



PUBLIC DISCLOSURE

October 6, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Triad Bank, N.A.
17926

7646 East 61st Street
Tulsa, OK 74133

Office of the Comptroller of the Currency

8282 South Memorial Drive
Suite 300
Tulsa, OK 74133

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 major factors that support this rating include:

- The lending test rating is based on the one full-scope assessment area (AA) in the state of Oklahoma.
- The loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of loans were originated or purchased inside the bank's AA.
- The geographic distribution of loans reflects reasonable distribution throughout the bank's AA.
- The distribution of loans to individuals of different incomes and businesses of different sizes reflects reasonable distribution.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is more than reasonable.

Triad Bank, N. A.'s (Triad Bank or bank) quarterly LTD ratio since the previous CRA Performance Evaluation (PE) averaged 93.85 percent. We compared the bank's LTD ratio to four similarly situated banks in their market area. The aggregate average LTD ratio for the competing banks was 82.87 percent, with a low average of 57.45 percent and a high average of 95.57 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

The bank originated and purchased 75.4 percent of its total loans inside the bank's AA during the evaluation period. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography. This analysis is performed at the bank, rather than the AA level.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	88	71.5	35	28.5	123	20,887	72.9	7,776	27.1	28,663
Small Business	38	86.4	6	13.6	44	7,735	87.8	1,079	12.2	8,814
Total	126	75.4	41	24.6	167	28,622	76.4	8,855	23.6	37,477

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

Triad Bank is a \$153 million community bank located in Tulsa, Oklahoma. Triad Bank is a single-state institution with the main bank facility located in south Tulsa, Oklahoma. The bank is a subsidiary of Triad Bancshares, Inc., a one-bank holding company headquartered at the main bank address.

The bank has one rating area, the state of Oklahoma, with one AA. Triad Bank's Partial Tulsa metropolitan statistical area (MSA) AA consists of all of Tulsa County which includes 175 census tracts (CTs). The bank has two locations within their AA, including the main bank and one branch which are located in southern Tulsa County. Each location has an automated teller machine (ATM), and surcharge free ATMs are available through the Transfund network.

The bank's strategy is to make loans to both consumers and businesses in Tulsa and the surrounding areas. The bank does considerable Small Business Administration lending which helps small businesses open or expand, creating jobs for the local economy. The bank is also working to expand their consumer loan presence by offering permanent financing and secondary market home loans. The bank began offering Federal Housing Administration (FHA) and United States Department of Veterans Affairs (VA) loans in early 2018.

As of December 31, 2019, tier 1 capital was approximately \$20 million, and loans totaled \$134 million or 87.1 percent of total assets. By number, the loan portfolio consists of 60 percent home mortgage loans, 20 percent commercial loans, and 20 percent consumer loans. By dollar volume, the loan portfolio consists of 70 percent home mortgage loans, 26 percent commercial loans, and 4 percent consumer loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. A CRA PE was last prepared as of October 6, 2016, and the bank received an overall rating of "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of Triad Bank’s CRA activities in its AA under the Small Bank CRA procedures. This includes the lending test which evaluates the bank’s record of meeting the credit needs of the AA through its lending activities.

Conclusions regarding the lending test are based on residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA) and a sample of small business loans. The evaluation period for loans is January 1, 2017 through December 31, 2019. Both loan categories were weighted equally in evaluating performance.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

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 AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area 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.

Triad Bank has only one AA in one state. Ratings are based solely on the results of this AA. The Office of Management and Budget made no changes to the bank’s AA during the review period.

The state rating is based on performance in all bank AAs. Refer to the “Scope” section under the State 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) or 195.28(c), respectively, 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 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 Oklahoma¹: Satisfactory

The lending test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the AA.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.

Description of Institution's Operations in Oklahoma

The bank operates two branches in their AA in the state of Oklahoma. The AA consists of 175 CTs in Tulsa County. Within the AA, there are 17 low-income CTs, 54 moderate-income CTs, 51 middle-income CTs, and 53 upper-income CTs.

Partial Tulsa MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Partial Tulsa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	175	9.7	30.9	29.1	30.3	0.0
Population by Geography	623,335	8.0	26.8	31.2	33.9	0.0
Housing Units by Geography	274,891	8.3	28.2	31.8	31.6	0.0
Owner-Occupied Units by Geography	146,793	4.5	20.5	32.9	42.1	0.0
Occupied Rental Units by Geography	99,287	12.4	36.9	31.6	19.1	0.0
Vacant Units by Geography	28,811	13.6	37.3	27.3	21.8	0.0
Businesses by Geography	68,038	3.9	21.6	34.0	40.5	0.0
Farms by Geography	1,485	3.6	17.3	38.6	40.5	0.0
Family Distribution by Income Level	156,574	22.0	16.9	19.6	41.4	0.0
Household Distribution by Income Level	246,080	24.4	16.5	17.7	41.5	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$141,333
			Median Gross Rent			\$783
			Families Below Poverty Level			12.3%

Source: 2015 ACS and 2019 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.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

The level of competition in the bank's market area is very strong. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share data, Triad Bank's deposit market share in the Tulsa, Oklahoma MSA was 0.48 percent and ranked 38th among 209 depository institutions in the AA. Competition for home mortgages is even stronger. With a total of 437 home mortgage lenders in the market area, Triad Bank ranks 92nd with only 0.16 percent of the mortgage market share.

We consulted with two community contacts in the MSA to gain a better understanding of the general community credit needs, as well as, local economic conditions. One contact indicated the need for more small business lending resources and financial literacy training. Another contact indicated the need for more outreach and resources for low- and moderate-income (LMI) housing.

The Partial Tulsa MSA AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Scope of Evaluation in Oklahoma

Triad Bank has only one AA which consists of a portion of the Tulsa, Oklahoma MSA in the state of Oklahoma. The Partial Tulsa MSA AA received a full-scope review. There are no limited-scope review areas.

LENDING TEST

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

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Partial Tulsa MSA AA 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 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 percentage of bank loans in low-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate distribution of loans in those geographies. The bank's percentage of loans in moderate-income CTs was somewhat lower than both the percentage of owner-occupied housing units and the aggregate lending in those CTs.

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 bank's small business lending in low-income geographies was somewhat lower than both the percentage of businesses in low-income geographies and the aggregate lending level. For moderate-income geographies, the bank's lending exceeded both the percentage of businesses and the aggregate lending in moderate-income geographies.

Lending Gap Analysis

There were no unexplained conspicuous gaps based on the geographic distribution of loans, branch locations, and the performance context.

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 of different sizes, given the performance context and 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 percentage of bank loans to low-income borrowers was significantly lower than the percentage of low-income families and lower than the aggregate percentage of lending. The percentage of bank loans to moderate-income borrowers was lower than the percentage of moderate-income families and the aggregate lending to those borrowers.

The bank started offering and originating FHA and VA loans at the beginning of 2018. Prior to 2018, all loans that qualified for these programs were referred to a third party. This contributed to the low percentage of bank loans to LMI borrowers. The bank also faces strong competition in the Tulsa, Oklahoma MSA from many larger, nationwide and regional institutions.

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 bank's loans to businesses with revenues less than or equal to \$1 million was near to the percentage of businesses identified as having revenues of less than or equal to \$1 million and exceeded the aggregate percentage of lending to these businesses.

Responses to Complaints

Triad Bank received no CRA-related complaints during the evaluation period.

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 MSAs and non-MSAs 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:	01/01/2017 to 12/31/2019	
Bank Products Reviewed:	Home mortgage and small business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
Oklahoma		
Partial Tulsa MSA AA	Full-scope	Includes all of Tulsa County

Appendix B: Summary of MMSA and State Ratings

RATINGS: Triad Bank, National Association	
Overall Bank:	Lending Test Rating
Triad Bank, National Association	Satisfactory
MMSA or State:	
Oklahoma	Satisfactory

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 MSAs, 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 available as of June 30th 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 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																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% 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
Partial Tulsa MSA	88	20,887	100.0	19,647	4.5	5.7	1.2	20.5	10.2	14.4	32.9	27.3	34.0	42.1	56.8	50.3	0.0	0.0	0.0
Total	88	20,887	100.0	19,647	4.5	5.7	1.2	20.5	10.2	14.4	32.9	27.3	34.0	42.1	56.8	50.3	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 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																			2017-19
Assessment Area:	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
Partial Tulsa MSA	88	20,887	293.3	19,647	22.0	1.1	6.6	16.9	6.8	17.2	19.6	4.5	19.3	41.4	62.5	38.0	0.0	25.0	18.8
Total	88	20,887	293.3	19,647	22.0	1.1	6.6	16.9	6.8	17.2	19.6	4.5	19.3	41.4	62.5	38.0	0.0	25.0	18.8

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 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 **2017-19**

Assessment Area:	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
Partial Tulsa MSA	38	7,735	100.0	12,494	3.9	2.6	3.7	23.0	26.3	22.2	34.5	29.0	33.7	38.6	42.1	40.3	0.0	0.0	0.0
Total	38	7,735	100.0	12,494	3.9	2.6	3.7	23.0	26.3	22.2	34.5	29.0	33.7	38.6	42.1	40.3	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 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 **2017-19**

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
Partial Tulsa MSA	38	7,735	100.0	12,290	86.1	68.4	41.2	5.2	26.3	8.7	5.3
Total	38	7,735	100.0	12,290	86.1	68.4	41.2	5.2	26.3	8.7	5.3

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%