
	3.6	21.4	35.7	35.7	3.6	100.0	10.2	26.0	32.9	29.5	1.4	100.0
	<b>Location of ATMs by Tract (%)</b>						<b>Percent of Households by Tracts<sup>1</sup> (%)</b>					
	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
0.0	22.2	37.0	37.0	3.7	100.0	8.8	25.0	35.3	30.9	0.1	100.0	
<b>Changes in Branch Location</b>	<b>Number of Branches (#)</b>						<b>Net Change in Branch Locations (#)</b>					
	<b>Total Branches</b>		<b>Openings (#)</b>		<b>Closings (#)</b>		<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
	28		1		2		0	(1)	(1)	0	0	(2)
<b>Community Development Services</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalization &amp; Stabilization</b>		<b>Total Services</b>	<b>Total Organizations</b>					
	5	113	11	0		129	41					
<sup>1</sup> Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

### **Community Development Services**

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

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

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



**STATE OF OKLAHOMA**

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

Major factors supporting the rating include:

Lending Test

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

Investment Test

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

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Oklahoma AAs and is responsive to the available service opportunities.

## **SCOPE OF EXAMINATION**

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

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

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN OKLAHOMA**

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

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

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

### **LENDING TEST**

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

#### **Lending Activity**

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

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

**Geographic Distribution of Loans**

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

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

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

**Community Development Lending**

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

**Table 8**

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

**INVESTMENT TEST**

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

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

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

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

**Table 9**

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

<sup>1</sup> Book Value of Investment  
<sup>2</sup> Original Market Value of Investment

**SERVICE TEST**

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

**Retail Banking Services**

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

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank closed two branches in the Oklahoma City MSA AA, one in a moderate- and one in a middle-income census tract. Nearby existing branches and alternative delivery systems satisfactorily service customer needs despite these closures.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby and drive-through hours are generally consistent across AAs, with all locations offering similar products and services.

**Table 10**

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

<sup>1</sup> Based on 2021 FFIEC census tract definitions.  
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

**Community Development Services**

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

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

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

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

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

**Table 11**

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

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

**Table 12**

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

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



**Table 13**

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

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

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

**Table 14**

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

*Source: Bureau of Labor Statistics: Local Area Unemployment Statistics*

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

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

**LENDING TEST**

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

**Lending Activity**

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

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

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. While the geographic distribution of home mortgage lending is excellent, the distribution of small business loans is adequate. Home improvement, multifamily and small farm loans were not evaluated at the individual product level based on lending levels that are too low to conduct meaningful analyses.

#### Home Mortgage Lending

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

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

#### Home Purchase Loans

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

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

Home Refinance Loans

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

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

Table 15

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

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.  
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table

Small Business Lending

The geographic distribution of small business lending is adequate. The distribution of small business loans in 2021 among low-income census tracts was comparable to levels noted in the aggregate lending data by number, as well as the demographic figure. Lending levels in the moderate-income census tracts were above the aggregate lending data by number and dollar and comparable to the demographic figure.

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

**Table 16**

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

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

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

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

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

Home Mortgage Lending

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

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

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

#### Home Purchase Loans

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

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

#### Home Refinance Loans

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

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

#### Home Improvement Loans

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

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

**Table 17**

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



### Small Business Lending

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

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

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

**Table 18**

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

**Community Development Lending**

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

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

**Table 19**

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

**INVESTMENT TEST**

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

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

**Table 20**

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

**SERVICE TEST**

The bank’s performance under the service test in the Oklahoma City MSA AA is excellent.

**Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The distribution of branches is relatively proportional to the percent of tracts by income level as well as the population by tract income. The bank operates 20 branches in the AA which all include on-site ATMs and 19 have drive-through facilities. Three branch offices are located in moderate-, 9 in middle-, 6 in upper- and 2 in unknown-income census tracts.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank closed two branches since the prior CRA evaluation. In 2021, the bank closed one limited-access branch in a moderate-income census tract in Oklahoma City due to the building in which it was located ceasing on-site operations. However, the bank did retain a full-service ATM in that location. The bank also closed a location in Moore, Oklahoma which was located in a middle-income census tract. This location could be effectively serviced via two other branches in the Moore area. Overall, there was no change in accessibility.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. Lobby hours and additional services do not vary by market. Branch hours range from 9:00 a.m. to 5:00 p.m. from Monday to Friday with extended drive-through hours until 6:00 p.m. and Saturday hours from 9:00 a.m. to 12:00 p.m.

**Table 21**

Retail Banking and Community Development Services – Oklahoma City MSA AA												
<b>Branch Accessibility</b>	<b>Location of Branches by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
	0.0	20.0	45.0	30.0	5.0	100.0	8.0	29.2	37.5	22.9	2.5	100.0
	<b>Location of ATMs by Tract (%)</b>						<b>Percent of Households by Tracts<sup>1</sup> (%)</b>					
	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
0.0	18.2	45.5	31.8	4.5	100.0	5.7	24.9	41.2	27.8	0.3	100.0	
<b>Changes in Branch Location</b>	<b>Number of Branches (#)</b>						<b>Net Change in Branch Locations (#)</b>					
	<b>Total Branches</b>		<b>Openings (#)</b>	<b>Closings (#)</b>			<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
	20		0	2			0	(1)	(1)	0	0	(2)
<b>Community Development Services</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>		<b>Revitalization &amp; Stabilization</b>	<b>Total Services</b>	<b>Total Organizations</b>					
	2	98	7		0	107	27					
<sup>1</sup> Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

**Community Development Services**

The bank is a leader in providing CD services. Bank staff provided a total of 107 CD services to 27 organizations and donated 1,853 hours to service activities during the evaluation period. The services were generally provided by employees who served on boards of directors for area agencies that provide community services to LMI individuals and families. The following activities were considered particularly responsive to CD service needs in the AA:

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

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

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

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

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

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

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

The state of Oklahoma AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in this area does not change the rating for the state of Oklahoma.

**Table 22**

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Tulsa Metropolitan	Consistent	Consistent	Consistent

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

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

Major factors supporting the rating include:

**Lending Test**

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

**Investment Test**

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

**Service Test**

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.
- The bank provides a relatively high level of CD services within its Arizona AA and is responsive to the available service opportunities.



## **SCOPE OF EXAMINATION**

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

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA**

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

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

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

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

- Two community contacts recently conducted as part of the CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meetings those credit needs, and for perspective on local economic conditions. These individuals were representatives of a local economic development entity and a non-profit organization that provides homeownership services.

**Table 23**

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

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

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

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

**Table 24**

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

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

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

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

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

**Table 25**

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

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

**Table 26**

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

- Unemployment in the AA generally mirrored statewide figures and trends, including a notable spike and gradual decline during, and exiting, the height of the pandemic.
- According to community members, the overall economy prior to the pandemic was extraordinarily strong, but was significantly impacted by the pandemic, especially in the hospitality and tourism industries.
- One community member stated larger businesses in the area were better able to sustain employment during the pandemic, with small businesses experiencing the most impact of job loss.
- Major employers<sup>1</sup> in the AA include Banner Health (10,728), American Express (9,213), Amazon (6,457), and Honeywell (6,171).

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

### **LENDING TEST**

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

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

### **Lending Activity**

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

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

### **Geographic Distribution of Loans**

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

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<sup>1</sup> Source: City of Phoenix

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

### Home Mortgage Lending

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

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

**Table 27**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Phoenix Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	4.5	0	0.0	2.8	0	0.0	5.3	0	0.0	3.3	4.5
Moderate	0	0.0	16.4	0	0.0	11.7	0	0.0	17.1	0	0.0	12.1	18.9
Middle	0	0.0	36.6	0	0.0	31.6	1	9.1	36.0	388	4.6	31.0	34.5
Upper	5	100.0	41.6	2,463	100.0	52.8	10	90.9	41.0	8,002	95.4	53.0	42.0
Unknown	0	0.0	0.9	0	0.0	1.0	0	0.0	0.6	0	0.0	0.7	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>2,463</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>8,390</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.0	0	0.0	1.3	0	0.0	2.8	0	0.0	1.8	4.5
Moderate	0	0.0	11.3	0	0.0	8.1	0	0.0	13.3	0	0.0	9.5	18.9
Middle	1	7.7	32.9	13	0.2	28.1	0	0.0	34.7	0	0.0	29.5	34.5
Upper	12	92.3	53.2	7,497	99.8	61.8	7	100.0	48.6	5,359	100.0	58.6	42.0
Unknown	0	0.0	0.6	0	0.0	0.7	0	0.0	0.5	0	0.0	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>7,510</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>5,359</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.0	0	0.0	1.5	0	0.0	2.2	0	0.0	1.7	4.5
Moderate	0	0.0	10.5	0	0.0	8.1	0	0.0	10.5	0	0.0	8.3	18.9
Middle	0	0.0	30.7	0	0.0	25.2	0	0.0	31.6	0	0.0	26.2	34.5
Upper	1	100.0	56.3	500	100.0	64.9	0	0.0	55.3	0	0.0	63.3	42.0
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.6	0	0.0	0.6	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>500</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	2	28.6	27.8	1,200	25.5	24.4	1	14.3	27.0	1,231	10.4	14.5	18.9
Moderate	2	28.6	34.5	2,015	42.8	22.6	6	85.7	39.7	10,620	89.6	32.1	30.7
Middle	2	28.6	23.4	1,175	25.0	31.9	0	0.0	18.3	0	0.0	25.4	30.9
Upper	1	14.3	13.4	319	6.8	20.9	0	0.0	14.0	0	0.0	26.8	19.0
Unknown	0	0.0	0.9	0	0.0	0.2	0	0.0	1.0	0	0.0	1.2	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>4,709</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>11,851</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	2	7.4	2.9	1,200	7.8	2.6	1	4.0	3.6	1,231	4.8	2.9	4.5
Moderate	2	7.4	13.0	2,015	13.2	9.8	6	24.0	14.4	10,620	41.5	11.3	18.9
Middle	3	11.1	34.1	1,188	7.8	29.4	1	4.0	34.9	388	1.5	29.7	34.5
Upper	20	74.1	49.4	10,899	71.2	57.5	17	68.0	46.6	13,361	52.2	55.5	42.0
Unknown	0	0.0	0.7	0	0.0	0.8	0	0.0	0.5	0	0.0	0.7	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>15,302</b>	<b>100.0</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>100.0</b>	<b>25,600</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.  
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is good. The distribution of loans in 2021 among low-income census tracts was comparable to aggregate lending data by number and dollar volume, as well as the demographic figure of the percentage of total businesses. Lending in moderate-income census tracts was above the aggregate lending data by number, comparable by dollar, and above the demographic figure.

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

**Table 28**

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

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

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

**Lending to Businesses of Different Sizes**

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

Small Business Lending

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

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



**Table 29**

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

### Community Development Lending

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

Examples of CD lending in the AA include:

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

**Table 30**

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

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

**INVESTMENT TEST**

The bank’s performance under the investment test in the Phoenix Metropolitan AA is adequate and the state of Arizona is low satisfactory. The bank has an adequate level of qualified CD investments and grants and is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA.

Examples of CD investments in the AA include:

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

**Table 31**

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

**SERVICE TEST**

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

**Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank operates six branches and three full-service ATMs in the AA. The locations feature two branches and one full-service ATM in moderate-income tracts, and four branches and three full-service ATMs in upper-income tracts. The proportion of branches in LMI census tracts exceeds the percentage of LMI census tracts in the AA.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank relocated one branch in an upper-income tract to another location a short distance away, also in an upper-income tract, since the prior CRA evaluation, with no change to accessibility.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. As discussed previously, all branch locations have hours from 9:00 a.m. to 5:00 p.m. Monday through Thursday but are open until 6:00 p.m. on Fridays.

**Table 32**

Retail Banking and Community Development Services – Phoenix Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	16.7	33.3	0.0	50.0	0.0	100.0	11.5	22.6	31.2	33.6	1.1	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts <sup>1</sup> (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
0.0	50.0	0.0	50.0	0.0	100.0	9.5	23.0	33.2	34.1	0.1	100.0	
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)	Closings (#)			Low	Mod	Mid	Upp	Unk	Total
	6		0	0			0	0	0	0	0	0
Community Development Services	Affordable Housing	Community Services	Economic Development	Revitalization & Stabilization	Total Services	Total Organizations						
	1	11	4	0	16	11						

<sup>1</sup> Based on 2021 FFIEC census tract definitions.  
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

**Community Development Services**

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

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

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

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

Major factors supporting the rating include:

**Lending Test**

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

**Investment Test**

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

**Service Test**

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.
- The bank provides an adequate level of CD services within its Colorado AA and is responsive to the available service opportunities.

## **SCOPE OF EXAMINATION**

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

## **DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO**

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

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

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

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

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

**Table 33**

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

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

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

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

**Table 34**

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

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

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

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

**Table 35**

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

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

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



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

**Table 36**

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

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

- Unemployment in the AA generally mirrored statewide figures and trends, including a notable spike and gradual decline during, and exiting, the height of the pandemic.
- A community member indicated that the area’s diverse economy was not as impacted by the economic downturn and even experienced growth levels in many sectors.
- Major employers<sup>2</sup> in the AA include Denver International Airport (35,000), Lockheed Martin (14,000), HealthONE Corporation (11,050), Centura Health (8,310), and SCL Health Systems (8,270).

<sup>2</sup> Source: Colorado Office of Economic Development & International Trade

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

### **LENDING TEST**

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

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

### **Lending Activity**

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

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

### **Geographic Distribution of Loans**

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

### **Small Business Lending**

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

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

**Table 37**

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

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Lending to Businesses of Different Sizes**

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

Small Business Lending

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

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

**Table 38**

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

**Community Development Lending**

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

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

**Table 39**

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

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

**INVESTMENT TEST**

The bank’s performance under the investment test in the Denver Metropolitan AA is adequate and the state of Colorado is low satisfactory. The bank made an adequate level of qualified CD investments and grants in this AA but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments and exhibits adequate responsiveness to the credit and CD needs of its AA.

Examples of CD investments in the AA include:

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

**Table 40**

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

<sup>1</sup> Book Value of Investment  
<sup>2</sup> Original Market Value of Investment

**SERVICE TEST**

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

**Retail Banking Services**

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank’s various geographies and to individuals of different income levels in the AA. The bank’s only location is located in a middle-income tract.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The branch opened during the previous evaluation is located in a middle-income tract.

The bank’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The branch has hours from 8:00 a.m. to 5:00 p.m. Monday through Friday.

**Table 41**

Retail Banking and Community Development Services – Denver Metropolitan AA												
<b>Branch Accessibility</b>	<b>Location of Branches by Tract (%)</b>						<b>Percent of Tracts<sup>1</sup> (%)</b>					
	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
	0.0	0.0	100.0	0.0	0.0	100.0	9.8	28.2	33.7	26.8	1.5	100.0
	<b>Location of ATMs by Tract (%)</b>						<b>Percent of Households by Tracts<sup>1</sup> (%)</b>					
	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>	<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
0.0	0.0	0.0	0.0	0.0	0.0	9.6	27.6	36.1	26.7	0.0	100.0	
<b>Changes in Branch Location</b>	<b>Number of Branches (#)</b>						<b>Net Change in Branch Locations (#)</b>					
	<b>Total Branches</b>		<b>Openings (#)</b>	<b>Closings (#)</b>			<b>Low</b>	<b>Mod</b>	<b>Mid</b>	<b>Upp</b>	<b>Unk</b>	<b>Total</b>
	1		0	0			0	0	0	0	0	0
<b>Community Development Services</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalization &amp; Stabilization</b>		<b>Total Services</b>	<b>Total Organizations</b>					
	2	2	0	0		4	2					
<sup>1</sup> Based on 2021 FFIEC census tract definitions. Note: Total percentages may vary by 0.1 percent due to automated rounding differences.												

**Community Development Services**

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

**APPENDIX A – SCOPE OF EXAMINATION**

**Table A-1**

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

**APPENDIX B – SUMMARY OF STATE RATINGS**

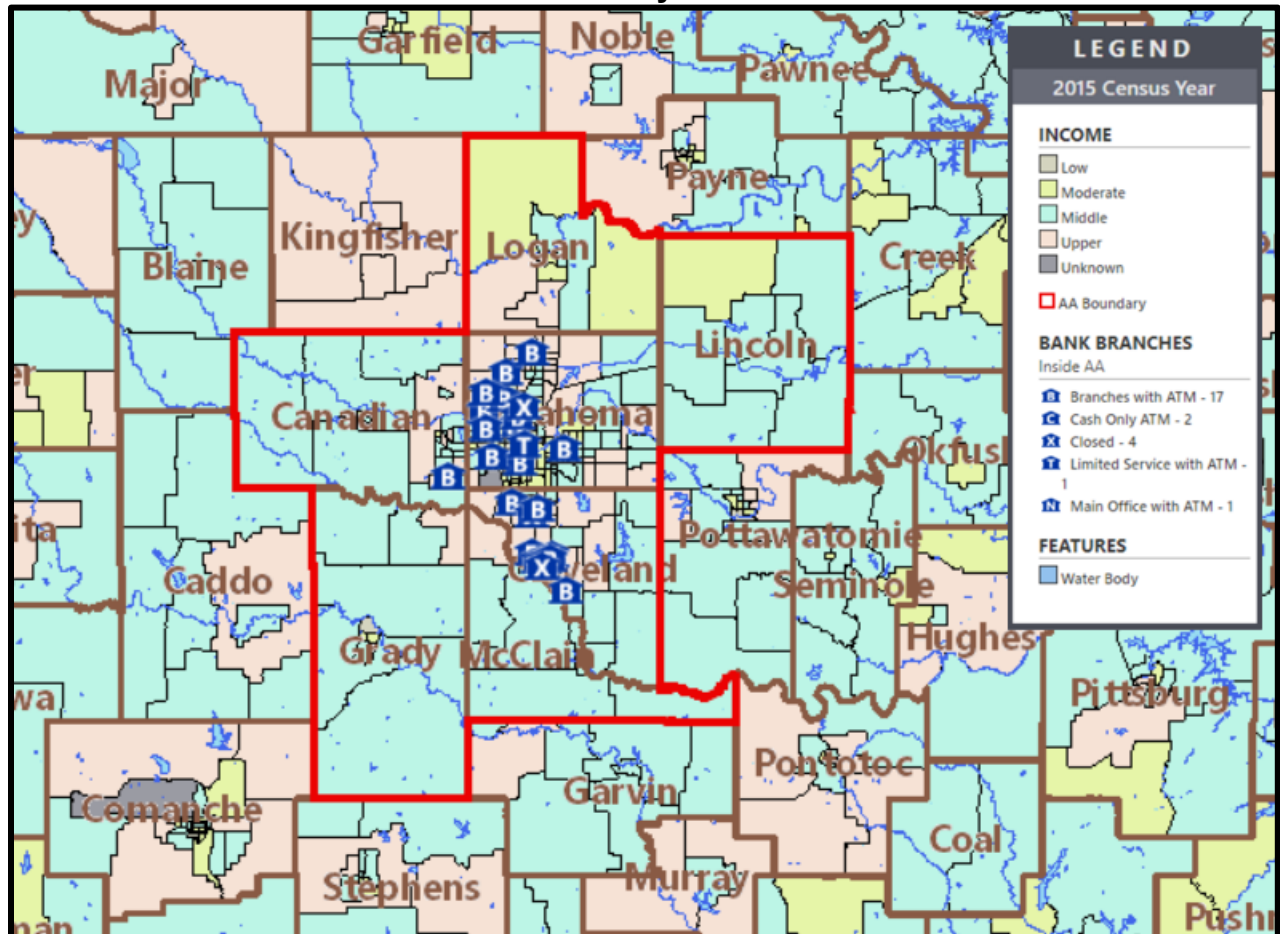
**Table B-1**

<b>State Name</b>	<b>Lending Test Rating</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Rating</b>
Oklahoma	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Arizona	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Colorado	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

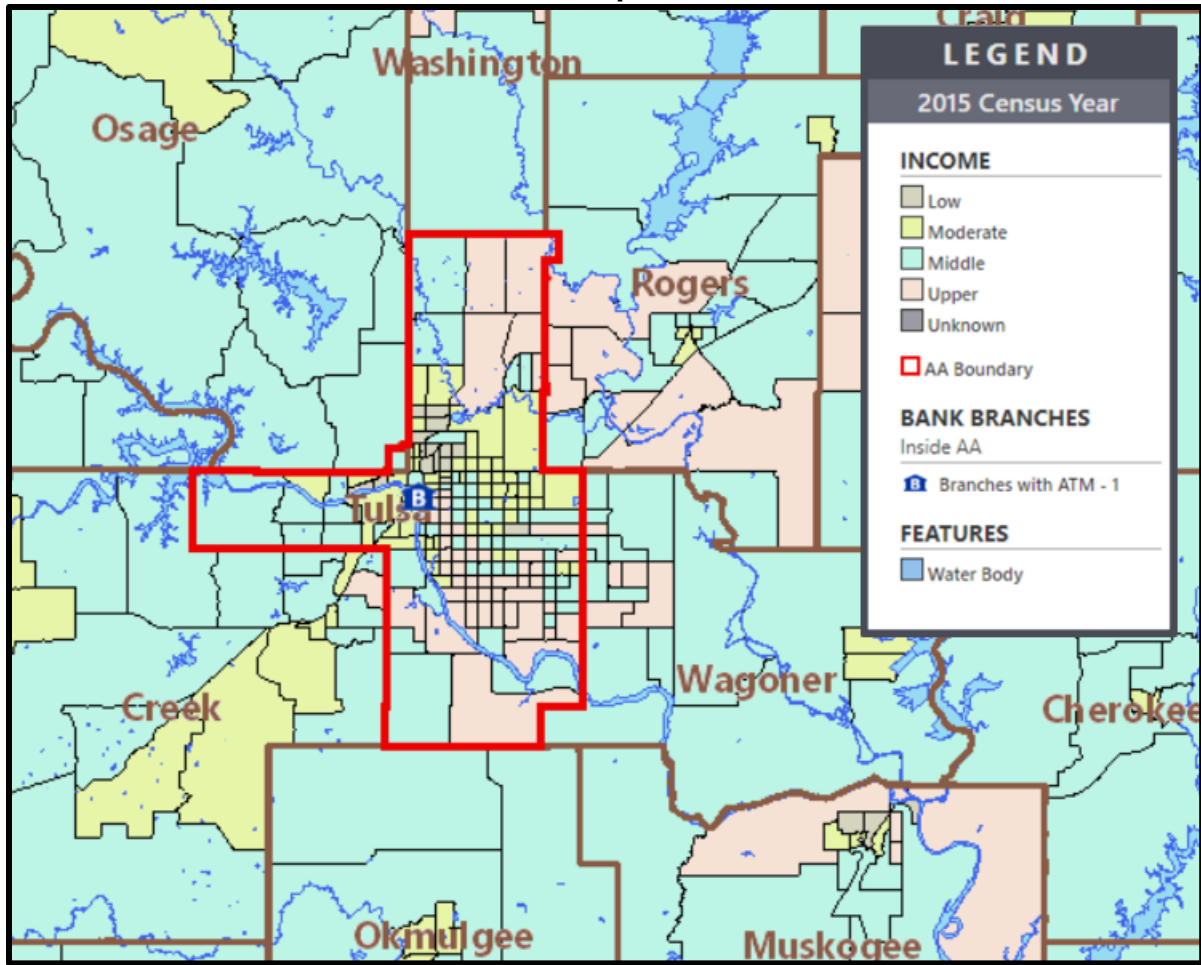


APPENDIX C – MAPS OF THE ASSESSMENT AREAS

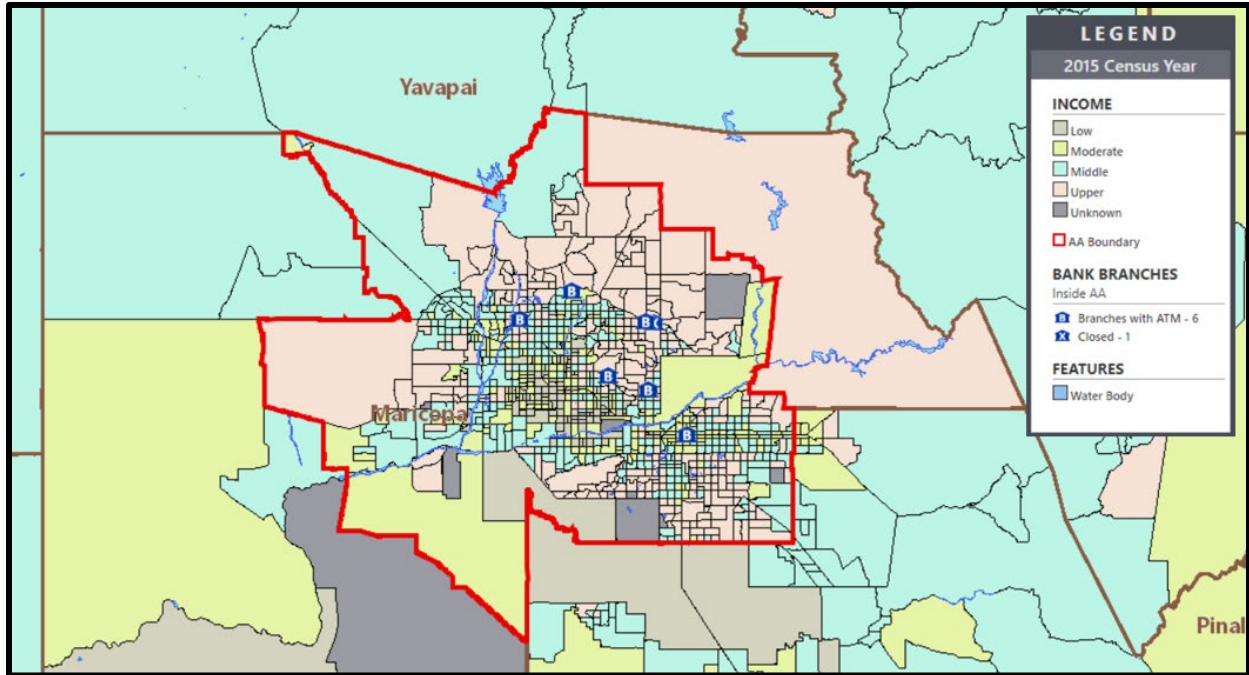
Oklahoma City MSA AA



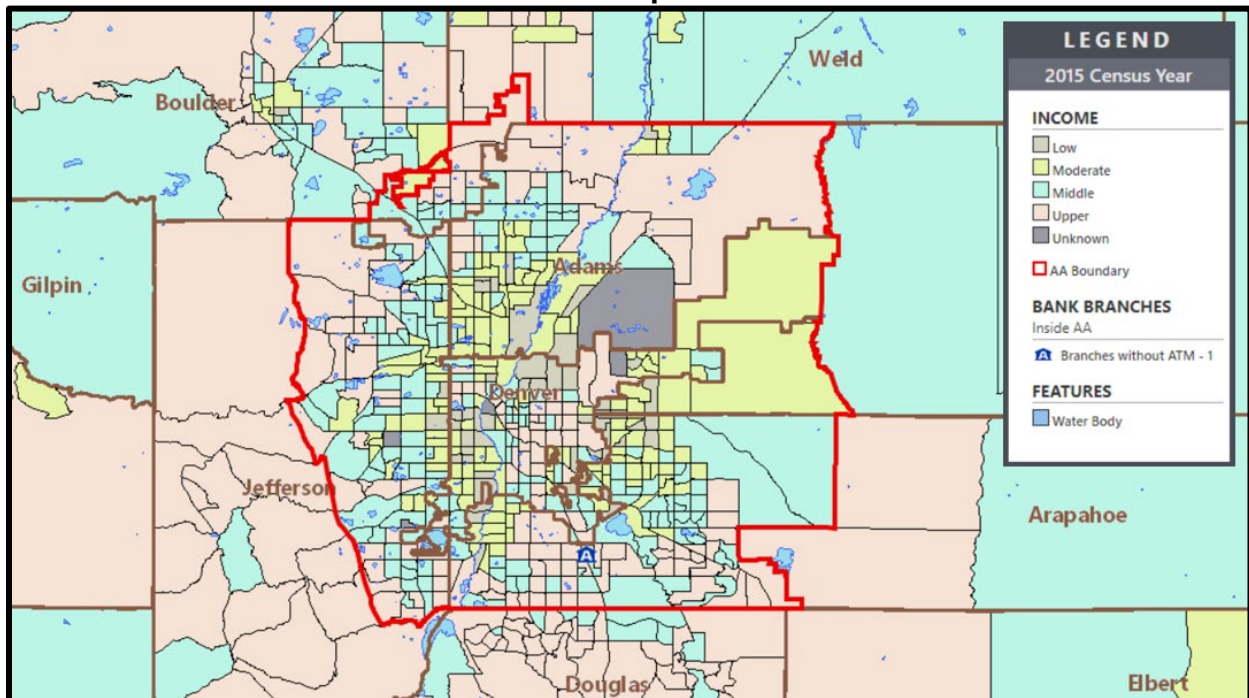
Tulsa Metropolitan AA



Phoenix Metropolitan AA



Denver Metropolitan AA



APPENDIX D – DEMOGRAPHIC INFORMATION

Table D-1

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

**Table D-2**

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

**Table D-3**

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

**Table D-4**

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

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

**Table D-5**

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



**Table D-6**

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

APPENDIX E – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Table E-1

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

**Table E-2**

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

**Table E-3**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography Assessment Area: Tulsa Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	1.4	0	0.0	0.5	0	0.0	1.6	0	0.0	0.7	4.5
Moderate	0	0.0	13.0	0	0.0	8.0	1	25.0	14.5	59	11.2	9.0	20.3
Middle	1	50.0	34.3	242	41.9	29.5	2	50.0	34.8	263	50.1	30.6	33.5
Upper	1	50.0	51.3	336	58.1	62.0	1	25.0	49.1	203	38.7	59.7	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>578</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>525</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.5	0	0.0	0.3	0	0.0	0.8	0	0.0	0.4	4.5
Moderate	1	12.5	8.0	36	2.1	4.7	1	50.0	10.0	130	34.0	6.3	20.3
Middle	1	12.5	29.6	168	9.8	24.4	0	0.0	33.3	0	0.0	27.6	33.5
Upper	6	75.0	62.0	1,519	88.2	70.6	1	50.0	55.9	252	66.0	65.7	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,723</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>382</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.5	0	0.0	0.7	0	0.0	2.8	0	0.0	1.9	4.5
Moderate	0	0.0	14.2	0	0.0	11.3	0	0.0	13.4	0	0.0	11.7	20.3
Middle	0	0.0	29.7	0	0.0	25.2	0	0.0	32.4	0	0.0	28.0	33.5
Upper	0	0.0	54.7	0	0.0	62.8	0	0.0	51.4	0	0.0	58.4	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	15.8	0	0.0	4.6	0	0.0	5.9	0	0.0	3.0	10.3
Moderate	0	0.0	44.2	0	0.0	50.5	1	100.0	42.4	444	100.0	41.0	36.3
Middle	0	0.0	30.0	0	0.0	36.8	0	0.0	37.3	0	0.0	36.2	31.4
Upper	0	0.0	10.0	0	0.0	8.1	0	0.0	14.4	0	0.0	19.8	22.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>444</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	1.1	0	0.0	0.6	0	0.0	1.3	0	0.0	0.7	4.5
Moderate	1	10.0	11.3	36	1.6	8.4	3	42.9	12.7	633	46.9	10.0	20.3
Middle	2	20.0	32.2	410	17.8	27.5	2	28.6	34.2	263	19.5	29.8	33.5
Upper	7	70.0	55.4	1,855	80.6	63.5	2	28.6	51.8	455	33.7	59.5	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>2,301</b>	<b>100.0</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,351</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.													

**Table E-4**

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

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

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

**Table E-5**

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

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

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

**Table E-6**

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

**Table E-7**

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

**Table E-8**

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



## APPENDIX F – GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Rated area:** A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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

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

# **Products and Services Available**



## **RETAIL CHECKING PRODUCTS**

- First Option Checking (online only)
- Freedom Checking
- Freestyle Checking
- Fresh Start Checking
- Global Checking
- Maximizer Checking
- Premier Club
- Private Reserve Checking
- Traditional Checking
- Varsity Checking

## **RETAIL SAVINGS PRODUCTS**

- Health Savings Account
- Money Market Account
- Money Market Investment Account
- Looney Tunes Savings Club
- Traditional Savings
- Varsity Savings

## **RETAIL LOAN PRODUCTS**

- Credit Builder and other Deposit Secured Loans
- Credit Cards
- Home Equity Loans
- Home Equity Lines of Credit
- Mortgage Loans
- Personal Loans, including Auto, Boat and RV Loans
- Personal Lines of Credit

## **RETAIL INSURANCE PRODUCTS**

- Credit Life & Disability
- Mechanical Parts and Labor Vehicle Service Contracts
- Term Life Insurance
- Secure Guaranteed Auto Protection (GAP)

- Whole Life Insurance

## **COMMERCIAL CHECKING PRODUCTS**

- Business Budget Checking
- Business Checking with Interest
- Business Performance Checking
- Commercial Checking
- IOLTA Checking (Interest on Lawyer Trust Accounts)
- Non-Profit Checking

## **COMMERCIAL SAVINGS PRODUCTS**

- Business Savings
- Capital Reserve Money Market Account
- Commercial Money Market Account

## **TREASURY PRODUCTS**

- Account Analysis
- Advantage Sweep Account
- Automated Clearing House (ACH) Origination
- ACH Blocker & Filter
- Business Online Banking (GoBiz)
- Cash Vault Services
- Demand Deposit Marketplace
- Enterprise Electronic Deposit (EED)
- Lockbox
- Maximum Asset Management
- Merchant Services
- Online Wire Origination
- PayExpress and AFA PayExpress
- Positive Pay
- Remote Deposit
- SmartSafe
- Target Balance Account

## **COMMERCIAL LOAN PRODUCTS**

- Business Credit Cards
- Commercial Loans
- Commercial Real Estate Loans

- Equipment Loans
- Equipment Leasing
- Metafund
- Small Business Loans (including SBA)
- Small Business Secured Lines of Credit
- Working Capital Loans

## **EVERYDAY SERVICES**

- Debit Cards
- Direct Line 24 Telephone Banking
- Online/Mobile Banking (GoBankFFB-includes Zelle, Money360, etc.)
- eStatements
- Bill Pay
- Mobile Deposit
- Pocket Your Change
- Overdraft Options
- Autobooks
- Direct Connect
- Early Payday
- FFB Wallet
- Quickbooks

## **INVESTMENT SERVICES**

- Annuities
- Certificates of Deposit
- Intrafi Time Deposits
- First Fidelity Financial Services
- Retirement Accounts
- Sweep Investment Accounts
- Trust Services

## **OTHER PRODUCTS AND SERVICES**

- First Option
- UltimateID
- Foreign Currency Purchase/Exchange
- Night Deposit
- Safe Deposit Box Rental\*
- Wire Transfers
- Debit Card Rewards

**\*Safe Deposit Boxes are unavailable at the following locations:**

- Arrowhead Office
- Biltmore Estates Office
- Corporate Office
- Downtown Oklahoma City Office
- Lindsey Office
- MacArthur Office
- Mesa Office
- Nichols Hills Office
- Noble Office
- Quail Creek Office

\*Limited Products and Services are available at the following locations:

- Corporate Office (No Teller Transactions)
- Downtown Oklahoma City (Drive In Only – No Account Opening)



**Master Fee Schedule**

	<b>Fee Description</b>	<b>Amount</b>
<b>A</b>	<b>Account Analysis Fee (Earnings Credit applies)</b>	\$18.00 mo.
	Statement Entry	\$0.20 ea.
	Deposit Item	\$0.10 ea.
	<b>Account Closing Fee with First Option (within 90 days - excludes Freedom Checking)</b>	\$30.00
	<b>Account Reconciliation</b>	
	QuickDisc - CD ROM (monthly/quarterly)	\$50.00
	QuickDisc - CD ROM (annually)	\$100.00
	<b>Account Verification (mortgage)</b>	\$30.00
	<b>Automated Clearing House (ACH) Services Fee</b>	
	ACH Origination	\$25.00 mo.
	Per Item	\$0.13 ea.
	ACH – Same Day per Item	\$0.50 ea.
	ACH – Additional Entity	\$10.00 ea.
	ACH Positive Pay	\$33.00 ea.
	ACH Exception Transaction	\$5.00 ea.
	ACH Returns	\$5.00 ea.
	Electronic Data Interchange (EDI) Online Report (per account)	\$25.00 mo.
	EDI Fax Report (up to 50 pages)	\$25.00 ea.
	EDI Fax Report per page (over 50 pages)	\$1.00 ea.
	<b>ATM Fee</b>	
	FFB ATM	FREE
	Non-FFB ATM (Global Checking first 20/cycle FREE)	\$1.00 ea.
	International ATM Transaction Exchange	2%
	Surcharge (non-client)	\$3.00 ea.
	<b>B</b>	<b>Bank Administration Institution (BAI) Maintenance Fee</b>
<b>Bank-to-Bank Transfers</b>		
Incoming		FREE
Outgoing		\$4.00 ea.
<b>BillPay Fee</b>		
Basic Business BillPay (includes 10 bills per month)		FREE
Additional Bills		\$1.00 ea.
Enhanced Business BillPay (includes 10 bills per month)		\$5.00 mo.
Additional Bills		\$0.60 ea.
Personal BillPay (unlimited)		FREE
<b>BSA Fee (for Money Service Business (MSB))</b>		\$250.00 mo.
<b>Business Budget Checking (includes 100 transactions)</b>		FREE
Excessive Transaction Fee		\$0.40 ea.

**Master Fee Schedule**

	<b>Fee Description</b>	<b>Amount</b>
<b>B</b>	<b>Business Checking with Interest - Below \$1,000 Minimum Balance Fee</b>	\$18.00 mo.
	Statement Entry	\$0.20 ea.
	Deposit Item	\$0.10 ea.
	<b>Business Performance Checking - Below \$5,000 Minimum Balance Fee (includes 100 transactions)</b>	\$18.00 mo.
	Statement Entry	\$0.20 ea.
	Deposit Item	\$0.10 ea.
	<b>Business Savings - Below \$500 Minimum Balance Fee (includes 12 deposits)</b>	\$15.00 mo.
	Statement Entry	\$0.20 ea.
	Deposit Item	\$0.10 ea.
	Excessive Withdrawal/Transfer Fee (includes 3 withdrawals per month)	\$15.00 ea.
<b>C</b>	<b>Cannabis Related Business (CRB) Fee</b>	
	One-time Account Application Fee	\$500.00
	One-time Closing Account(s) Termination Fee	\$500.00
	Tier I CRB Entity Fee (includes OK, AZ, CO, FL)	\$500.00 mo.
	Tier I Late Production Reporting Fee (includes OK, AZ, CO, FL)	\$100.00 mo.
	Tier II CRB Entity Fee (includes OK, AZ, CO, FL)	\$250.00 mo.
	Tier III CRB Entity Fee (includes OK, AZ, CO, FL)	FREE
	Cash Verification Fee	
	Arizona & Colorado Cash Verification - Armored Car Pass Through	
	Sealed Deposit Bag	\$2.00 ea.
	Plus the following multiplier based on per bag deposit amount:	
	\$0 - \$2,500	\$0.20 per \$100
	\$2,501 - \$5,000	\$0.19 per \$100
	\$5,001 - \$7,500	\$0.18 per \$100
	\$7,501 - \$10,000	\$0.17 per \$100
	\$10,001 - \$12,500	\$0.16 per \$100
	\$12,501 - \$15,000	\$0.15 per \$100
	\$15,001 - \$17,500	\$0.14 per \$100
	\$17,501 - \$20,000	\$0.13 per \$100
	\$20,001	\$0.12 per \$100
	Olahoma & Florida Cash Verification - Deposits made at a Branch	\$0.03 per \$100
	<b>Capital Reserve Money Market - Below \$25,000 Minimum Balance Fee</b>	\$20.00 mo.
Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	\$15.00 ea.	
<b>Cashier's Check Fee</b>		
Client	\$6.00 ea.	
Non-Client	Not Available	

This list may not be all inclusive. All fees are applied per tax ID # unless specified by account.  
 Notify the Product Manager for review of missing/inaccurate fees. Member FDIC. Equal Housing Lender. **Effective 05/24.**

**Master Fee Schedule**

<b>Fee Description</b>	<b>Amount</b>
<b>C Cash Vault Services Fee</b>	
Armored Car or Courier Services - Pricing for this service is negotiated. Contracts may be direct with the vendor. Clients depositing or requesting change orders more than \$10,000.00, at one time, on a weekly basis, and / or clients depositing cash of \$30,000.00 total per week, must utilize an Armored Car service.	
Buying Coin (per roll)	\$.03 per \$100
Buying Coin (per box)	\$.03 per \$100
Buying Currency Straps	\$.03 per \$100
Depositing Currency Straps	\$.03 per \$100
Deposit FFB Bag of Coin	\$.03 per \$100
Deposit Partial Bag of Coin	\$.03 per \$100
Night Drop Deposits	\$.03 per \$100
Lock Bag	\$25.00 ea.
Zipper Bag	\$15.00 ea.
<b>Certificate of Deposit Early Withdrawal Penalty</b>	2% of withdrawal amount
<b>Charge Back/Return Check Fee</b>	
Personal	FREE
Business	\$7.00 ea.
<b>Charge Off Processing Fee</b>	\$50.00
<b>Check Cashing Fee (on-us non-client)</b>	\$5.00 ea.
<b>Check Printing Fee</b>	Varies by style
<b>Coin Counting Fee (non-client)</b>	0.08 per \$100
<b>Collections Fee (client - outgoing &amp; incoming)</b>	\$15.00 ea.
<b>Collections Fee (non-client - outgoing)</b>	\$25.00 ea.
<b>Commercial Appraisal Review Fee</b>	\$750.00
<b>Commercial Checking Fee (earnings credit applies)</b>	\$18.00 mo.
Statement Entry	\$0.20 ea.
Deposit Item	\$0.10 ea.
<b>Commercial Checking on Analysis Fee (earnings credit applies)</b>	\$18.00 mo.
Statement Entry	\$0.20 ea.
Deposit Item	\$0.10 ea.
<b>Commercial Evaluation Review Fee</b>	\$150.00
<b>Commercial Money Market Fee - Below \$2,500 Minimum Balance Fee</b>	\$25.00 mo.
Statement Entry	\$0.20 ea.
Excessive Deposit Item Fee (includes 25 deposits per month)	\$0.10 ea.
Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	\$15.00 ea.
<b>Commercial Loan Documentation Fee</b>	\$250.00
<b>Commercial Loan Origination Fee</b>	Varies

This list may not be all inclusive. All fees are applied per tax ID # unless specified by account.  
 Notify the Product Manager for review of missing/inaccurate fees. Member FDIC. Equal Housing Lender. **Effective 05/24.**

**Master Fee Schedule**

	<b>Fee Description</b>	<b>Amount</b>
<b>C</b>	<b>Consumer Loan Documentation Fee</b>	
	Secured Loan Documentation Fee	\$100.00
	Unsecured Loan Documentation Fee	\$100.00
	Real Estate Secured Loan Documentation Fee	\$150.00
	<b>Credit Card Fee</b>	
	Personal:	
	Rewards & Signature Annual Fee	None
	Rewards & Signature Late Fee	\$29.00
	Rewards & Signature Return Payment	\$35.00 ea.
	Rewards & Signature Minimum Finance Charge	\$.50
	Rewards & Signature Cash Advance	\$10.00 ea. or 3% of advance (greater)
	Rewards & Signature Balance Transfer	\$10.00 ea. or 3% of transfer (greater)
	Rewards & Signature Foreign Transaction	3% of transaction (U.S. Dollars)
	Over-the-Credit-Limit Fee	None
	Business:	
	Business Essentials Annual Fee	\$50.00
	Business Essentials Late Fee	\$50.00
Business Essentials Return Payment	\$50.00 ea.	
Business Essentials Minimum Finance Charge	\$.50	
Business Essentials Cash Advance	\$50.00 ea. or 3% of advance (greater)	
Business Essentials Balance Transfer	\$50.00 ea. or 3% of transfer (greater)	
Business Essentials Foreign Transaction	3% of transaction (U.S. Dollars)	
Over-the-Credit-Limit Fee	None	
<b>D</b>	<b>Debit Card Fee</b>	
	Debit Card Replacement	\$5.00 ea.
	Debit Card Rewards (requires registration but points accumulate with all transactions)	FREE
	Debit Card PIN Replacement	FREE
	Debit Card Expedited Replacement	\$5.00 ea. + FedEx cost
	<b>Deposit Corrections Fee</b>	
	Mail, Duplicate Mail Advice, Telephone Advice, or Fax Notification	\$5.00 ea.
	Email Notification	\$3.00 ea.
	Check Issued for Error on Deposit	\$6.00 ea.
	Second Bag Verification (upon request)	\$5.00 ea.

**Master Fee Schedule**

	<b>Fee Description</b>	<b>Amount</b>
D	<b>Dormant Checking Account Fee (excludes Freedom Checking)</b>	\$10.00 mo.
	<b>Dormant Savings Account Fee (per quarter)</b>	\$10.00 ea.
	<b>Dual Statement Fee</b>	\$3.00 ea.
E	<b>Electronic Deposit Services Fee</b>	
	Business Set Up, Per Merchant, One Time Per Entity	\$50.00
	Client Owned Machine or Machine Purchased from FFB	\$30.00 mo.
	Scan Check – Single Input, Single Feed Scanner (includes FFB scanner)	\$50.00 mo.
	Additional Scanner	\$20.00 mo.
	Remote Deposit Capture with a Single Feed Scanner-Batch Input	\$60.00 mo.
	Additional Scanner	\$20.00 mo.
	Remote Deposit Capture with a Batch Feed Scanner (Multi-Feed)-Batch Input	\$75.00 mo.
	Additional Scanner (all scanner types)	\$35.00 mo.
	Additional Entity	\$10.00 mo.
	Deposited Item (per image)	\$0.10 ea.
	Per Deposit	\$1.00 ea.
	Single Feed Scanner (purchase)	\$300.00 ea.
	High Speed Batch Feed Scanner (purchase)	\$600.00 ea.
	Scanners priced on an 18-month amortization and added to the monthly fee.	
	F	<b>First Option Fee</b>
<b>First Option with Ultimate ID Plus Fee</b>		\$12.00 mo.
<b>First Option Early Account Closure Fee (within 90 days)</b>		\$30.00 ea.
<b>Foreign Currency Purchase or Exchange Fee</b>		\$25.00 + shipping
Currency Purchase under \$250.00		\$35.00 ea.
<b>Freedom Checking Fee (no overdraft/insufficient/dormant fees)</b>		\$5.00 mo.
<b>Freestyle Checking</b>		FREE
<b>Fresh Start Checking Fee</b>		\$12.00 mo.
G	<b>Garnishment Fee</b>	\$75.00 ea.
	<b>GoBankFFB Personal Online Banking Platform</b>	FREE
	<b>GoBankFFB Business Online Banking Platform</b>	FREE
	<b>GoBizFFB Essentials Business Online Banking Platform Fee</b>	\$7.00 mo.
	<b>GoBizFFB Commercial Business Online Banking Platform Fee</b>	\$20.00 mo.
H	<b>Hold Mail Fee</b>	\$5.00 mo.
	<b>Health Savings Account (HSA)</b>	FREE

This list may not be all inclusive. All fees are applied per tax ID # unless specified by account.  
 Notify the Product Manager for review of missing/inaccurate fees. Member FDIC. Equal Housing Lender. **Effective 05/24.**

**Master Fee Schedule**

	<b>Fee Description</b>	<b>Amount</b>
I	<b>In-House Mortgage Origination Fee</b>	\$799.00
	<b>Insufficient Funds Fee (return item-max of 5 overdraft and/or insufficient fees per day)</b>	
	Personal:	
	Per Presentment (excludes Freedom Checking)	\$12.50 ea.
	Per Presentment (resulting in negative \$5 balance or less)	FREE
	Per Presentment (item amount of \$5 or less)	FREE
	Business:	
	Per Presentment	\$33.00 ea.
	<b>IntraFi Early Withdrawal Penalty</b>	2% of withdrawal amount
	<b>IOLTA Checking</b>	FREE
	<b>IRA Closing Fee</b>	\$35.00 ea.
	<b>IRA Transfer Fee</b>	\$35.00 ea.
J	<b>Jumbo Mortgage Origination Fee</b>	\$799.00
L	<b>Loan Payment Fee</b>	
	Loan Payment Late Fee	
	Personal	Greater of 5% of payment or as allowed under OK §2-203
	Business	Lesser of 5% of payment or \$250
	Loan Payment Return Fee	\$25.00 ea.
	Loan Payment One-Time by Telephone	\$4.99 ea.
	Loan Payment One-Time Online	
	Personal	FREE
	Business	\$2.99 ea.
	Loan Payment Recurring Online (Personal & Business)	FREE
	<b>Lockbox (Wholesale) Services Fee</b>	\$100.00
	<b>Looney Tunes Savings Club - Below \$50 Minimum Balance Fee</b>	\$5.00 mo.
	Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	\$1.00 ea.
M	<b>Maximizer Checking - Below \$1,500 Minimum Balance Fee</b>	\$12.00 mo.
	<b>Maximum Asset Management Maintenance Fee (account service charges &amp; per item charges apply)</b>	\$150.00 mo.
	<b>Mobile Deposit Fee</b>	
	Personal	FREE
	Business	\$1.00 ea.
	<b>Money Service Business Fee</b>	\$250.00 mo.
	<b>Money Market Account - Below \$2,500 Minimum Balance Fee</b>	\$15.00 mo.
	Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	\$15.00 ea.
	<b>Money Market Investment - Below \$25,000 Minimum Balance Fee</b>	\$20.00 mo.
	Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	\$15.00 ea.

This list may not be all inclusive. All fees are applied per tax ID # unless specified by account. Notify the Product Manager for review of missing/inaccurate fees. Member FDIC. Equal Housing Lender. **Effective 05/24.**

**Master Fee Schedule**

	<b>Fee Description</b>	<b>Amount</b>
<b>N</b>	<b>Notary Fee (per visit)</b>	\$5.00 ea.
	<b>Non-Profit Checking - Below \$1,000 Minimum Balance Fee</b>	\$18.00 mo.
	Statement Entry	\$0.20 ea.
	Deposited Item	\$0.10 ea.
<b>O</b>	<b>Overdraft Fee (paid item-max of 5 overdraft and/or insufficient fees per day)</b>	
	Personal:	
	Per Presentment (excludes Freedom Checking)	\$25.00 ea.
	Per Presentment (resulting in negative \$5 balance or less)	FREE
	Per Presentment (item amount of \$5 or less)	FREE
	Business:	
	Per Presentment	\$33.00 ea.
	7-Day Overdraft Processing Fee (assessed after 7 consecutive calendar days as a one-time fee per occurrence)	\$25.00 ea.
<b>P</b>	<b>Paper Statement Fee</b>	
	Personal:	
	Per Cycle (excludes Freedom, Freestyle and Global Checking)	\$3.00 mo.
	Per Cycle (PayExpress & AF PayExpress Cards)	\$2.00 mo.
	Per Cycle (Traditional Checking)	FREE
	Business:	
	Per Cycle	\$3.00 mo.
	Statement Printout (without images)	\$3.00 ea.
	<b>Payroll Card Services Fee</b>	
	Payroll Card Set Up	\$10.00 ea.
	PayExpress Debit Card & PIN Replacement (excluded AFA PayExpress)	\$5.00 ea.
	PayExpress Excessive ATM Withdrawal Fee (includes 4 per statement cycle)	\$5.00 ea.
	PayExpress Paper Statment	\$2.00 ea.
AFA PayExpress PIN Replacement Fee	\$5.00 ea.	
AFA PayExpress Excessive ATM Withdrawal Fee (includes 5 per statement cycle)	\$3.00 ea.	
AFA PayExpress/PayExpress Account Closure Fee	\$10.00 ea.	
<b>Personal Line of Credit Annual Fee (lines over \$5,000)</b>	\$35.00	
Loan Advance	\$5.00 ea.	
<b>Pocket Your Change</b>	FREE	
<b>Positive Pay Services Fee</b>		
Maintenance Fee	\$45.00 mo.	
Additional Entity	\$10.00 mo.	
Exception Items (includes 25 items)	\$2.00 ea.	
<b>Private ATM (PATM) Operator Fees</b>		
5 or more ATMs	\$250.00 mo.	
4 or less ATMs	\$50.00 mo.	
<b>Private Reserve Checking - Below \$100,000 Minimum Balance Fee</b>	\$10.00 mo.	

This list may not be all inclusive. All fees are applied per tax ID # unless specified by account.  
 Notify the Product Manager for review of missing/inaccurate fees. Member FDIC. Equal Housing Lender. **Effective 05/24.**

**Master Fee Schedule**

	<b>Fee Description</b>	<b>Amount</b>
<b>Q</b>	<b>QuickDisc - CD ROM Fee</b>	
	Monthly/Quarterly	\$50.00
	Annually	\$100.00
<b>R</b>	<b>Research/Account Reconciliation Fee</b>	
	Minimum Charge	\$25.00
	Per Hour	\$25.00
	Per Item	\$3.00 ea.
<b>S</b>	<b>Safe Deposit Box Fee</b>	
	Annual Billing Fee (if automatic debit is not used)	\$10.00
	Late Fee (after 60 days)	\$25.00
	Replacement Key	\$10.00 ea.
	Drilling Fee	\$100.00 minimum, may vary
	Annual Box Rent by Size (availability varies by branch)	
	2 X 5	\$25.00
	3 X 5	\$30.00
	2 X 10	\$35.00
	3 X 7 1/4	\$35.00
	3 X 10	\$40.00
	3 X 12 1/2	\$40.00
	4 X 10	\$45.00
	5 X 5	\$35.00
	5 X 10	\$50.00
	5 X 12 1/2	\$55.00
	6 X 10	\$65.00
	6 1/2 X 10	\$70.00
	7 X 10	\$75.00
	10 X 10	\$100.00
	24 X 24	\$350.00
		<b>Secure File Transfer Protocol (SFTP) File Input or Output Delivery (per account)</b>
	<b>Small Business Loan Documentation Fee</b>	
	Small Business Real Estate Loan Documentation Fee	\$275.00
	Small Business Vehicle & Equipment Loan Documentation Fee	\$250.00
	<b>Small Business Loan Origination Fee</b>	Varies
	<b>Stop Payment Fee (valid for 12 months)</b>	\$33.00 ea.



**Master Fee Schedule**

	<b>Fee Description</b>	<b>Amount</b>	
<b>S</b>	<b>Sweep Accounts</b> (account service charges and per Item charges may apply)		
	Advantage Sweep Account Maintenance (per account)	\$50.00 mo.	
	Demand Deposit Marketplace (DDM) Sweep Account Maintenance (per account)	\$70.00 mo.	
	Maximum Asset Management Maintenance	\$150.00 mo.	
	AIM Sweep Fund Maintenance (per account)	\$50.00 mo.	
	Tier I \$0-\$499,999	0.35% per annum	
	Tier II \$500,000-\$999,999	0.25% per annum	
	Tier III \$1,000,000 and above	0.20% per annum	
<b>T</b>	<b>Target Balance Account Maintenance Fee</b>	\$25.00 mo.	
	Statement Entry	\$0.20 ea.	
	Deposit Item	\$0.10 ea.	
	Additional Child/Sub Account	\$10.00 ea.	
	<b>Tax Levy</b>	\$75.00 ea.	
	<b>Temporary Checks (10 checks per request)</b>	\$3.00 ea.	
	<b>Traditional Savings - Below \$200 Minimum Balance Fee</b>	\$6.00 mo.	
	Excessive Withdrawal/Transfer Fee (includes 3 withdrawals per month)	\$1.00 ea.	
	<b>U</b>	<b>Ultimate ID Plus Fee</b>	\$6.00 mo.
		<b>V</b>	<b>Varsity Checking</b>
<b>Varsity Savings - Below \$100 Minimum Balance Fee</b>	\$5.00 mo.		
Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	\$1.00 ea.		
<b>W</b>	<b>Wire Transfer Services Fee</b>		
	Online Wire Transfer Module	\$30.00 mo.	
	Additional Entity	\$10.00 mo.	
	Online Domestic Wire	\$10.00 ea.	
	Domestic Wire Transfer (cut off 3 pm CST, 2 pm MST, DST 3:30 pm CST for all branches)		
	Incoming	\$12.00 ea.	
	Outgoing (consumer & business)	\$25.00 ea.	
	Incoming & Outgoing (non-client)	Not Available	
	International Wire Transfer (cut off 12:00 pm local time for all branches)		
	Incoming	\$20.00 ea.	
	Outgoing Consumer	\$75.00 ea.	
	Outgoing Business	\$45.00 ea.	
	Draft	\$40.00 ea.	
	Incoming Notification or Special Handling	\$5.00 ea.	
	Mail Advice	\$5.00 ea.	
	Tracer or Recall	\$30.00 ea.	

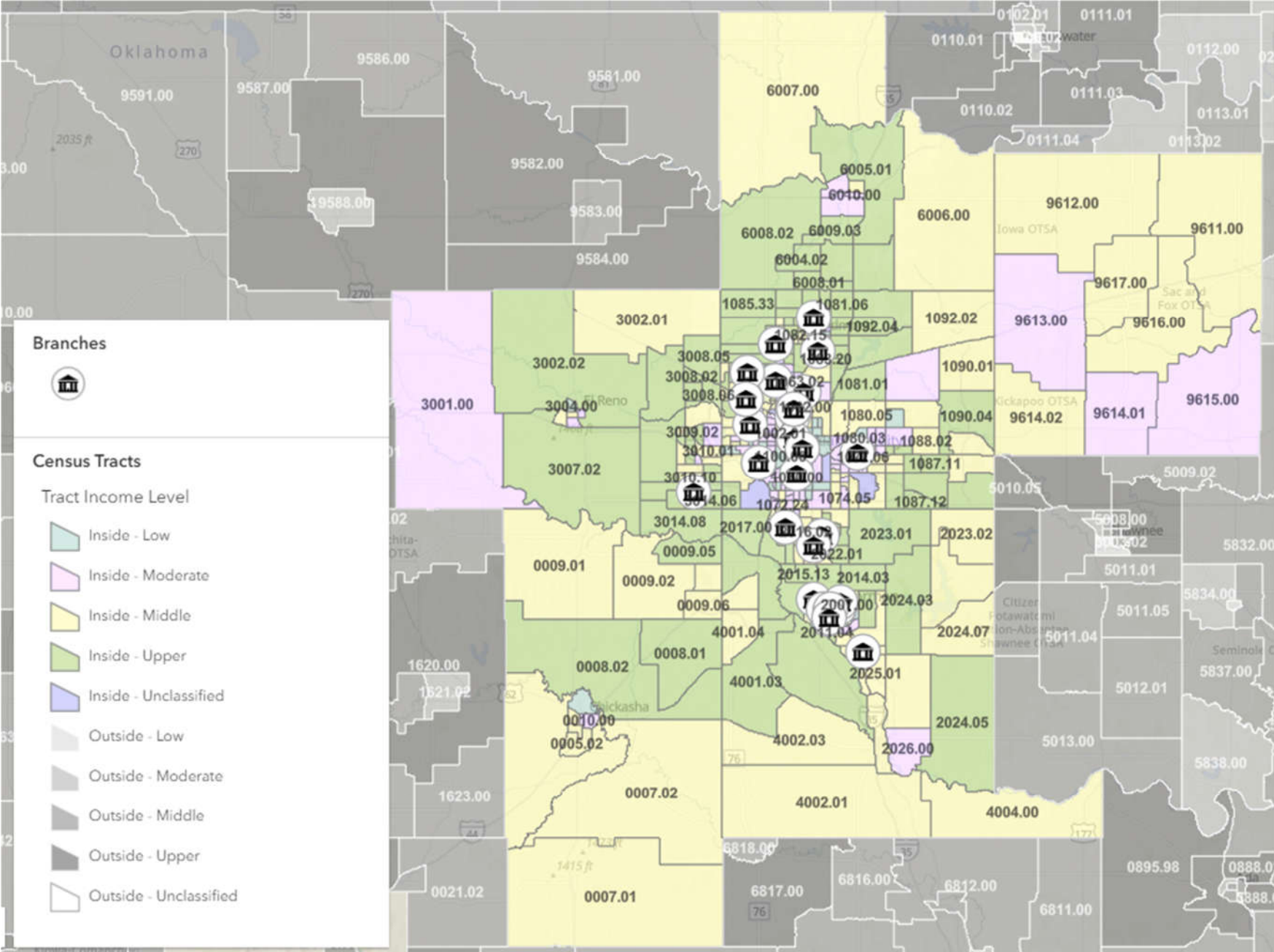
**Master Fee Schedule**

<b>Fee Description</b>		<b>Amount</b>
Z	<b>Zero Balance Account Maintenance Fee</b>	\$25.00 mo.
	Statement Entry	\$0.20 ea.
	Deposit Item	\$0.10 ea.
	Additional Child/Sub Account	\$10.00 ea.

<b>Employee Personal Account Fees Waived</b>	
	Maximizer Checking Account with no minimum balance requirement
	Free Checks (one box per order - any style)
	First Option
	Debit Card Replacement
	Coin Counting
	Stop Payments
	Bank-to-Bank Transfers
	Cashier's Checks
	Notary Services
	One Small Safe Deposit Box (where available)

# **Assessment Area(s)**

# 2024 Oklahoma City Facility-Based Assessment Area





## Tract Group Assessment Area - Detail

Institution: FIRST FIDELITY BANK

Assessment Area: 2024 OKLAHOMA CITY

Summary Only: False

Area	Year	State	County	Tract	MSA
<b>40: Oklahoma, 36420: Oklahoma City, OK MSA, 017: Canadian County</b>					
0029	2024	40	017	3001.00	36420
0029	2024	40	017	3002.01	36420
0029	2024	40	017	3002.02	36420
0029	2024	40	017	3003.00	36420
0029	2024	40	017	3004.00	36420
0029	2024	40	017	3005.00	36420
0029	2024	40	017	3006.00	36420
0029	2024	40	017	3007.01	36420
0029	2024	40	017	3007.02	36420
0029	2024	40	017	3008.02	36420
0029	2024	40	017	3008.03	36420
0029	2024	40	017	3008.04	36420
0029	2024	40	017	3008.05	36420
0029	2024	40	017	3008.06	36420
0029	2024	40	017	3009.01	36420
0029	2024	40	017	3009.02	36420
0029	2024	40	017	3009.04	36420
0029	2024	40	017	3009.05	36420
0029	2024	40	017	3010.01	36420
0029	2024	40	017	3010.03	36420
0029	2024	40	017	3010.06	36420
0029	2024	40	017	3010.10	36420
0029	2024	40	017	3010.11	36420
0029	2024	40	017	3010.12	36420
0029	2024	40	017	3010.13	36420
0029	2024	40	017	3010.14	36420
0029	2024	40	017	3010.15	36420
0029	2024	40	017	3011.00	36420
0029	2024	40	017	3012.01	36420
0029	2024	40	017	3012.02	36420
0029	2024	40	017	3013.01	36420
0029	2024	40	017	3013.02	36420
0029	2024	40	017	3014.06	36420
0029	2024	40	017	3014.07	36420

0029	2024	40	017	3014.08	36420
0029	2024	40	017	3014.09	36420
0029	2024	40	017	3014.10	36420
<b>40: Oklahoma, 36420: Oklahoma City, OK MSA, 027: Cleveland County</b>					
0029	2024	40	027	2001.00	36420
0029	2024	40	027	2002.00	36420
0029	2024	40	027	2003.00	36420
0029	2024	40	027	2004.00	36420
0029	2024	40	027	2005.00	36420
0029	2024	40	027	2006.02	36420
0029	2024	40	027	2006.03	36420
0029	2024	40	027	2006.04	36420
0029	2024	40	027	2007.00	36420
0029	2024	40	027	2008.00	36420
0029	2024	40	027	2009.00	36420
0029	2024	40	027	2010.00	36420
0029	2024	40	027	2011.02	36420
0029	2024	40	027	2011.03	36420
0029	2024	40	027	2011.04	36420
0029	2024	40	027	2012.01	36420
0029	2024	40	027	2012.02	36420
0029	2024	40	027	2012.04	36420
0029	2024	40	027	2012.05	36420
0029	2024	40	027	2013.02	36420
0029	2024	40	027	2013.03	36420
0029	2024	40	027	2014.03	36420
0029	2024	40	027	2014.04	36420
0029	2024	40	027	2014.05	36420
0029	2024	40	027	2015.05	36420
0029	2024	40	027	2015.08	36420
0029	2024	40	027	2015.09	36420
0029	2024	40	027	2015.11	36420
0029	2024	40	027	2015.12	36420
0029	2024	40	027	2015.13	36420
0029	2024	40	027	2015.14	36420
0029	2024	40	027	2016.02	36420
0029	2024	40	027	2016.03	36420
0029	2024	40	027	2016.04	36420
0029	2024	40	027	2016.07	36420
0029	2024	40	027	2016.09	36420
0029	2024	40	027	2016.10	36420
0029	2024	40	027	2016.11	36420
0029	2024	40	027	2016.12	36420
0029	2024	40	027	2017.00	36420

0029	2024	40	027	2018.01	36420
0029	2024	40	027	2018.02	36420
0029	2024	40	027	2019.02	36420
0029	2024	40	027	2019.03	36420
0029	2024	40	027	2019.04	36420
0029	2024	40	027	2020.02	36420
0029	2024	40	027	2020.04	36420
0029	2024	40	027	2020.05	36420
0029	2024	40	027	2020.06	36420
0029	2024	40	027	2020.07	36420
0029	2024	40	027	2020.08	36420
0029	2024	40	027	2021.02	36420
0029	2024	40	027	2021.04	36420
0029	2024	40	027	2021.05	36420
0029	2024	40	027	2021.06	36420
0029	2024	40	027	2021.07	36420
0029	2024	40	027	2022.01	36420
0029	2024	40	027	2022.03	36420
0029	2024	40	027	2022.05	36420
0029	2024	40	027	2022.07	36420
0029	2024	40	027	2022.08	36420
0029	2024	40	027	2023.01	36420
0029	2024	40	027	2023.02	36420
0029	2024	40	027	2024.03	36420
0029	2024	40	027	2024.04	36420
0029	2024	40	027	2024.05	36420
0029	2024	40	027	2024.06	36420
0029	2024	40	027	2024.07	36420
0029	2024	40	027	2025.01	36420
0029	2024	40	027	2025.02	36420
0029	2024	40	027	2026.00	36420
<b>40: Oklahoma, 36420: Oklahoma City, OK MSA, 051: Grady County</b>					
0029	2024	40	051	0001.00	36420
0029	2024	40	051	0004.00	36420
0029	2024	40	051	0005.01	36420
0029	2024	40	051	0005.02	36420
0029	2024	40	051	0006.00	36420
0029	2024	40	051	0007.01	36420
0029	2024	40	051	0007.02	36420
0029	2024	40	051	0008.01	36420
0029	2024	40	051	0008.02	36420
0029	2024	40	051	0009.01	36420
0029	2024	40	051	0009.02	36420
0029	2024	40	051	0009.04	36420

0029	2024	40	051	0009.05	36420
0029	2024	40	051	0009.06	36420
0029	2024	40	051	0010.00	36420
<b>40: Oklahoma, 36420: Oklahoma City, OK MSA, 081: Lincoln County</b>					
0029	2024	40	081	9611.00	36420
0029	2024	40	081	9612.00	36420
0029	2024	40	081	9613.00	36420
0029	2024	40	081	9614.01	36420
0029	2024	40	081	9614.02	36420
0029	2024	40	081	9615.00	36420
0029	2024	40	081	9616.00	36420
0029	2024	40	081	9617.00	36420
<b>40: Oklahoma, 36420: Oklahoma City, OK MSA, 083: Logan County</b>					
0029	2024	40	083	6001.01	36420
0029	2024	40	083	6002.00	36420
0029	2024	40	083	6003.00	36420
0029	2024	40	083	6004.01	36420
0029	2024	40	083	6004.02	36420
0029	2024	40	083	6005.01	36420
0029	2024	40	083	6005.02	36420
0029	2024	40	083	6006.00	36420
0029	2024	40	083	6007.00	36420
0029	2024	40	083	6008.01	36420
0029	2024	40	083	6008.02	36420
0029	2024	40	083	6009.03	36420
0029	2024	40	083	6010.00	36420
<b>40: Oklahoma, 36420: Oklahoma City, OK MSA, 087: McClain County</b>					
0029	2024	40	087	4001.03	36420
0029	2024	40	087	4001.04	36420
0029	2024	40	087	4001.05	36420
0029	2024	40	087	4001.06	36420
0029	2024	40	087	4002.01	36420
0029	2024	40	087	4002.03	36420
0029	2024	40	087	4002.04	36420
0029	2024	40	087	4003.00	36420
0029	2024	40	087	4004.00	36420
<b>40: Oklahoma, 36420: Oklahoma City, OK MSA, 109: Oklahoma County</b>					
0029	2024	40	109	1001.00	36420
0029	2024	40	109	1002.01	36420
0029	2024	40	109	1002.02	36420
0029	2024	40	109	1002.03	36420
0029	2024	40	109	1003.00	36420
0029	2024	40	109	1004.00	36420
0029	2024	40	109	1005.00	36420



0029	2024	40	109	1008.00	36420
0029	2024	40	109	1009.00	36420
0029	2024	40	109	1010.00	36420
0029	2024	40	109	1011.00	36420
0029	2024	40	109	1012.00	36420
0029	2024	40	109	1013.00	36420
0029	2024	40	109	1014.00	36420
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0029	2024	40	109	1019.00	36420
0029	2024	40	109	1020.00	36420
0029	2024	40	109	1021.00	36420
0029	2024	40	109	1022.00	36420
0029	2024	40	109	1023.00	36420
0029	2024	40	109	1024.00	36420
0029	2024	40	109	1025.00	36420
0029	2024	40	109	1032.00	36420
0029	2024	40	109	1033.00	36420
0029	2024	40	109	1039.00	36420
0029	2024	40	109	1041.00	36420
0029	2024	40	109	1042.00	36420
0029	2024	40	109	1043.00	36420
0029	2024	40	109	1044.00	36420
0029	2024	40	109	1045.00	36420
0029	2024	40	109	1046.00	36420
0029	2024	40	109	1047.00	36420
0029	2024	40	109	1048.00	36420
0029	2024	40	109	1049.00	36420
0029	2024	40	109	1050.00	36420
0029	2024	40	109	1051.01	36420
0029	2024	40	109	1052.01	36420
0029	2024	40	109	1052.02	36420
0029	2024	40	109	1053.00	36420
0029	2024	40	109	1054.00	36420
0029	2024	40	109	1055.00	36420
0029	2024	40	109	1056.00	36420
0029	2024	40	109	1059.03	36420
0029	2024	40	109	1059.04	36420
0029	2024	40	109	1059.05	36420
0029	2024	40	109	1059.06	36420
0029	2024	40	109	1059.07	36420
0029	2024	40	109	1060.00	36420
0029	2024	40	109	1061.00	36420
0029	2024	40	109	1062.00	36420

0029	2024	40	109	1063.01	36420
0029	2024	40	109	1063.02	36420
0029	2024	40	109	1063.03	36420
0029	2024	40	109	1064.01	36420
0029	2024	40	109	1064.02	36420
0029	2024	40	109	1064.03	36420
0029	2024	40	109	1065.01	36420
0029	2024	40	109	1065.02	36420
0029	2024	40	109	1065.03	36420
0029	2024	40	109	1066.01	36420
0029	2024	40	109	1066.02	36420
0029	2024	40	109	1066.06	36420
0029	2024	40	109	1066.07	36420
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0029	2024	40	109	1066.11	36420
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0029	2024	40	109	1067.04	36420
0029	2024	40	109	1067.05	36420
0029	2024	40	109	1067.06	36420
0029	2024	40	109	1067.08	36420
0029	2024	40	109	1067.09	36420
0029	2024	40	109	1067.10	36420
0029	2024	40	109	1068.01	36420
0029	2024	40	109	1068.02	36420
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0029	2024	40	109	1078.06	36420
0029	2024	40	109	1078.07	36420
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0029	2024	40	109	1078.10	36420

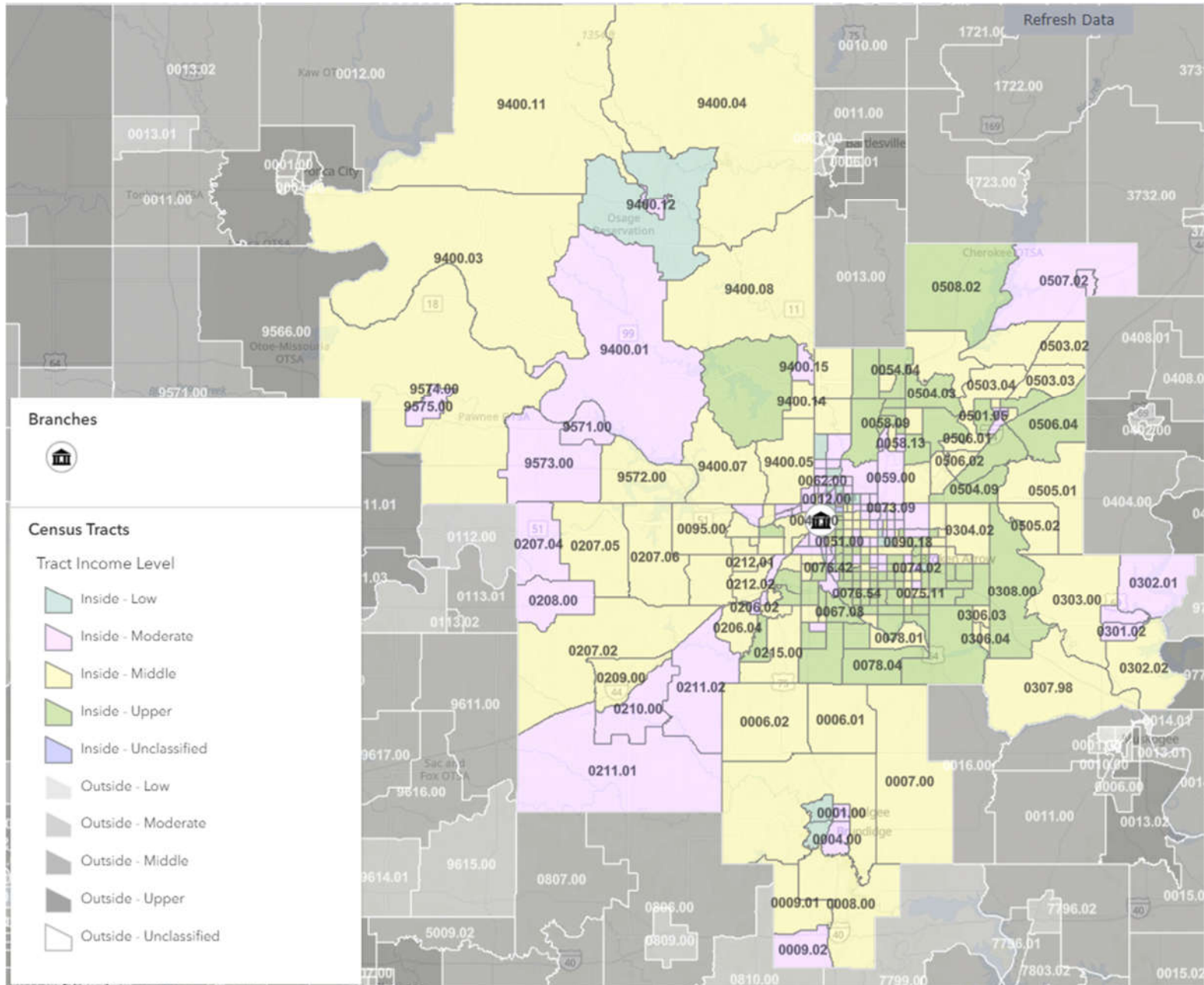
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0029	2024	40	109	9800.05	36420
0029	2024	40	109	9800.06	36420
0029	2024	40	109	9800.07	36420
0029	2024	40	109	9800.08	36420
0029	2024	40	109	9800.09	36420

Discovery > Reporting > Setup Maintenance > Tract Group Assessment Area - Detail and Summary

# 2024 Tulsa Facility-Based Assessment Area





## Tract Group Assessment Area - Detail

Institution: FIRST FIDELITY BANK

Assessment Area: 2024 TULSA

Summary Only: False

Area	Year	State	County	Tract	MSA
<b>40: Oklahoma, 46140: Tulsa, OK MSA, 037: Creek County</b>					
0030	2024	40	037	0201.01	46140
0030	2024	40	037	0201.02	46140
0030	2024	40	037	0201.03	46140
0030	2024	40	037	0206.02	46140
0030	2024	40	037	0206.03	46140
0030	2024	40	037	0206.04	46140
0030	2024	40	037	0207.02	46140
0030	2024	40	037	0207.04	46140
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0030	2024	40	037	0207.06	46140
0030	2024	40	037	0207.07	46140
0030	2024	40	037	0208.00	46140
0030	2024	40	037	0209.00	46140
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0030	2024	40	037	0211.02	46140
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0030	2024	40	037	0213.00	46140
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0030	2024	40	037	0214.02	46140
0030	2024	40	037	0215.00	46140
0030	2024	40	037	0216.00	46140
<b>40: Oklahoma, 46140: Tulsa, OK MSA, 111: Okmulgee County</b>					
0030	2024	40	111	0001.00	46140
0030	2024	40	111	0002.00	46140
0030	2024	40	111	0003.00	46140
0030	2024	40	111	0004.00	46140
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0030	2024	40	111	0006.01	46140
0030	2024	40	111	0006.02	46140
0030	2024	40	111	0007.00	46140
0030	2024	40	111	0008.00	46140



0030	2024	40	111	0009.01	46140
0030	2024	40	111	0009.02	46140
<b>40: Oklahoma, 46140: Tulsa, OK MSA, 113: Osage County</b>					
0030	2024	40	113	9400.01	46140
0030	2024	40	113	9400.03	46140
0030	2024	40	113	9400.04	46140
0030	2024	40	113	9400.05	46140
0030	2024	40	113	9400.06	46140
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0030	2024	40	113	9400.13	46140
0030	2024	40	113	9400.14	46140
0030	2024	40	113	9400.15	46140
<b>40: Oklahoma, 46140: Tulsa, OK MSA, 117: Pawnee County</b>					
0030	2024	40	117	9571.00	46140
0030	2024	40	117	9572.00	46140
0030	2024	40	117	9573.00	46140
0030	2024	40	117	9574.00	46140
0030	2024	40	117	9575.00	46140
<b>40: Oklahoma, 46140: Tulsa, OK MSA, 131: Rogers County</b>					
0030	2024	40	131	0501.01	46140
0030	2024	40	131	0501.03	46140
0030	2024	40	131	0501.04	46140
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0030	2024	40	131	0505.02	46140
0030	2024	40	131	0506.01	46140

0030	2024	40	131	0506.02	46140
0030	2024	40	131	0506.03	46140
0030	2024	40	131	0506.04	46140
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0030	2024	40	131	0507.02	46140
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<b>40: Oklahoma, 46140: Tulsa, OK MSA, 143: Tulsa County</b>					
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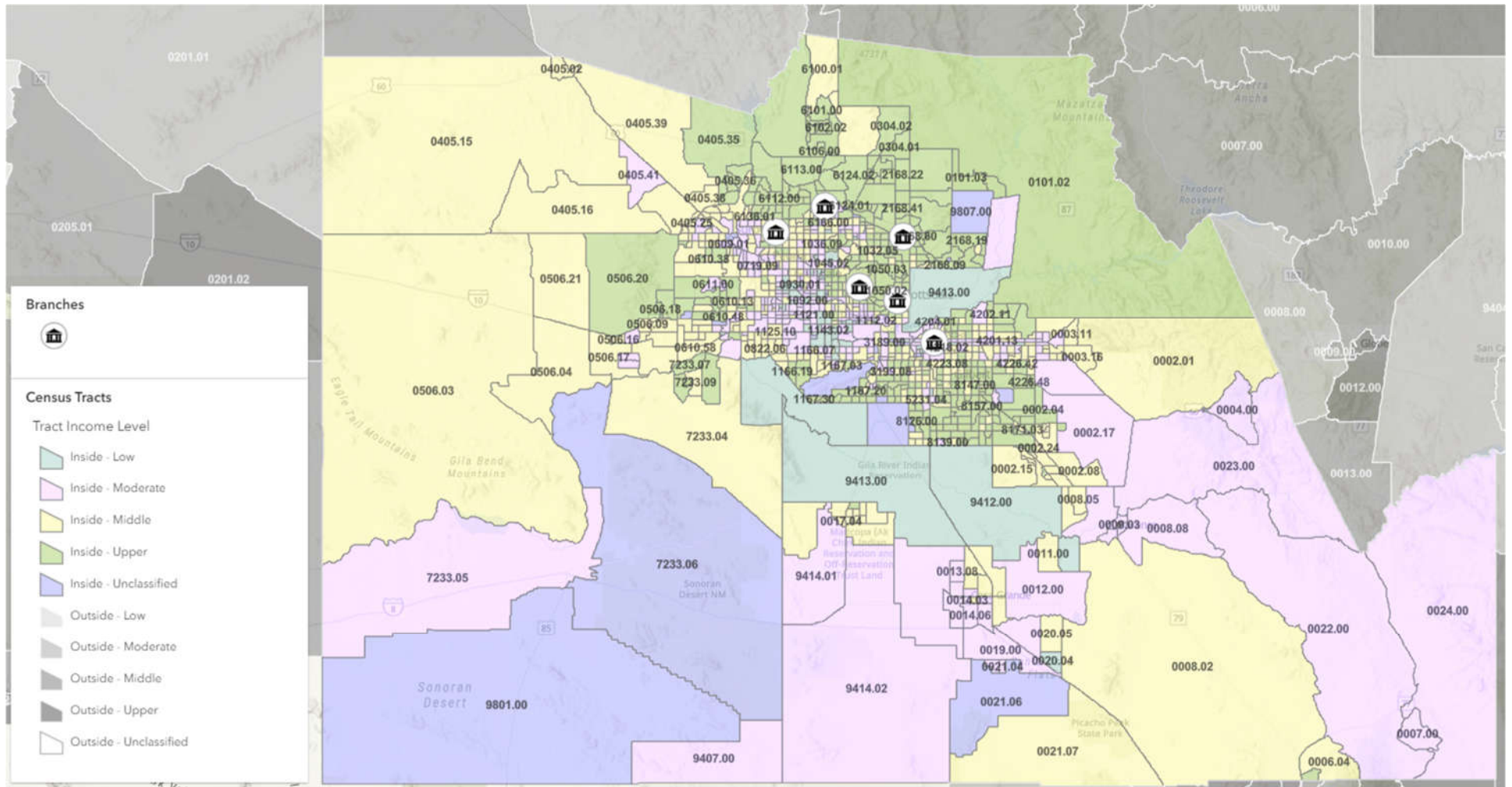
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0030	2024	40	143	0084.00	46140
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0030	2024	40	143	0094.03	46140
0030	2024	40	143	0094.04	46140
0030	2024	40	143	0095.00	46140
0030	2024	40	143	0113.00	46140
0030	2024	40	143	0114.00	46140

**40: Oklahoma, 46140: Tulsa, OK MSA, 145: Wagoner County**

0030	2024	40	145	0302.02	46140
0030	2024	40	145	0303.00	46140
0030	2024	40	145	0304.02	46140
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0030	2024	40	145	0306.04	46140
0030	2024	40	145	0306.05	46140
0030	2024	40	145	0307.98	46140
0030	2024	40	145	0308.00	46140

Discovery > Reporting > Setup Maintenance > Tract Group Assessment Area - Detail and Summary

# 2024 Phoenix Facility-Based Assessment Area







## Tract Group Assessment Area - Detail

Institution: FIRST FIDELITY BANK

Assessment Area: 2024 PHOENIX

Summary Only: False

Area	Year	State	County	Tract	MSA
<b>04: Arizona, 38060: Phoenix-Mesa-Chandler, AZ MSA, 013: Maricopa County</b>					
0031	2024	04	013	0101.02	38060
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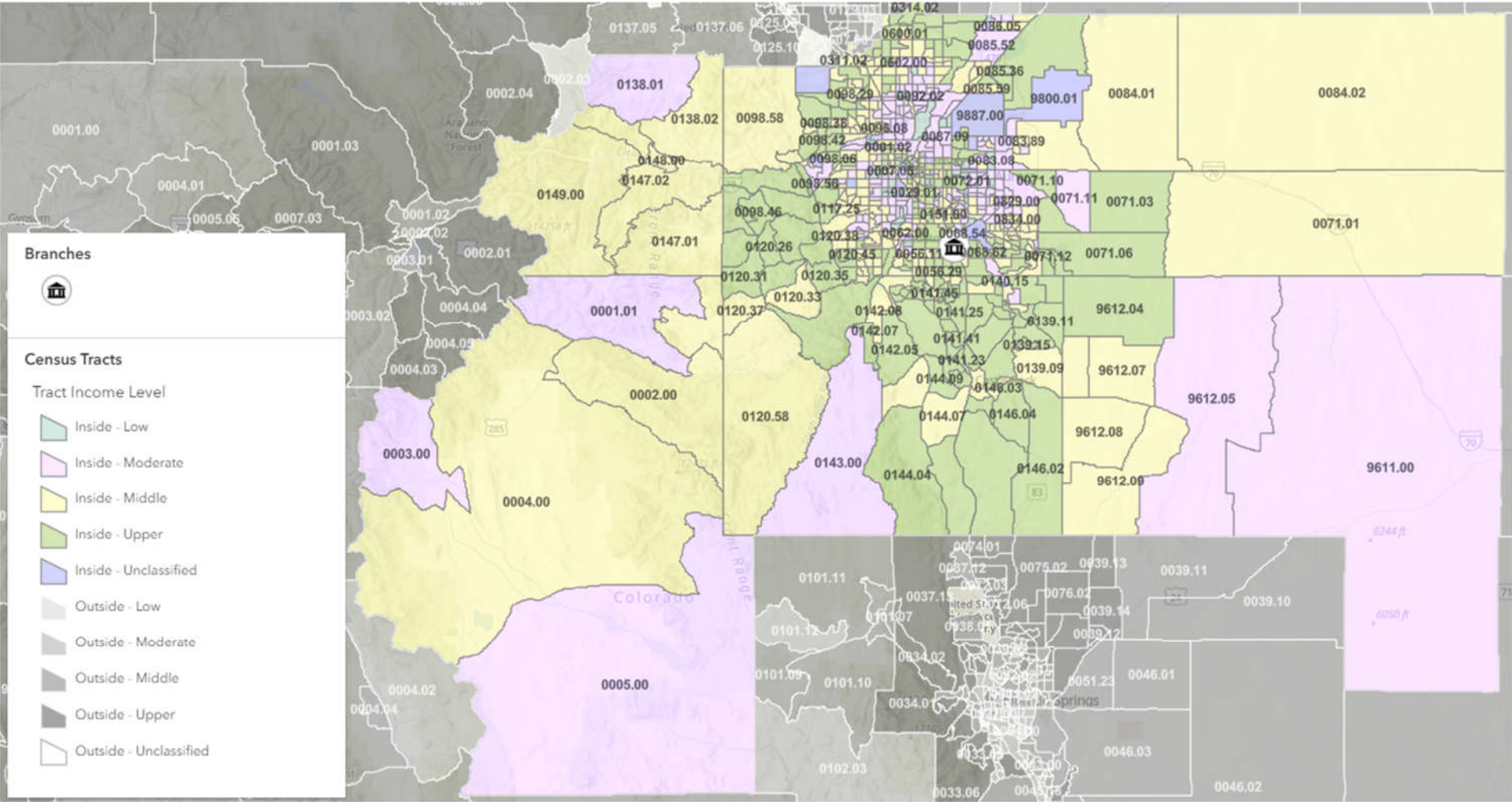


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Discovery > Reporting > Setup Maintenance > Tract Group Assessment Area - Detail and Summary

# 2024 Denver Facility-Based Assessment Area





<b>Tract Group Assessment Area - Detail</b>					
<b>Institution: FIRST FIDELITY BANK</b>					
<b>Assessment Area: 2024 DENVER</b>					
Area	Year	State	County	Tract	MSA
<b>08: Colorado, 19740: Denver-Aurora, CO MSA, 001: Adams County</b>					
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0032	2024	08	005	0808.00	19740
0032	2024	08	005	0809.00	19740
0032	2024	08	005	0810.01	19740
0032	2024	08	005	0810.02	19740
0032	2024	08	005	0811.01	19740
0032	2024	08	005	0811.02	19740
0032	2024	08	005	0812.00	19740
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0032	2024	08	005	0815.00	19740
0032	2024	08	005	0816.00	19740
0032	2024	08	005	0817.00	19740
0032	2024	08	005	0818.00	19740
0032	2024	08	005	0819.00	19740



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0032	2024	08	005	0822.00	19740
0032	2024	08	005	0823.00	19740
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0032	2024	08	005	0832.02	19740
0032	2024	08	005	0833.00	19740
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0032	2024	08	005	0858.00	19740
0032	2024	08	005	0859.00	19740
0032	2024	08	005	0860.01	19740
0032	2024	08	005	0860.02	19740
0032	2024	08	005	0861.00	19740

0032	2024	08	005	0862.00	19740
0032	2024	08	005	0863.00	19740
0032	2024	08	005	0864.00	19740
0032	2024	08	005	0865.00	19740
0032	2024	08	005	0866.00	19740
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0032	2024	08	005	0868.01	19740
0032	2024	08	005	0868.02	19740
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0032	2024	08	005	0873.01	19740
0032	2024	08	005	0873.02	19740
0032	2024	08	005	9800.00	19740
<b>08: Colorado, 19740: Denver-Aurora, CO MSA, 014: Broomfield County</b>					
0032	2024	08	014	0300.00	19740
0032	2024	08	014	0301.00	19740
0032	2024	08	014	0302.00	19740
0032	2024	08	014	0303.00	19740
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0032	2024	08	014	0311.01	19740
0032	2024	08	014	0311.02	19740
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0032	2024	08	014	0311.04	19740
0032	2024	08	014	0312.01	19740
0032	2024	08	014	0312.02	19740
0032	2024	08	014	0313.00	19740
0032	2024	08	014	0314.01	19740
0032	2024	08	014	0314.02	19740
0032	2024	08	014	0314.03	19740
0032	2024	08	014	9801.00	19740
0032	2024	08	014	9802.00	19740
0032	2024	08	014	9803.00	19740
<b>08: Colorado, 19740: Denver-Aurora, CO MSA, 019: Clear Creek County</b>					

0032	2024	08	019	0149.00	19740
<b>08: Colorado, 19740: Denver-Aurora, CO MSA, 031: Denver County</b>					
0032	2024	08	031	0001.02	19740
0032	2024	08	031	0002.01	19740
0032	2024	08	031	0002.02	19740
0032	2024	08	031	0003.01	19740
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0032	2024	08	031	0005.04	19740
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0032	2024	08	031	0010.00	19740
0032	2024	08	031	0011.01	19740
0032	2024	08	031	0011.02	19740
0032	2024	08	031	0013.01	19740
0032	2024	08	031	0013.02	19740
0032	2024	08	031	0014.01	19740
0032	2024	08	031	0014.02	19740
0032	2024	08	031	0014.03	19740
0032	2024	08	031	0015.00	19740
0032	2024	08	031	0016.01	19740
0032	2024	08	031	0016.02	19740
0032	2024	08	031	0016.03	19740
0032	2024	08	031	0017.03	19740
0032	2024	08	031	0017.04	19740
0032	2024	08	031	0017.05	19740
0032	2024	08	031	0017.06	19740
0032	2024	08	031	0017.07	19740
0032	2024	08	031	0018.00	19740
0032	2024	08	031	0019.01	19740
0032	2024	08	031	0020.00	19740

0032	2024	08	031	0021.01	19740
0032	2024	08	031	0021.02	19740
0032	2024	08	031	0023.00	19740
0032	2024	08	031	0024.02	19740
0032	2024	08	031	0024.04	19740
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0032	2024	08	031	0036.03	19740
0032	2024	08	031	0037.01	19740
0032	2024	08	031	0037.02	19740
0032	2024	08	031	0037.03	19740
0032	2024	08	031	0038.01	19740

0032	2024	08	031	0038.02	19740
0032	2024	08	031	0039.01	19740
0032	2024	08	031	0039.02	19740
0032	2024	08	031	0040.02	19740
0032	2024	08	031	0040.03	19740
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0032	2024	08	031	0041.08	19740
0032	2024	08	031	0041.09	19740
0032	2024	08	031	0041.10	19740
0032	2024	08	031	0041.11	19740
0032	2024	08	031	0041.12	19740
0032	2024	08	031	0041.13	19740
0032	2024	08	031	0042.01	19740
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0032	2024	08	031	0048.01	19740
0032	2024	08	031	0050.01	19740
0032	2024	08	031	0050.03	19740
0032	2024	08	031	0050.04	19740
0032	2024	08	031	0051.02	19740

0032	2024	08	031	0051.04	19740
0032	2024	08	031	0052.00	19740
0032	2024	08	031	0053.00	19740
0032	2024	08	031	0055.02	19740
0032	2024	08	031	0055.03	19740
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0032	2024	08	031	0069.03	19740
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0032	2024	08	031	0070.13	19740
0032	2024	08	031	0070.37	19740
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0032	2024	08	031	0083.05	19740
0032	2024	08	031	0083.06	19740
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0032	2024	08	031	0153.00	19740
0032	2024	08	031	0154.00	19740
0032	2024	08	031	0155.00	19740
0032	2024	08	031	0156.00	19740
0032	2024	08	031	0157.00	19740

0032	2024	08	031	0158.00	19740
0032	2024	08	031	9800.01	19740
0032	2024	08	031	9801.00	19740
0032	2024	08	031	9802.00	19740
<b>08: Colorado, 19740: Denver-Aurora, CO MSA, 035: Douglas County</b>					
0032	2024	08	035	0139.04	19740
0032	2024	08	035	0139.05	19740
0032	2024	08	035	0139.07	19740
0032	2024	08	035	0139.09	19740
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0032	2024	08	035	0141.08	19740
0032	2024	08	035	0141.09	19740
0032	2024	08	035	0141.10	19740
0032	2024	08	035	0141.12	19740
0032	2024	08	035	0141.13	19740
0032	2024	08	035	0141.14	19740
0032	2024	08	035	0141.15	19740
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0032	2024	08	035	0141.26	19740
0032	2024	08	035	0141.27	19740
0032	2024	08	035	0141.28	19740
0032	2024	08	035	0141.29	19740
0032	2024	08	035	0141.30	19740

0032	2024	08	035	0141.31	19740
0032	2024	08	035	0141.32	19740
0032	2024	08	035	0141.33	19740
0032	2024	08	035	0141.34	19740
0032	2024	08	035	0141.35	19740
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0032	2024	08	035	0144.05	19740
0032	2024	08	035	0144.07	19740
0032	2024	08	035	0144.08	19740
0032	2024	08	035	0144.09	19740
0032	2024	08	035	0144.10	19740
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0032	2024	08	035	0145.04	19740
0032	2024	08	035	0145.05	19740
0032	2024	08	035	0145.06	19740
0032	2024	08	035	0146.02	19740
0032	2024	08	035	0146.03	19740
0032	2024	08	035	0146.04	19740
<b>08: Colorado, 19740: Denver-Aurora, CO MSA, 039: Elbert County</b>					
0032	2024	08	039	9611.00	19740
0032	2024	08	039	9612.04	19740
0032	2024	08	039	9612.05	19740
0032	2024	08	039	9612.06	19740
0032	2024	08	039	9612.07	19740
0032	2024	08	039	9612.08	19740
0032	2024	08	039	9612.09	19740
<b>08: Colorado, 19740: Denver-Aurora, CO MSA, 047: Gilpin County</b>					



08: Colorado, 19740: Denver-Aurora, CO MSA, 059: Jefferson County					
0032	2024	08	059	0098.06	19740
0032	2024	08	059	0098.07	19740
0032	2024	08	059	0098.15	19740
0032	2024	08	059	0098.23	19740
0032	2024	08	059	0098.24	19740
0032	2024	08	059	0098.27	19740
0032	2024	08	059	0098.28	19740
0032	2024	08	059	0098.29	19740
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0032	2024	08	059	0102.08	19740
0032	2024	08	059	0102.09	19740
0032	2024	08	059	0102.10	19740
0032	2024	08	059	0102.11	19740

0032	2024	08	059	0102.12	19740
0032	2024	08	059	0102.13	19740
0032	2024	08	059	0103.03	19740
0032	2024	08	059	0103.04	19740
0032	2024	08	059	0103.05	19740
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0032	2024	08	059	0106.03	19740
0032	2024	08	059	0106.04	19740
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0032	2024	08	059	0109.02	19740
0032	2024	08	059	0110.00	19740
0032	2024	08	059	0111.01	19740
0032	2024	08	059	0111.02	19740
0032	2024	08	059	0112.02	19740
0032	2024	08	059	0113.00	19740
0032	2024	08	059	0114.01	19740
0032	2024	08	059	0114.02	19740
0032	2024	08	059	0115.51	19740
0032	2024	08	059	0115.52	19740
0032	2024	08	059	0116.01	19740
0032	2024	08	059	0116.02	19740
0032	2024	08	059	0117.01	19740
0032	2024	08	059	0117.02	19740
0032	2024	08	059	0117.08	19740
0032	2024	08	059	0117.09	19740
0032	2024	08	059	0117.10	19740
0032	2024	08	059	0117.11	19740
0032	2024	08	059	0117.12	19740
0032	2024	08	059	0117.20	19740
0032	2024	08	059	0117.21	19740
0032	2024	08	059	0117.23	19740
0032	2024	08	059	0117.24	19740

0032	2024	08	059	0117.25	19740
0032	2024	08	059	0117.26	19740
0032	2024	08	059	0117.27	19740
0032	2024	08	059	0117.28	19740
0032	2024	08	059	0117.29	19740
0032	2024	08	059	0117.30	19740
0032	2024	08	059	0117.31	19740
0032	2024	08	059	0117.32	19740
0032	2024	08	059	0117.33	19740
0032	2024	08	059	0118.03	19740
0032	2024	08	059	0118.04	19740
0032	2024	08	059	0118.06	19740
0032	2024	08	059	0118.07	19740
0032	2024	08	059	0118.08	19740
0032	2024	08	059	0119.04	19740
0032	2024	08	059	0119.51	19740
0032	2024	08	059	0120.22	19740
0032	2024	08	059	0120.23	19740
0032	2024	08	059	0120.24	19740
0032	2024	08	059	0120.26	19740
0032	2024	08	059	0120.27	19740
0032	2024	08	059	0120.30	19740
0032	2024	08	059	0120.31	19740
0032	2024	08	059	0120.32	19740
0032	2024	08	059	0120.33	19740
0032	2024	08	059	0120.34	19740
0032	2024	08	059	0120.35	19740
0032	2024	08	059	0120.36	19740
0032	2024	08	059	0120.37	19740
0032	2024	08	059	0120.38	19740
0032	2024	08	059	0120.39	19740
0032	2024	08	059	0120.41	19740
0032	2024	08	059	0120.42	19740
0032	2024	08	059	0120.43	19740
0032	2024	08	059	0120.44	19740
0032	2024	08	059	0120.45	19740
0032	2024	08	059	0120.46	19740
0032	2024	08	059	0120.47	19740
0032	2024	08	059	0120.48	19740
0032	2024	08	059	0120.49	19740
0032	2024	08	059	0120.50	19740
0032	2024	08	059	0120.51	19740
0032	2024	08	059	0120.52	19740
0032	2024	08	059	0120.53	19740

0032	2024	08	059	0120.54	19740
0032	2024	08	059	0120.55	19740
0032	2024	08	059	0120.57	19740
0032	2024	08	059	0120.58	19740
0032	2024	08	059	0120.59	19740
0032	2024	08	059	0120.60	19740
0032	2024	08	059	0158.00	19740
0032	2024	08	059	0159.00	19740
0032	2024	08	059	0603.00	19740
0032	2024	08	059	0604.00	19740
0032	2024	08	059	0605.01	19740
0032	2024	08	059	9800.00	19740
0032	2024	08	059	9804.00	19740
0032	2024	08	059	9807.00	19740
0032	2024	08	059	9808.00	19740
<b>08: Colorado, 19740: Denver-Aurora, CO MSA, 093: Park County</b>					
0032	2024	08	093	0001.01	19740
0032	2024	08	093	0001.02	19740
0032	2024	08	093	0002.00	19740
0032	2024	08	093	0003.00	19740
0032	2024	08	093	0004.00	19740
0032	2024	08	093	0005.00	19740

# **Branch & ATM Information**



## Branch List and Hours of Operation

January 9, 2025

Branch Number & Name	Branch Name, Address, & Census Demographic Information	Tract Income Level	Tract Minority %		Hours of Operation
001 Corporate	5100 N Classen Blvd, Ste 500 Oklahoma City, OK 73118 36420/40/109/1001.00	Moderate	43.75%	Lobby	8 am - 5 pm (M-F)
101 East Moore	400 S Eastern Ave Moore, OK 73160 36420/40/027/2021.06	Middle	34.39%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
102 West Moore	11919 S Pennsylvania Ave Oklahoma City, OK 73170 36420/40/027/2018.01	Upper	35.63%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
103 Capitol Hill	700 SW 29th Oklahoma City, OK 73109 36420/40/109/1050.00	Unknown	84.09%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat)
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
104 Downtown Norman	131 E Main St Norman, OK 73069 36420/40/027/2001.00	Unknown	31.36%	Lobby	9 am - 5 pm (M-F)
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
105 Brookhaven	3595 W Robinson Norman, OK 73072 36420/40/027/2015.05	Upper	25.44%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
108 39th Expressway	5800 NW 39th Expressway Oklahoma City, OK 73132 36420/40/109/1068.04	Moderate	57.56%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
109 Midwest City	301 N Air Depot Midwest City, OK 73110 36420/40/109/1080.06	Middle	48.25%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
110 Northwest Expressway	6005 NW Expressway Oklahoma City, OK 73132 36420/40/109/1085.14	Middle	52.47%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
111 Quail Creek	13144 N May Ave Oklahoma City, OK 36420/40/109/1083.55	Moderate	64.79%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
113 Lindsey Street	1337 W Lindsey St Norman, OK 73069 36420/40/027/2010.00	Middle	36.93%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M - F), 9 am - 12 pm (Sat)
115 Noble	900 N Main St Noble, OK 73068 36420/40/027/2025.02	Middle	22.61%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
116 Meridian	1400 S Meridian Oklahoma City, OK 73108 36420/40/109/1070.02	Moderate	61.62%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
117 Mustang	1521 N Mustang Road Mustang, OK 73064 36420/40/017/3014.10	Middle	26.84%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)



## Branch List and Hours of Operation

January 9, 2025

Branch Number & Name	Branch Name, Address, & Census Demographic Information	Tract Income Level	Tract Minority %	Hours of Operation	
118 Nichols Hills	6404 Avondale Drive Oklahoma City, OK 73116 36420/40/109/1064.01	Upper	14.26%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
119 Rose Creek	2825 NW 164th Edmond, OK 73013 36420/40/109/1082.35	Upper	41.68%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
120 Edmond Broadway	2600 S Broadway Edmond, OK 73013 36420/40/109/1083.04	Middle	26.95%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
121 Edmond Coffee Creek	725 W Covell Rd Edmond, OK 73003 36420/40/109/1082.24	Upper	21.97%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
122 Midtown OKC	424 NW 10th Oklahoma City, OK 73103 36420/40/109/1025.00	Upper	33.69%	Lobby	9 am - 5 pm (M-F)
151 Midtown Tulsa	30 W 21st Street Tulsa, OK 74114 46140/40/143/0045.00	Upper	17.75%	Lobby	9 am - 5 pm (M-F)
				Drive-in	8 am - 6 pm (M-F)
401 Biltmore Estates	6232 N 32nd St Phoenix, AZ 85018 38060/04/013/1078.00	Upper	12.97%	Lobby	9 am - 5 pm (M-F)
402 Old Town Scottsdale	7401 E Camelback Rd Scottsdale, AZ 85251 38060/04/013/2172.01	Upper	23.09%	Lobby	9 am - 5 pm (M-F), 8 am - 6 pm
				Drive-in	
403 Scottsdale Promenade	16435 N Scottsdale Rd, Ste 150 Scottsdale, AZ 85260 38060/04/013/2168.16	Upper	18.35%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
404 Deer Valley	22841 N 19th Ave Phoenix, AZ 85027 38060/04/013/6147.00	Moderate	40.47%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
				Drive-in	
405 Arrowhead	17235 N 75th Ave, Ste B100 Glendale, AZ 85308 38060/04/013/6178.00	Upper	20.26%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
406 Mesa	63 E Main Mesa, AZ 85201 38060/04/013/4214.00	Moderate	44.47%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
501 Denver Tech Center	5613 DTC Parkway, Ste 810 Greenwood Village, CO 80111 19740/08/005/0068.59	Middle	40.47%	Lobby	8 am - 5 pm (M-F)



## ATM Locations

January 9, 2025

ATM Location	Address & Census Demographic Information	Tract Income Level	Tract Minority %	ATM Service Capacity
001 Corporate	5100 N Classen Blvd Oklahoma City, OK 73118 36420/40/109/1001.00	Moderate	43.75%	Withdrawal Only
101 East Moore	400 S Eastern Ave Moore, OK 73160 36420/40/027/2021.06	Middle	34.39%	Deposit and Withdrawal
102 West Moore	11919 S Pennsylvania Ave Oklahoma City, OK 73170 36420/40/027/2018.01	Upper	35.63%	Deposit and Withdrawal
103 Capitol Hill	700 SW 29th Oklahoma City, OK 73109 36420/40/109/1050.00	Unknown	84.09%	Deposit and Withdrawal
104 Downtown Norman	131 E Main St Norman, OK 73069 36420/40/027/2001.00	Unknown	31.36%	Deposit and Withdrawal
105 Brookhaven	3595 W Robinson Norman, OK 73072 36420/40/027/2015.05	Upper	25.44%	Deposit and Withdrawal
107 American Fidelity	9000 Cameron Parkway Oklahoma City, OK 73114 36420/40/109/1083.01	Moderate	72.34%	Deposit and Withdrawal
108 39th Expressway	5800 NW 39th Expressway Oklahoma City, OK 73122 36420/40/109/1068.04	Moderate	57.56%	Deposit and Withdrawal
109 Midwest City	301 N Air Depot Midwest City, OK 73110 36420/40/109/1080.07	Middle	48.25%	Deposit and Withdrawal
110 NW Expressway	6005 NW Expressway Oklahoma City, OK 73132 36420/40/109/1085.14	Middle	52.47%	Deposit and Withdrawal
111 Quail Creek	13144 N May Ave Oklahoma City, OK 36420/40/109/1083.55	Moderate	64.79%	Deposit and Withdrawal
113 Lindsey St	1337 W Lindsey Norman, OK 73069 36420/40/027/2010.00	Middle	36.93%	Deposit and Withdrawal





## ATM Locations

January 9, 2025

ATM Location	Address & Census Demographic Information	Tract Income Level	Tract Minority %	ATM Service Capacity
115 Noble	900 N Main Noble, OK 73068 36420/40/027/2025.00	Middle	22.60%	Deposit and Withdrawal
116 Meridian	1400 S Meridian Oklahoma City, OK 73108 36420/40/109/1070.02	Moderate	61.62%	Deposit and Withdrawal
117 Mustang	1521 N Mustang Road Mustang, OK 73064 36420/40/017/3014.10	Middle	26.84%	Deposit and Withdrawal
118 Nichols Hills	6404 Avondale Drive Oklahoma City, OK 73116 36420/40/109/1064.01	Upper	14.26%	Deposit and Withdrawal
119 Rose Creek	2825 NW 164th Edmond, OK 73012 36420/40/109/1082.18	Upper	41.68%	Deposit and Withdrawal
120 Broadway	2600 S Broadway Edmond, OK 73013 36420/40/109/1083.04	Middle	26.95%	Deposit and Withdrawal
121 Coffee Creek	725 W Covell Road Edmond, OK 73003 36420/40/109/1082.13	Upper	21.97%	Deposit and Withdrawal
122 Midtown Oklahoma City	424 NW 10th Oklahoma City, OK 73103 36420/40/109/1025.00	Upper	36.69%	Deposit and Withdrawal
151 Midtown Tulsa	30 W 21st Street Tulsa, OK 74114 46140/40/143/0045.00	Upper	17.75%	Deposit and Withdrawal
401 Biltmore Estates	6232 N 32nd St Phoenix, AZ 85018 38060/04/013/1078.00	Upper	12.97%	Deposit and Withdrawal
402 Downtown Scottsdale	7401 E Camelback Rd Scottsdale, AZ 85251 38060/04/013/2172.01	Upper	23.09%	Deposit and Withdrawal
403 N Scottsdale	16405 N Scottsdale Rd, Ste 150 Scottsdale, AZ 85254 38060/04/013/2168.16	Upper	18.35%	Deposit and Withdrawal



## ATM Locations

January 9, 2025

<b>ATM Location</b>	<b>Address &amp; Census Demographic Information</b>	<b>Tract Income Level</b>	<b>Tract Minority %</b>	<b>ATM Service Capacity</b>
<b>Normandy Creek Shopping Center</b>	2200 W Main St Norman, OK 73069 36420/40/027/2010.00	Middle	36.93%	Deposit and Withdrawal
<b>Main &amp; Berry</b>	1190 W Main St Norman, OK 73069 36420/40/027/2005.00	Middle	26.00%	Deposit and Withdrawal



**Branch Locations Opened or Closed**  
**January 9, 2025**

<b>Branch Name and Address</b>	<b>Demographic Information</b>	<b>Close/Open</b>	<b>Date</b>
<b>16277 Greenway Hayden Loop Scottsdale, AZ 85260</b>	38060/04/013/2168.16 Upper Income Census Tract	Close	9/10/2022
<b>16405 N Scottsdale Rd, Suite 150 Scottsdale, AZ 85254</b>	38060/04/013/2168.16 Upper Income Census Tract	Open	9/12/2022
<b>722 N Broadway Ave Oklahoma City, OK 73102</b>	36420/40/109/1091.00 Middle Income Census Tract	Close	7/31/2024
<b>424 NW 10th Oklahoma City, OK 73103</b>	36420/40/109/1025.00 Upper Income Census Tract	Open	8/1/2024
<b>12215 N MacArthur Blvd Oklahoma City, OK 73162</b>	36/40/109/1085.29 Upper Income Census Tract	Close	12/13/2024
<b>13144 N May Ave Oklahoma City, OK 73120</b>	36420/40/109/1083.55 Moderate Census Tract	Open	12/16/2024
<b>10904 N May Ave Oklahoma City, OK 73120</b>	36420/40/109/1083.55 Middle Census Tract	Close	1/1/2025

## Community Reinvestment Act Disclosure Notice

The CRA data about our small business and small farm lending are available online for review. The data show geographic distribution of loans. These data are available online at the Federal Financial Institution Examination Council Web site (<https://www.ffiec.gov>). CRA data for many other financial institutions are also available at this Website.

## 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)). HMDA data for many other financial institutions are also available at this Website.

# **Public Written Comments**



July 29, 2022

Mr. Lee R. Symcox,  
First Fidelity Bank  
5100 N Classen Blvd, Suite 500  
Oklahoma City, OK 73118

Dear Mr. Lee R. Symcox:

Thank you for your support and commitment to United Way of Central Oklahoma. Enclosed you will find documentation on United Way partner agency programs that we believe meet the criteria to be considered as qualified investments for the Community Reinvestment Act (CRA) exam credit. The enclosed table lists United Way funded programs by agency along with the number of clients those agencies serve and the percentage of those clients whose family income falls below \$53,600 (80% low-income limit for 2021 for a family of four as published in the HUD Income Limits Documentation System).

In addition, the table shows which of the provisions of the CRA the program falls under as a qualified investment. Supporting documentation for the data in the table is available at United Way of Central Oklahoma and at the specified Partner Agency.

The enclosed table indicates that close to **74.72%** of the total funds allocated by United Way to partner agencies were directed to services for clients whose family income is less than \$53,600. (The table also shows that income data was collected on **78.41%** of the program funds.) The funded services address needs for education, health care, social services, childcare, employment and other health and human service needs of low and moderate-income individuals and families. In addition, many of these programs provide credit counseling, offer technical assistance to other nonprofit organizations, or address housing needs, including funding homeless shelters. As you know, programs addressing some or all of these needs can be considered as potentially qualified investments under the CRA.

We developed this table in consultation with staff in the Consumer Affairs department of the Examinations and Inspections Division of the Federal Reserve Bank of Kansas City as well as with input from the FFIEC. We believe that the data therein demonstrates that First Fidelity Bank's corporate gift of \$20,000 to United Way of Central Oklahoma should be considered for eligibility as a qualified investment under the terms of the Community Reinvestment Act.

If you have questions, please contact me at [dhampton@unitedwayokc.org](mailto:dhampton@unitedwayokc.org) or (405) 236-8441. Thank you for your commitment to building a stronger, healthier more compassionate community for all.

Sincerely,

A handwritten signature in blue ink that reads "Debby Hampton".

Debby Hampton  
President & CEO

Enclosure

**United Way of Central Oklahoma  
Community Reinvestment Act Report 2021-2022**

AGENCY	PROGRAMS	2022/2023	CRA Criteria								LMI #	Total #	% Low	Comments
		ALLOCATION	1	2	3	4	5	6	7	8	Clients	Clients	Income	
												(Actuals 2021/2022)		
<b>AREAWIDE AGING AGENCY, INC.</b>														
	Senior Stabilization Program	\$ 53,597							Y			15,456	15,456	100%
<b>BETHESDA, INC.</b>														
	Stop, Go & Tell Education	\$ 20,000							Y			12,591	N/A	Income data not collected
	Therapeutic Counseling Program	\$ 44,000							Y			605	738	82%
<b>BIG BROTHERS BIG SISTERS OF OKLAHOMA, OKLAHOMA CITY</b>														
	One-to-One Mentoring	\$ 160,000							Y			521	N/A	Income data not collected
<b>BOY SCOUTS OF AMERICA, LAST FRONTIER COUNCIL</b>														
	Comprehensive Youth Development	\$ 432,296							Y			4,390	N/A	Income data not collected
<b>BOYS &amp; GIRLS CLUBS OF OKLAHOMA COUNTY</b>														
	Boys and Girls Clubs	\$ 202,500							Y			3,616	4,041	89%
<b>CALM WATERS CENTER FOR CHILDREN &amp; FAMILIES</b>														
	Center-based Support Groups	\$ 51,000							Y			405	700	58%
	School-based Support Groups	\$ 16,097							Y			189	312	61%
<b>CAMP FIRE HEART OF OKLAHOMA</b>														
	Educational Sustainability	\$ 14,000							Y			433	1,143	38%
	OKC Comprehensive Youth Development	\$ 95,000							Y			163	354	46%
	Outdoor Education	\$ 88,000							Y			468	1,043	45%
<b>CARDINAL COMMUNITY HOUSE</b>														
	Women's Services	\$ 1,181							Y			-	N/A	Income data not collected
<b>CASA OF OKLAHOMA COUNTY, INC.</b>														
	Case Management	\$ 100,223							Y			726	N/A	Income data not collected
<b>CATHOLIC CHARITIES</b>														
	Family Support Services	\$ 86,625							Y			1,900	2,062	92%
	Immigration Assistance	\$ 170,000							Y			138	181	76%
	Homeless Services	\$ 22,440							Y			682	698	98%
<b>A CHANCE TO CHANGE</b>														
	A Chance to Recover	\$ 68,205							Y			232	397	58%
	A Chance to Succeed	\$ 30,600							Y			33	273	12%
<b>CITIZENS CARING FOR CHILDREN</b>														
	Resource Center	\$ 104,130							Y			1,860	N/A	Income data not collected
<b>CITY CARE</b>														
	Supportive Housing	\$ 44,000				Y			Y			166	173	96%
<b>COFFEE CREEK RIDING CENTER</b>														
	Therapeutic Riding Program	\$ 23,289							Y			41	N/A	Income data not collected
<b>COMMUNITY LITERACY CENTERS, INC.</b>														
	LEAP	\$ 67,980							Y			864	988	87%
<b>DAILY LIVING CENTERS, INC.</b>														
	Adult Day Health Care	\$ 197,454							Y			120	231	52%
	Elderly & Disabled Community Transportation	\$ 20,424							Y			60	120	50%
<b>DALE ROGERS TRAINING CENTER, INC.</b>														
	Adult Rehab	\$ 111,000							Y			94	N/A	Income data not collected
	Camp Tumbleweed	\$ 10,200							Y			6	N/A	Income data not collected
	Special Needs	\$ 14,400							Y			16	N/A	Income data not collected
<b>D-DENT, INC.</b>														
	Preventative	\$ 4,500							Y			847	847	100%
	Restorative	\$ 73,000							Y			603	603	100%
<b>EARC, INC.</b>														
	The Trails	\$ 72,143							Y			22	22	100%
<b>FAMILY BUILDERS, INC.</b>														



**United Way of Central Oklahoma  
Community Reinvestment Act Report 2021-2022**

AGENCY	PROGRAMS	2022/2023	CRA Criteria								LMI #	Total #	% Low	Comments
		ALLOCATION	1	2	3	4	5	6	7	8	Clients	Clients	Income	
											(Actuals 2021/2022)			
	Child Abuse Prevention	\$ 168,000							Y		435	618	70%	
	Community Education Program	\$ 3,000									695	N/A	N/A	Income data not collected
	Violence Prevention	\$ 32,500							Y		383	584	66%	
<b>GIRL SCOUTS-WESTERN OKLAHOMA</b>														
	Leadership Development	\$ 265,000							Y		1,361	2,831	48%	
<b>GOODWILL INDUSTRIES OF CENTRAL OKLAHOMA</b>														
	Job Connection Center	\$ 24,000							Y		-	568	N/A	Income data not collected
<b>HEALTH ALLIANCE FOR THE UNINSURED</b>														
	Care Connection	\$ 33,343							Y		404	404	100%	
	Cooperative Central Pharmacy	\$ 36,220							Y		4,786	4,786	100%	
<b>HEARTLINE</b>														
	2-1-1 24/7 Services	\$ 186,379							Y		363,991	N/A	N/A	Income data not collected
	Suicide Prevention	\$ 37,276							Y		22,401	N/A	N/A	Income data not collected
<b>THE HOMELESS ALLIANCE</b>														
	Capacity Building	\$ 43,900				Y	Y				14,309	14,309	100%	
	WestTown Resource Center	\$ 56,400							Y		4,082	4,082	100%	
	Horizon HMIS	\$ 26,648									14,309	14,309	100%	
<b>INTEGRIS HOSPICE</b>														
	Hospice of Oklahoma County	\$ 140,250							Y		1,320	N/A	N/A	Income data not collected
<b>JOHN W. KEYS SPEECH &amp; HEARING CENTER</b>														
	Hearing Aid Bank	\$ 12,000							Y		94	94	100%	
	Language Preschool	\$ 13,000							Y		18	32	56%	
<b>LATINO COMMUNITY DEVELOPMENT AGENCY</b>														
	Health	\$ 20,200							Y		6,555	6,555	100%	
	Prevention	\$ 51,050							Y		954	954	100%	
	Tony Reyes Child Development	\$ 47,903							Y		87	93	94%	
	Treatment	\$ 38,872							Y		3,050	3,050	100%	
<b>LEGAL AID SERVICES OF OKLAHOMA, INC.</b>														
	Oklahoma City Law Office	\$ 92,700							Y	Y	3,075	3,141	98%	
<b>MENTAL HEALTH ASSOCIATION OKLAHOMA</b>														
	Sunbridge Counseling	\$ 17,860							Y		1,467	N/A	N/A	Income data not collected
	Student Mental Health	\$ 60,348							Y		10,398	N/A	N/A	Income data not collected
<b>METROPOLITAN BETTER LIVING CENTER</b>														
	Adult Day Health	\$ 128,960							Y		413	415	100%	
<b>MOORE YOUTH &amp; FAMILY SERVICES</b>														
	Moore Alternative School and Treatment Program	\$ 82,315							Y		13	31	42%	
<b>NEIGHBORHOOD SERVICES ORGANIZATION</b>														
	Housing & Community Development	\$ 293,934				Y			Y		74	74	100%	
	Palo Duro	\$ 38,598				Y			Y		25	25	100%	
<b>NEWVIEW OKLAHOMA</b>														
	OKC Low Vision Rehabilitation	\$ 37,500							Y		140	402	35%	
<b>NORTHCARE</b>														
	Adult Services	\$ 302,000							Y		6,664	6,870	97%	
<b>OKLAHOMA FOUNDATION FOR THE DISABLED, INC.</b>														
	Oklahoma Foundation for the Disabled	\$ 223,000							Y		110	200	55%	
<b>OKLAHOMA MEDICAL RESEARCH FOUNDATION (OMRF)</b>														
	Research Program	\$ 85,000							Y		-	N/A	N/A	Income data not collected
<b>OKLAHOMA UNITED METHODIST CIRCLE OF CARE</b>														
	Foster Care Services	\$ 30,000							Y		-	153	N/A	Income data not collected
<b>PIVOT, INC.</b>														
	Supporting Kids in Independent Living (SKIL)	\$ 65,000							Y		205	205	100%	

**United Way of Central Oklahoma  
Community Reinvestment Act Report 2021-2022**

AGENCY	PROGRAMS	2022/2023 ALLOCATION	CRA Criteria								LMI #	Total #	% Low	Comments	
			1	2	3	4	5	6	7	8	Clients	Clients	Income		
	The Point at Pivot	\$ 30,000									107	107	100%		
<b>POSITIVE TOMORROWS</b>															
	Education	\$ 133,612							Y		139	139	100%		
	Family Support Services	\$ 90,000							Y		444	458	97%		
	Extracurricular Program	\$ 13,800							Y		89	89	100%		
<b>POSSIBILITIES, INC.</b>															
	Inside Out Community Leadership	\$ 24,250							Y		-	181	N/A	Income data not collected	
<b>REMERGE</b>															
	ReMerge Diversion Program	\$ 45,000							Y		112	229	49%		
<b>RSVP OF CENTRAL OKLAHOMA, INC.</b>															
	Provide-A-Ride Transportation	\$ 75,000							Y		152	152	100%		
	Volunteer Recruit & Placement	\$ 60,000							Y		157	224	70%		
<b>THE SALVATION ARMY CENTRAL OKLAHOMA AREA COMMAND</b>															
	Boys & Girls Club	\$ 172,000							Y			184	N/A	Income data not collected	
	Emergency Shelter	\$ 202,000							Y		877	877	100%		
	Senior Services	\$ 208,000							Y			447	N/A	Income data not collected	
	Social Services	\$ 225,000							Y		5,694	5,694	100%		
	Disaster Services	\$ 35,000							Y			1,670	N/A	Income data not collected	
	Transportation	\$ 97,000							Y		158	158	100%		
<b>SKYLINE</b>															
	Food Pantry	\$ 64,500							Y		10,975	10,976	100%		
<b>SPECIAL CARE, INC.</b>															
	Childcare-Special Needs	\$ 390,000							Y		75	180	42%		
	Management & General	\$ 29,345							Y		75	180	42%		
<b>SUNBEAM FAMILY SERVICES, INC.</b>															
	Early Childhood Services	\$ 310,000							Y		1,847	1,885	98%		
	Mental Health Services	\$ 218,000							Y		452	565	80%		
	Senior Services	\$ 159,500							Y		991	1,665	60%		
	Contracted Foster Care	\$ 50,500							Y		118	197	60%		
<b>TEEM, THE EDUCATION &amp; EMPLOYMENT MINISTRY</b>															
	Job Placement	\$ 42,312							Y			298	N/A	Income data not collected	
<b>TINKER AFB YOUTH CENTER</b>															
	Social Programs	\$ 15,700							Y			1,170	N/A	Income data not collected	
	Sports Program	\$ 10,600							Y			708	N/A	Income data not collected	
<b>UPWARD TRANSITIONS</b>															
	Community Outreach Program	\$ 350,000							Y		5,515	5,515	100%		
<b>URBAN LEAGUE OF GREATER OKLAHOMA CITY, INC.</b>															
	Workforce & Career Development	\$ 118,830							Y		1,601	1,880	85%		
	Housing & Financial Literacy	\$ 103,000			Y	Y			Y		598	796	75%		
	Community Convening & Social Justice	\$ 27,000									2,291	3,420	67%		
	Education & Family Development	\$ 88,500							Y		1,404	1,839	76%		
<b>VARIETY CARE</b>															
	Family Planning	\$ 48,000							Y		11,785	15,296	77%		
	Obstetric Clinic	\$ 185,000							Y		2,366	2,984	79%		
	Pediatric Clinic	\$ 266,000							Y		34,951	36,862	95%		
	Dental Clinic	\$ 24,000							Y		9,769	12,512	78%		
<b>YMCA OF GREATER OKLAHOMA CITY</b>															
	Lincoln Park Senior Center	\$ 51,500							Y		166	166	100%		
	Teens	\$ 17,312							Y		25	86	29%		
<b>YOUTH &amp; FAMILY SERVICES, INC.</b>															
	Community Counseling	\$ 25,000							Y			746	N/A	Income data not collected	
	The Caring Center	\$ 25,175							Y			185	N/A	Income data not collected	
	Management & General	\$ 875							Y			41,510	N/A	Income data not collected	
<b>YWCA OF OKLAHOMA CITY</b>															

**United Way of Central Oklahoma  
Community Reinvestment Act Report 2021-2022**

AGENCY	PROGRAMS	2022/2023	CRA Criteria								LMI #	Total #	% Low	Comments	
		ALLOCATION	1	2	3	4	5	6	7	8	Clients	Clients	Income		
											<b>(Actuals 2021/2022)</b>				
	CARE	\$ 874,000						Y			1,767	6,570	27%		
	HOPE	\$ 20,000						Y			667	702	95%		
		(Total dollars applied towards the low income)													
	<b>TOTAL DOLLARS</b>	10016751									183915	675186	0.2724		
<p align="center">Approximately 74.72% of the total funds allocated by United Way to partner agencies were directed to services for clients whose family income is less than \$53,600.</p> <p align="center">Income data was collected on 78.41% of the program funds.</p>															

**Arizona District Office**  
**3<sup>rd</sup> Party Lender Rankings**  
 Fiscal Year 2022 4<sup>th</sup> Quarter  
 10/01/21 through 9/30/22

<b>No. 1 Lender</b> <b>JP Morgan Chase Bank</b> <b>25</b> <b>\$31,466,357</b>	<b>No. 2. Lender:</b> <b>First Fidelity</b> <b>23</b> <b>\$31,580,793</b>	<b>No. 3 Lender:</b> <b>Glacier Bank</b> <b>18</b> <b>\$22,023,579</b>
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Lender	Count	Amount	Lender	Count	Amount
4. Zions Bank	17	\$22,007,340	Unison Bank	4	\$9,124,063
5. Western Alliance	9	\$12,490,788	First International B&T	4	\$4,894,061
6. Bank 34	8	\$24,596,631	Western Alliance Bank	4	\$4,567,043
7. Commerce Bank of AZ	8	\$9,079,119	Comerica Bank	3	\$11,438,797
8. Bank Five Nine	6	\$7,787,500	Gateway Bank, FSB	3	\$888,201
9. Meadows Bank	6	\$7,685,351	First Interstate Bank	3	\$792,450
10. Desert Financial CU	6	\$3,559,761	KS StateBank	2	\$15,555,152
Western State Bank	6	\$3,236,459	Poppy Bank	2	\$7,269,459
Arizona Financial CU	6	\$3,088,850	Wells Fargo Bank	2	\$4,452,500
Horizon Community Bank	5	\$10,532,778	MUFG Union Bank	2	\$4,425,500
Bell Bank	5	\$4,694,732	BOK Financial Corporation	2	\$4,131,690
MidFirst Bank	4	\$13,656,323	Pacific Premier Bank	2	\$4,115,890
Pinnacle Bank	4	\$10,044,770			

<b>TOTALS</b>	<b>240</b>	<b>\$352,600,621</b>
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**504 3<sup>rd</sup> Party Production**

Mountain America FCU	2	\$3,180,600
Nicolet National Bank	2	\$2,598,921
First Savings Bank	2	\$2,589,575
FirstBank	2	\$2,107,700
UMB Bank, National Association	2	\$1,773,342
Neighborhood National Bank	2	\$1,613,600
BNC National Bank	2	\$1,216,200
Bank of America, National Association	2	\$937,500
Enterprise Bank & Trust	1	\$5,525,000
First Foundation Bank	1	\$4,750,800
Celtic Bank Corporation	1	\$4,316,958
Metro Phoenix Bank	1	\$2,310,000
Notre Dame FCU	1	\$2,293,034
Citigroup Inc.	1	\$2,133,630
Peoples National Bank, National Association	1	\$2,030,858
Old National Bank	1	\$1,861,000
First American Bank	1	\$1,818,106
CIBC Bank USA	1	\$1,610,000
Plumas Bank	1	\$1,600,000
Sunflower Bank, National Association	1	\$1,262,500
Arizona Bank & Trust	1	\$1,101,000
Enterprise Bank and Trust Company	1	\$1,050,000
Bank of the West	1	\$1,025,000
First Source Federal Credit Union	1	\$982,682
OneAZ CU	1	\$929,387
1st Bank Yuma	1	\$909,297
CrossFirst Bank	1	\$889,727
First Citizens Bank	1	\$861,250
First Advantage Corporation	1	\$851,737
UNKNOWN	1	\$804,038
Citizens Business Bank	1	\$725,000
Signature Bank	1	\$725,000
BMO Harris Bank National Association	1	\$719,049
Washington Federal Bank	1	\$670,500
First Internet Bank of Indiana	1	\$605,000
Prestamos CDFI, LLC	1	\$537,300
Harvest Commercial Capital, LLC	1	\$480,150
City National Bank	1	\$450,000
Tucson Old Pueblo CU	1	\$444,111
Bank of Utah	1	\$392,632
Gateway Commercial Bank	1	\$237,500
Mission Bank	1	\$225,000
Western Bank	1	\$0

**Arizona District Office**  
**3<sup>rd</sup> Party Lender Rankings**  
 Fiscal Year 2024 1<sup>st</sup> Quarter  
 10/01/2023 through 12/31/2023

<b>No. 1 Lender</b> <b>First Fidelity Bank</b> <b>8</b> <b>\$5,766,020</b>	<b>No. 2. Lender:</b> <b>FW Bank</b> <b>3</b> <b>\$3,627,900</b>	<b>No. 3 Lender:</b> <b>First Savings Bank</b> <b>2</b> <b>\$4,238,850</b>
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Lender	Count	Amount	Lender	Count	Amount
Western Alliance Bank	2	\$3,822,150	Gateway Bank	1	\$602,500
Commerce Bank of Arizona	2	\$2,953,027	Harvest Commercial Capital	1	\$369,806
Western State Bank	2	\$2,195,000	JPMorgan Chase	1	\$300,000
Poppy Bank	1	\$6,236,019	Glacier Bank	1	\$230,800
Capital Community Bank	1	\$3,179,941	No Lender ID Provided	2	\$7,249,720
OneAZ CU	1	\$2,500,000			
Banc of California	1	\$1,897,880			
Comerica Bank	1	\$1,755,000			
Bell Bank	1	\$1,486,935			
Unison Bank	1	\$1,381,250			
Pinnacle Bank	1	\$1,272,500			
First-Citizens Bank & Trust	1	\$700,000			
Arizona Financial Credit Union	1	\$625,000			

<b>TOTALS</b>	<b>35</b>	<b>\$52,390,298</b>
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**Arizona District Office**  
**3<sup>rd</sup> Party Lender Rankings**  
Fiscal Year 2025 1<sup>st</sup> Quarter  
10/01/2024 through 12/31/2024

<b>No. 1 Lender</b> <b>First Fidelity Bank</b> <b>10</b> <b>\$8,767,473</b>	<b>No. 2. Lender:</b> <b>Glacier Bank</b> <b>4</b> <b>\$10,950,643</b>	<b>No. 3 Lender:</b> <b>Bank of America</b> <b>4</b> <b>\$3,773,600</b>
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Lender	Count	Amount	Lender	Count	Amount
Celtic Bank	3	\$12,194,046	Laguna Hills	1	\$4,150,000
JPMorgan Chase	3	\$5,372,504	Umpqua Bank	1	\$2,224,433
First Bank of the Lake	3	\$3,827,900	First-Citizens Bank & Trust	1	\$882,000
BNC National Bank	2	\$8,448,734	Mountain America FCU	1	\$791,900
Southwest Heritage Bank	2	\$5,069,412	America First FCU	1	\$659,932
Comerica Bank	2	\$4,533,500	Gainey Business Bank	1	\$625,000
CalPrivate Bank	2	\$3,695,000	1st Bank Yuma	1	\$614,400
KS StateBank	2	\$3,112,000	UNKNOWN	1	\$609,547
Bell Bank	2	\$1,352,430	U.S. Bank, National Association	1	\$592,200
Gateway Commercial Bank	2	\$975,000	Desert Financial CU	1	\$575,000
Zions Bank	2	\$517,053	Unison Bank	1	\$547,500
United Business Bank	1	\$8,750,000	Integro Bank	1	\$480,000
Newtek Bank	1	\$6,225,000	Sunwest Bank	1	\$462,750

<b>TOTALS</b>	<b>61</b>	<b>\$100,778,957</b>
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**504 3<sup>rd</sup> Party Production**

Arizona Financial Credit Union	1	N/A
Live Oak Banking Company	1	N/A
TrustBank	1	N/A



**PREMIOS  
NOSOTROS!**  
LIDERAZGO - MÉRITO EMPRESARIAL



Phoenix AZ, April 10th, 2023

Dear  
Iván O García  
SENIOR VICE PRESIDENT  
FIRST FIDELITY BANK  
Present. -

We are excited to bring to our community PREMIOS NOSOTROS for 7th consecutive year, organized by Asociación de Empresarios Latinoamericanos in the State of Arizona.

Our mission: We promote the development and growth of Latino businesses in Arizona; through business transformation based on the standards of the knowledge economy, an organizational structure that promotes innovation, empowerment, recognition, and the generation of professional business leaders.

Our gala is attended by Government Authorities, Political Leaders, Corporate Entrepreneurs, Latino Entrepreneurs, Leaders, and the Latino Community, in a space where together we celebrate the success of our people.

In this context, I inform you that you will receive recognition for your professionalism, ethics, and commitment to serving our Latino business community.

Gala: PREMIOS NOSOTROS 2023  
Category: OUTSTANDING LATINO EXECUTIVE OF THE YEAR  
Ceremony: April 27th, 2023 / Starting 6pm – 11pm  
Venue: 7533 W Thomas Rd, Phoenix, AZ85033 (Eduardo's Reception Hall)

If you have any questions, please, contact us at (602) 525 6948 / [jgarcia@aelarizona.com](mailto:jgarcia@aelarizona.com)

Sincerely,

Jorge Enrique Garcia  
CEO – FOUNDER  
Premios Nosotros  
Asociación de Empresarios Latinoamericanos  
Arizona

December 13, 2023

Mr. Lee R. Symcox, First Fidelity Bank  
5100 N Classen Blvd Suite 500  
Oklahoma City, OK 73118

Dear Mr. Symcox:

Thank you for your support and commitment to United Way of Central Oklahoma. Enclosed you will find documentation on United Way partner agency programs that we believe meet the criteria to be considered as qualified investments for the Community Reinvestment Act (CRA) exam credit. The enclosed table lists United Way funded programs by agency along with the number of clients those agencies serve and the percentage of those clients whose family income falls below \$59,950 (80% low-income limit for 2022 for a family of four as published in the HUD Income Limits Documentation System).

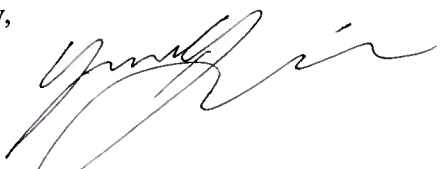
In addition, the table shows which of the provisions of the CRA the program falls under as a qualified investment. Supporting documentation for the data in the table is available at United Way of Central Oklahoma and at the specified Partner Agency.

The enclosed table indicates that close to **61.87%** of the total funds allocated by United Way to partner agencies were directed to services for clients whose family income is less than \$59,950. The table also shows that income data was collected on **77.04%** of the program funds. The funded services address needs for education, health care, social services, childcare, employment and other health and human service needs of low and moderate-income individuals and families. In addition, many of these programs provide credit counseling, offer technical assistance to other nonprofit organizations, or address housing needs, including funding homeless shelters. Programs addressing some or all of these needs can be considered as potentially qualified investments under the CRA.

We developed this table in consultation with staff in the Consumer Affairs department of the Examinations and Inspections Division of the Federal Reserve Bank of Kansas City as well as with input from the FFIEC. We believe that the data therein demonstrates that First Fidelity Bank's corporate gift of \$20,000 to United Way of Central Oklahoma should be considered for eligibility as a qualified investment under the terms of the Community Reinvestment Act.

If you have questions, please contact [ygalvan@unitedwayokc.org](mailto:ygalvan@unitedwayokc.org) or (405) 236-8441. Thank you for your commitment to building a stronger, healthier more compassionate community for all.

Sincerely,



Yvonne Galvan  
Community Impact Administrative Assistant



- American Fidelity Assurance Company
- Arvest Bank
- BancFirst
- The Chickasaw Nation
- Clements Family Compellier
- Continental Resources
- Luke & Becky Corbett Foundation
- Cox Communications
- Cresap Family Foundation
- Devon Energy
- Dobson Family Foundation
- Dolese Bros. Co.
- Eddie Foundation / Clay & Jamie Farha
- Dr. Robert Ellis & Nancy P. Ellis
- Express Employment International
- First Fidelity Bank – Lee & Suzie Symcox
- Gaming Capital Group
- E.L. and Thelma Gaylord Foundation
- Howard Family Charitable Foundation
- Inasmuch Foundation
- INTEGRIS Health
- Dennis & Janet Jaggi
- Fred Jones Family Foundation & Kirk Hall
- Bill & Sherri Lance
- Jenee & Darren Lister
- Love Family
- Love's Travel Stops
- Ed & Kathy Martin
- Herman & LaDonna Meinders
- Robert H. Meinders
- MidFirst Bank / Jeff & Marisa Records
- OGE Energy Corp.
- Oklahoma City Community Foundation
- Oklahoma City Thunder
- ONE Gas Foundation
- Presbyterian Health Foundation
- George Records
- Natalie Shirley
- Dr. & Mrs. Robert Spinks
- Craig & Sherry Stetson
- Doug & Susie Stussi
- David & Jane Thompson
- Tyler Media
- Gregg Wadley & Susan E. Brackett
- Shane & Lori Wharton

**SPECIAL THANKS TO OUR  
CENTENNIAL DONORS OF \$25,000  
OR MORE**

**A Century of Compassion**

**United Way of Central Oklahoma  
Community Reinvestment Act Report 2022-2023**

AGENCY	PROGRAMS	2023/2024	CRA Criteria								LMI #	Total #	% Low	Comments
		ALLOCATION	2	3	4	5	6	7	8	Clients	Clients	Income		
<b>(Actuals 2022/2023)</b>														
<b>AREAWIDE AGING AGENCY, INC.</b>														
	Senior Stabilization Program	\$ 53,597									2,717	20,887	13%	
<b>BETHESDA, INC.</b>														
	Stop, Go, Tell Education	\$ 19,000										15,400	N/A	Income data not collected
	Therapeutic Counseling Program	\$ 44,000									625	738	85%	
<b>BIG BROTHERS BIG SISTERS OF OKLAHOMA, OKLAHOMA CITY</b>														
	One-to-One Mentoring	\$ 160,000										434	N/A	Income data not collected
<b>BOY SCOUTS OF AMERICA, LAST FRONTIER COUNCIL</b>														
	Comprehensive Youth Development	\$ 432,296										5,021	N/A	Income data not collected
<b>BOYS &amp; GIRLS CLUBS OF OKLAHOMA COUNTY</b>														
	Boys and Girls Clubs	\$ 215,000									4,062	4,514	90%	
<b>CALM WATERS CENTER FOR CHILDREN &amp; FAMILIES</b>														
	Center-based Support Groups	\$ 54,060									602	1,012	59%	
	School-based Support Groups	\$ 20,000									425	832	51%	
<b>CAMP FIRE HEART OF OKLAHOMA</b>														
	Educational Sustainability	\$ 14,000									-	825	N/A	Income data not collected
	OKC Comprehensive Youth Development (Clubs)	\$ 97,500									-	200	N/A	Income data not collected
	Outdoor Education	\$ 89,000									-	1,893	N/A	Income data not collected
<b>THE CARE CENTER</b>														
	Victim Support Services	\$ 40,000									-	762	N/A	Income data not collected
<b>CASA OF OKLAHOMA COUNTY, INC.</b>														
	Case Management	\$ 102,000									-	653	N/A	Income data not collected
<b>CATHOLIC CHARITIES</b>														
	Family Support Services	\$ 86,625									1,720	1,972	87%	
	Immigration Assistance	\$ 27,000									357	552	65%	
	Homeless Services	\$ 170,000									1,138	1,138	100%	
<b>A CHANCE TO CHANGE</b>														
	A Chance to Recover	\$ 68,205									-	334	N/A	Income data not collected
	A Chance to Succeed	\$ 30,600									-	564	N/A	Income data not collected
<b>CITIZENS CARING FOR CHILDREN</b>														
	Resource Center	\$ 104,130										1,890	N/A	Income data not collected
<b>CITY CARE</b>														
	Supportive Housing	\$ 46,640									185	193	96%	
<b>COMMUNITY LITERACY CENTERS, INC.</b>														
	LEAP	\$ 67,980									667	807	83%	
<b>DAILY LIVING CENTERS, INC.</b>														
	Adult Day Health Care	\$ 197,454									253	264	96%	
	Elderly & Disabled Community Transportation	\$ 20,500									93	98	95%	
<b>DALE ROGERS TRAINING CENTER, INC.</b>														
	Adult Rehab	\$ 111,000										90	N/A	Income data not collected
	Camp Tumbleweed	\$ 10,200										14	N/A	Income data not collected
	Special Needs	\$ 14,400										18	N/A	Income data not collected
<b>D-DENT, INC.</b>														
	Preventative	\$ 4,500									1,325	1,325	100%	
	Restorative	\$ 73,000									633	633	100%	
<b>EARC, INC.</b>														
	The Trails	\$ 70,779									30	30	100%	

**United Way of Central Oklahoma  
Community Reinvestment Act Report 2022-2023**

AGENCY	PROGRAMS	2023/2024	CRA Criteria						LMI #	Total #	% Low	Comments
		ALLOCATION	2	3	4	5	6	7	8	Clients	Clients	
(Actuals 2022/2023)												
<b>GIRL SCOUTS-WESTERN OKLAHOMA</b>												
	Leadership Development	\$ 265,000					Y		651	3,429	19%	
<b>GOODWILL INDUSTRIES OF CENTRAL OKLAHOMA</b>												
	Job Connection Center	\$ 6,892					Y		607	607	100%	
<b>HEALTH ALLIANCE FOR THE UNINSURED</b>												
	Care Connection	\$ 33,434					Y		46	419	11%	
	Cooperative Central Pharmacy	\$ 36,220					Y		275	2,686	10%	
<b>HEARTLINE</b>												
	2-1-1 24/7 Services	\$ 185,155					Y			225,679	N/A	Income data not collected
	Suicide Prevention	\$ 38,500					Y			23,148	N/A	Income data not collected
<b>THE HOMELESS ALLIANCE</b>												
	Capacity Building	\$ 43,900		Y	Y				12,340	12,340	100%	
	WestTown Resource Center	\$ 56,400					Y		1,558	1,558	100%	
	Horizon HMIS	\$ 26,648							12,340	12,340	100%	
<b>INTEGRIS HOSPICE</b>												
	Hospice of Oklahoma County	\$ 134,451					Y			1,402	N/A	Income data not collected
<b>JOHN W. KEYS SPEECH &amp; HEARING CENTER</b>												
	Hearing Aid Bank	\$ 12,000					Y		46	46	100%	
	Language Preschool	\$ 13,000					Y		16	26	62%	
<b>LATINO COMMUNITY DEVELOPMENT AGENCY</b>												
	Health	\$ 20,200					Y		6,094	6,134	99%	
	Prevention	\$ 51,050					Y		1,061	1,072	99%	
	Tony Reyes Child Development	\$ 47,903					Y		93	93	100%	
	Treatment	\$ 38,872					Y		3,050	3,050	100%	
<b>LEGAL AID SERVICES OF OKLAHOMA, INC.</b>												
	Oklahoma City Law Office	\$ 92,700					Y	Y	4,088	4,182	98%	
<b>MENTAL HEALTH ASSOCIATION OKLAHOMA</b>												
	Sunbridge Counseling	\$ 19,000					Y			1,852	N/A	Income data not collected
	TeenScreen	\$ 70,000					Y			17,128	N/A	Income data not collected
<b>METROPOLITAN BETTER LIVING CENTER</b>												
	Adult Day Health	\$ 128,960					Y		300	309	97%	
<b>MOORE YOUTH &amp; FAMILY SERVICES</b>												
	Moore Alternative School and Treatment Program	\$ 80,700					Y		-	30	N/A	Income data not collected
<b>NEIGHBORHOOD SERVICES ORGANIZATION</b>												
	Housing & Community Development	\$ 293,934		Y	Y				92	92	100%	
	Palo Duro	\$ 40,000		Y	Y				20	20	100%	
<b>NEWVIEW OKLAHOMA</b>												
	OKC Low Vision Rehabilitation	\$ 37,500					Y		274	855	32%	
	Pediatric Low Vision	\$ 33,679							39	82	48%	
<b>NORTHCARE</b>												
	Adult Services	\$ 302,000					Y		196	6,767	3%	
<b>OKLAHOMA FOUNDATION FOR THE DISABLED, INC.</b>												
	Oklahoma Foundation For the Disabled	\$ 223,000					Y		105	200	53%	
<b>OKLAHOMA MEDICAL RESEARCH FOUNDATION (OMRF)</b>												
	Research Program	\$ 85,000					Y			-	N/A	Income data not collected
<b>OKLAHOMA UNITED METHODIST CIRCLE OF CARE</b>												

**United Way of Central Oklahoma  
Community Reinvestment Act Report 2022-2023**

AGENCY	PROGRAMS	2023/2024	CRA Criteria						LMI #	Total #	% Low	Comments
		ALLOCATION	2	3	4	5	6	7	8	Clients	Clients	
									(Actuals 2022/2023)			
	Foster Care Services	\$ 30,000					Y		-	148	N/A	Income data not collected
<b>PIVOT, INC.</b>												
	Supporting Kids in Independent Living (SKIL)	\$ 70,000					Y		262	262	100%	
	The Point at Pivot	\$ 34,000							96	96	100%	
<b>POSITIVE TOMORROWS</b>												
	Education	\$ 135,120					Y		146	146	100%	
	Family Support Services	\$ 90,400					Y		653	665	98%	
	Extracurricular Program	\$ 13,920					Y		217	225	96%	
<b>POSSIBILITIES, INC.</b>												
	Participatory Community Capacity Building	\$ 22,000					Y		29	154	19%	
<b>REMERGE</b>												
	ReMerge Diversion Program	\$ 47,500					Y		137	337	41%	
<b>RSVP OF CENTRAL OKLAHOMA, INC.</b>												
	Volunteer Recruit & Placement	\$ 54,000					Y		57	249	23%	
<b>THE SALVATION ARMY CENTRAL OKLAHOMA AREA COMMAND</b>												
	Boys & Girls Club	\$ 173,079					Y		-	184	N/A	Income data not collected
	Emergency Shelter	\$ 202,000					Y		1,043	1,043	100%	
	Senior Services	\$ 208,000					Y		509	509	100%	
	Social Services	\$ 225,000					Y		1,047	12,787	8%	
	Disaster Services	\$ 44,000					Y		-	1,339	N/A	Income data not collected
	Transportation	\$ 92,000					Y		100	100	100%	
<b>SKYLINE</b>												
	Food Pantry	\$ 69,015					Y		12,596	12,596	100%	
<b>SPECIAL CARE, INC.</b>												
	Childcare-Special Needs	\$ 385,000					Y		76	180	42%	
	Management & General	\$ 23,500					Y		76	180	42%	
<b>SUNBEAM FAMILY SERVICES, INC.</b>												
	Early Childhood Services	\$ 310,000					Y		1,496	1,893	79%	
	Mental Health Services	\$ 218,000					Y		459	586	78%	
	Senior Services	\$ 158,000					Y		943	1,551	61%	
	Contracted Foster Care	\$ 49,500					Y		62	170	36%	
	Child Abuse Prevention	\$ 164,124							452	744	61%	
<b>TEEM, THE EDUCATION &amp; EMPLOYMENT MINISTRY</b>												
	Job Placement	\$ 49,010					Y		-	355	N/A	Income data not collected
	Violence Prevention	\$ 31,750							317	649	49%	
<b>TINKER AFB YOUTH CENTER</b>												
	Social Programs	\$ 16,485					Y		-	3,974	N/A	Income data not collected
	Sports Program	\$ 11,130					Y		-	2,179	N/A	Income data not collected
<b>UPWARD TRANSITIONS</b>												
	Community Outreach Program	\$ 360,000					Y		3,292	3,292	100%	
<b>URBAN LEAGUE OF GREATER OKLAHOMA CITY, INC.</b>												
	Workforce & Career Development	\$ 118,830					Y		1,646	1,927	85%	
	Housing & Financial Literacy	\$ 110,000	Y	Y			Y		398	542	73%	
	Community Convening & Social Justice	\$ 26,460							3,969	5,924	67%	
	Education & Family Development	\$ 90,000					Y		1,404	1,816	77%	
<b>VARIETY CARE</b>												
	Family Planning	\$ 48,000					Y		11,785	15,296	77%	
	Obstetric Clinic	\$ 185,000					Y		2,366	2,984	79%	
	Pediatric Clinic	\$ 266,000					Y		34,951	36,862	95%	
	Dental Clinic	\$ 24,000					Y		9,769	12,512	78%	

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<b>YMCA OF GREATER OKLAHOMA CITY</b>												
									<b>(Actuals 2022/2023)</b>			
	Lincoln Park Senior Center	\$ 50,500				Y			304	304	100%	
	Teens	\$ 19,300				Y			-	118	N/A	Income data not collected
<b>YOUTH &amp; FAMILY SERVICES, INC.</b>												
	Community Counseling	\$ 24,500				Y			-	1,008	N/A	Income data not collected
	The Caring Center	\$ 25,175				Y			-	198	N/A	Income data not collected
	Management & General	\$ 550				Y			-	41,510	N/A	Income data not collected
<b>YWCA OF OKLAHOMA CITY</b>												
	CARE	\$ 874,000				Y			249	6,811	4%	
	<b>TOTAL DOLLARS</b>	\$ 10,008,412							149,029	563,044	26%	

# YWCA IS ON A MISSION

YWCA Oklahoma City  
2460 NW 39th St  
Oklahoma City, OK 73112  
P 405.948.1770  
F 405.943.7177  
[www.ywcaokc.org](http://www.ywcaokc.org)

May 22, 2024

Valerie Jury  
First Fidelity Bank  
5100 N Classen Blvd Ste 500  
Oklahoma City, OK 73118

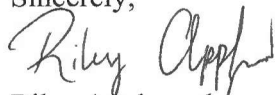
Dear Valerie,

Thank you for your in-kind donation on 5/16/2024 of Tickets for 4 (and 2 parking passes) for a Thunder Basketball game (date TBD) you valued at \$640.00. Your compassion and generosity is an amazing gift – not just to our agency but to the women, men, and children who are touched by them.

Women and children come to YWCA OKC to rebuild their lives after escaping violence in their home. Often they show up with little or nothing. YWCA OKC helps meet their immediate needs, whether it is food, medical care, or simply a place to rest for a while; then we start the process of helping them heal from their abuse. YWCA OKC relies on generous donors like you so we can continue providing these vital services to victims of domestic violence and sexual assault during their darkest hours.

We appreciate your continued support and hope you will visit us online at [ywcaokc.org](http://ywcaokc.org) to find out about upcoming events and volunteer opportunities.

Sincerely,



Riley Appleyard  
Assistant Director of Donor Engagement

Thank you Valerie!

*Note: We are a 501(c)3 nonprofit and your gift may qualify as a charitable deduction for federal income tax purposes. Please consult your tax professional for guidance and retain this written acknowledgment of your donation for your tax records.*

