## INTERMEDIATE SMALL BANK

## **PUBLIC DISCLOSURE**

September 28, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Liberty National Bank Charter 23516 629 SW C Avenue Lawton, OK 73501

Office of the Comptroller of the Currency The Park Harvey Building 301 NW 63rd St., Ste 490 Oklahoma City, OK 73116

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## **Overall CRA Rating**

Institution's CRA Rating: This institution is rated Satisfactory

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on the two full-scope assessment areas (AAs) in the state of Oklahoma.
- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of the loans were originated inside the bank's AA.
- The geographic distribution of loans reflects reasonable distribution throughout the bank's AAs.
- The distribution of loans to individuals of different incomes and businesses of different sizes reflects reasonable distribution.
- The Community Development (CD) Test rating is based on the two full-scope AAs in the state of Oklahoma.
- CD activities reflect adequate responsiveness to the needs of communities within the bank's AAs.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is reasonable.

The quarterly average net LTD ratio for Liberty National Bank (LNB or bank) from March 31, 2019, to December 31, 2021 (the evaluation period) was 72.81 percent. LNB's LTD ranged from a high of 83.45 percent in the third quarter of 2019 to a low of 64.51 percent in the second quarter of 2021. LNB's average was in line with similar-sized banks that share some or all of the same market area as LNB. Similar-sized banks had an average LTD of 76.53 percent over the evaluation period with ratios ranging from an average low of 66.42 percent and a average high of 87.20 percent.

Bank	Asset Size	Average LTD
Liberty National Bank	978,769	72.81
First Bank and Trust Company	799,781	87.20
The First National Bank and Trust Company	986,168	66.42
NBC Oklahoma	889,382	79.69
Quail Creek Bank	826,696	72.79

LNB's LTD ratio showed a generally downward trend over the evaluation period as the ratio was heavily impacted by the COVID-19 pandemic. In 2020 LNB saw increases to loan balances from

originated Small Business Association Payment Protection Program (PPP) loans and, later, an increase in deposit balances as depositors received federal pandemic-related stimulus funds and financial support. The federal government later forgave the PPP loans, but the depositors did not spend the funds as fast as expected which reduced the LTD ratio further.

#### **Lending in Assessment Area**

A majority of the bank's loans are inside its assessment areas (AAs).

The bank originated or purchased 66.5 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area													
	N	lumber o	of Loans		Total	Dollar A	000s)						
Loan Category	Insid	de	Outsi	de		Insid	e	Outsic	Total \$(000s)				
	#	%	#	%	#	\$	%	\$	\$ %				
Home Mortgage	398	73.6	143	26.4	541	75,937 70.3		32,040	29.7	107,977			
Small Business	563	62.2	342	37.8	904	164,740	36.5	286,735	63.5	451,475			
Total	961	66.5	485	33.5	1,445	240,677	43.0	318,775	57.0	559,452			

## **Description of Institution**

Liberty National Bank (LNB) is a community bank headquartered in Lawton, Oklahoma. It is a subsidiary of B.O.E. Bancshares, Incorporated, a one-bank holding company, also headquartered in Lawton, Oklahoma. The main bank and drive through are located at 629 SW C Avenue, Lawton, Oklahoma. There are another seven full-service branches with drive throughs in Lawton, Elgin, Chickasha, Blanchard, and Apache. There are Automated Teller Machines (ATMs) at each of the eight bank locations and 15 additional stand-alone ATMs throughout the bank's AAs. Since the previous performance evaluation, LNB has opened one new branch in Oklahoma City and added an ATM at the same location. No other locations have been opened or closed during the evaluation period. See the tables below for a complete list of branch and ATM locations.

LNB Branch Locations												
Location	Address	City										
Lawton – Main Office	629 S.W. C Ave.	Lawton, OK										
Lawton – Gore Branch	4005 W. Gore Blvd.	Lawton, OK										
Lawton – Medicine Park Branch	23975 State Highway 49	Lawton, OK										
Elgin Branch	8232 State Highway 17	Elgin, OK										
Chickasha Branch	1924 4 <sup>th</sup> St.	Chickasha, OK										
Blanchard Branch	1525 N Council Rd.	Blanchard, OK										
Apache Branch	1112 S Coblake St.	Apache, OK										
Oklahoma City Branch	13300 S. Pennsylvania Ave.	Oklahoma City, OK										

LNB ATM	LNB ATM Locations											
Location	Address	City										
Alex – Chisholm Corner	609 State Highway 19	Alex										
Apache – Branch	1112 S. Coblake	Apache										
Apache – Chisholm Center	614 Apache Trail	Apache										
Blanchard – Branch	1525 N. Council Rd.	Blanchard										
Chickasha – Branch	1924 S. 4 <sup>th</sup> St.	Chickasha										
Chickasha – The Turnaround	714 E. Choctaw Rd.	Chickasha										
Chickasha – Playtime Lanes	3501 S. 4 <sup>th</sup> St.	Chickasha										
Chickasha – Grady County Courthouse	326 W Choctaw Ave.	Chickasha										
Dibble – Kim & Kevin's Store	12283 State Highway 39	Dibble										
Elgin – Branch	8232 State Highway 17	Elgin										
Fletcher	102 State Highway 277	Fletcher										
Lawton – Cache Rd.	4401 N.W. Cache Rd.	Lawton										
Lawton – Hop N Sack	2 S.E. 45 <sup>th</sup> St.	Lawton										
Lawton – Comanche County Fairgrounds	920 S.W. C Avenue	Lawton										
Lawton – Main Branch	701 S.W. C Avenue	Lawton										
Lawton – Comanche County Memorial Hospital	3401 W. Gore Blvd.	Lawton										
Lawton – Ft. Sill Municipal Airport	3401 S.W. 11 <sup>th</sup> St.	Lawton										
Lawton – Gore Branch	4005 W. Gore Blvd.	Lawton										
Lawton – Comanche County Courthouse	315 S.W. 5 <sup>th</sup> St.	Lawton										
Lawton – Burgess Grill	617 S.W. C Avenue	Lawton										
Lawton – E. Gore	2308 E. Gore Blvd.	Lawton										
Lawton – Medicine Park Branch	23975 State Highway 49	Lawton										
Oklahoma City – Branch	13300 S. Pennsylvania Ave.	Oklahoma City										

LNB's primary focus is to serve commercial and agricultural customers in Comanche, Cotton, Cleveland, Grady, McClain, Caddo, and Stephens counties. LNB meets these lending needs by providing traditional loan and deposit products and services, as well as online banking, internet bill-pay, mobile banking, and telephone banking. The bank also offers various government guaranteed loan products. Bank lobby and drive through services are offered Monday through Friday 8:00 A.M. to 5:00 P.M. at all locations. Limited Saturday hours are offered at all drive throughs.

As of December 31, 2021, the bank's total assets equaled \$907 million, of which \$552 million, or 61 percent, includes various types of loans to individuals, commercial businesses, and agricultural related enterprises. LNB's portfolio consists of the following:

Loan Portfolio Composition as of December 31, 2021											
	\$ (000)	% of Portfolio									
Real Estate Loans	433,722	77.57									
Commercial/Business Loans	83,865	14.99									
Agricultural Loans	26,043	4.66									
Other Loans	7,925	1.42									
Consumer Loans	7,584	1.36									
Total Loans	559,139	100.00									

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. A "Satisfactory" rating was assigned to LNB at the last CRA performance evaluation performed as of September 3, 2019.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

We completed a full-scope review of LNB's CRA activities in its AAs under the Intermediate Small Bank CRA procedures which include a lending test and a CD test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AAs through qualified CD lending, investments, donations, and services.

Conclusions regarding the lending test are based on samples of business and residential real estate loans originated between January 1, 2019, and December 31, 2021 (evaluation period). Conclusions regarding the CD test are based on the bank's CD activities during the same period.

#### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

#### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

LNB has two full-scope rating areas, the Lawton MSA AA and the OKC Partial MSA AA, and one limited-scope area, the Oklahoma Non-MSA AA. The Lawton MSA AA will receive more weight in the overall performance conclusion as LNB has operated in the AA since its incorporation.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; the extent to which institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **State Rating**

#### State of Oklahoma

CRA rating for the State of Oklahoma<sup>1</sup>: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

• LNB's distribution of loans to small businesses and home mortgage borrowers of low- and moderate-income levels reflects reasonable distribution.

- LNB's distribution of loans to small businesses and home mortgage borrowers in low- and moderate-income geographies reflects reasonable distribution.
- A majority of LNB's loans were made inside their AA.
- CD loans, investments, and services reflect excellent responsiveness to the needs of the AAs.

#### **Description of Institution's Operations in Oklahoma**

The bank operates eight locations and 23 ATMs in the three AAs in the State of Oklahoma. The bank's primary focus overall is commercial lending in addition to the traditional suite of loan and deposit products to meet the needs of the communities in which they serve. Primary loan products in all three AAs were similar so home mortgages and small business loans were chosen for analysis.

The assessment areas (AAs) in this performance evaluation (PE) are the Lawton MSA AA, the OKC Partial MSA AA, and the Oklahoma Non-MSA AA. The Lawton MSA AA consists of Comanche and Cotton Counties and all census tracts (CTs) within those counties. The Lawton MSA AA has three low-income CTs, 10 moderate-income CTs, 14 middle-income CTs, seven upper-income CT, and one not rated CT. The OKC Partial MSA AA consists of Cleveland, Grady, and McClain Counties and all CTs within those counties. This AA is a portion of the overall OKC MSA. The OKC Partial MSA AA has one low-income CT, 13 moderate-income CT, 38 middle-income CTs, 25 upper-income CTs, and one not rated CT. The Oklahoma Non-MSA AA consists of Caddo and Stephens Counties and all CTs within those counties. The Oklahoma Non-MSA AA has zero low-income CTs, one moderate-income CT, 15 middle-income CTs, and four upper-income CTs.

<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

#### Lawton MSA AA

Table A – Demographic Information of the Assessment Area													
Assessment Ar	ea: Liberty	NB Lawtor	n MSA 2021										
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts)	34	8.8	29.4	38.2	20.6	2.9							
Population by Geography	131,643	6.1	22.7	43.8	27.3	0.1							
Housing Units by Geography	54,500	6.6	24.0	41.8	27.6	0.0							
Owner-Occupied Units by Geography	25,725	3.9	15.6	43.2	37.2	0.0							
Occupied Rental Units by Geography	19,944	9.6	32.1	40.0	18.2	0.0							
Vacant Units by Geography	8,831	7.7	30.0	41.9	20.5	0.0							
Businesses by Geography	7,160	4.9	31.8	35.2	27.9	0.2							
Farms by Geography	361	2.2	12.5	33.2	52.1	0.0							
Family Distribution by Income Level	30,017	22.6	18.1	18.7	40.7	0.0							
Household Distribution by Income Level	45,669	23.8	16.3	17.8	42.1	0.0							
Median Family Income MSA - 30020 Lawton, OK MSA		\$57,051	Median Housin	\$108,669									
			Median Gross	Rent		\$767							
			Families Below	13.9%									

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

The Lawton MSA AA is a competitive market area with 13 different financial institutions operating at least one branch in the area. Based on the FDIC Market Share Data as of June 30, 2021, LNB has 25.8 percent of all deposits; the most of all banks operating in the area. The deposits account for 71.4 percent of bank deposits and 5.86 percent of total bank loans. Primary competitors include Arvest Bank, BancFirst, and The City National Bank and Trust Company of Lawton with 15.9 percent, 13.6 percent, and 12.7 percent of deposits in the area, respectively.

In the Lawton MSA AA, the Fort Sill Army Post is the largest employer, providing government jobs. In addition to government and government related jobs, education, health, leisure, and hospitality jobs are also prevalent in the Lawton MSA AA. Other large employers in the area include Goodyear Tire and Rubber Company, Lawton Public Schools, and the Comanche County Memorial Hospital.

The opportunity for residential, commercial, and other loans is very limited around military installations. These loans do not represent the primary credit need to members of the military. Housing subsidies are provided by the military to personnel.

An existing community contact in the AA indicated that the local economy in and around the Lawton area is steady. The contact noted that the primary credit need is financing for small farms and entrepreneurial businesses. In addition, the contact stated that several opportunities exist for local financial institutions to participate in the AA. The contact stated that banks in the area are competitive and meet the credit needs of the area.

#### OKC PARTIAL MSA AA

Table A – Demographic Information of the Assessment Area												
Assessment Area	ı: Liberty N	B OKC 1	MSA 2021									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #						
Geographies (Census Tracts)	78	1.3	16.7	48.7	32.1	1.3						
Population by Geography	358,738	0.3	12.3	54.2	33.1	0.1						
Housing Units by Geography	145,825	0.4	14.1	54.6	30.9	0.0						
Owner-Occupied Units by Geography	91,364	0.2	8.5	56.4	34.9	0.0						
Occupied Rental Units by Geography	40,745	0.5	24.1	50.9	24.4	0.1						
Vacant Units by Geography	13,716	1.4	21.4	54.0	23.2	0.0						
Businesses by Geography	29,330	0.4	13.6	46.9	38.9	0.2						
Farms by Geography	1,211	0.8	6.5	61.9	30.7	0.0						
Family Distribution by Income Level	89,998	18.0	16.3	22.0	43.8	0.0						
Household Distribution by Income Level	132,109	20.7	15.3	18.7	45.4	0.0						
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Ho	using Val	ue	\$142,671						
			Median Gross Rent			\$806						
		Families Be Level	8.2%									

Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

Competition in the OKC Partial MSA AA is strong with 34 other financial institutions operating at least one branch in the area. Based on FDIC Market Share Data as of June 30, 2021, LNB holds 3.9 percent of total deposits in the area and is ranked 10<sup>th</sup> in the AA. The OKC Partial MSA AA accounts for approximately 32.2 percent of bank deposits and 22.4 percent of bank loans.

The primary place of economic activity in the OKC Partial MSA AA is located in Norman, Oklahoma in Cleveland County. Norman is the most southern city in the Oklahoma City metro area. Major employers in this area are the University of Oklahoma, medical facilities, and hospitality jobs. Other town centers in this AA are Blanchard, Chickasha, and Moore. Moore, OK is primarily a suburb of Oklahoma City offering retail lending and a moderate level of commercial lending opportunities. Chickasha is a small town with a moderate amount of retail and commercial lending opportunities. However, this area is dominated by a local bank that is well ingrained in the business community. Blanchard is a growing bedroom community for Oklahoma City offering a source for retail banking services but limited commercial lending.

A community contact was interviewed that provides affordable and low-income housing in the AA. The contact indicated the area's economy is generally stable with active local banks in the community appropriately meeting the credit needs of the AA. The contact noted that the area's primary credit needs remain affordable home mortgage loans.

#### Scope of Evaluation in Oklahoma

Full-scope areas for this performance evaluation were the Lawton MSA AA and the OKC Partial MSA AA due to the level of lending and share of bank deposits in these AAs. The OK Non-MSA AA was selected as a limited-scope area for this performance evaluation due to the limited level of bank lending and share of deposits in this AA and containing only one moderate income geography and no low-income geographies. The Lawton MSA AA received the most weighting in overall performance ratings as LNB has been established in this AA since its incorporation. The OKC Partial MSA AA received less weighting in performance ratings as LNB is a newer entrant to this market area and is not as well established as other institutions.

As noted in the Institution Description above, there are three low income and ten moderate income geographies in the Lawton MSA AA along with one low income and 13 moderate income geographies in the OKC Partial MSA AA. The primary loan products during the evaluation period for all AAs were home mortgages and small business loans.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

#### LENDING TEST

The bank's performance under the Lending Test in Oklahoma is rated Satisfactory.

#### **Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank's lending performance in the state of Oklahoma is reasonable.

#### Lawton MSA AA

#### Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the Lawton MSA AA.

#### Home Mortgage Loans

Refer to Table O in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in the Lawton MSA AA reflects good distribution among LMI geographies and is of satisfactory performance. For the evaluation period, the distribution to low-income CTs is near to the percentage of owner-occupied housing units and exceeds the aggregate distribution of loans in the AA. The distribution to moderate income CTs is also near to the percentage of owner-occupied housing units and also exceeds the aggregate distribution of loans in the AA.

#### Small Loans to Businesses

Refer to Table Q in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small business loans in the Lawton MSA AA reflects good distribution among LMI geographies and is of satisfactory performance. For the evaluation period, the distribution to low-income CTs is near to the percentage of businesses and the aggregate distribution of loans in the AA. The distribution to moderate income CTs is also near to the percentage of businesses and the aggregate distribution of loans in the AA.

#### Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

#### Home Mortgage Loans

Refer to Table P in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans in the Lawton MSA AA reflects adequate distribution among LMI borrowers. Home mortgage lending in the Lawton MSA AA reflects adequate penetration among LMI borrowers and meets the standard for satisfactory performance. For the evaluation period, the penetration to low-income borrower was lower than the percentage of low-income families, but the bank's percentage of loans exceeded the aggregate percentage of lending. This indicates that the bank is making more loans to low-income borrowers in the AA than the aggregate level of lending of all banks in the AA, resulting in an overall adequate level of penetration to low-income borrowers in the AA. In the AA, the median gross income for a low-income borrower is \$28,525 while the median home price is \$108,669, 3.8 times the median gross income for a low-income borrower. In addition, the median rent in the AA is \$767, which is 32% of the median gross income for a low-income borrower, resulting in rent burdened borrowers.

Lending penetration to moderate-income borrowers was also lower than the percentage of moderate-income families in the AA and somewhat lower than the aggregate percentage of lending. In the AA, the median gross income for moderate-income borrowers is \$45,640, meaning the median home price in the AA listed above is 2.4 times the median gross income for a moderate-income borrower. The median rent in the AA is 20 percent of the median gross income for a moderate-income borrower.

LNB's home mortgage products are limited to 80 percent LTV for fixed rate loans and 85 percent for variable rate loans. LNB is ranked 18<sup>th</sup> in the AA for market share of loans at 1.34 percent by number of loans. The majority of home mortgage lenders in the AA with greater market share than LNB are lenders that sell mortgage loans on the secondary market and offer low down payment loans to borrowers.

#### Small Loans to Businesses

Refer to Table R in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of business loans in the Lawton MSA AA reflects reasonable distribution. Lending to small businesses, those with less than \$1 million, in the Lawton MSA AA reflects good penetration. For the evaluation period, the penetration to small businesses was near to the percentage of businesses

identified as having revenues of less than or equal to \$1 million and exceeded the aggregate lending for these businesses.

#### OKC Partial MSA AA

#### Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

#### Home Mortgage Loans

Refer to Table O in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans in the OKC Partial MSA AA reflects adequate distribution among moderate-income geographies. For the evaluation period, the distribution to low-income CTs is significantly lower than the percentage of owner-occupied housing units in the AA and equal to the level of aggregate lending in the AA. There is only one low-income CT in the AA that contains 0.2 percent of owner-occupied housing units (see Table A – OKC Partial MSA 2021 above). The distribution to moderate-income CTs is somewhat lower than both the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA.

#### Small Loans to Businesses

Refer to Table Q in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of loans to small businesses in the OKC Partial MSA AA reflects adequate distribution to LMI geographies in the AA and meets the standard for satisfactory performance. For the evaluation period, the distribution to low-income CTs exceeds both the percentages of businesses located in the low-income CTs and the aggregate lending level. The distribution to moderate-income CTs is somewhat lower than both the percentage of businesses located in the geography and the aggregate lending level.

#### Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

#### Home Mortgage Loans

Refer to Table P in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans in the OKC Partial MSA AA reflects adequate distribution among LMI borrowers. Home mortgage lending in the OKC Partial MSA AA reflects adequate penetration among LMI borrowers and meets the standard for satisfactory performance. For the evaluation period, the penetration to low-income borrowers was lower than the percentage of low-income families, but the bank's percentage exceeded the aggregate percentage of lending. In the OKC MSA AA, the median

income for low-income borrowers is \$32,029 while the median home price in the AA is \$142,671, 4.5 times the median income for low-income borrowers. The median rent in the AA is \$806 or 30 percent of the median income for low-income borrowers.

The penetration to moderate-income borrowers was lower than both the percentage of moderate-income borrowers in the AA and the aggregate percentage of lending.

LNB has 70 home mortgages in total in this AA. Among all home mortgage lenders in the AA, LNB ranks 78<sup>th</sup> out of 134 lenders with 25 or more loans. Further, this AA includes the entire campus of the University of Oklahoma and the approximately 9,200 students that live in university owned housing on campus<sup>2,3</sup>. College students do not typically have well-paying jobs, if at all. See explanation of lending products on page 11 of this Evaluation.

#### Small Loans to Businesses

Refer to Table R in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of business loans in the OKC Partial MSA AA reflects good distribution. Lending to small businesses, those with less than \$1 million in gross annual revenue, in the OKC Partial MSA AA reflects reasonable penetration and meets the standard for satisfactory performance. For the evaluation period, the penetration to small businesses was somewhat lower than the percentage of small businesses in the AA and exceeded the aggregate level of lending.

#### **Responses to Complaints**

The bank did not have any CRA related complaints in this state during the evaluation period.

### Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Oklahoma Non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope areas.

#### COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Oklahoma is rated Satisfactory.

### **Conclusions for Area Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

#### **Number and Amount of Community Development Loans**

The bank' level of CD lending demonstrates adequate responsiveness, considering the banks capacity and the need and availability of such opportunities for CD lending in the bank's AAs.

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#### Lawton MSA AA

During the evaluation period, the bank originated or renewed 12 CD loans totaling \$3.5 million in the Lawton MSA AA. These loans include eight loans totaling \$2.1 million for economic development, two loans totaling \$1.2 million for community service, one loan totaling \$118 thousand for affordable housing, and one loan totaling \$65 thousand to revitalize and stabilize a designated area within the AA.

While not included in the table above, LNB was very active in the SBA Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. LNB's participation resulted in the origination of 142 PPP loans totaling \$14.6 million that stabilized the economy by helping to maintain LMI jobs in the AA.

#### OKC Partial MSA AA

During the evaluation period, the bank originated or renewed 15 CD loans totaling \$17.5 million in the OKC Partial MSA AA. These loans include 11 loans totaling \$16.7 million for economic development, three loans totaling \$644 thousand to revitalize and stabilize a designated area, and one loan totaling \$100 thousand for community service within the AA.

LNB was very active in the SBA Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. LNB's participation resulted in the origination of 92 PPP loans totaling \$9.7 million that stabilized the economy by helping to maintain LMI jobs in the AA.

#### Non MSA AA

During the evaluation period, the bank originated or renewed 10 CD loans totaling \$12.8 million in the Non MSA AA. These loans include four loans totaling \$6.0 million for economic development, three loans totaling \$2.2 million to revitalize and stabilize a designated area, two loans totaling \$4.4 million to support LMI students and elderly LMI patients, and one loan totaling \$193 thousand for affordable housing within the AA.

LNB was very active in the SBA Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. LNB's participation resulted in the origination of 46 PPP loans totaling \$6.8 million that stabilized the economy by helping to maintain LMI jobs in the AA.

#### **Number and Amount of Qualified Investments**

LNB's level of CD investments reflects adequate responsiveness to the needs of the bank's AAs.

#### Lawton MSA AA

The level of qualified investments and donations, totaling \$588 thousand during the evaluation period, reflects adequate responsiveness to the CD needs in the Lawton MSA AA. Included in the total, the bank made 23 qualified donations totaling \$38 thousand. These donations and contributions were to local schools and non-profit organizations that provide social services, including youth programs, scholarship services and funds, and food assistance programs that target LMI individuals.

In 2021, LNB purchased a school bond totaling \$550 thousand within the Lawton MSA AA. The proceeds from this bond were used to repair and remodel Geronimo Elementary School and acquire transportation equipment. According to the Oklahoma State Department of Education, 67 percent of this school's students were low income.

#### OKC Partial MSA AA

The level of qualified investments and donations, totaling \$2.1 million during the evaluation period, reflects adequate responsiveness to the CD needs in the OKC Partial MSA AA. Included in the total, the bank made 29 qualified donations totaling \$16 thousand. These donations and contributions were to local Chambers of Commerce, churches, and non-profit organizations that provide social services, including youth programs, food assistance, and economic development services that target LMI individuals.

During the evaluation period, LNB purchased nine school bonds totaling \$2.1 million within the OKC Partial MSA AA. The proceeds from the bonds were primarily used to fund improvements to schools with over 50 percent enrollment of LMI students.

#### Non MSA AA

The level of qualified investments and donations, totaling \$1.3 million during the evaluation period, reflects adequate responsiveness to the CD needs in the Non MSA AA. Included in the total, the bank made 11 qualified donations totaling \$6 thousand. These donations and contributions were to local Chambers of Commerce and non-profit organizations that provided food assistance and economic development services that target LMI individuals.

During the evaluation period, LNB purchased three school bonds totaling \$1.3 million within the Non MSA AA. The proceeds from the bonds were primarily used to fund improvements to schools with over 50 percent enrollment of LMI students.

#### **Extent to Which the Bank Provides Community Development Services**

LNB's level of CD services reflects adequate responsiveness to the needs of the bank's AAs.

#### Lawton MSA AA

The level of qualified CD services is adequate in the full-scope Lawton MSA AA. Bank officers serve in leadership positions in organizations that provide education opportunities to LMI families and that provide technical expertise and financial assistance to these organizations. The qualifying CD services include the following:

#### • Great Plains Technology Center Foundation

A bank officer is a board member of this non-profit organization. The foundation provides financial assistance to high school students based on financial need. A majority of the students in the area are from LMI families.

#### • Lawton Public School Foundation/Bond Oversight Committee

Bank officers serve on the board of directors of this non-profit organization, with one serving as Treasurer. This foundation provides support to the schools and teachers by funding programs and providing supplies that they would not otherwise get through the school system. A majority of the

students are from LMI families. One of the officers also serves as Chairman of the Lawton Public Schools Bond Oversight Committee. This committee oversees the issued school bonds and ensures that the funds are dispersed as approved to the schools.

#### OKC Partial MSA AA

The level of qualified CD services is adequate in the full-scope OKC Partial MSA AA. Bank officers serve in leadership positions in organizations involved in economic and small business development activities. Bank officers serve in leadership positions in organizations that provide community services to LMI families and that provide technical expertise and financial assistance to these organizations. The qualifying CD services include the following:

#### • Chambers of Commerce and Economic Development Organizations

Bank officers are active in taking leadership positions with the Chickasha Chamber of Commerce, Blanchard Chamber of Commerce, and the Chickasha Economic Development Council. Bank officers have served or are currently serving as board members of these organizations, with one officer serving as President of the Blanchard Chamber of Commerce. Bank officers provide technical expertise through involvement with planning, budgeting, and financing, among other activities.

#### • Chickasha Public Schools

A bank officer served as board member on the Chickasha School Board. The officer provided their financial and business expertise on the decisions of the school board. A majority of the students in the Chickasha schools are from LMI families.

#### • Grady Memorial Hospital Foundation

A bank officer serves on the board of directors of this non-profit organization. The foundation supports the medical services and programs of Grady Memorial Hospital and provides cost effective health care services to its community. Grady County Memorial Hospital accepts patients on Medicaid and provides health care services to LMI families.

#### • Chickasha Lions Club

A bank officer serves as Secretary/Treasurer for the Lions Club. This organization helps meet community needs through volunteer activities and are dedicated to raising funds to sponsor assorted programs that serve to improve the lives of LMI children and the community at large. The services they are involved in include providing eye exams and glasses for LMI individuals and making annual donations to the Regional Food Bank of Oklahoma for the Grady County Food for Kids Backpack program.

#### Non MSA AA

The level of qualified CD services is adequate in the limited-scope Non MSA AA. Bank officers serve in leadership positions in organizations involved in economic and small business development activities and an organization that provides community services to LMI families. These officers provide technical expertise and financial assistance to these organizations. The qualifying CD services include the following:

#### • Chambers of Commerce and Economic Development Organizations

Bank officers are active in taking leadership positions with the Apache Chamber of Commerce and the Duncan Chamber of Commerce. Bank officers have served or are currently serving as board members of these organizations, with one officer serving as President of the Apache Chamber of Commerce. Bank officers provide technical expertise through involvement with planning, budgeting, and financing, among other activities.

#### • Gabriel's House

A bank officer serves on the board of Gabriel's House, a community service-oriented organization that provides an after-school program for LMI students. The officer provides technical expertise through involvement with planning, budgeting, and financing, among other activities.

# Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	January 1, 2019, to December 31, 2021										
Bank Products Reviewed:	Home mortgage, small busine	SS									
	Community development loans, qualified investments, community development										
	services										
Affiliate(s)	Affiliate Relationship	Products Reviewed									
N/A											
List of Assessment Areas and Type o	f Examination										
Rating and Assessment Areas	Type of Exam	Other Information									
Oklahoma											
Lawton MSA AA	Full-scope	AA consists of all census tracts in Comanche and									
Lawton MSA AA	Tun-scope	Cotton Counties									
OKC Partial MSA AA	Full-scope	AA consists of all census tracts in Cleveland,									
OKC I aitiai WISA AA	Tun-scope	Grady, and McClain Counties									
Oklahoma Non-MSA AA	Limited-scope	AA consists of all census tracts in Caddo and									
Okianoma ivon-ivisa aa	Limited-scope	Stephens Counties									

# **Appendix B: Summary of MMSA and State Ratings**

RATINGS - Liberty National Bank												
Lending Test CD Test Overall Bank/Sta Overall Bank: Rating* Rating Multistate Ratin												
Liberty National Bank	Satisfactory	Satisfactory	Satisfactory									
State:												
Oklahoma	Satisfactory	Satisfactory	Satisfactory									

<sup>(\*)</sup> The Lending Test and Community Development Test carry equal weight in the overall rating.

# **Appendix C: Definitions and Common Abbreviations**

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances. Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives 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 under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

**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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**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.

**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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (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.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## **Appendix D: Tables of Performance Data**

#### **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- **Table O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- **Table P.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because arrogate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography
   The percentage distribution of the number of small loans (less than or equal to \$500,000)
  to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income
  geographies compared to the percentage distribution of farms (regardless of revenue size)
  throughout those geographies. The table also presents aggregate peer data for the years the

data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- **Table T.** Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2019-21

	Tote	ıl Home N	Aortaga	Loans	I ow-l	ncome '	Tracts	Moderat	o_Incon	o Tracts	Middle	Income	Tracts	Unner	Income	Tracts	Not Available-Income Tracts			
	Total Home Mortgage Loans Low-Income Tracts			Tracts	Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income 11 acts						
Assessment Area:	#	\$	% of Total	Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	
Lawton MSA	195	29,772	49.0	4,417	3.9	3.1	1.2	15.6	14.9	11.8	43.2	32.8	41.0	37.2	49.2	46.0	0.0	0.0	0.0	
Oklahoma Non-MSA	55	5,808	13.8	1,724	0.0	0.0	0.0	3.1	0.0	1.6	71.2	85.5	71.2	25.7	14.5	27.3	0.0	0.0	0.0	
OKC Partial MSA	148	40,357	37.2	18,647	0.2	0.0	0.0	8.5	4.7	7.5	56.4	53.4	47.6	34.9	41.9	44.9	0.0	0.0	0.0	
Total	398	75,937	100.0	24,788	0.9	1.5	0.2	9.1	9.0	7.9	56.1	47.7	48.0	34.0	41.7	43.8	0.0	0.0	0.0	
Source: 2015	ACS; 0.	1/01/2019	- 12/31/2	2021 Bank	Data, 2021	HMDA .	Aggregate L	ata, "" da	ta not a	vailable.										

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2019-21

	Total Home Mortgage Loans				Low-In	come Bo	orrowers	Moderate	Moderate-Income Borrowers			Middle-Income Borrowers			ncome B	Borrowers	Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Lawton MSA	195	29,772	49.0	4,417	22.6	5.6	3.8	18.1	6.7	12.3	18.7	14.9	18.9	40.7	49.2	28.2	0.0	23.6	36.7
Oklahoma Non-MSA	55	5,808	13.8	1,724	20.3	-	5.1	16.6	9.1	14.2	19.6	7.3	18.7	43.4	34.5	36.3	0.0	49.1	25.6
OKC Partial MSA	148	40,357	37.2	18,647	18.0	4.7	4.1	16.3	6.1	14.6	22.0	7.4	19.4	43.8	27.0	33.3	0.0	54.7	28.6
Total	398	75,937	100.0	24,788	19.3	4.5	4.2	16.7	6.8	14.1	21.0	11.1	19.2	43.1	38.9	32.6	0.0	38.7	29.8

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Due to rounding, totals may not equal 100.0%

#### Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2019-21

	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Lawton MSA	244	46,723	100.0	1,925	4.9	4.1	4.3	31.8	30.7	35.9	35.2	19.7	30.3	27.9	45.5	29.5	0.2	0.0	0.0
Oklahoma Non-MSA	84	18,188	68.3	1,201	0.0	0.0	0.0	5.1	3.6	6.2	72.8	45.2	65.3	22.1	51.2	28.5	0.0	0.0	0.0
OKC Partial MSA	235	99,966	61.5	7,173	0.4	0.8	0.3	13.6	7.2	11.7	46.9	57.0	45.2	38.9	34.0	42.8	0.2	0.0	0.0
Total	563	164,877	75.2	10,299	1.1	3.6	1.0	15.9	15.8	15.6	47.7	39.1	44.7	35.1	41.5	38.7	0.2	0.0	0.0

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2019-21

	To	otal Loans to Si	mall Businesses	1	Businesses	with Revenues	s <= 1MM	Businesses wit		Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Lawton MSA	244	46,723	100.0	1,925	82.4	70.1	33.0	3.7	17.6	13.9	12.3	
Oklahoma Non-MSA	84	18,188	68.3	1,201	82.6	39.3	37.1	4.7	54.8	12.7	6.0	
OKC Partial MSA	235	99,966	61.5	7,173	89.5	54.5	29.1	2.9	32.3	7.6	13.2	
Total	563	164,877	75.2	10,299	87.5	54.6	30.8	3.3	34.9	9.2	10.5	

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%