



PUBLIC DISCLOSURE

November 4, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank and Trust Company of Broken Arrow
Charter Number 7115

121 South Main Street
Broken Arrow, OK 74012

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 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, the LTD ratio is reasonable.

First National Bank of Broken Arrow (FNBBA)'s quarterly LTD ratio since the previous CRA Performance Evaluation (PE) averaged 78.86 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 70.26 percent, with a low average of 45.50 percent and a high average of 92.33 percent.

Lending in Assessment Area

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

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	96	68.1	45	31.9	141	24,874	64.6	13,657	35.4	38,531
Small Business	50	83.3	10	16.7	60	27,711	77.3	8,120	22.7	35,831
Total	146	72.6	55	27.4	201	52,585	70.7	21,777	29.3	74,362
<i>Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0</i>										

As detailed in the above table, the bank originated and purchased 72.6 percent of its total loans inside the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Description of Institution

The FNBBA is a \$185 million community bank located in Broken Arrow, Oklahoma. FNBBA is a single-state institution with the main bank facility located in downtown Broken Arrow, Oklahoma. The bank is a subsidiary of First Broken Arrow Corporation, a one-bank holding company headquartered at the main bank address.

The bank has one rating area, the state of Oklahoma, with one AA. FNBBA's partial Tulsa metropolitan statistical area (MSA) AA includes 115 census tracts (CT) in Eastern Tulsa County and 17 CTs in Western Wagoner County. All of the CTs in the AA are part of the Tulsa MSA. The bank has three locations within their AA, including the main bank and two branches which are located within the city of Broken Arrow.

The bank's primary focus is commercial lending, although it offers a variety of consumer loan and deposit products to meet the needs of the community. As of December 31, 2018, tier 1 capital was approximately \$20 million, and loans totaled \$149 million or 80.7 percent of total assets. The loan portfolio consists of 66 percent commercial loans, 33 percent home mortgage loans, and one 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 August 3, 2015, and the bank received an overall rating of "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of FNBBA'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, 2016 through December 31, 2018.

Due to the bank's strategic focus on commercial loans and the composition of the loan portfolio, business loans received more weight than the residential real estate loans in reaching our conclusions.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA 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.

FNBBA has only one AA in one state. Ratings are based solely on the results of this AA.

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 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 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 three branches in their AA in the state of Oklahoma. The AA consists of 132 CTs, including 115 CTs in Eastern Tulsa County and 17 CTs in Western Wagoner County. Within the AA, there are three low-income CTs, 33 moderate-income CTs, 46 middle-income CTs, and 50 upper-income CTs.

Partial Tulsa MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNBBA AA 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	132	2.3	25.0	34.8	37.9	0.0
Population by Geography	458,495	2.0	23.9	36.0	38.1	0.0
Housing Units by Geography	203,849	2.3	25.2	36.6	35.9	0.0
Owner-Occupied Units by Geography	111,994	0.3	16.1	37.1	46.5	0.0
Occupied Rental Units by Geography	72,552	5.1	36.9	36.4	21.5	0.0
Vacant Units by Geography	19,303	3.1	34.3	34.1	28.5	0.0
Businesses by Geography	44,916	1.9	20.1	35.2	42.8	0.0
Farms by Geography	919	1.4	15.6	44.3	38.7	0.0
Family Distribution by Income Level	115,550	18.1	16.5	19.9	45.4	0.0
Household Distribution by Income Level	184,546	21.7	15.6	18.2	44.5	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$158,043
			Median Gross Rent			\$792
			Families Below Poverty Level			9.5%

Source: 2015 ACS Census and 2018 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, FNBBA's deposit market share in their portion of the Tulsa, OK MSA was 0.77 percent and ranked 24th among 49 depository institutions in the AA. Competition for home mortgages is even stronger. With a total of 395 home mortgage lenders in the market area, FNBBA ranks 60th with only 0.24 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 affordable housing for low- and moderate-income (LMI) families. Another contact indicated that there is a need for higher paying jobs in the area.

Scope of Evaluation in Oklahoma

FNBBA has only one AA which consists of a portion of the Tulsa, OK 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.

Based on a full-scope review, 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 MSA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable distribution. 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.

In 2016, 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 those CTs. The bank's percentage of loans in moderate-income CTs was lower than both the percentage of owner-occupied housing units and the aggregate lending in those geographies.

For 2017-2018, 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 also exceeded both the percentage of owner-occupied housing units and the aggregate lending in those CTs.

Small Loans to Businesses

The geographic distribution of small loans to businesses reflects excellent distribution given performance context factors. 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.

In 2016, the bank's small business lending in low-income geographies exceeded both the percentage of businesses located in those geographies and the aggregate lending level. For moderate-income geographies, the bank's lending also exceeded both the percentage of businesses and the aggregate lending in those geographies.

For 2017-2018, the bank's small business lending in low-income geographies was significantly 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. Competition for loans within the bank's AA is significant, and the number of businesses in low-income CTs decreased significantly during the 2017-2018 evaluation period due to changes in the designated income level of several CTs.

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 product lines offered by the bank.

Home Mortgage Loans

The borrower distribution of home mortgage loans is reasonable given the performance context. 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.

In 2016, the percentage of bank loans 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. The percentage of bank loans to moderate-income borrowers was somewhat lower than both the percentage of moderate-income families and the aggregate lending in those geographies.

For 2017-2018, the percentage of bank loans to low-income borrowers was lower than the percentage of low-income families but near to the percentage of aggregate lending in those geographies. The percentage of bank loans to moderate-income borrowers was lower than both the percentage of moderate-income families and the aggregate lending in the moderate-income CTs.

The bank faces strong competition in the partial Tulsa MSA AA from larger, nationwide and regional institutions. The bank's ability to lend is also hindered by the fact that many LMI borrowers in the AA cannot meet current home mortgage lending standards.

Small Loans to Businesses

The borrower distribution of business loans reflects reasonable distribution. 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.

In 2016, the bank's loans to businesses with revenues less than or equal to \$1 million 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.

For 2017-2018, the bank's loans to businesses with revenues less than or equal to \$1 million 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.

Responses to Complaints

FNBBBA 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:	01/01/2016 to 12/31/2018	
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
Oklahoma		
Partial Tulsa MSA AA	Full-scope	Includes eastern Tulsa County and western Wagoner County

Appendix B: Summary of MMSA and State Ratings

RATINGS: The First National Bank and Trust Company of Broken Arrow	
Overall Bank:	Lending Test Rating
FNBBA	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 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 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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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 AA	36	9,679	100.0	15,124	0.8	2.8	0.5	18.4	5.6	13.0	30.3	30.6	31.5	50.5	61.1	54.9	0.0	0.0	0.0
Total	36	9,679	100.0	15,124	0.8	2.8	0.5	18.4	5.6	13.0	30.3	30.6	31.5	50.5	61.1	54.9	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
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 AA	60	15,195	100.0	14,138	0.3	1.7	0.2	16.1	18.3	13.4	37.1	31.7	38.0	46.5	48.3	48.4	0.0	0.0	0.0
Total	60	15,195	100.0	14,138	0.3	1.7	0.2	16.1	18.3	13.4	37.1	31.7	38.0	46.5	48.3	48.4	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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																				2016
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 AA	36	9,679	100.0	15,124	17.4	8.3	4.6	16.5	8.3	16.6	19.7	5.6	19.7	46.4	38.9	40.5	0.0	38.9	18.6	
Total	36	9,679	100.0	15,124	17.4	8.3	4.6	16.5	8.3	16.6	19.7	5.6	19.7	46.4	38.9	40.5	0.0	38.9	18.6	

*Source: 2010 U.S. Census ; 01/01/2016 - 12/31/2016 Bank Data, 2016 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																				2017-18
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 AA	60	15,195	260.9	14,138	18.1	5.0	5.3	16.5	6.7	16.0	19.9	6.7	18.4	45.4	38.3	37.1	0.0	43.3	23.1	
Total	60	15,195	260.9	14,138	18.1	5.0	5.3	16.5	6.7	16.0	19.9	6.7	18.4	45.4	38.3	37.1	0.0	43.3	23.1	

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2018 Bank Data, 2018 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																				2016
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 AA	24	16,430	100.0	9,603	3.6	8.3	4.3	24.0	25.0	22.1	26.7	29.2	24.4	45.6	37.5	49.3	0.0	0.0	0.0	
Total	24	16,430	100.0	9,603	3.6	8.3	4.3	24.0	25.0	22.1	26.7	29.2	24.4	45.6	37.5	49.3	0.0	0.0	0.0	

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA 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																				2017-18
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 AA	26	11,281	100.0	10,049	1.9	0.0	2.2	20.1	38.5	19.1	35.2	15.4	35.0	42.8	46.1	43.7	0.0	0.0	0.0	
Total	26	11,281	100.0	10,049	1.9	0.0	2.2	20.1	38.5	19.1	35.2	15.4	35.0	42.8	46.1	43.7	0.0	0.0	0.0	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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											2016
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 AA	24	16,430	100.0	9,603	85.0	62.5	46.2	6.1	33.3	8.9	4.2
Total	24	16,430	100.0	9,603	85.0	62.5	46.2	6.1	33.3	8.9	4.2

*Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 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											2017-18
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 AA	26	11,281	100.0	10,049	84.5	61.5	45.2	6.1	38.5	9.4	0.0
Total	26	11,281	100.0	10,049	84.5	61.5	45.2	6.1	38.5	9.4	0.0

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