



**PUBLIC DISCLOSURE**

April 1, 2021

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Great Plains National Bank  
Charter Number 23049

2017 West Third Street  
Elk City, OK 73644

Office of the Comptroller of the Currency

The Harvey Parkway Building  
301 NW 63rd Street, Suite 490  
Oklahoma City, OK 73116-7908

**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.

# Table of Contents

OVERALL CRA RATING.....2  
DESCRIPTION OF INSTITUTION .....3  
SCOPE OF THE EVALUATION .....4  
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....5  
STATE RATING.....6  
STATE OF OKLAHOMA .....6  
LENDING TEST .....10  
COMMUNITY DEVELOPMENT TEST .....15  
STATE OF TEXAS.....20  
LENDING TEST .....22  
COMMUNITY DEVELOPMENT TEST .....24  
APPENDIX A: SCOPE OF EXAMINATION .....A-1  
APPENDIX B: SUMMARY OF STATE RATINGS .....B-1  
APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS .....C-1  
APPENDIX D: TABLES OF PERFORMANCE DATA .....D-1

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated Satisfactory

**The lending test is rated:** Satisfactory

**The community development test is rated:** Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on four full scope assessment areas (AA), three in the state of Oklahoma and one in the state of Texas.
- The loan-to-deposit (LTD) ratio is outstanding and exceeds the standards for satisfactory performance.
- Great Plains National Bank (hereafter "GPNB" or "the bank") originated a majority of its loans within their assessment area (AA).
- The bank's distribution to small business and home mortgage borrowers of different incomes reflects reasonable dispersion and meets the standard for satisfactory performance in both Oklahoma and Texas.
- The bank's distribution to small business and home mortgage borrowers in different geographies reflects reasonable dispersion and meets the standard for satisfactory performance in both Oklahoma and Texas.
- The Community Development (CD) Test rating is based on the four full scope AAs.
- CD lending reflects excellent responsiveness to the needs of the bank's AAs.
- CD investments reflects excellent responsiveness to the needs of the bank's AAs.

### Loan-to-Deposit Ratio

The bank's LTD ratio is outstanding and exceeds the standard for satisfactory performance considering the bank's size, financial condition, and credit needs of the AAs. As of December 31, 2020, GPNB's LTD ratio is 95.70 percent. GPNB's quarterly average LTD ratio from March 31, 2018 through December 31, 2020 is 94.96 percent. We compared GPNB's LTD ratio to four similarly situated banks in their market areas. The comparative banks aggregate average LTD ratio ranged from a high of 84.90 percent and a low of 69.18 percent.

Bank Name	Total Assets \$(000s)	Avg. LTD Ratio
Great Plains National Bank	945,007	94.96
Quail Creek Bank, National Association	766,740	81.23
Vision Bank, National Association	826,936	83.84
Stride Bank, National Association	1,123,488	84.90
The First National Bank and Trust Co.	777,821	69.18

### Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated and purchased 66.34 percent of its total loans inside the bank's AAs during the evaluation period.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	4,643	65.96	2,396	34.04	7,039	893,450	61.78	552,647	38.22	1,446,097
Small Business	112	86.82	17	13.18	129	69,073	89.59	8,025	10.41	77,098
Total	4,755	66.34	2,413	33.66	7,168	962,523	63.19	560,672	36.81	1,523,195

The bank's primary products based on loan originations and purchases are home mortgage and small business loans, which is the same for all AAs.

### **Description of Institution**

GPNB is a \$954 million community banking institution headquartered in Elk City, Okla., which is located in the western part of the state. GPNB is a multistate institution with locations in both Oklahoma and Texas. GPNB is a subsidiary of a one-bank holding company, Great Plains Bancshares, Inc located in Elk City, Okla. The bank operates 20 banking centers, with 18 banking centers in Oklahoma communities and two banking centers in two Texas communities. Additionally, there is an Administration Office and Mortgage Division Headquarters in Oklahoma City. In 2017 GPNB acquired Liberty Federal Savings out of Enid, Okla. This included branch locations in Enid, Stillwater, and Frisco, Texas.

The bank has four rating areas, the State of Oklahoma with three AA's and the State of Texas with one AA. AA's include the Oklahoma City MSA, Enid MSA, and the Oklahoma Non-MSA. Within the State of Oklahoma AA's there are 18 branch locations and 20 ATMs (non-deposit taking). For the State of Texas there are two branches and two ATMs (non-deposit taking) within the Dallas-Plano-Irving, MSA. We combined the Dallas-Plano-Irving MSA with the Ft. Worth MSA since they were contiguous. The branch in Irving, Texas did not open until November of 2020.

GPNB's primary focus is to serve the commercial, agricultural, and consumer customers in the above communities and their surrounding areas. The bank meets these needs by providing a variety of loan and deposit products, as well as other financial services. As of December 31, 2020, tier 1 capital was approximately \$93 million, and loans totaled \$802 million or 84.8 percent of total assets. The loan portfolio consists of \$419 million in commercial loans, \$230 million in residential real estate loans, \$131 million in agricultural real estate, \$29 million in consumer loans, and \$3 million in other loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. A CRA Performance Evaluation was last prepared as of March 26, 2018, and the bank received an overall rating of "Satisfactory."

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We completed a full-scope review of GPNB's CRA activities in its AAs, under the Intermediate Small Bank CRA procedures, which includes the lending test and the 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 and donations, and services.

Conclusions regarding the lending test are based on samples of business and residential real estate loans originated in 2018, 2019, and 2020. 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 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 we selected the full-scope AAs. 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.

GPNB has four rating areas and separate ratings for the State of Oklahoma and the State of Texas. The bank's overall rating is based on the full scope reviews of these AAs. The Oklahoma Non-MSA AA accounts for approximately 63.3 percent of the bank's deposits and 73.8 percent of the number of loans originated during the evaluation period. More weight was allocated to this AA based on the above details.

The Oklahoma and Texas state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and State Rating section for details regarding how we weighted the areas 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 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 Bureau of Consumer Financial Protection, 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 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:** Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution of loans to low- and moderate-income (LMI) tracts for home mortgage and small business lending.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.
- CD lending reflects excellent responsiveness to the needs of the bank's AAs.
- CD qualified investments reflects excellent responsiveness to the needs of the bank's AAs.

### Description of Institution's Operations in Oklahoma

The bank operates 18 branches and 20 ATMs in three AAs in the State of Oklahoma. The bank's primary focus overall is commercial lending, although they offer a variety of loan and deposit products to meet the needs of the community. Due to similarities in the primary products in each AA, we chose the same products for analysis in each AA.

#### **Oklahoma City, OK MSA AA**

The Oklahoma City MSA AA consists of 342 contiguous census tracts (CT), including all of Oklahoma County, Cleveland County, Grady County, and Canadian County. The Oklahoma City MSA AA consists of 29 low-income CTs, 101 moderate-income CTs, 123 middle-income CTs and 80 upper-income CTs. Six of the 20 branches are located in the Oklahoma City MSA AA. Nine CTs have no income assigned income designation. The El Reno branch is located in a middle-income CT, whereas all of the other branches (Tuttle, Edmond, Moore, Piedmont, and Midtown) are located in an upper-income CT.

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<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.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Oklahoma City MSA 2020**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	342	8.5	29.5	36.0	23.4	2.6
Population by Geography	1,202,899	6.8	24.7	38.9	29.4	0.3
Housing Units by Geography	505,049	6.7	26.8	38.7	27.4	0.3
Owner-Occupied Units by Geography	284,883	3.7	18.9	41.9	35.5	0.1
Occupied Rental Units by Geography	168,435	10.5	37.5	34.5	16.9	0.6
Vacant Units by Geography	51,731	11.0	35.6	35.6	17.1	0.6
Businesses by Geography	122,756	4.4	21.4	35.2	35.7	3.2
Farms by Geography	3,388	3.6	16.1	42.9	36.6	0.9
Family Distribution by Income Level	293,275	21.5	17.3	20.5	40.8	0.0
Household Distribution by Income Level	453,318	23.5	16.7	18.0	41.8	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$137,897
			Median Gross Rent			\$804
			Families Below Poverty Level			11.4%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Competition in the Oklahoma City MSA AA is strong with approximately 89 other financial institutions in the areas, including several large nationwide and regional banks. Based on FDIC Deposit Market Share data as of June 30, 2020, GPNB holds 0.28 percent of the market share of deposits and is ranked 52<sup>nd</sup> among financial institutions in the MSA. The Oklahoma City MSA AA accounts for approximately 1.34 percent of the bank's deposits and 22.2 percent of the number of loans originated during the evaluation period.

We consulted with two community contacts in the AA to gain a better understanding of the general community credit and developmental needs, as well as economic conditions. These community contacts work to provide services for low- to moderate-income families and help low- to moderate-families achieve the goal of home ownership. Both organizations serve Oklahoma and Canadian Counties. One also serves Cleveland and Logan Counties. One contact indicated the Covid-19 pandemic has had a significant impact on the job market. The pandemic resulted in decreased mobility and job cuts in professional services, leisure/hospitality, and retail. The shape of Oklahoma's recovery will depend on how quickly it can safely pursue lasting re-openings. They indicated a need for financial education, funding of individual development accounts, and affordable housing. Another contact indicated a need for financial institutions to provide financial support for continued affordable housing developments. Additional needs are, foreclosure counseling, homebuyer education, down payment assistance, and providing grants for appliance packages for new homeowners.

## **Oklahoma Non-MSA AA**

The Oklahoma Non-MSA AA consists of 45 CTs, including nine full counties consisting of, Jackson County, Dewey County, Woodward County, Kiowa County, Roger Mills County, Washita County, Greer County, Beckham County, and Harmon County. Additionally, the Oklahoma Non-MSA AA consists of a partial portion of Payne County, which excludes three CTs south of the Cimarron River. The Oklahoma Non-MSA AA consists of two low-income CTs, eight moderate-income CTs, 21 middle-income CTs, and 14 upper-income CTs. Ten of the 20 branches are located in the Oklahoma Non-MSA AA. The Stillwater branch is located in a low-income CT and the Hollis Branch is located in a moderate-income CT. Five branches (Elk City South, Woodward, Mangum, Hobart, and Taloga) are all located in middle-income CTs, and Sayre, Elk City North, and Cordell are all located in upper-income CTs.

**Table A – Demographic Information of the Assessment Area**  
**Assessment Area: Oklahoma Non-MSA 2020**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	45	4.4	17.8	46.7	31.1	0.0
Population by Geography	176,737	5.3	16.1	41.3	37.3	0.0
Housing Units by Geography	79,631	3.6	17.8	42.9	35.6	0.0
Owner-Occupied Units by Geography	38,958	0.2	12.2	45.7	41.9	0.0
Occupied Rental Units by Geography	27,144	7.9	26.5	37.1	28.4	0.0
Vacant Units by Geography	13,529	4.9	16.6	46.7	31.8	0.0
Businesses by Geography	12,830	4.7	17.1	39.6	38.6	0.0
Farms by Geography	1,011	1.0	10.5	49.5	39.1	0.0
Family Distribution by Income Level	40,677	20.1	15.9	17.8	46.2	0.0
Household Distribution by Income Level	66,102	25.5	15.1	16.7	42.6	0.0
Median Family Income Non-MSAs - OK		\$51,491	Median Housing Value			\$112,198
			Median Gross Rent			\$722
			Families Below Poverty Level			12.7%
<i>Source: 2015 ACS and 2020 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Competition in the Oklahoma Non-MSA AA is strong with approximately 44 other financial institutions in the areas, including several regional banks. Based on FDIC Deposit Market Share data as of June 30, 2020, GPNB holds 13.98 percent of the market share of deposits and is ranked 2<sup>nd</sup> among financial institutions in the MSA. The Oklahoma Non-MSA AA accounts for approximately 63.30 percent of the bank's deposits and 73.8 percent of the number of loans originated during the evaluation period.

We consulted with three community contacts in the AA to gain a better understanding of the general community credit and developmental needs, as well as economic conditions. These community contacts primarily have an economic development purpose, one of the three also assists with transportation and housing and provides services for small business and farmers. The organizations we contacted are located in Beckham County, Washita County, and Woodward County. They all indicated that the needs of the community are met, and the banks are active. Additionally, one of the three contacts mentioned a need for housing, specifically middle-income housing in Washita County.

## **Enid MSA AA**

The Enid MSA AA consists of 12 CTs, including all of Garfield County and no low-income CTs, three moderate-income CTs, six middle-income CTs, and three upper-income CTs. Two of the 20 branches are located in the Enid, OK MSA AA. The Broadway Avenue location is located in a moderate-income CT and the Oakwood Branch is located in an upper-income CT.

**Table A – Demographic Information of the Assessment Area**

**Assessment Area: Enid MSA 2020**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	12	0.0	25.0	50.0	25.0	0.0
Population by Geography	62,192	0.0	30.4	44.2	25.4	0.0
Housing Units by Geography	26,856	0.0	30.1	43.0	26.9	0.0
Owner-Occupied Units by Geography	15,938	0.0	26.6	40.3	33.2	0.0
Occupied Rental Units by Geography	7,999	0.0	33.0	49.7	17.2	0.0
Vacant Units by Geography	2,919	0.0	41.3	39.4	19.3	0.0
Businesses by Geography	4,557	0.0	31.5	41.2	27.3	0.0
Farms by Geography	282	0.0	18.8	42.6	38.7	0.0
Family Distribution by Income Level	16,911	19.0	19.9	22.3	38.8	0.0
Household Distribution by Income Level	23,937	21.8	17.0	20.1	41.2	0.0
Median Family Income MSA - 21420 Enid, OK MSA		\$57,419	Median Housing Value			\$97,211
			Median Gross Rent			\$746
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS and 2020 D&amp;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.</i>						

Competition in the Enid MSA AA is strong with approximately 14 other financial institutions in the area, including several large regional banks. Based on FDIC Deposit Market Share data as of June 30, 2020, GPNB holds 3.82 percent of the market share of deposits and is ranked 7<sup>th</sup> among financial institutions in the MSA. The Enid MSA AA accounts for approximately 6.90 percent of the bank's deposits and 19.5 percent of the number of loans originated during the evaluation period.

We consulted with two community contacts in the AA to gain a better understanding of the general community credit and developmental needs, as well as economic conditions. These community contacts have an economic development purpose and provide services for small businesses and farmers. Both organizations serve Garfield County. They both indicated a need for agricultural lending. Additionally, one of the two contacts mentioned a need for affordable housing, specifically moderate-income housing. They indicated that that baby boomers were not leaving their homes, which accounts for a majority of moderate-income housing. The areas have received grants and funding for low-income housing, which presently includes more supply than demand.

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

### **LENDING TEST**

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

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

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

The bank exhibits reasonable geographic distribution of loans in the State of Oklahoma. Overall, the geographic distribution of home mortgage loans and small business loans is reasonable given performance context.

##### Oklahoma City 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 Oklahoma City MSA AA reflects reasonable dispersion among LMI geographies and meets the standard for satisfactory performance. For the time period of 2018-2020, the distribution to low-income tracts is lower than both the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA. Only 8.5 percent of CTs in the Oklahoma City MSA AA are low-income. Furthermore, 6.7 percent of housing in the AA are in low-income tracts and homeownership in the AA is 3.7 percent in low-income tracts, making it difficult to lend in the low-income CTs. Additionally, Oklahoma City MSA AA market is very competitive with approximately 89 other competitor banks. The distribution to moderate-income tracts is somewhat lower than owner-occupied housing units in the AA and 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 loans to businesses in the Oklahoma City MSA AA reflects reasonable dispersion in the LMI geographies and meets the standard for satisfactory performance. For the time period of 2018-2020, the distribution to low-income tracts is near to both the percentages of businesses located in the geography and the aggregate lending level. The dispersion to moderate-income tracts is somewhat lower than both the percentages of businesses located in the geography and the aggregate lending level.

Oklahoma Non-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 Oklahoma Non-MSA AA reflects reasonable distribution. Home mortgage lending in the Oklahoma Non-MSA AA reflects reasonable distribution among LMI geographies and meets the standard for satisfactory performance. For the time period of 2018-2020, the distribution to low-income tracts exceeds the percentage of owner-occupied housing units and is somewhat lower than the aggregate distribution of loans in the AA. The distribution to moderate-income tracts is somewhat lower than the percentage of owner-occupied housing units and is lower than 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 business loans in the Oklahoma Non-MSA AA reflects reasonable distribution. Small business lending in the Oklahoma Non-MSA AA reflects reasonable distribution among LMI geographies and meets the standard for satisfactory performance. For the time period of 2018-2020, the distribution to low-income tracts is somewhat lower than both the percentage of businesses located in the geography and the aggregate lending level. The dispersion to moderate-income tracts is lower than both the percentage of businesses located in the geography and the aggregate lending level.

The Oklahoma Non-MSA AA comprises 10 counties, nine contiguous and one non-contiguous. This AA has two low-income tracts in Payne county whose area is dominated by the Oklahoma State University (OSU) campus in Stillwater, OK. This AA has nine moderate-income areas in three different counties. Five of the moderate-income tracts are also in Payne County, in and around Stillwater and the OSU campus. The OSU campus is a main driver for housing for college students. This demand for off-campus housing for students limits the number of homes available for purchase in the moderate-income CTs as they are primarily converted to rentals to students. One moderate-income CT, the entirety of Harmon County, is overwhelmingly rural with more farmland than homes or subdivisions. Three moderate-income CTs are in and around the town of Altus in Jackson County. Altus is home to Altus Air Force Base and is the largest employer in the area. The majority of military families in this area typically do not live in the area long enough to justify purchasing a home.

Enid 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 Enid MSA AA reflects reasonable distribution. Home mortgage lending in the Enid MSA AA reflects reasonable distribution among LMI geographies and meets the standard for satisfactory performance. Because the Enid MSA AA has no low-income CTs,

we focused on lending in moderate-income CTs. For the time period of 2018-2020, the distribution to moderate-income tracts is somewhat lower than the percentage of owner-occupied housing units and exceeds the aggregate distribution of lending 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 business loans in the Enid MSA AA reflects reasonable distribution.

Small business lending in the Enid MSA AA reflects reasonable distribution among LMI geographies and meets the standard for satisfactory performance. Because the Enid MSA AA has no low-income CTs, we focused on lending in moderate-income CTs. For the time period of 2018-2020, the distribution to moderate-income tracts is near to the percentage of businesses located in the geography and is somewhat lower than the aggregate lending level.

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

The bank exhibits 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.

#### Oklahoma City MSA AA

### ***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 Oklahoma City MSA AA reflects reasonable distribution among LMI borrowers. Home mortgage lending in the Oklahoma City MSA AA reflects reasonable penetration among LMI borrowers and meets the standard for satisfactory performance. For the time period of 2018-2020, the penetration to low-income borrowers was lower than the percentage of low-income families, but the bank's percentage of loans exceeded the aggregate percentage of lending. Lending to moderate-income borrowers was excellent, the bank exceeded both the percentage of moderate-income families and the aggregate percentage of lending in the AA.

### ***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 Oklahoma City MSA AA reflects reasonable distribution. Lending to small businesses, those with less than \$1 million, in the Oklahoma City MSA AA reflects reasonable penetration. For the time period of 2018-2020, the penetration to small businesses was somewhat lower than the percentage of businesses identified as having revenues of less than or equal to \$1 million but exceeded the aggregate lending for these businesses.

## Oklahoma Non-MSA AA

### ***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 Oklahoma Non-MSA AA reflects reasonable distribution among LMI borrowers in the Oklahoma Non-MSA AA. Home mortgage lending in the Oklahoma Non-MSA AA reflects reasonable penetration among LMI borrowers and meets the standard for satisfactory performance. For the time period of 2018-2020, the penetration to low-income borrowers was lower than the percentage of low-income families and was near to the aggregate percentage of lending. Lending to moderate-income individuals was reasonable, somewhat lower than the percentage of moderate-income families, but was near to the percentage of aggregate lending in the AA.

### ***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 borrower distribution of business loans in the Oklahoma Non-MSA AA reflects reasonable distribution. Lending to small businesses, those with less than \$1 million, in the Oklahoma Non-MSA AA reflects reasonable penetration. For the time period of 2018-2020, the penetration to small businesses was near to the percentage of businesses identified as having revenues of less than \$1 million and exceeded the aggregate lending for these businesses.

## Enid MSA AA

### ***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 Enid MSA AA reflects reasonable distribution. Home mortgage lending in the Enid MSA AA reflects reasonable penetration among LMI borrowers and meets the standard for satisfactory performance. For the time period of 2018-2020, the penetration to low-income borrowers was lower than the percentage of low-income families but exceeded the aggregate lending in the AA. Lending to moderate-income borrowers was somewhat lower than the percentage of moderate-income families and was near the aggregate lending in the AA. Low-income borrowers in the Enid MSA AA earned an average of \$28,700 annually while the average home price was \$97,211, making it difficult for low-income borrowers to qualify for home loans without flexible terms and lower closing costs.

### ***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 borrower distribution of business loans in the Enid MSA AA reflects reasonable distribution. Lending to small businesses, those with less than \$1 million, in the Enid MSA AA reflects reasonable penetration.

For the time period of 2018-2020, 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.

### **Responses to Complaints**

During the evaluation period the bank received three complaints related to CRA, all associated with branch closures in the State of Oklahoma. The bank provided responses to all of the complaints received. They encouraged customers to reach out to local customer service employees with any additional concerns. Additionally, they encouraged customers to leverage technology and utilize online banking and mobile banking.

### **Scope of Evaluation in Oklahoma**

There are three AAs in Oklahoma, and we performed full scope procedures on all AAs. The majority of deposits and loans are made in the Oklahoma Non-MSA AA, as this is where the bank has the largest and longest presence. The bank began entering the Oklahoma City market in 2017 when they opened a branch in Midtown. Additionally, the bank acquired the branches in Enid (Enid MSA AA) and Stillwater (Oklahoma Non-MSA AA) in 2017. The prior institution did not have a large foothold in this market. Refer to each AA for more detailed information.

## COMMUNITY DEVELOPMENT TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

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

The implementation of the Coronavirus Aid, Relief, and Economic Security Act (CARES), was a large factor in the bank having a significant increase in community development loans over the evaluation period. The Small Business Administration (SBA) deployed the full guaranteed Payment Protection Program (PPP) in 2020. The PPP is intended to incentivize small businesses to keep their employees on payroll despite business hardship.

### Number and Amount of Community Development Loans

The bank's level of community development loans demonstrates excellent responsiveness to the needs of its AAs given performance context.

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<b>Community Development Loans</b>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Oklahoma City MSA	50	54.35%	\$25,634	47.82%
Oklahoma Non-MSA	39	42.39%	\$17,285	32.25%
Enid MSA	3	3.26%	\$10,685	19.93%
<b>Total</b>	<b>92</b>	<b>100%</b>	<b>\$53,604</b>	<b>100%</b>

#### Oklahoma City MSA AA

The level of community development loans in the Oklahoma City MSA AA indicates excellent responsiveness to the needs of the AA. During the evaluation period, the bank originated or renewed 50 CD loans, totaling \$25.6 million in the Oklahoma City MSA AA. These loans were all for economic development and resulted in the retention of 2,025 LMI jobs. The bank underwrote the majority of the CD loans - 62 percent by number and 38 percent by dollar – through the PPP. The remaining \$16 million in CD loans were from the normal course of business over the evaluation period.

Significant loans included a \$2.5 million dollar loan to a trucking company, to pay payroll, which resulted in the retention of 302 LMI jobs in the AA.

#### Oklahoma Non-MSA AA

The level of community development loans in the Oklahoma Non-MSA AA indicates excellent responsiveness to the needs of the AA. During the evaluation period, the bank originated or renewed 39 CD loans, totaling \$17.3 million in the Oklahoma Non-MSA AA. These loans were all for economic development and resulted in the retention of 1,514 LMI jobs. The bank underwrote the majority of the CD loans - 92 percent by number and 62 percent by dollar – through the PPP. The remaining \$6.6 million in CD loans were from the normal course of business over the evaluation period.

Significant loans included a \$4.1 million dollar loan to a hospital association, to pay payroll, which resulted in the retention of 435 LMI jobs.

#### Enid MSA AA

The level of community development loans in the Enid MSA AA indicates excellent responsiveness to the needs of the AA. During the evaluation period, the bank originated or renewed three CD loans, totaling \$10.7 million in the Enid MSA AA. These loans were all for economic development and resulted in the retention of 251 LMI jobs and the creation of eight LMI jobs. The bank underwrote the majority of these loans in the normal course of business over the evaluation period.

Significant loans included the construction and permanent financing of a \$5 million dollar loan to build a convenience store, which resulted in the creation of eight LMI jobs.

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

<b>Qualified Investments</b>										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Oklahoma City MSA	0	0	9	\$817	9	9.37%	\$817	17.14%	0	0
Oklahoma Non-MSA	0	0	83	\$1,270	83	86.46%	\$1,270	26.65%	0	0
Enid MSA	0	0	4	\$2,679	4	4.17%	\$2,679	56.21%	0	0
			96	\$4,766	96		\$4,766			

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank's level of investments and donations demonstrates excellent responsiveness to the needs of its AAs given performance context.

#### Oklahoma City MSA AA

The level of qualified investments in the Oklahoma City MSA AA indicates excellent responsiveness to the needs of the AA. The bank made three qualified investments in the Oklahoma City MSA AA, totaling \$817,000, or 17.14% of total qualified investments in the State of Oklahoma. Investments consisted of three bonds, two school bonds in Canadian County for Union City Schools totaling \$135,000 and one

bond for \$580,000 for Warr Acres, Okla. Donations included \$1,425 to various El Reno high school clubs, \$230.00 to the Shriners, and \$128.00 to the Tuttle Special Olympics.

Competition for qualified investment in the Oklahoma City MSA AA is strong. There are limited to qualified investments available, and it is often difficult for community banks to compete with the large nationwide and regional banks in the MSA.

#### Oklahoma Non-MSA AA

The level of qualified investments in the Oklahoma Non-MSA AA indicates excellent responsiveness to the needs of the AA. The bank made seven qualified investments in the Oklahoma Non-MSA AA, totaling \$1.3 million, or 26.65% of total qualified investments in the State of Oklahoma. Investments consisted of seven bonds, all for the Greer County ISD. School bonds will be used for school building improvements. The public schools located in Greer County reported that 67.67 percent of their students were low income on the Oklahoma State Department of Education Low Income Report.

Significant donations included \$10,000 to a fire relief fund. On June 25, 2018, FEMA declared disaster DR-4373-OK for the wildfires that occurred from April 11 through April 20, 2018. Of the counties named in the disaster declaration all but one (Custer County) are included in the bank's assessment area. This donation provided relief to ranchers effected by the Western Oklahoma Wildfires. The bank made additional significant contributions to local schools, including \$4,700 for senior scholarships, \$10,850 for graduating seniors, \$5,000 to supplement funding, \$3,890 to the Future Farmers of America, and \$2,500 to support a basketball program. All schools reported over 50 percent of their students were low income on the Oklahoma Department of Education Low Income Report.

There are few qualified CD investments available in areas of rural Oklahoma. Majority of opportunities consist primarily of low-income school bonds, and competition is strong.

#### Enid MSA AA

The level of qualified investments in the Enid MSA AA indicates excellent responsiveness to the needs of the AA. The bank made four qualified investments in the Enid MSA AA, totaling \$2.7 million, or 56.21 percent of total qualified investments in the State of Oklahoma. Significant donations included selling the Enid Branch to the city for \$250,000 resulting in a building donation of \$2.6 million. GPNB will continue to lease the building over the next year while searching for a new branch facility. The city plans to lease a portion of the building to the non-profit Making a Difference, an after-school and summer youth program focused on middle school children. The second floor will be utilized as a shared use conference room. United Way of Northwest Oklahoma currently occupies a suite on the second floor of the building as well. Additional donations of \$128,800 were made to two qualifying organizations. One organization provides grants and funds to emerging and changing community needs in Enid and the greater Northwest Oklahoma. The other works to help improve health, safety, education, and economic well-being of at-risk individuals and families in the community.

The bank made a \$100,000 donation to an organization with intent of improving the quality of life for not only the residents of Enid but also those in Northwest Oklahoma. This donation provided for the setup of an unrestricted endowment fund, to help the Enid area residents. Unrestricted funds provide money that is awarded in grants by the Foundations Board of Directors. Unrestricted funds are flexible and responsive to emerging and changing community needs. Donors place no restrictions on their gifts and leave decisions about charitable use of the funds to the Foundation.

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

The level of qualified community development services provided by bank employees within the State of Oklahoma indicates adequate responsiveness.

Bank officers sits on nine boards for 11 organizations that are involved in economic or small business development activities, affordable housing, revitalization and stabilizations, and organizations that provide and support community services to low- and-moderate income families. Over the evaluation period bank officers volunteered 789 hours and provided financial expertise to the boards they participate on.

### Oklahoma City MSA AA

Community development services provided by bank employees within the Oklahoma City MSA AA indicates poor responsiveness to the needs of the community. One mortgage loan officer volunteered eight hours and was a reoccurring guest speaker for a local organization and presented at a workshop focused on homebuying. The mission of the organization is to promote the self-sufficiency of the socially, economically, and culturally disadvantaged citizens of Oklahoma and Canadian counties. In partnership with their communities, their goal is to eliminate poverty among their citizens by opening to everyone the opportunity to work, to live in decency, dignity, and worth, and to secure the opportunities needed to become fully self-sufficient.

### Oklahoma Non-MSA AA

Community development services provided by bank employees within the Oklahoma Non-MSA AA indicates excellent responsiveness to the needs of the community. Eight officers volunteer their time and serve in leadership positions at 10 different organizations. These organizations are involved in economic and small business development, affordable housing, community service, and revitalization and stabilization. Officers volunteered 741 hours of their time over the evaluation period. The following are examples of qualifying CD services.

Two bank officers serve on the board, as a board member and advisory board member. This organization is a non-profit that provides assisted living and home health care to over 2,500 senior adults in Oklahoma. This organization provides affordable housing as well as community services to the local AA and to the entire state.

One employee serves as a board member for a health center. The clinic is a health care facility funded by grants to provide healthcare to lower income individuals. The organization is a non-profit 501c (3) that provides services to insured, uninsured, underinsured, and underserved children and adults in Southwest Oklahoma. While the clinic is not a free clinic, it does consider an individual's or family's income and situation and bases its charges accordingly.

A bank officer serves as a board member of a local Community Development Corporation (CDC). They provide lending oversight when discussing the viability of new projects. The CDC is a 501 c(3) non-profit development entity serving Alfalfa, Dewey, Harper, Woods, and Woodward counties in Northwest Oklahoma. Their mission is to revitalize the rural communities in its service region and to increase community sustainability through pro-active social and economic change efforts. One of the ways they accomplish this is by assisting low-income households with needed housing improvements. Additionally, they maintain an active portfolio of affordable rental units in Alva, Cherokee, Waynoka, Freedom, and Mooreland.

Two bank officers participate in a local organization. One serves as the President and the other is a member. The organization is a network of individuals in the Elk City area that works together to promote peace, fight disease, provide clean water, sanitation, and hygiene, save mothers and children, support education, and grow local economies. Additionally, one of their primary functions of the organization is to support the Meals on Wheels Program. This program provides meal delivery service to the elderly and disabled. They also provide dictionaries to all 3<sup>rd</sup> graders in the area and support and run local pageants.

Enid MSA AA

Community development services provided by bank employees within the Enid MSA AA indicates adequate responsiveness to the needs of the community. The Enid Market President volunteered 48 hours over the evaluation period with a local organization. This organization works with developmentally disabled adults by providing employment in their 2nd Story Employment Center. The Enid Market President serves on the Board and Financial Committee and lends financial expertise when determining which projects to fund and managing financial aspects of projects underway.

## State of Texas

**CRA rating for the State of Texas<sup>2</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Outstanding

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution of loans to LMI tracts for home mortgage and small business lending.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.
- CD lending indicates excellent responsiveness to the needs of the bank's AAs.
- CD qualified investments indicates excellent responsiveness to the needs of the bank's AAs.
- The amount of CD services indicates excellent responsiveness to the needs of the bank's AAs.

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

The bank operates two branches and two ATMs in one AA in the State of Texas. The bank's primary focus overall is commercial lending, although they offer a variety of loan and deposit products to meet the needs of the community. Due to similarities in the primary products in each AA, we chose the same products for analysis in each AA.

#### **Dallas-Plano-Irving MSA**

The Dallas-Plano-Irving, TX MSA AA consists of 721 CTs, including all of Collin County, Dallas County, Denton County, and Tarrant County. The Dallas-Plano-Irving MSA AA comprises 65 low-income CTs, 159 moderate-income CTs, 181 middle-income CTs and 309 upper-income CTs. Seven CTs have no assigned income designation. Two of the 20 branches are located in the Dallas-Plano-Irving MSA. The Irving location is located in a low-income CT and the Frisco location is located in a middle-income CT.

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<sup>2</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.

**Table A – Demographic Information of the Assessment Area****Assessment Area: Dallas-Plano-Irving MSA 2020**

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	721	9.0	22.1	25.1	42.9	1.0
Population by Geography	3,571,498	8.4	20.9	25.4	45.1	0.2
Housing Units by Geography	1,411,895	9.1	20.1	26.4	44.1	0.3
Owner-Occupied Units by Geography	737,870	2.3	14.3	24.6	58.6	0.2
Occupied Rental Units by Geography	574,581	16.4	26.6	28.9	27.5	0.5
Vacant Units by Geography	99,444	17.4	25.3	25.1	31.6	0.5
Businesses by Geography	475,600	5.4	15.8	23.5	54.3	1.0
Farms by Geography	6,906	3.8	15.7	23.6	56.2	0.8
Family Distribution by Income Level	874,872	19.9	14.8	16.9	48.4	0.0
Household Distribution by Income Level	1,312,451	20.7	15.8	17.1	46.4	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$212,636
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Gross Rent			\$1,020
			Families Below Poverty Level			9.1%

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 Dallas-Plano-Irving MSA AA is strong with approximately 162 other financial institutions in the areas, including several large nationwide and regional banks. Based on FDIC Deposit Market Share data as of June 30, 2020, GPNB holds less than 0.01 percent of the market share of deposits and is not ranked among financial institutions in the MSA. The Dallas-Plano-Irving MSA AA does not account for a significant portion of the bank's deposits and only 2.0 percent of the number of loans originated during the evaluation period.

We consulted with four community contacts in the AA to gain a better understanding of the general community credit and developmental needs, as well as economic conditions. These community contacts work to provide services for low- to moderate-income families, affordable housing, and economic and business development. The organizations serve counties located within the bank's AAs. Organizations indicated needs for wrap around services such as job training, financial education, and money management programs to help those unemployed and under-employed. Additional needs include access to capital, participation from banks in the Dallas Federal Home Loan Bank Affordable Housing Program, and bank sponsorship through grant applications.

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

### **LENDING TEST**

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

Based on a full scope review of the Dallas-Plano-Irving MSA the bank's lending performance is reasonable.

#### **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 Texas 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 Dallas-Plano-Irving MSA AA reflects reasonable dispersion. Home mortgage lending in the Dallas-Plano-Irving MSA AA reflects reasonable dispersion among LMI geographies and meets the standard for satisfactory performance. For the time period of 2018-2020, the percentage of bank loans in low-income CTs exceeded both the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA. The bank's percentage of loans in moderate-income CTs was somewhat lower than the percentage of owner-occupied housing units and exceeded the aggregate distribution of loans in the AA.

##### ***Small Loans to Businesses***

Refer to Table Q in the state of Texas 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 loans to businesses in the Dallas-Plano-Irving MSA AA reflects reasonable distribution. Small business lending in the Dallas-Plano-Irving MSA AA reflects reasonable distribution among LMI geographies and meets the standard for satisfactory performance. For the time period of 2018-2020, the percentage of bank loans in low-income CTs exceeded both the percentage of businesses located in those geographies and the aggregate lending level. For moderate-income geographies, the bank's lending was lower than both the percentage of businesses and the aggregate lending in moderate-income geographies. As previously mentioned, the bank acquired the Frisco location in 2017 and lacked a strong foothold in the market. Additionally, they were in the process of a continuous renovation through 2019, and the Irving Branch did not open until November of 2020. Considering performance context small business lending reflects reasonable distribution.

#### **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 Texas 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.

Home mortgage lending in the Dallas-Plano-Irving MSA AA reflects reasonable penetration among LMI borrowers and meets the standard for satisfactory performance. For the time period of 2018-2020, the penetration to low-income borrowers was significantly lower than both the percentage of low-income families and the percentage of aggregate lending in the AA. In the Dallas-Plano-Irving MSA AA, low-income families earned an average of \$35,574 and account for 19.9 percent of the total population while the average home price is over \$212,636 and the median rent is \$1,020, making it difficult for low-income families to save enough money to qualify for home mortgage loans. Lending to moderate-income borrowers was somewhat lower than both the percentage of moderate-income families and the percentage of aggregate lending in the AA. When considering performance context this raises lending to a satisfactory level.

### ***Small Loans to Businesses***

Refer to Table R in the State of Texas 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.

Lending to small businesses, those with less than \$1 million, in the Dallas-Plano-Irving MSA AA reflects reasonable penetration. For the time period of 2018-2020, the penetration to small businesses was somewhat lower than the percentage of businesses identified as having revenues of less than or equal to \$1 million but exceeded the aggregate lending for these businesses. When considering performance context this raises lending to a satisfactory level.

### **Responses to Complaints**

GPNB received no CRA related complaints pertaining to the State of Texas locations during the evaluation period.

### **Scope of Evaluation in Texas**

There is only one AA area in Texas, and we performed full scope procedures as this area has not been previously reviewed. The bank acquired the branch in Frisco in 2017 and opened a new branch in Irving, Texas in November of 2020. When the branch in Frisco was acquired it had only one full time person who served as a teller. This branch was delayed in getting up and running from a staffing perspective. The prior institution did not have a large foothold in the market. Once GPNB acquired the branch, there was a continuous renovation project that took place until the current Regional President came on board in 2019. The Irving branch is a new location and was opened less than two months during the evaluation period.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the State of Texas is rated Outstanding.

### Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area(s). The implementation of the Coronavirus Aid, Relief, and Economic Security Act (CARES), was a large factor in the bank having community development loans over the evaluation period.

### Number and Amount of Community Development Loans

The bank's level of community development loans demonstrates excellent responsiveness to the needs of its AAs given performance context. The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<b>Community Development Loans</b>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Dallas-Plano-Irving MSA	11	100%	\$2,576	100%

During the evaluation period, the bank originated or renewed 11 CD loans, totaling \$2.6 million in the Dallas-Plano-Irving MSA AA. These loans were all for economic development and resulted in the retention of 247 LMI jobs. The bank underwrote the majority of the CD loans - 82 percent by number and 77 percent by dollar – through the PPP.

Significant loans included \$483,300 and \$389,999 dollar loans to pay payroll, which resulted in the retention of 66 LMI jobs in the AA.

## Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Dallas-Plano-Irving MSA	0	0	4	1,063	4	100%	\$1,063	100%	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

The bank's level of investments and donations demonstrates excellent responsiveness to the needs of its AAs given performance context.

The bank made one qualified investment in the Dallas-Plano-Irving MSA AA, totaling \$1.1 million, or 99.25% of total qualified investments in the State of Texas. Investments consisted of one municipal bond, for the City of Rowlett, Texas. Proceeds from the sale of the bonds will be used to finance the construction and improvement of city streets, improvement and equipment of municipal park and recreational facilities, and finance the construction and improvement of equipment of public safety facilities. This benefits the community as a whole and all low- to moderate income individuals that reside within the community.

Donations included \$2,500 to a global charity. The bank donated to support a walkathon and raise funds for the charity. The charity is active in nine countries across five continents. Volunteers drive the organization's efforts, dedicating a portion of their lives in selfless service of others both in their local neighborhoods as well as on a global scale. Working in five key areas, the charity aims to express a spirit of selfless service through Health Awareness, Educational Services, Humanitarian Relief, Environmental Protection & Preservation and Community Empowerment. From Walkathons that raise funds for local organizations and community health fairs to sustained support for school and hospitals to humanitarian relief during international disasters, the charity provides an opportunity for individuals to serve at every human scale. The bank made additional donations of \$5,000 to an information technology organization that serves as a more targeted version of a Chamber of Commerce for IT companies in the bank's Dallas - Plano - Irving MSA AA. They help existing employers retain their employees and they also help new employers establish businesses in the AA, which results in the creation of low- to moderate-income individual jobs.

Competition for qualified investment in the Dallas-Plano-Irving MSA is strong. There are limited qualified investments available, and it is often difficult for community banks to compete with the large nationwide and regional banks in the MSA.

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

The level of qualified community development services provided by bank employees within the State of Texas indicates excellent responsiveness.

Community development services provided by bank officers within the Dallas-Plano-Irving MSA AA indicates excellent responsiveness to the needs of the community. The Regional President sits on three boards for three organizations that are involved in economic or small business development activities and organizations that provide and support community services to low-and moderate-income families. Over the evaluation period he volunteered 165 hours and provided financial expertise to the boards he participates on. The following are examples of qualifying CD services.

The Regional President serves as a board member and lends his financial expertise in determining which community projects to fund. This organization promotes inclusive communities, working toward the elimination of bias, bigotry, and oppression and encouraging understanding and equity through shared experiences and educational programming. They provide programming and educational forums that address the opportunities and challenges of living in a pluralistic society. The organization promotes understanding and respect among all races, religions, and cultures through advocacy, conflict resolution, and education. In affirmation of the founding principles, the organization exists to promote individual and group dignity, cooperation, mutual understanding, and respect among all peoples.

The regional president serves as a board member and lends his financial expertise in determining which community projects to fund. The organization's mission is to protect and promote commerce through advocacy, resources, and connections. The organization is involved in the community and promotes economic development by helping small businesses and assists in recruiting larger businesses to the area that employ low-to-moderate income individuals.

## 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.”

<b>Time Period Reviewed:</b>	January 1, 2018 to December 31, 2020	
<b>Bank Products Reviewed:</b>	Home mortgage & small business loans, community development loans, qualified investments, and community development services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Oklahoma</b>		
Oklahoma City MSA AA	Full-Scope	Counties of Canadian, Cleveland, Grady, and Oklahoma
Oklahoma Non-MSA AA	Full-Scope	Counties of Jackson, Dewey, Woodward, Kiowa, Roger Mills, Washita, Greer, Beckham, Harmon, and Payne
Enid MSA AA	Full-Scope	Counties of Garfield
<b>Texas</b>		
Dallas-Plano-Irving MSA AA	Full-Scope	Counties of Collin, Dallas, Denton, and Tarrant

## Appendix B: Summary of State Ratings

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RATINGS      Great Plains National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
Great Plains National Bank	Satisfactory	Outstanding	Satisfactory
State:			
Oklahoma	Satisfactory	Outstanding	Satisfactory
Texas	Satisfactory	Outstanding	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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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

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### 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.

**Table Q. 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 aggregate 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.

**Table R. Assessment Area Small Business Loan Distribution 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2018-20</b>	
<b>AA:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Agg't</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Agg't</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Agg't</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Agg't</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Agg't</b>	
Dallas-Plano-Irving MSA 2020	98	31,074	2.1	132,122	2.3	3.1	2.2	14.4	11.2	10.5	24.6	17.3	23.0	58.6	68.4	64.0	0.2	0.0	0.2	
Enid MSA 2020	84	14,727	1.8	1,434	0.0	0.0	0.0	26.6	14.3	12.8	40.3	47.6	44.9	33.2	38.1	42.3	0.0	0.0	0.0	
Oklahoma Non-MSA 2020	731	104,471	15.7	3,393	0.2	0.3	0.7	12.2	6.4	13.2	45.7	45.7	38.2	41.9	47.6	47.9	0.0	0.0	0.0	
Oklahoma City MSA 2020	3,730	743,178	80.3	43,058	3.7	1.3	2.1	18.9	14.0	13.7	41.9	36.6	38.2	35.5	48.0	45.9	0.1	0.1	0.1	
<b>Total</b>	<b>4,643</b>	<b>893,450</b>	<b>100.0</b>	<b>180,007</b>	<b>2.6</b>	<b>1.1</b>	<b>2.1</b>	<b>15.6</b>	<b>12.8</b>	<b>11.3</b>	<b>30.1</b>	<b>37.8</b>	<b>27.1</b>	<b>51.5</b>	<b>48.2</b>	<b>59.2</b>	<b>0.1</b>	<b>0.0</b>	<b>0.2</b>	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2018-20**

AA:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Dallas-Plano-Irving MSA 2020	98	31,074	2.5	132,122	19.9	--	2.7	14.8	9.2	11.2	16.9	18.2	18.3	48.4	68.4	54.2	0.0	7.2	13.6
Enid MSA 2020	84	14,727	1.8	1,434	19.0	7.1	6.8	19.9	13.1	15.2	22.3	26.2	19.6	38.8	40.5	34.2	0.0	13.1	24.2
Oklahoma Non-MSA 2020	731	104,471	15.7	3,393	20.1	3.0	3.4	15.9	10.8	11.2	17.8	19.6	16.6	46.2	56.0	47.3	0.0	10.7	21.4
Oklahoma City MSA 2020	3,730	743,178	80.3	43,058	21.5	7.9	6.3	17.3	20.5	17.3	20.5	25.8	18.8	40.8	39.1	33.4	0.0	6.8	24.1
<b>Total</b>	<b>4,643</b>	<b>893,450</b>	<b>100.0</b>	<b>180,007</b>	<b>20.3</b>	<b>6.9</b>	<b>3.6</b>	<b>15.5</b>	<b>18.6</b>	<b>12.7</b>	<b>17.8</b>	<b>24.6</b>	<b>18.4</b>	<b>46.4</b>	<b>42.4</b>	<b>49.0</b>	<b>0.0</b>	<b>7.5</b>	<b>16.3</b>

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
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 2018-20**

AA:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dallas-Plano-Irving MSA 2020	250	151,194	39.46	122,921	5.4	12.9	5.8	15.8	6.5	17.7	23.5	22.6	20.8	54.3	58.1	54.7	1.0	0.0	1.0
Enid MSA 2020	26	13,389	3.49	744	0.0	0.0	0.0	31.5	26.1	33.2	41.2	43.5	35.3	27.3	30.4	31.5	0.0	0.0	0.0
Oklahoma Non-MSA 2020	806	118,158	30.83	2,578	4.7	3.3	4.3	17.1	6.7	13.7	39.6	56.7	40.5	38.6	33.3	41.5	0.0	0.0	0.0
Oklahoma City MSA 2020	317	100,465	26.22	25,645	4.4	3.6	4.7	21.4	14.3	19.5	35.2	50.0	34.8	35.7	32.1	38.4	3.2	0.0	2.6
<b>Total</b>	<b>1,399</b>	<b>383,206</b>	<b>100.0</b>	<b>151,888</b>	<b>5.2</b>	<b>5.36</b>	<b>5.5</b>	<b>17.0</b>	<b>12.50</b>	<b>18.1</b>	<b>26.3</b>	<b>42.86</b>	<b>23.6</b>	<b>50.0</b>	<b>39.29</b>	<b>51.6</b>	<b>1.4</b>	<b>0.0</b>	<b>1.2</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 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											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Dallas-Plano-Irving MSA 2020	31	32,411	27.7	122,921	88.1	64.52	47.4	4.2	35.48	7.7	0.0	
Enid MSA 2020	23	12,105	20.5	744	82.9	69.57	39.7	5.0	30.43	12.2	0.0	
Oklahoma Non-MSA 2020	30	3,839	26.8	2,578	81.0	76.67	45.9	4.4	23.33	14.6	0.0	
Oklahoma City MSA 2020	28	20,718	25.0	25,645	88.1	64.29	45.6	3.8	35.71	8.1	0.0	
<b>Total</b>	<b>112</b>	<b>69,073</b>	<b>100.0</b>	<b>151,888</b>	<b>87.9</b>	<b>68.75</b>	<b>47.0</b>	<b>4.1</b>	<b>31.25</b>	<b>8.0</b>	<b>0.0</b>	
<i>Source: 2020 D&amp;B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>												