



PUBLIC DISCLOSURE

December 2, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Vision Bank, National Association
Charter Number 12591

101 East Main Street
Ada, OK 74820

Office of the Comptroller of the Currency
Oklahoma City Field Office
The Harvey Parkway Building
301 N.W. 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.

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

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

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is excellent.

Vision Bank's LTD ratio as of December 31, 2018 was 91 percent. The bank's average quarterly LTD ratio from March 31, 2016 through December 31, 2018 was 86 percent. This average was compared to the average of three similar banks located in Vision Bank's AA or the surrounding counties, with total assets between \$500 million and \$700 million, for the same period. Vision Bank's average LTD ratio of 86 percent is higher than the average of the three comparable banks of 73 percent. These average LTD ratios are detailed in the following table.

Loan-to-Deposit Ratios		
Institution	Total Assets \$000's (As of 12/31/18)	Average Loan to Deposit Ratio
<i>Vision Bank, National Association, Ada</i>	\$652,958	86%
First Bank & Trust Company, Duncan	\$585,397	79%
The First National Bank and Trust Co., Chickasha	\$626,286	70%
First National Bank & Trust Company of Ardmore	\$510,897	69%

Source: Institution Reports of Condition from March 31, 2016 to December 31, 2018.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs. A majority of the number of home mortgage loans and small business loans and a majority of the dollar amount of home mortgage loans and small business loans were originated in the bank's AAs.

Vision Bank originated or purchased 74 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The following table provides details on all home mortgage loans and our sample of 120 loans to small businesses.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,346	73.6	483	26.4	1,829	145,882	72.6	55,195	27.4	201,077
Small Business	89	74.2	31	25.8	120	9,620	73.8	3,413	26.2	13,033
Total	1,435	73.6	514	26.4	1,949	155,502	72.6	58,608	27.4	214,110

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0

Description of Institution

Vision Bank is a community bank headquartered in Ada, Oklahoma. It is a subsidiary Vision BancShares, Inc., a one-bank holding company.

The main bank is located at 101 E. Main Street, Ada, Oklahoma. The motor bank is located at 12th & Rennie Avenue, Ada, Oklahoma. There are seven additional full-service branches with drive throughs in Prague, Meeker, Durant, Shawnee, Sulphur, and Davis. There are Automated Teller Machines (ATMs) at all of the bank's locations and there are 11 additional stand-alone ATMs throughout the bank's AAs. Since the previous CRA evaluation, Vision Bank has not opened or closed any of its branch locations. See the tables below for complete branch and ATM information.

Vision Bank's Branch Locations		
<i>Location</i>	<i>Address</i>	<i>City</i>
Ada Main Office	101 E. Main	Ada, OK
Ada – Motor Bank	12th & Rennie	Ada, OK
Ada – Arlington Branch	1901 Arlington	Ada, OK
Sulphur Branch	1100 W. Broadway	Sulphur, OK
Davis Branch	1200 E. Main	Davis, OK
Shawnee Branch	4301 N. Harrison	Shawnee, OK
Durant Branch	2514 University Blvd.	Durant, OK
Prague Branch	802 Jim Thorpe Blvd.	Prague, OK
Meeker Branch	409 S. Dawson	Meeker, OK

Vision Bank's ATM Locations		
<i>Location</i>	<i>Address</i>	<i>City</i>
Ada Main Bank	101 E. Main	Ada, OK
Ada – Motor Bank	12 th & Rennie	Ada, OK
Arlington Center	1800 Arlington	Ada, OK
Arlington Branch	1901 Arlington	Ada, OK
Mercy Hospital	430 N. Monte Vista	Ada, OK
Sinclair E Stop Express	1533 Craddock Road	Ada, OK
Chickasaw Medical Center	1921 Stonecipher Blvd.	Ada, OK
Pruett's Food	1601 N. Broadway	Ada, OK
Latta	Hwy 1 & 32 nd Street	Ada, OK
Legal Shield	1 Prepaid Way	Ada, OK
Sulphur Branch	1100 W. Broadway	Sulphur, OK
Davis Branch	1200 E. Main	Davis, OK
Falls Creek Gift Shop	6715 OK-77D	Davis, OK
Shawnee Branch	4301 N. Harrison	Shawnee, OK
Kickapoo	1718 N. Kickapoo	Shawnee, OK
Durant Branch	2514 University Blvd.	Durant, OK
1 st Street	1310 N. 1 st Street	Durant, OK
Highway 70	5024 W. Highway 70	Durant, OK
Prague Branch	802 Jim Thorpe Blvd.	Prague, OK
Meeker Branch	409 S. Dawson	Meeker, OK

Vision Bank's primary focus is to serve commercial and consumer customers in Pontotoc, Murray, Johnston, Pottawatomie, Okfuskee, Bryan, and Lincoln Counties. Vision Bank meets these needs by providing traditional loan and deposit products and services, as well as online banking, internet bill pay, mobile banking, and telephone banking. The bank also offers trust and retail non-deposit investment services, as well as various government guaranteed loan products for both commercial and consumer customers. The bank's mortgage department originates long-term residential mortgages for sale on the secondary market. Bank lobby and drive through services are offered Monday through Friday 9:00 A.M. to 5:00 P.M. at all locations except for the main branch, which has no drive through. Limited Saturday hours are available at all drive throughs.

As of December 31, 2018, the bank's total assets equaled \$653 million, of which \$466 million, or 71 percent, includes various types of loans to individuals, commercial businesses, and agricultural related enterprises. Specifically, the bank's loan portfolio consists of the following:

Loan Portfolio Composition as of December 31, 2018		
	\$ (000)	%
Commercial/Business Loans	\$194,134	41.70%
Residential Real Estate Loans	\$172,196	36.98%
Consumer Loans	\$47,049	10.10%
Agricultural Loans	\$42,963	9.23%
Other Loans	\$9,251	1.99%
Total	\$465,593	100.00%

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AAs. A "Satisfactory" rating was assigned to Vision Bank at the last CRA performance evaluation performed as of March 21, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of Vision Bank's OKC Partial Metropolitan Statistical Area (MSA) AA and Non-MSA AA 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.

This Performance Evaluation is based on 2010 U.S. Census data and the updated 2015 American Community Survey (ACS) demographic information. Conclusions regarding the Lending Test are based on all home mortgage loans (home purchase, home refinance, and home improvement) originated in 2016, with a separate assessment based on all home mortgage loans originated in 2017 and 2018. Our review also included a random sample of small business loans originated in 2016, with a separate assessment based on a random sample of small business loans originated in 2017

and 2018. The 2016 home mortgage loans and small business sample are compared to 2010 Census Data information, whereas the 2017 and 2018 home mortgage loans and small business samples are compared to updated information from the 2015 ACS U.S. Census. Conclusions regarding the CD Test are based on CD loans, investments, and service activities from January 1, 2016 through December 31, 2018.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, we selected one or more of AAs within that state for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the 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, and where applicable, multistate ratings.

Vision Bank has only one rating area, the state of Oklahoma, and the bank’s overall rating is based on the full-scope reviews of the AAs within the state. Due to the bank’s focus on commercial and residential real estate lending and the fact that an equal portion of the loan portfolio is attributed to both, equal weight was given to both products.

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), 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 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: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the AAs.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.
- CD lending reflects adequate responsiveness to the needs of the bank's AAs.
- CD investments reflect adequate responsiveness to the needs of the bank's AAs.

Description of Institution's Operations in Oklahoma

Vision Bank's overall primary focus is residential real estate and small business lending, although they offer a variety of loan and deposit products to meet the needs of the community. The bank operates eight full-service banking offices, plus one motor bank, and has 20 ATMs within its AAs. The AAs adopted by Vision Bank consist of whole geographies, do not reflect illegal discrimination, and do not arbitrarily exclude low- or moderate-income (LMI) geographies. They meet the requirements of the CRA regulations. All AAs were considered in evaluating Vision Bank's CRA performance. The Non-MSA AA and OKC Partial MSA AA received full-scope reviews. There were no limited-scope AAs.

OKC Partial MSA AA

The OKC Partial MSA AA consists of two contiguous census tracts (CTs), which includes part of Lincoln County. In 2016, the AA consisted of two middle-income tracts and contained no LMI tracts. There were no changes in CT designations during the evaluation period. Two of the bank's branches (Prague and Meeker) are in the OKC Partial MSA AA, with both being in middle-income CTs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: OKC Partial MSA AA						2016
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	12,843	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	5,497	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,056	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	772	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	669	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	471	0.0	0.0	100.0	0.0	0.0
Farms by Geography	38	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,677	24.0	20.8	22.9	32.3	0.0
Household Distribution by Income Level	4,828	24.5	16.5	19.0	40.0	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$58,775	Median Housing Value			\$89,328
			Median Gross Rent			\$529
			Families Below Poverty Level			11.9%
<i>Source: 2010 U.S. Census and 2016 D&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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: OKC Partial MSA AA						2017-18
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	100.0	0.0	0.0
Population by Geography	13,164	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	5,697	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	3,924	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	998	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	775	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	465	0.0	0.0	100.0	0.0	0.0
Farms by Geography	44	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,628	23.0	21.6	23.4	31.9	0.0
Household Distribution by Income Level	4,922	27.3	17.1	19.1	36.5	0.0
Median Family Income MSA - 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$105,428
			Median Gross Rent			\$632
			Families Below Poverty Level			11.5%
<i>Source: 2015 ACS Census and 2018 D&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>						

Local economic conditions have seen a slight downturn due to declines in the oil and gas and agricultural industries. Lincoln County is a rural area and considered a bedroom community to Oklahoma City (OKC) metro area. Major employers in the area include Tinker Air Force Base (AFB) and the local school districts. Given the proximity to OKC, most residents in Lincoln County commute to Tinker AFB or other employers in the OKC metro area.

Vision Bank experiences competition from BancFirst in this AA. BancFirst has branches located in both Meeker and Prague.

We reviewed two community contacts to help identify the credit needs of the community. Both contacts' primary mission is to promote economic development by providing various services to small businesses and startups. They also work to attract new businesses to the area. These contacts indicated that the local financial institutions are involved in the local community activities and are meeting the credit needs of the community.

Non-MSA AA

The Non-MSA AA consists of 42 CTs located in southeast and east-central Oklahoma, which includes all of Pontotoc, Murray, Pottawatomie, and Bryan Counties. The AA also includes parts of

Okfuskee and Johnston Counties. In 2016, the Non-MSA AA consisted of four low-income CTs, two moderate-income CTs, 30 middle income CTs, and six upper-income CTs. As of 2018 data, three low-income CTs and four middle-income CTs became moderate-income CTs. Some changes also occurred in the number of middle-and upper-income CTs. Six of the bank's branches and the bank's motor bank are in this AA. Both the main bank location and motor bank are in a moderate-income CT.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						2016
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	9.5	4.8	71.4	14.3	0.0
Population by Geography	168,816	5.4	4.3	76.3	14.0	0.0
Housing Units by Geography	73,734	6.4	4.0	76.2	13.4	0.0
Owner-Occupied Units by Geography	44,546	3.2	2.9	78.3	15.7	0.0
Occupied Rental Units by Geography	18,814	13.3	6.9	69.5	10.2	0.0
Vacant Units by Geography	10,374	7.7	3.7	79.1	9.6	0.0
Businesses by Geography	8,768	12.5	2.2	70.4	14.9	0.0
Farms by Geography	554	2.9	1.6	86.3	9.2	0.0
Family Distribution by Income Level	43,303	21.1	17.7	20.6	40.7	0.0
Household Distribution by Income Level	63,360	24.2	15.5	18.6	41.8	0.0
Median Family Income Non-MSAs – OK		\$47,749	Median Housing Value			\$87,293
			Median Gross Rent			\$577
			Families Below Poverty Level			14.0%
<i>Source: 2010 U.S. Census and 2016 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.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA AA						2017-18
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	2.4	21.4	57.1	19.0	0.0
Population by Geography	172,840	1.9	14.4	65.0	18.6	0.0
Housing Units by Geography	75,164	2.1	15.2	64.4	18.3	0.0
Owner-Occupied Units by Geography	42,977	0.8	9.1	67.0	23.0	0.0
Occupied Rental Units by Geography	21,358	4.3	26.3	59.8	9.6	0.0
Vacant Units by Geography	10,829	2.8	17.4	63.0	16.8	0.0
Businesses by Geography	8,693	4.1	19.5	59.6	16.9	0.0
Farms by Geography	448	0.2	7.6	68.3	23.9	0.0
Family Distribution by Income Level	42,810	20.1	17.5	20.8	41.7	0.0
Household Distribution by Income Level	64,335	23.6	15.9	17.5	43.0	0.0
Median Family Income Non-MSAs - OK		\$51,698	Median Housing Value			\$98,941
			Median Gross Rent			\$649
			Families Below Poverty Level			13.3%
<i>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.</i>						

Local economic conditions have seen a slight decline in most of the AA, with the exception of Durant. The decline in economic conditions is largely due to the downturn in the oil and gas and agricultural industries. Durant is expecting industrial growth and an increase in housing permits in the next two to three years. Major employers in Ada include the Chickasaw Nation, Flex-N-Gate (Manufacture automobile parts), Mercy Hospital, and the local school district. Major employers in Durant include the Choctaw Nation and the local school district. Major employers in Shawnee include Shawnee Milling Company and the local school district.

Vision Bank faces strong competition from other national and state-chartered banks headquartered in the AA and branches of larger banks and financial institutions. The Ada market is considered overbanked with Citizens Bank, Arvest Bank, Bank of the West, Communications Federal Credit Union, Arbuckle Credit Union, and Oklahoma Heritage Bank all having locations that serve Ada. Other competitors include First United Bank, Simmons Bank, and Tinker Federal Credit Union.

We conducted a community contact interview and reviewed one other community contact to help identify the credit needs of the community. Both contacts' primary mission is to promote economic development by providing various services to small businesses and startups. They also work to

attract new businesses to the area. The contacts indicated that the community's credit needs were being met and that the financial institutions are active in the community. One contact stated that there are some low-income areas in Durant that would benefit from revitalization efforts. There is also some small business opportunity in the Durant area with new industrial plants moving there.

Scope of Evaluation in Oklahoma

The OKC Partial MSA AA and the Non-MSA AA received full-scope reviews. The bank has no limited-scope AAs. Non-MSA AAs within the same state are combined, analyzed, and presented as one AA for this evaluation. Refer to the table in appendix A for a list of all AAs under review.

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. Overall, the geographic distribution of home mortgage and small loans to businesses is reasonable given the performance context.

Home Mortgage Loans

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

OKC Partial MSA AA

A geographic analysis of home mortgage loans in the OKC Partial MSA AA was not performed as this AA does not contain any low- or moderate-income CTs and therefore a geographic analysis would not be meaningful.

Non-MSA AA

Vision Bank's geographic distribution of home mortgage loans in the Non-MSA AA reflects reasonable distribution.

In 2016, the percentage of bank loans made in low-income geographies slightly exceeds both the percentage of owner-occupied units and aggregate peer data in low-income tracts. The percentage

of bank loans made in moderate-income geographies was slightly below the percentage of owner-occupied units and aggregate peer data in moderate-income tracts.

In 2017 and 2018, the percentage of bank loans made in low-income geographies is slightly below the percentage of owner-occupied units and aggregate peer data in low-income tracts. The percentage of bank loans made in moderate-income geographies exceeds the percentage of reported owner-occupied units in moderate-income tracts and is slightly below the aggregate peer data in those tracts.

Loans to Small Businesses

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

OKC Partial MSA AA

A geographic analysis of small business loans in the OKC Partial MSA AA was not performed as this AA does not contain any low- or moderate-income CTs and therefore a geographic analysis would not be meaningful.

Non-MSA AA

Lending to businesses in the Non-MSA AA reflects reasonable distribution.

In 2016, the percentage of business loans in the low-income tracts exceeds the percentage of businesses and aggregate peer data in those tracts. There were no business loans in the moderate-income tracts. In 2016, only two of the 42 tracts in the AA were moderate-income tracts and only 2.2 percent of the businesses in the AA were in those two tracts. The aggregate peer lending data in the moderate-income tracts amounted to just 1.4 percent.

In 2017 and 2018, the percentage of business loans in the low-income tract is slightly below the percentage of businesses in the low-income tract; but slightly above the aggregate peer data in that tract. There was only one low-income tract in this AA in 2017 and 2018. The percentage of business loans in the moderate-income tracts is below the percentage of businesses in the moderate-income tracts and the aggregate peer data in those tracts. The lower distribution in the moderate-income tracts can partially be attributed to the fact that some of the tracts are predominately residential or vacant land. A couple of the moderate-income tracts are occupied by Southeastern University and Choctaw Nation Casino and facilities that are not typically obtaining small business loans.

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

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

OKC Partial MSA AA

Home mortgage lending in the AA reflects poor distribution among LMI families.

In 2016, lending to low-income borrowers was significantly below the percentage of low-income families in the AA; but, exceeded the aggregate peer data in the AA. Lending to moderate-income borrowers was significantly below the percentage of moderate-income families and aggregate peer data in the AA.

In 2017 and 2018, lending to low-income borrowers was significantly below the percentage of low-income families in the AA; but, exceeded the aggregate peer data in the AA. Lending to moderate-income borrowers was slightly below the percentage of moderate-income families and aggregate peer data in the AA.

The poor distribution in the OKC Partial MSA AA is partially explainable by the small two tract AA, where a majority of the work force commute to Tinker AFB or the much larger surrounding cities for work. The Prague and Meeker locations also have strong competition from branches of a much larger financial institution. The branches have had a fair amount of residential loan applications; but many of the loan denials were due to customers not able to meet the minimum requirements.

Non-MSA AA

Home mortgage lending in the AA reflects reasonable distribution among LMI families.

In 2016, lending to low-income borrowers was significantly below the percentage of low-income families in the AA; but, exceeded the aggregate peer data in the AA. Lending to moderate-income borrowers was slightly below the percentage of moderate-income families in the AA and consistent with the aggregate peer data in the AA.

In 2017 and 2018, lending to low-income borrowers was significantly below the percentage of low-income families in the AA; but exceeded the aggregate peer data in the AA. Lending to moderate-income borrowers was below the percentage of moderate-income families in the AA and consistent with aggregate peer data in the AA.

Overall the percent of bank loans compared to percent of families is poor but compared to aggregate peer data loans are consistent with or exceed peer in all areas.

Slightly more weight was given to the distribution to moderate-income families as they can more easily qualify for conventional home mortgage products. The Chickasaw Nation, headquartered in Ada, Oklahoma, offers affordable housing mortgages, in addition to home counseling and service programs to tribal members and tribal employees regardless of origin. Mortgage products have flexible terms, that include low closing costs, no private mortgage insurance, and low rates. Grant

money from the tribe is also available to qualified applicants. The Chickasaw Nation's affordable housing programs meet a significant need among LMI families and contribute to the low distribution levels by banks offering conventional mortgage products. The Choctaw Tribe, headquartered in Durant, Oklahoma, and the Citizen Potawatomi Nation Tribe, headquartered in Shawnee, Oklahoma, also offer a variety of homebuyer programs with down payment and closing cost assistance to their members, as well as other tribe members.

Loans to Small Businesses

Refer to Table R in 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.

OKC Partial MSA AA

Small business lending in the AA reflects excellent distribution among businesses with revenues of less than \$1.0 million.

The borrower distribution of loans to small businesses based on a sample of 2016 originations reflects an excellent distribution of loans to businesses with revenues of less than \$1.0 million and an excellent distribution compared to aggregate peer data.

The borrower distribution of loans to small businesses based on a sample of 2017 and 2018 originations reflects an excellent distribution of loans to businesses with revenues of less than \$1.0 million and an excellent distribution compared to aggregate peer data.

Non-MSA AA

Small business lending in the AA reflects reasonable distribution among businesses with revenues of less than \$1.0 million.

The borrower distribution of loans to small businesses based on a sample of 2016 originations reflects a reasonable distribution of loans to businesses with revenues of less than \$1.0 million and an excellent distribution compared to aggregate peer data.

The borrower distribution of loans to small businesses based on a sample of 2017 and 2018 originations reflects an excellent distribution of loans to businesses with revenues of less than \$1.0 million and to aggregate peer data.

Based on the 2016 and 2017 – 2018 data, more than 15 percent of the businesses did not report income data.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

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

Based on full-scope reviews, the bank exhibits adequate responsiveness to CD needs in the AAs through CD loans, qualified investments and donations, 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.

Number and Amount of Community Development Loans

Qualifying CD loans are those that meet the definition of CD, as defined in the CRA regulations. Vision Bank's level of CD loans indicates adequate responsiveness to the needs of the bank's AAs.

OKC Partial MSA AA

The level of qualified CD loans in the OKC Partial MSA AA reflects adequate responsiveness. The bank originated or renewed 20 CD loans totaling \$2.8 million that qualify as CD loans.

Vision Bank extended 18 loans totaling \$2.8 million that promoted economic development by creating or maintaining LMI jobs. The bank made loans to nine different small businesses and farms within the bank's AA that had gross revenues below \$1.0 million or met the size eligibility standard for being a small business. Approximately 36 LMI jobs were created or maintained in the bank's AA. The bank also extended two loans totaling \$18 thousand to a borrower providing housing and care for mentally disabled men in the AA.

Non-MSA AA

The level of qualified CD loans in the Non-MSA AA reflects adequate responsiveness. The bank originated or renewed 70 CD loans totaling \$32.3 million that qualify as CD loans.

Vision bank extended 48 loans totaling \$25.1 million that promoted economic development by creating or maintaining LMI jobs. The bank made loans to 30 different small businesses and small farms within the bank's AA that had gross revenues below \$1.0 million or met the size eligibility standard for being a small business. Approximately 458 LMI jobs were created or maintained in the bank's AA. Jobs were in various industries such as manufacturing, auto repair, retail, sanitation, and transportation.

Six loans totaling \$3.8 million were extended to purchase, refinance, or construct affordable housing in the AA. The majority of units in the multi-family complexes financed by the bank rent for rates that are below the median market rents in the area, thus providing housing for LMI individuals. The majority of these affordable housing units are also located in LMI CTs.

Vision Bank extended 17 loans to six borrowers totaling \$3.5 million to provide funding to non-profit agencies that focus on providing community services to LMI individuals and geographies. Three loans were extended to a local non-profit school that assists special needs individuals and provides employment opportunities through a work program with local

businesses. Other loans were provided to organizations providing addiction recovery services, emergency shelter for homeless individuals, and maintaining roads in LMI areas.

Number and Amount of Qualified Investments

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose CD, as defined in the CRA regulations. Vision Bank's level of CD investments reflects adequate responsiveness to the needs of the bank's AAs.

OKC Partial MSA AA

The level of qualified investments and donations, totaling \$2.0 million during the evaluation period, reflects adequate responsiveness to the CD needs in the bank's AA. Included in the total, the bank made three qualified donations totaling \$9.2 thousand. These donations and contributions were made to local organizations that promote economic development by attracting new businesses to the area, providing resources to local businesses, and promoting commerce in the downtown areas.

During the evaluation period, Vision Bank purchased two school bonds totaling \$939 thousand within their AA. The two bonds were used to construct, renovate, and remodel Phases One and Two of an existing middle school in Lincoln County and to purchase student transportation equipment. More than 50 percent of the student populations in the school district qualify for the federal free or reduced-price lunch program. In addition to the two bonds purchased during the assessment period, the bank also has two prior period investments with the same school district totaling \$1.0 million. Funds from those bonds were used to construct, equip, and furnish a new gymnasium.

Non-MSA AA

The level of qualified investments and donations, totaling \$10.0 million during the evaluation period, reflects adequate responsiveness to the CD needs in the bank's AA. Included in the total, the bank made 26 qualified donations totaling \$147 thousand. These donations and contributions were to local schools and non-profit organizations that provide social services.

During the evaluation period, Vision Bank purchased 17 municipal bonds totaling \$3.8 million. The bonds were purchased from seven different school districts in Pottawatomie, Pontotoc, Murray, and Bryan Counties. These bonds financed various improvements and renovations to schools in the bank's AA. More than 50 percent of the student populations in the school districts qualify for the federal free or reduced-price lunch program.

Vision Bank purchased a \$2.0 million bond from the Tax Increment Financing District in Durant. This bond provided funding for the Commercial Metals Company Project Plan. The project is to complete a technologically advanced micro mill that features higher yields and lower energy consumption than the traditional mini mill processes. The project is in a moderate-income tract and was estimated to create 240 new jobs with almost half being LMI jobs.

In addition to investment purchases made during the evaluation period, the bank had 13 qualifying prior period investments that had not yet matured totaling \$4.1 million. Twelve were municipal bonds purchased from various school districts in the AA, where more than 50 percent of students qualify for the federal free or reduced-price lunch program. The other investment was a \$1.3 million bond issued by the Ada Public Works Authority to fund energy efficiency measures in the city, which includes two moderate-income tracts.

Extent to Which the Bank Provides Community Development Services

Vision Bank's level of CD services reflects excellent responsiveness to the needs of the bank's AAs.

OKC Partial MSA AA

The level of qualified CD services is adequate in Vision Bank's OKC Partial MSA AA. Vision Bank employees are active in organizations that promote economic development and with a civic organization that provides social services to LMI families. These employees provided technical and financial expertise as members of these organizations.

Three employees serve on the board for local Chambers of Commerce, whose primary mission is to promote small businesses and attract new businesses to the area. One officer serves on the Meeker Chamber as a member and Secretary. Two officers serve on the Prague Chamber, with one being a board member and the other the Treasurer. Another employee serves in a leadership position for an organization providing school supplies and other services to the children of LMI families.

Non-MSA AA

The level of qualified CD services is excellent in Vision Bank's Non-MSA AA. Vision Bank employees are active in non-profit and civic organizations that provide social services to LMI families, organizations that promote economic development, and organizations that provide affordable housing. These employees provide technical and financial expertise as members of these organizations.

Four employees serve on the board of local Chambers of Commerce, whose primary mission is to promote small businesses and attract new businesses to the area. Employees serve as board members of the Ada, Davis, and Durant Chambers. Employees are also active in various organizations that promote economic development in the bank's AA; including the Ada Industrial Development Coalition, Ada Job Foundation, Murray County Development Authority, and Shawnee Economic Development Foundation.

Bank officers serve in leadership positions for various organizations providing social services to LMI individuals and families throughout the bank's AA. Examples of organizations served include local Lions Clubs, Shawnee Educational Foundation, Salvation Army, Addiction Behavioral Health Center, Ada Regional United Way, Crisis Control Center of Durant, Court Appointed Special Advocates, and Relay for Life. Employees were also active in organizations that promote affordable housing such as Habitat for Humanity, Ada Housing Authority, and Fuller Center for Housing.

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-MSA 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:	3/21/16 to 12/31/18	
Bank Products Reviewed:	Home mortgage loans (1/1/16 to 12/31/18) Small business loans (1/1/16 to 12/31/18) Community development loans Qualified investments Community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Oklahoma		
OKC Partial MSA AA	Full-scope	The AA consists of 2 census tracts in Lincoln County. The AA is in east central Oklahoma and includes the cities of Prague and Meeker.
Non-MSA AA	Full-scope	The AA consists of 42 census tracts in Pontotoc, Murray, Johnson, Pottawatomie, Okfuskee, and Bryan Counties. The AA is in southeastern Oklahoma and includes the cities of Ada, Shawnee, Davis, Sulphur, and Durant.

Appendix B: Summary of State Rating

RATINGS Vision Bank, NA			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Vision Bank, NA	Satisfactory	Satisfactory	Satisfactory
State:			
State of Oklahoma	Satisfactory	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

measured through commuting.

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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
OKC Partial MSA	49	3,166	9.4	340	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-MSA	471	51,847	90.6	3,830	3.2	6.6	2.3	2.9	0.6	2.4	78.3	66.9	78.1	15.7	25.9	17.2	0.0	0.0	0.0
Total	520	55,013	100.0	4,170	2.9	6.0	2.1	2.6	0.6	2.2	80.1	70.0	79.9	14.4	23.5	15.8	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
OKC Partial MSA	62	5,138	7.5	265	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Non-MSA	764	85,731	92.5	3,577	0.8	0.3	0.4	9.1	12.0	13.0	67.0	57.3	63.9	23.0	30.4	22.8	0.0	0.0	0.0
Total	826	90,869	100.0	3,842	0.8	0.2	0.3	8.4	11.1	12.1	69.8	60.5	66.3	21.1	28.1	21.2	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	
OKC Partial MSA	49	3,166	9.4	340	24.0	12.2	11.5	20.8	6.1	22.4	22.9	42.9	25.3	32.3	32.7	28.5	0.0	6.1	12.4	
Non-MSA	471	51,847	90.6	3,830	21.1	5.1	3.8	17.7	13.0	13.6	20.6	15.5	19.5	40.7	54.8	45.1	0.0	11.7	18.0	
Total	520	55,013	100.0	4,170	21.3	5.8	4.4	17.9	12.3	14.3	20.8	18.1	20.0	40.0	52.7	43.8	0.0	11.2	17.5	

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.

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	
OKC Partial MSA	62	5,138	7.5	265	23.0	11.3	8.7	21.6	19.4	23.8	23.4	21.0	21.9	31.9	45.2	29.4	0.0	3.2	16.2	
Non-MSA	764	85,731	92.5	3,577	20.1	6.2	3.6	17.5	10.5	10.6	20.8	16.4	16.2	41.7	50.5	33.8	0.0	16.5	35.8	
Total	826	90,869	100.0	3,842	20.3	6.5	3.9	17.8	11.1	11.5	21.0	16.7	16.6	40.9	50.1	33.5	0.0	15.5	34.5	

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	
OKC Partial MSA	18	1,455	42.9	195	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Non-MSA	24	3,620	57.1	2,465	12.5	16.7	8.8	2.2	0.0	1.4	70.4	58.3	74.6	14.9	25.0	15.2	0.0	0.0	0.0	
Total	42	5,075	100	2,660	11.8	9.5	8.2	2.0	0.0	1.3	72.0	76.2	76.5	14.2	14.3	14.1	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	
OKC Partial MSA	21	1,251	44.7	196	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	
Non-MSA	26	3,295	55.3	2,521	4.1	3.9	3.4	19.5	11.5	15.3	59.6	38.5	61.5	16.9	46.1	19.8	0.0	0.0	0.0	
Total	47	4,546	100	2,717	3.9	2.1	3.2	18.5	6.4	14.2	61.6	66.0	64.3	16.0	25.5	18.4	0.0	0.0	0.0	

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 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
OKC Partial MSA	18	1,455	42.9	195	86.2	94.4	65.6	6.4	5.6	7.4	0.0
Non-MSA	24	3,620	57.1	2,465	79.2	87.5	60.0	5.6	12.5	15.2	0.0
Total	42	5,075	100.0	2,660	79.6	90.5	60.5	5.6	9.5	14.8	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 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
OKC Partial MSA	21	1,251	44.7	196	85.2	90.5	67.9	6.2	9.5	8.6	0.0
Non-MSA	26	3,295	55.3	2,521	78.5	92.3	56.5	5.9	7.7	15.6	0.0
Total	47	4,546	100.0	2,717	78.8	91.5	57.3	6.0	8.5	15.2	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*