

First Fidelity Bank

CRA Public File

Performance Evaluation



PUBLIC DISCLOSURE

January 12, 2026

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

First Fidelity Bank
RSSD# 106359

5100 North Classen Boulevard, Suite 500
Oklahoma City, Oklahoma 73118

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

NOTE: This document is an evaluation of this bank'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, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: Satisfactory

The following table indicates the performance level of First Fidelity Bank (the bank) with respect to the lending, investment, and service tests.

Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			X
High Satisfactory	X		
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			
* *The lending test is weighted more heavily than the investment and service tests in determining the overall rating.*			

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to assessment area (AA) credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- A substantial majority of the bank's loans are originated within its delineated AAs.
- The bank's distribution of loans by income level of geography (geographic distribution) is good.
- The bank's distribution of loans among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes (borrower distribution) is adequate.
- The bank is a leader in making community development (CD) loans.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives but exhibits adequate responsiveness to credit and CD needs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels in its AAs.

- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- The bank is a leader in providing CD services and is responsive to the available service opportunities.

INSTITUTION

DESCRIPTION OF INSTITUTION

The bank is an interstate financial institution headquartered in Oklahoma City, Oklahoma. The bank's characteristics include:

- The bank is a wholly owned subsidiary of First Fidelity Bancorp, Inc., a one-bank holding company also located in Oklahoma City.
- The bank has total assets of $2.9 billion as of September 30, 2025.
- As of January 1, 2025, the bank operates 20 branches in the state of Oklahoma, 6 branches in the state of Arizona and 1 branch in the state of Colorado. Additionally, the bank operates 25 automated teller machines (ATMs) at 24 of the branch offices as well as 5 stand-alone ATMs.
- As shown in the table below, the bank's primary business focus is commercial lending, which comprises 74.6 percent of its lending portfolio by dollar.
- No mergers or acquisitions have taken place since the prior evaluation.

Table 1

Composition of Loan Portfolio as of June 30, 2025		
Loan Type	$(000)	%
Construction and Land Development	136,290	6.9
Farmland	1,700	0.1
1- to 4-Family Residential Real Estate	238,030	12.0
Multifamily Residential Real Estate	73,194	3.7
Nonfarm Nonresidential Real Estate	1,063,582	53.6
Agricultural	59	0.0
Commercial and Industrial	191,854	9.7
Consumer	263,670	13.3
Other	14,149	0.7
Gross Loans	**1,982,528**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

The bank was rated Satisfactory under the Community Reinvestment Act (CRA) at its March 6, 2023 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA

demographic and economic characteristics, and credit needs. Performance was assessed within the bank's four AAs. The Oklahoma City Metropolitan Statistical Area (MSA) AA, the Phoenix Metropolitan AA, and the Denver Metropolitan AA were assessed using a full-scope review. The Tulsa Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's home purchase, home refinance, home improvement, and multi-family loans reported on the bank's 2022, 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs).
- The bank's small business loans reported on the bank's 2022, 2023 and 2024 CRA LARs.
- CD loans originated from January 1, 2022, through December 31, 2024.
- Qualified investments, grants and donations that were made from January 1, 2022, through December 31, 2024, including those made prior to but still outstanding during this period; and,
- Retail banking services and CD services from January 1, 2022, through December 31, 2024.

Although the bank reported small farm loans on the 2022, 2023 and 2024 CRA LARs, the volume was too low to conduct a meaningful analysis of this product. Branching activity for this evaluation was included from January 1, 2022, through January 1, 2025.

When determining the overall institutional rating, more weight was placed on the Oklahoma state rating based on branching and lending volumes, followed by the Arizona state rating and finally, the Colorado state rating. With respect to the lending analysis, more emphasis was placed on small business lending due to the bank's strategic focus on commercial lending and overall lending volumes.

In addition, for the geographic and borrower distribution analyses, more consideration was given to the volume of loan originations than the dollar amount, as this represents the numbers of individuals or entities served. Additional emphasis was placed on the bank's performance in comparison to aggregate lending data, rather than in comparison to relative demographic figures, as aggregate lending data is considered representative of credit demand. Specifically, aggregate lending data is expected to describe many factors impacting lenders within an AA. Aggregate lending datasets are updated annually and are, therefore, expected to predict more relevant comparisons.

Furthermore, in most of the AAs subject to full-scope reviews, lending levels were frequently too low to render meaningful analyses for one or more loan products. These instances typically included home improvement and multifamily loans. Due to limited volume, only total home mortgage lending data was evaluated collectively in the Phoenix Metropolitan AA, as the volume for individual mortgage products was too low and an analysis was not considered meaningful. Home mortgage lending was not evaluated in the Tulsa or Denver Metropolitan AAs due to overall low origination volume.

Table 2 illustrates the bank's presence in each AA by number of branches, the percentage of lending and deposits compared to the bank wide, and the state level totals, and the bank's June 30, 2025 deposit market share as a percentage of all Federal Deposit Insurance Corporation (FDIC)-insured financial institutions.

Table 2

Review Type and Market Share by AA								
Assessment Area	**Review Type**	**Br. #**	**Percent of Bank's Lending by $[1]**		**Percent of Bank's Deposits by $[2]**		**Deposit Market Share**	
			Bank	**State**	**Bank**	**State**	**% Market Share[2]**	**Market Share Rank[3]**
State of Oklahoma		20	52.3	100.0	68.2	100.0	1.82	7 of 105
Oklahoma MSA	Full	19	49.1	93.9	66.8	98.0	2.98	6 of 71
Tulsa Metropolitan	Limited	1	3.2	6.1	1.4	2.0	0.09	51 of 60
State of Arizona		6	43.1	100.0	30.5	100.0	0.43	16 of 58
Phoenix Metropolitan	Full	6	43.1	100.0	30.5	100.0	0.43	16 of 58
State of Colorado		1	4.6	100.0	1.3	100.0	0.03	57 of 67
Denver Metropolitan	Full	1	4.6	100.0	1.3	100.0	0.03	57 of 67

1. *Based on the bank's HMDA, small business, and small farm lending used in the analysis.*
2. *Based on the June 30, 2025 FDIC's Deposit Market Share Report.*
3. *Based on the bank's ranking among FDIC-insured financial institutions in each AA.*

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of performance in Oklahoma, Arizona and Colorado and the specific AAs that received full-scope reviews. Lending data for the AA that received a limited-scope review is located in Appendix F.

While conclusions with respect to the lending test were evaluated for three years, only 2023 and 2024 lending tables for the full-scope reviews are reflected in the body of this report. The bank's 2022 lending data can be found in Appendix D of this report.

LENDING TEST

The bank's overall lending test performance is high satisfactory. The lending test performance for Oklahoma is consistent with the overall institution rating, while performance for Arizona and Colorado are both rated low satisfactory.

Lending Activity

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect good responsiveness to AA credit needs. The responsiveness for the Oklahoma City MSA AA was also considered good, while the Phoenix Metropolitan AA and Denver Metropolitan AA were considered to have adequate responsiveness to AA credit needs. The decrease in lending activity from the previous evaluation was mainly due to the U.S. Small Business Administration's (SBA) Paycheck Protection Program (PPP) that was in response to the Coronavirus Disease 2019 pandemic (pandemic) no longer being offered.

Table 3

Summary of Lending Activity Reviewed				
Loan Type	**2022 - 2024**			
	#	**$(000)**	**#%**	**$%**
Home Improvement	64	5,263	14.0	4.0
Home Purchase	130	50,646	29.0	38.0
Multi-Family Housing	19	33,506	4.0	25.0
Refinancing	169	39,714	37.0	30.0
Other Purpose Closed-End	73	4,136	16.0	3.0
Total HMDA related	**455**	**133,265**	**23.0**	**25.0**
Small Business	1,516	403,153	77.0	75.0
TOTAL LOANS	**1,971**	**536,418**	**100.0**	**100.0**

Note: Percentages may not total 100.0 percent due to rounding.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The bank offers flexible programs throughout the AAs, including government guaranteed small business loans and consumer loans that assist in building credit for those with derogatory or no credit history. Such loan programs help borrowers who might not otherwise qualify for credit.

The bank offers a Credit Builder small dollar loan program that assists in building credit for borrowers with derogatory credit or that have no traditional credit references. In addition, the bank offers a Line of Credit product for $750 or less that is available to any applicant regardless of credit score. During the evaluation period, the bank originated 509 Credit Builder loans for $1,121,952 and 18 Line of Credit loans for $26,100. Additionally, the bank provides support for small business borrowers by participating in the SBA's 504 Loan Program that provides long-term, fixed-rate financing for major fixed assets that promote business growth and job creation. During the evaluation period, the bank originated 108 loans for $96.1 million (MM).

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AAs. The bank originated a substantial majority of loans, by number and dollar, inside its AAs.

Table 4

Lending Inside and Outside the Assessment Areas								
Loan Type	**Inside**				**Outside**			
	#	**#%**	**$(000)**	**$%**	**#**	**#%**	**$(000)**	**$%**
CV - Home Purchase - Conventional	91	70.0	30,625	60.5	39	30.0	20,021	39.5
HI - Home Improvement	61	95.3	4,866	92.5	3	4.7	397	7.5
MF - Multi-Family Housing	12	63.2	26,959	80.5	7	36.8	6,547	19.5
OC - Other Purpose Closed-End	71	97.3	4,061	98.2	2	2.7	75	1.8
RF - Refinancing	146	86.4	29,424	74.1	23	13.6	10,290	25.9
Total HMDA related	**381**	**83.7**	**95,935**	**72.0**	**74**	**16.3**	**37,330**	**28.0**
SB - Small Business	1,361	89.8	348,118	86.3	155	10.2	55,035	13.7
TOTAL LOANS	**1,742**	**88.4**	**444,053**	**82.8**	**229**	**11.6**	**92,365**	**17.2**
Note: Percentages may not total 100.0 percent due to rounding.								

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AAs. The state rating for Oklahoma is consistent with the overall rating, while performance in Arizona is rated adequate and performance in Colorado is rated excellent.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has an overall adequate penetration among individuals of different income levels and businesses of different sizes. The state rating for Oklahoma is consistent with the overall rating, while the ratings for Arizona and Colorado are rated poor.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending. The bank is a leader in making CD loans. The table below summarizes all CD loans originated in the bank's four AAs during the evaluation period. The majority of CD loans by dollar volume, 77.3 percent, were originated within the state of Arizona, while 13.1 percent were originated in the state of Oklahoma, and 9.7 percent in the state of Colorado. The bank

is a leader in making CD loans in Arizona and Colorado and makes an adequate level in Oklahoma. Examples of how the bank was responsive to the needs of the AAs include:

- The bank originated a loan for $7.0MM that was for working capital for a business that provides affordable housing in the Phoenix Metropolitan AA. The business has over 90 properties that are considered affordable housing.
- One loan for $9.0MM was originated in a moderate-income tract related to economic development. The loan was to a small business that was used to purchase commercial real estate that would house local businesses.
- A community service loan for $2.5MM was originated to an organization that provides behavioral health services, primarily to LMI individuals, related to abuse and family relationships.

Table 5

Community Development Loans – All		
Community Development Purpose	**#**	**$(000)**
Affordable Housing	9	$24,970
Community Services	6	$17,096
Economic Development	95	$240,341
Revitalization and Stabilization	5	$22,856
Outside Activities	0	0
Total Loans	**115**	**$305,262**

INVESTMENT TEST

This performance criterion evaluates the bank's level of qualified grants, donations, or in-kind contributions of property made since the last examination that have a primary purpose of community development.

The bank's overall performance under the investment test is low satisfactory. The state ratings for Oklahoma, Arizona, and Colorado are consistent with the overall rating. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits adequate responsiveness to the credit and CD needs of its AAs. The majority of qualified investments and donations by dollar volume, 73.8 percent, were generated in the state of Oklahoma, with 22.6 percent in the state of Arizona and the remainder in Colorado.

In addition, the majority of prior-period bank investments are government agency-issued mortgage-backed securities (MBS) pools that support affordable housing by providing home loans to LMI individuals and families. The bank made six new community service CD investments totaling $1.6MM within the Oklahoma and Arizona AAs during the evaluation period. All six current-period investments consisted of school bonds for funding the construction and/or renovation of buildings for schools that were primarily comprised

of students eligible to receive free or reduced lunch. The table below summarizes the bank's qualified CD investments, including prior-period and current-period investments, as well as donations and grant activity. Of note, four prior-period investments benefited both the Oklahoma City MSA AA and Tulsa Metropolitan AA. Numerically these were included under the Oklahoma City MSA AA; however, the respective dollar amounts were included in both AAs.

In addition to qualified investments, the bank also made a number of qualified donations. The bank's donation activity increased by both number and dollar volume since the previous evaluation and included 200 donations for an approximate total of $589,000. Overall, 83.5 percent of the donations by number were made in the state of Oklahoma, with the remaining amounts made in the states of Arizona (7.0 percent) and Colorado (9.5 percent).

Table 6

Investments, Grants, and Donations – All								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	8	$1,277	0	0	8	$17	16	$1,294
Community Services	3	$1,128	6	$1,580	114	$324	123	$3,032
Economic Development	1	$750	0	0	75	$241	76	$991
Revitalization and Stabilization	0	0	0	0	3	$7	3	$7
Outside Activities	0	0	0	0	0	0	0	0
Total	12	$3,155	6	$1,580	200	$589	218	$5,324

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test is outstanding. The Oklahoma and Colorado state ratings were consistent with the overall rating, while Arizona was rated High Satisfactory.

Retail Banking Services

This performance criterion evaluates the bank's level of service-delivery systems provided in each geographic classification. The table below illustrates the distribution of the bank's branches and ATMs by income level of geographies, as well as the number of branch openings/closings and the number of CD services provided during the evaluation period.

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to

individuals of different income levels in each AA. Of the 27 total branch offices subject to this evaluation, 6 offices were located in moderate-, 8 in middle-, 11 in upper-, and 2 in unknown-income census tracts. These locations generally align with the total percentage of census tracts in the AAs by income level. The bank also maintains ATMs at 24 of the 27 branch offices, plus 5 stand-alone ATMs. In addition to bank-owned ATMs, the bank's debit cards can be used at thousands of surcharge-free ATMs across the country at 7-Eleven, OnCue, and QuikTrip locations.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank closed two branches and opened one branch in the Oklahoma City MSA AA. The two closures were to consolidate operations into one newly opened branch. Additionally, one limited-service branch was relocated and converted to a full-service branch, also in the Oklahoma City MSA AA. The relocation is not reflected in the changes in branch location section of the table below.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. Lobby hours are generally consistent across the various AAs with hours ranging from 9 a.m. to 5 p.m., Monday through Friday, and drive-through hours from 8 a.m. to 6 p.m. Additionally, Saturday hours at most locations are from 9 a.m. to 12 p.m.

Table 7

Retail Banking and Community Development Services – All												
Branch Accessibility	**Location of Branches by Tract (%)**						**Percent of Tracts[1] (%)**					
	Low	**Mod**	**Mid**	**Upp**	**Unk**	**Total**	**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	0.0	22.2	29.6	40.7	7.4	100.0	5.9	26.3	34.3	30.8	2.6	100.0
	Location of ATMs by Tract (%)						**Percent of Households by Tracts[1] (%)**					
	Low	**Mod**	**Mid**	**Upp**	**Unk**	**Total**	**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	0.0	16.7	40.0	33.3	10.0	100.0	5.2	26.5	36.1	31.6	0.7	100.0
Changes in Branch Location	**Number of Branches (#)**						**Net Change in Branch Locations (#)**					
	Total Branches		**Openings (#)**		**Closings (#)**		**Low**	**Mod**	**Mid**	**Upp**	**Unk**	**Total**
	27		1		2		0	1	(1)	(1)	0	(1)
Community Development Services	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalization & Stabilization**		**Total Services**		**Total Organizations**	
	12		144		2		0		158		34	

[1] *Based on 2024 FFIEC census tract definitions.*
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

This performance criterion evaluates the bank's level of CD services. The bank is a leader in providing CD services. Employees at the bank provided 158 qualified services to 34 different organizations. Services provided included serving on boards of directors

(boards) of affordable housing organizations, non-profit organizations that primarily serve LMI individuals and families, and economic development organizations that advise and cater to small business incubation and development. Other staff served on committees that provided technical assistance on financial matters, such as budgeting and financial planning. The bank's services primarily occurred in the state of Oklahoma, which had 79.7 percent of the institution total, and the rating was consistent with the overall rating. In the state of Arizona, the bank provides a relatively high level of CD services, accounting for 10.8 percent of the total. The state of Colorado accounted for 9.5 percent of the total CD services and the rating was consistent with the overall rating.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

STATE OF OKLAHOMA

CRA rating for Oklahoma:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Outstanding

Major factors supporting the rating include:

Lending Test

- Lending levels reflect good responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is good.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses of different sizes is adequate.
- The bank makes an adequate level of CD loans within its AAs.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives but exhibits adequate responsiveness to the credit and CD needs throughout its Oklahoma AAs.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AAs.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Oklahoma AAs and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Oklahoma was consistent with the overall scope for the institution. A full-scope review was conducted for the Oklahoma City MSA AA, and

the overall state rating was based predominantly on the bank's performance in this AA since it represents a substantial majority of the bank's branch network, as well as lending and deposit volume.

A limited-scope review was conducted for the Tulsa Metropolitan AA to ascertain if the bank's performance in this area was generally consistent with its performance in the overall state evaluation.

The analysis of loans originated in the state included 582 small business and 327 home mortgage loans. Weighting among the products aligns with discussions in the overall Institution Scope of Examination section of this report. Home mortgage loans were not evaluated in the Tulsa Metropolitan AA due to limited volume.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN OKLAHOMA

The bank delineates 2 of its 4 AAs and operates 20 of its 27 branches in the state of Oklahoma. The bank's Oklahoma operations represent 52.3 percent of the bank's lending activity and 68.2 percent of the bank's deposits.

Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report, with a primary emphasis on commercial lending followed by residential real estate lending. Detailed descriptions of the bank's operations in each AA are provided in each AA analysis.

Two community contacts recently conducted as part of CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The representatives were from a local housing authority and a business chamber within the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's performance under the lending test in the state of Oklahoma is high satisfactory. Bank performance under the lending test in the Oklahoma City MSA AA is considered good.

Lending Activity

The bank's overall lending activities in the state of Oklahoma and in the Oklahoma City MSA AA reflect good responsiveness to AA credit needs. The bank makes use of

innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. The lending programs offered in the state generally mirror those outlined in the overall Institution Lending Activity section of this report.

Geographic Distribution of Loans

The bank's overall geographic distribution of lending within Oklahoma reflects good distribution among the different census tracts and dispersion throughout the AAs. The distribution of loans across the different geographies is good in the Oklahoma City MSA AA.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank's lending within Oklahoma has an overall adequate penetration among individuals of different income levels and businesses of different sizes. The borrower distribution of loans is adequate in the Oklahoma City MSA AA.

Community Development Lending

The bank provides an adequate level of CD loans within the state of Oklahoma. The bank originated 10 CD loans totaling $39.9MM in AAs within the state. The Oklahoma City MSA AA originated 5 loans totaling $17.0MM, while the remaining 5 loans, totaling $22.8MM, were originated in the Tulsa Metropolitan AA.

Table 8

Community Development Loans – State of Oklahoma		
Community Development Purpose	**#**	**$(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	8	$22,288
Revitalization and Stabilization	2	$17,561
Outside Activities	0	0
Total Loans	**10**	**$39,849**

INVESTMENT TEST

The bank's overall performance under the investment test in the state of Oklahoma is low satisfactory. Bank performance under the investment test in the Oklahoma City MSA AA is considered adequate.

The bank has an adequate level of qualified CD investments and grants within Oklahoma but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits adequate responsiveness to the credit and CD needs

of its AAs. Consistent with prior evaluations, the bank's CD investment strategy is comprised of purchasing municipal bonds that benefit area schools and districts which contain a majority of student populations eligible for free and reduced lunches.

Additionally, the bank maintains prior-period government agency-issued mortgage-backed securities pools that support affordable housing to LMI borrowers. As mentioned previously, four of these investments benefit both the Oklahoma City MSA AA and the Tulsa Metropolitan AA. The count of these investments is included in the Oklahoma City MSA AA section, while the respective dollar amounts are broken out into each respective AA.

The bank also made a number of donations in the state, primarily to organizations that provide community services that support LMI individuals and families.

Table 9

Investments, Grants, and Donations – State of Oklahoma								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	5	$980	0	0	3	$2	8	$981
Community Services	1	$380	5	$1,350	90	$223	96	$1,954
Economic Development	1	750	0	0	71	$235	72	$985
Revitalization and Stabilization	0	0	0	0	3	$7	3	$7
Outside Activities	0	0	0	0	0	0	0	0
Total	7	$2,110	5	$1,350	167	$467	179	$3,927

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's overall performance under the service test in the state of Oklahoma is outstanding. Bank performance under the service test in the Oklahoma City MSA AA is considered excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, within Oklahoma are accessible to the bank's various geographies and to individuals of different income levels in each AA. A majority of the branches located in Oklahoma are in the Oklahoma City MSA AA with 19 branch locations, including the main office, that are accessible to geographies and individuals of different income levels.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. Since the prior evaluation, the bank closed two branches in the Oklahoma City MSA AA, one in a middle-income census tract, and one in an upper-income census tract. A new branch was opened in the same AA in a moderate-income census tract. These closures and subsequent opening were to consolidate branch activities due to the close proximity of the locations. Additionally, one limited-service branch located in a middle-income census tract was converted to a full-service branch and relocated to an upper-income census tract. This conversion is not reflected in the table below.

The bank's products, services, and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals. The bank's operations in the state of Oklahoma generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 10

Retail Banking and Community Development Services – State of Oklahoma												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	20.0	35.0	35.0	10.0	100.0	6.3	26.9	34.6	29.5	2.7	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	19.2	42.3	26.9	11.5	100.0	5.4	25.9	37.6	30.3	0.9	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	20		1		2		0	1	(1)	(1)	0	(1)
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	3		123		0		0		126		22	

[1] *Based on 2024 FFIEC census tract definitions.*
Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank is a leader in providing CD services within the state of Oklahoma. During the evaluation, bank representatives performed 126 services to 22 organizations throughout the state. A substantial majority of services performed were to organizations that provide various community services that benefit LMI individuals and families. Capacities of CD services performed generally consisted of board membership and financial literacy instruction in schools with a majority of student populations eligible for free or reduced lunches.

OKLAHOMA CITY MSA ASSESSMENT AREA
METROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE OKLAHOMA CITY MSA AA

The bank's Oklahoma City MSA AA consists of Canadian, Cleveland, Grady, Lincoln, Logan, McClain, and Oklahoma Counties in their entireties, which also comprise the Oklahoma City, Oklahoma MSA. Refer to Appendix C for a map of the AA and Appendix E for additional demographic data.

- There have been no changes to the AA delineation since the prior evaluation.
- The AA is comprised of 419 census tracts, including 30 low-, 104 moderate-, 147 middle-, 119 upper- and 19 unknown-income census tracts. At the previous evaluation, the AA was comprised of 363 census tracts, including 29 low-, 106 moderate-, 136 middle-, 83 upper-, and 9 unknown-income census tracts.
- The bank operates 19 of its 27 banking offices in this AA. All of the locations have onsite ATMs, and all but one branch have drive-through facilities.
- According to the June 30, 2025 FDIC Deposit Market Share Report, the bank ranked 6th out of 71 FDIC-insured institutions in the AA with a market share of 3.0 percent.
- Two community contacts recently conducted as part of CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The representatives were from a local housing authority and a business chamber within the AA.

Table 11

Population Change Assessment Area: Oklahoma City MSA			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Oklahoma City MSA	1,318,408	1,425,695	8.1
Canadian County, OK	126,193	154,405	22.4
Cleveland County, OK	268,614	295,528	10.0
Grady County, OK	53,612	54,795	2.2
Lincoln County, OK	34,504	33,458	(3.0)
Logan County, OK	44,493	49,555	11.4
McClain County, OK	36,512	41,662	14.1
Oklahoma County, OK	754,480	796,292	5.5
Oklahoma	3,849,733	3,959,353	2.8

Source: 2020 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey

- The AA's population increase between 2015 and 2020 surpassed the state of Oklahoma, with growth in several counties near Oklahoma City. Lincoln County is relatively rural and the least populated county in the AA and was the only AA county noting a decline in population.
- Approximately 36.0 percent of residents in the state of Oklahoma reside in the AA.
- A majority of the 2020 AA population resided in Oklahoma and Cleveland Counties, which is roughly 76.6 percent of the total AA population.
- A community contact noted that the growth in Canadian County is largely due to the proximity to Oklahoma County. They also noted that 30 percent of the people living in Canadian County commute to Oklahoma County for work.

Table 12

Median Family Income Change Assessment Area: Oklahoma City MSA			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Oklahoma City MSA	69,988	75,170	7.4
Canadian County, OK	79,529	85,700	7.8
Cleveland County, OK	76,689	80,924	5.5
Grady County, OK	67,163	75,100	11.8
Lincoln County, OK	60,374	63,261	4.8
Logan County, OK	73,817	90,430	22.5
McClain County, OK	75,587	80,385	6.3
Oklahoma County, OK	65,933	70,629	7.1
Oklahoma	63,401	67,511	6.5

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- Based on the 2020 American Community Survey (ACS) data, the portion of AA families living below the poverty level was 9.5 percent, which was below the Oklahoma statewide figure of 11.3 percent. The portion of families living below the poverty level in the seven AA counties ranged from 4.9 percent in Canadian County to 12.1 percent in Lincoln County.
- Growth rates in median family income were positive in all the AA counties and in the state of Oklahoma, with the highest rates in Logan County at 22.5 percent and Grady County at 11.8 percent.
- The percentage of LMI families in the AA at 38.7 percent was similar to the state of Oklahoma at 39.1 percent.

Table 13

Housing Cost Burden Assessment Area: Oklahoma City MSA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Oklahoma City MSA	76.7	36.8	40.2	55.6	29.5	15.8
Canadian County, OK	76.5	43.0	34.8	53.8	41.0	14.5
Cleveland County, OK	75.6	43.9	40.2	65.4	33.4	15.8
Grady County, OK	64.0	10.5	29.1	36.0	17.6	11.8
Lincoln County, OK	56.1	15.5	30.7	42.4	21.6	14.4
Logan County, OK	66.4	24.3	40.0	41.4	36.1	14.6
McClain County, OK	82.2	24.5	44.8	44.5	24.7	12.6
Oklahoma County, OK	78.0	35.4	41.3	57.5	27.4	16.8
Oklahoma	72.5	35.3	37.9	52.2	26.2	15.4

Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The AA cost burden for both LMI renters and homeowners was generally consistent with figures for the state of Oklahoma, with the greatest burden among low-income renters when compared to low-income homeowners.
- The median housing value in the seven AA counties ranged from $116,800 in Lincoln County, to a high of $183,800 in McClain County, compared to $162,599 for the AA, and $142,400 for the state of Oklahoma.
- There are 578,343 housing units in the AA, of which 58.2 percent are owner-occupied, 32.2 percent are rental units and 9.5 percent are vacant units.
- The median age of housing stock in the AA was 45 years of age. When segregated by the income level of census tract, the median age was 61 years in low-, 58 in moderate-, 44 years in middle-, and 30 years in upper-income census tracts. The older age of homes in LMI census tracts suggests more dilapidated homes in need of repair.

Table 14

Unemployment Rates Assessment Area: Oklahoma City MSA					
Area	**2020**	**2021**	**2022**	**2023**	**2024**
Oklahoma City MSA	6.1	3.8	2.8	3.0	3.1
Canadian County, OK	5.9	3.2	2.5	2.6	2.8
Cleveland County, OK	5.5	3.3	2.6	2.8	2.9
Grady County, OK	6.4	3.7	2.8	2.9	3.0
Lincoln County, OK	6.1	3.9	3.2	3.3	3.4
Logan County, OK	5.1	3.3	2.7	3.0	3.1
McClain County, OK	5.5	3.2	2.6	2.7	2.8
Oklahoma County, OK	6.5	4.2	3.0	3.1	3.2
Oklahoma	6.3	4.0	3.0	3.2	3.3
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- The industries with the most employees in the AA include the private sector, government, health care and social assistance, professional and technical services, and accommodation and food services.
- A community contact noted the major employers of the area include the University of Oklahoma and the Oklahoma Postal Training Center.
- Another community contact mentioned Canoo (a start-up electric vehicle manufacturer) and Liberty Energy as two major employers in Canadian County.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OKLAHOMA CITY MSA AA

LENDING TEST

The bank's performance under the lending test in the Oklahoma City MSA AA is good.

Lending Activity

The bank's lending activities reflect good responsiveness to AA credit needs. The evaluation of lending in the AA included 536 small business loans and 317 home mortgage loans.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A description of the bank's flexible lending products is discussed in the overall institution section of this report.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects good distribution among the different census tracts and dispersion throughout the AA. This conclusion is derived from good penetrations noted among tracts of various income levels for both home mortgage and small business lending.

Home Mortgage Lending

The geographic distribution of home mortgage lending is good. The bank's lending in 2024 in low-income census tracts was significantly above aggregate by number, and by dollar as well as to the percentage of owner-occupied units (demographic). Lending in moderate-income census tracts was comparable to aggregate by number and dollar and comparable to the demographic figure. Lending in 2023 was below 2024 performance, while lending in 2022 was above.

When evaluating lending by dispersion, while gaps or lapses were noted, it was explained by performance context. Notably, the level of competition in the AA, the distance of many census tracts from the bank's branches, and a relatively low number of home mortgage loans disbursed amongst the AA's 134 LMI census tracts contributed to the gaps noted. As a result, this did not impact the overall conclusion.

Home Purchase Loans

The geographic distribution of home purchase lending is good. The bank's lending in 2024 in low-income census tracts was significantly above aggregate by number, above aggregate by dollar and significantly above the demographic figure. Lending in moderate-income census tracts was comparable to aggregate by number and dollar and below the demographic figure.

Home purchase lending in 2023 was consistent with 2024 lending patterns, while lending in 2022 was above 2024 lending.

Home Refinance Loans

The geographic distribution of home refinance lending is good. The bank's lending in 2024 in low-income census tracts was comparable to aggregate by number and dollar and comparable to the demographic figure. Lending in moderate-income census tracts was above aggregate by number and dollar and above the demographic figure.

Home refinance lending in 2023 was above 2024 lending patterns, while lending in 2022 was consistent with 2024.

Table 15

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Oklahoma City MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	5.9	3.3	160	5.0	2.1	2	8.0	2.6	123	2.4	1.7	3.4
Moderate	3	17.6	15.7	420	13.1	10.9	3	12.0	16.9	496	9.6	12.1	18.0
Middle	8	47.1	36.4	1,673	52.4	32.0	9	36.0	37.0	1,311	25.3	32.5	40.1
Upper	5	29.4	43.9	941	29.5	54.6	11	44.0	43.0	3,251	62.7	53.3	37.7
Unknown	0	0.0	0.6	0	0.0	0.5	0	0.0	0.5	0	0.0	0.4	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	3,194	100.0	100.0	25	100.0	100.0	5,181	100.0	100.0	100.0
Refinance Loans													
Low	3	12.5	3.1	167	4.0	1.7	1	3.8	3.4	71	2.0	2.0	3.4
Moderate	5	20.8	17.7	539	12.8	12.2	6	23.1	16.6	567	15.6	12.0	18.0
Middle	8	33.3	39.4	712	16.9	34.8	10	38.5	38.8	960	26.5	34.4	40.1
Upper	8	33.3	39.4	2,788	66.3	51.0	9	34.6	40.5	2,027	55.9	51.0	37.7
Unknown	0	0.0	0.5	0	0.0	0.4	0	0.0	0.7	0	0.0	0.5	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	4,206	100.0	100.0	26	100.0	100.0	3,625	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.0	0	0.0	3.0	3	16.7	2.4	177	18.4	2.2	3.4
Moderate	1	8.3	14.3	10	1.6	10.7	3	16.7	16.7	128	13.3	13.7	18.0
Middle	8	66.7	37.8	398	64.7	34.0	6	33.3	35.0	267	27.8	31.1	40.1
Upper	3	25.0	44.0	207	33.7	51.6	6	33.3	45.3	390	40.5	52.1	37.7
Unknown	0	0.0	0.8	0	0.0	0.6	0	0.0	0.6	0	0.0	0.9	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	615	100.0	100.0	18	100.0	100.0	962	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	7.6	0	0.0	6.4	0	0.0	12.8	0	0.0	14.1	7.3
Moderate	0	0.0	34.8	0	0.0	36.6	0	0.0	31.4	0	0.0	24.4	34.7
Middle	0	0.0	29.9	0	0.0	26.5	0	0.0	28.7	0	0.0	23.9	37.5
Upper	0	0.0	27.2	0	0.0	28.7	0	0.0	25.0	0	0.0	36.8	17.2
Unknown	0	0.0	0.5	0	0.0	1.9	0	0.0	2.1	0	0.0	0.8	3.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	6	7.8	3.2	386	4.2	2.3	9	10.3	2.7	452	4.3	2.6	3.4
Moderate	11	14.3	15.7	1,043	11.2	12.4	14	16.1	16.6	1,248	11.8	12.9	18.0
Middle	34	44.2	37.0	3,101	33.4	32.0	35	40.2	37.3	2,992	28.3	32.2	40.1
Upper	25	32.5	43.5	4,525	48.7	52.7	29	33.3	42.8	5,894	55.7	51.8	37.7
Unknown	1	1.3	0.6	240	2.6	0.5	0	0.0	0.6	0	0.0	0.5	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	77	100.0	100.0	9,295	100.0	100.0	87	100.0	100.0	10,586	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is good. Lending in low-income census tracts was significantly above aggregate by number, comparable by dollar and significantly above the percentage of total businesses operating in those tracts (demographic). Lending in moderate-income census tracts was comparable to aggregate by number and by dollar, as well as comparable to the demographic figure. Lending levels in 2023 and 2022 were below the 2024 lending levels.

When evaluating lending by dispersion, while gaps or lapses were noted, these gaps were explained by performance context. Similar to home mortgage lending, the level of competition in the AA, the distance of many census tracts from the bank's branches, and a relatively low number of small business loans disbursed amongst the AA's 134 LMI census tracts contributed to the gaps noted. As a result, this did not impact the overall conclusion.

Table 16

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Oklahoma City MSA

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	11	6.9	3.9	1,505	5.7	4.9	28	12.9	3.7	1,520	4.9	4.3	4.8
Moderate	32	20.1	19.1	4,414	16.7	22.8	47	21.7	18.2	6,194	19.8	20.8	23.2
Middle	57	35.8	31.9	6,796	25.8	29.2	58	26.7	32.0	9,551	30.6	31.1	34.9
Upper	55	34.6	42.9	13,141	49.8	41.1	76	35.0	44.0	13,634	43.7	41.4	34.3
Unknown	4	2.5	1.5	523	2.0	1.9	8	3.7	1.5	327	1.0	2.2	2.8
Tract-Unk	0	0.0	0.7	0	0.0	0.2	0	0.0	0.7	0	0.0	0.2	
Total	159	100.0	100.0	26,379	100.0	100.0	217	100.0	100.0	31,226	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank's lending has an adequate distribution among individuals of different income levels and businesses of different sizes. The distribution of small business lending reflects adequate penetration levels, while the analysis of home mortgage lending reflects good penetration.

Home Mortgage Lending

The borrower distribution of home mortgage lending is good. The bank's lending to low-income borrowers was significantly above aggregate by number and dollar but below the percent of families by family income (demographic figure). Lending to moderate-income borrowers was comparable to aggregate by both number and dollar, as well as the demographic figure.

Lending patterns in 2023 were consistent with 2024, while 2022 lending patterns were below 2024.

Home Purchase Loans

The borrower distribution of home purchase lending is adequate. Lending to low-income borrower's was comparable to aggregate by number and dollar and significantly below the demographic figure. Lending to moderate-income borrowers was significantly below aggregate by number and dollar, as well as the demographic figure.

Home purchase lending patterns for 2023 and 2022 were above 2024 lending patterns and contributed to the overall adequate rating.

Home Refinance Loans

The borrower distribution of home refinance lending is good. The bank's lending to low-income borrowers was significantly above aggregate by number and dollar and comparable to the demographic figure. Lending to moderate-income borrowers was significantly above aggregate by number, comparable by dollar and above the demographic figure.

Home refinance lending in 2023 was consistent with 2024, while 2022 lending patterns were below.

Table 17

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Oklahoma City MSA

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	11.8	4.7	100	3.1	2.4	1	4.0	4.6	128	2.5	2.3	21.1
Moderate	2	11.8	16.3	230	7.2	11.4	1	4.0	16.7	38	0.7	11.7	17.6
Middle	1	5.9	18.7	150	4.7	16.9	4	16.0	19.0	576	11.1	16.7	20.5
Upper	8	47.1	30.9	2,099	65.7	41.4	12	48.0	29.8	3,686	71.1	39.7	40.8
Unknown	4	23.5	29.4	615	19.3	27.9	7	28.0	30.0	753	14.5	29.4	0.0
Total	17	100.0	100.0	3,194	100.0	100.0	25	100.0	100.0	5,181	100.0	100.0	100.0
Refinance Loans													
Low	6	25.0	7.0	308	7.3	3.4	5	19.2	6.0	356	9.8	2.6	21.1
Moderate	4	16.7	15.4	219	5.2	10.2	6	23.1	13.2	305	8.4	7.9	17.6
Middle	5	20.8	18.4	605	14.4	15.5	3	11.5	16.6	340	9.4	12.6	20.5
Upper	8	33.3	32.6	2,968	70.6	41.7	8	30.8	28.9	2,092	57.7	34.5	40.8
Unknown	1	4.2	26.5	106	2.5	29.2	4	15.4	35.2	532	14.7	42.4	0.0
Total	24	100.0	100.0	4,206	100.0	100.0	26	100.0	100.0	3,625	100.0	100.0	100.0
Home Improvement Loans													
Low	2	16.7	6.4	125	20.3	3.8	3	16.7	7.0	74	7.7	4.0	21.1
Moderate	5	41.7	17.3	238	38.7	11.7	4	22.2	15.0	318	33.1	10.2	17.6
Middle	0	0.0	20.7	0	0.0	16.1	5	27.8	22.9	241	25.1	18.1	20.5
Upper	4	33.3	47.6	152	24.7	56.6	3	16.7	46.9	146	15.2	55.9	40.8
Unknown	1	8.3	8.0	100	16.3	11.7	3	16.7	8.1	183	19.0	11.7	0.0
Total	12	100.0	100.0	615	100.0	100.0	18	100.0	100.0	962	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	13	16.9	5.2	649	7.0	2.6	12	13.8	5.1	628	5.9	2.5	21.1
Moderate	17	22.1	16.2	878	9.4	11.2	16	18.4	15.9	839	7.9	11.0	17.6
Middle	9	11.7	19.0	875	9.4	16.7	14	16.1	19.0	1,228	11.6	16.1	20.5
Upper	32	41.6	33.2	6,072	65.3	42.1	30	34.5	31.5	6,378	60.2	39.4	40.8
Unknown	6	7.8	26.4	821	8.8	27.4	15	17.2	28.5	1,513	14.3	31.0	0.0
Total	77	100.0	100.0	9,295	100.0	100.0	87	100.0	100.0	10,586	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The borrower distribution of small business lending is adequate. The bank's lending to businesses with revenues of $1MM or less was below aggregate by number and dollar, and significantly below the percentage of total businesses (demographic). However, additional consideration was given to lending by loan size, as the bank reported 35.9 percent of the loans with unknown revenues. The bank originated 83.4 percent of the loans in amounts of $250,000 or less. These dollar amounts are typically associated with credit demands of small businesses and demonstrate the bank's willingness to meet the credit needs of small businesses.

The bank's lending patterns in 2023 and 2022 were consistent with 2024.

Table 18

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Oklahoma City MSA

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	48	30.2	55.7	7,293	27.6	37.8	60	27.6	53.4	7,362	23.6	39.9	91.2
Over $1 Million	62	39.0		17,118	64.9		79	36.4		20,364	65.2		7.6
Revenue Unknown	49	30.8		1,968	7.5		78	35.9		3,500	11.2		1.2
Total	159	100.0		26,379	100.0		217	100.0		31,226	100.0		100.0
By Loan Size													
$100,000 or Less	103	64.8	93.0	4,225	16.0	38.5	141	65.0	92.9	5,230	16.7	37.6	
$100,001 - $250,000	26	16.4	3.9	4,790	18.2	17.0	40	18.4	3.9	7,807	25.0	17.2	
$250,001 - $1 Million	30	18.9	3.1	17,364	65.8	44.5	36	16.6	3.2	18,189	58.2	45.1	
Total	159	100.0	100.0	26,379	100.0	100.0	217	100.0	100.0	31,226	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	29	60.4		1,379	18.9		40	66.7		1,812	24.6		
$100,001 - $250,000	10	20.8		1,687	23.1		13	21.7		2,239	30.4		
$250,001 - $1 Million	9	18.8		4,227	58.0		7	11.7		3,311	45.0		
Total	48	100.0		7,293	100.0		60	100.0		7,362	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

The bank provides an adequate level of CD loans. The bank originated 5 CD loans totaling $17.0MM in this AA. The following are examples of CD loans that were responsive to AA credit needs:

- The bank originated one loan for $1.5MM to renew a line of credit for a local business that is located in a moderate-income census tract, but that also employs a majority of LMI employees. The loan was for the purpose of renewing a line of credit to help with daily operations for the business.
- A $1.3MM loan was originated to a small business located in a low-income census tract, but that also employs a majority of LMI employees. The loan was used as a revolving line of credit for business operations.

Table 19

Community Development Loans – Oklahoma City MSA AA		
Community Development Purpose	#	**$(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	4	$7,012
Revitalization and Stabilization	1	$10,000
Outside	0	0
Total Loans	**5**	**$17,012**

INVESTMENT TEST

The bank's performance under the investment test in the Oklahoma City MSA AA is adequate. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits adequate responsiveness to the credit and CD needs of its AA. Of the bank's total current investments, 66.7 percent were originated within the Oklahoma City MSA AA and totaled $950,000. Examples of the investment activity in the AA include:

- The bank made annual donations in 2022, 2023 and 2024 to a non-profit that provides essential community services to the local area and primarily serves LMI individuals and families. The donations for all three years totaled just over $60,000.
- The bank had five donations totaling $6,600 to an organization that helps provide social services to those in crisis. Over 95.0 percent of the clients they help are considered to be LMI individuals.

Table 20

Investments, Grants, and Donations – Oklahoma City MSA AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	5	$739	0	0	3	$2	8	$740
Community Services	1	$380	4	$950	84	$210	89	$1,540
Economic Development	1	$750	0	0	71	$235	72	$985
Revitalization and Stabilization	0	0	0	0	3	$7	3	$7
Outside	0	0	0	0	0	0	0	0
Total	7	$1,869	4	$950	161	$453	172	$3,272

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Oklahoma City MSA AA is excellent.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The distribution of branches is relatively proportional to the percent of tracts by income level as well as the population by tract income. The bank operates 19 branches in the AA, which all include on-site ATMs and all but one branch have drive-through facilities. Four branch offices are located in moderate-, 7 in middle-, 6 in upper-, and 2 in unknown-income census tracts.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank closed two branches since the prior CRA evaluation. The bank closed two locations, one in December 2024 and the other in January 2025, and subsequently opened one new branch that is located between both of the former locations in December 2024. Additionally, one branch that was previously designated as a limited-service branch was relocated and is now operating as a full-service branch. The branch relocation is not reflected in the table below under the changes to branch location section.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's operations in the AA generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Of note, a community contact noted the bank specifically as it related to the number of financial services available in the area. The contact mentioned that the local institutions have been proactive in developing relationships and offering assistance.

Table 21

Retail Banking and Community Development Services – Oklahoma City MSA AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	21.1	36.8	31.6	10.5	100.0	7.2	24.8	35.1	28.4	4.5	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	20.0	44.0	24.0	12.0	100.0	5.6	23.6	39.4	30.1	1.3	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	19		1		2		0	1	(1)	(1)	0	(1)
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	3		122		0		0		125		21	

1. *Based on 2024 FFIEC census tract definitions.*

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank is a leader in providing CD services. During the evaluation period, bank representatives provided 125 services to 21 area organizations. The services were a mixture of board membership for organizations that provide community services to LMI individuals and families, financial education instruction to students from schools with majority populations eligible for free or reduced lunches, as well as providing financial expertise to assist area agencies that support affordable housing. Examples of these CD services include:

- A bank employee served monthly on the board for an organization that provides behavioral health services, educational services and additional support to families that are considered LMI.
- Two employees served as board members for an organization that helps individuals look for jobs and also provides support to increase financial literacy. These individuals are recovering from substance abuse or mental health struggles and are considered to be LMI.

TULSA METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE TULSA METROPOLITAN AA

The AA is comprised of the Tulsa, Oklahoma MSA in its entirety (Creek, Okmulgee, Osage, Pawnee, Rogers, Tulsa and Wagoner Counties). Refer to Appendix C for a map of the AA.

- The AA delineation was revised in April of 2024 to take the entirety of the Tulsa, Oklahoma MSA. Previously, the bank's AA was comprised of Tulsa County in its entirety and one tract within Osage County.
- The AA is comprised of 313 census tracts, including 16 low-, 93 moderate-, 106 middle-, 97 upper-, and 1 unknown-income census tract(s).
- The AA for 2022 and 2023 was comprised of 209 census tracts, including 13 low-, 67 moderate-, 53 middle-, 75 upper-, and 1 unknown-income census tracts.
- At the previous evaluation, the AA was comprised of 176 census tracts, including 17 low-, 54 moderate-, 52 middle-, and 53 upper-income census tracts.
- The bank operates one full-service branch in the AA with a drive-through and full-service onsite ATM. The branch is located in Tulsa, in an upper-income census tract.
- Based on the 2020 ACS data, the AA population is 1,015,331.
- The AA's composition of families by income level includes 21.5 percent low-, 17.7 percent moderate-, 19.7 percent middle-, and 41.2 percent upper-income families.
- According to the June 30, 2025 FDIC Deposit Market Share Report, the bank ranked 51st out of 60 FDIC-insured institutions in the AA with a market share of 0.1 percent.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA METRPOLITAN AA

The state of Oklahoma AA listed in the table below was reviewed using limited-scope examination procedures. Conclusions regarding the institution's CRA performance are drawn from a review of available facts and data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding the bank's performance in these areas do not change the rating for the state of Oklahoma.

Table 22

Assessment Area	Lending Test	Investment Test	Service Test
Tulsa Metropolitan	Exceeds	Exceeds	Consistent

STATE OF ARIZONA/PHOENIX METROPOLITAN ASSESSMENT AREA

CRA rating for Arizona:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	High Satisfactory

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is adequate.
- The bank's distribution of loans among individuals of different income levels, including LMI, and businesses of different sizes is poor.
- The bank is a leader in making CD loans within its AA.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives but exhibits adequate responsiveness to the credit and CD needs throughout its Arizona AA.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.
- The bank provides a relatively high level of CD services within its Arizona AA and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Arizona was consistent with the overall scope for the institution. A full-scope review was conducted for the Phoenix Metropolitan AA, the

sole AA within the state. The overall state rating in Arizona is based exclusively on the bank's performance in the Phoenix Metropolitan AA and is discussed concurrently with the state performance.

The analysis of loans originated in the state included 702 small business and 50 home mortgage loans. Weighting among the products aligns with discussions in the overall Institution Scope of Examination section of this report. Home mortgage loans were evaluated at the total home mortgage level and not by subproduct due to low overall volume.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN ARIZONA

The bank delineates one of its four AAs and operates six of its 27 branches in the state of Arizona. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE PHOENIX METROPOLITAN AA

The bank's Phoenix Metropolitan AA consists of Maricopa and Pinal Counties in their entireties, which also comprise the Phoenix-Mesa-Chandler, Arizona MSA. Refer to Appendix C for a map of the AA and Appendix E for additional demographic data.

- The AA delineation was revised in April 2024 to take the entirety of the Phoenix-Mesa-Chandler, Arizona MSA. Previously, the bank's AA was comprised of a large majority of census tracts within Maricopa County.
- The AA is comprised of 1,104 census tracts, including 68 low-, 294 moderate-, 362 middle-, 354 upper-, and 26 unknown-income census tracts.
- The AA for 2022 and 2023 was comprised of 1,000 census tracts, including 64 low-, 257 moderate-, 310 middle-, 347 upper-, and 22 unknown-income census tracts.
- At the previous evaluation, the AA was comprised of 907 census tracts, including 104 low-, 205 moderate-, 283 middle-, 305 upper-, and 10 unknown-income census tracts.
- The bank operates 6 of its 27 branches in this AA. Three of the branches have full-service ATMs and two branches have drive-through facilities.
- According to the June 30, 2025 FDIC Deposit Market Share Report, the bank ranked 16th out of 58 FDIC-insured institutions in the AA with a market share of 0.4 percent.
- Two community contacts recently conducted as part of CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the

credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions. The representatives were from a local community development organization and a local economic development organization.

Table 23

Population Change Assessment Area: Phoenix Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Phoenix Metropolitan	4,407,915	4,845,832	9.9
Maricopa County, AZ	4,018,143	4,420,568	10.0
Pinal County, AZ	389,772	425,264	9.1
Arizona	6,641,928	7,151,502	7.7
Source: 2020 U.S. Census Bureau Decennial Census *2011-2015 U.S. Census Bureau: American Community Survey*			

- Approximately 67.8 percent of residents in the state of Arizona reside in the AA.
- A majority of the 2020 AA population resided in Maricopa County, which is roughly 91.2 percent of the total AA population.
- According to the 2020 ACS, Pinal County had 21.6 percent of residents aged 65 or older, while Maricopa County had 15.2 percent. The state of Arizona's population of 65 or older was at 17.7 percent.

Table 24

Median Family Income Change Assessment Area: Phoenix Metropolitan			
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Phoenix Metropolitan	69,582	78,930	13.4
Maricopa County, AZ	70,745	80,161	13.3
Pinal County, AZ	60,487	69,494	14.9
Arizona	64,986	73,456	13.0
Source: 2011-2015 U.S. Census Bureau: American Community Survey *2016-2020 U.S. Census Bureau: American Community Survey* *Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

- Pinal County had a higher percentage of LMI families at 44.4 percent, compared to Maricopa County with 38.3 percent.
- The percentage of families below poverty in the AA is 9.1 percent, which is similar to the Arizona statewide figure of 10.1 percent. When assessed by income level of census tracts in the AA, the poverty rates were 16.8 percent in low-, 41.5 percent in moderate-, 27.3 percent in middle-, 13.7 percent in upper-, and 0.7 percent in unknown-income census tracts.

Table 25

Housing Cost Burden Assessment Area: Phoenix Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Phoenix Metropolitan	80.1	56.6	43.6	62.5	37.1	19.8
Maricopa County, AZ	81.1	57.7	44.0	63.8	37.7	19.8
Pinal County, AZ	64.5	39.5	36.9	53.4	32.7	19.4
Arizona	78.5	54.7	43.0	60.0	36.2	19.7

Source: HUD, 2017-2021 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The AA cost burden for both LMI renters and homeowners was generally consistent with figures for the state of Arizona, with the greatest burden among LMI renters in Maricopa County versus LMI renters in Pinal County.
- The median housing value for the state of Arizona at $242,000 was between the AA counties with values of $278,700 in Maricopa County and $200,200 in Pinal County.
- Of the total housing units in the AA, 9.2 percent were located in Pinal County, while the remaining 90.8 percent were located in Maricopa County.
- Pinal County had a higher percentage of vacant units at 16.6 percent compared to Maricopa County with 9.6 percent. Additionally, Maricopa County had a higher percentage of rental units at 33.3 percent compared to Pinal County with 18.8 percent.
- A community contact noted that affordable housing has been an exponentially growing need in the area and that affordable housing has not grown with the migration growth.
- Another contact noted that rental prices have increased and that housing prices, in general, have made it more difficult for residents to move to the area, especially in the city of Scottsdale.

Table 26

Unemployment Rates Assessment Area: Phoenix Metropolitan					
Area	2020	2021	2022	2023	2024
Phoenix Metropolitan	7.3	4.6	3.3	3.2	3.2
Maricopa County, AZ	7.2	4.6	3.3	3.2	3.1
Pinal County, AZ	7.5	4.9	3.7	3.7	3.8
Arizona	7.8	5.0	3.8	3.7	3.6

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The industries with the most employers in the AA include the private sector, professional and technical services, health care and social assistance, construction, and retail trade.
- One community contact noted major industries in the area as finance and insurance, healthcare, technology and logistics management.
- A community contact noted that small business lending is a major credit need, as well as the expansion and stabilization of small businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PHOENIX METRPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the Phoenix Metropolitan AA is adequate, and the state of Arizona is rated low satisfactory. The lending test conclusion was bolstered by a significant volume of CD lending which had a favorable impact on the conclusion.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation includes 702 small business loans and 50 home mortgage loans.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A discussion of these products is highlighted in the overall Institution section of this evaluation.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate distribution among the different census tracts and dispersion throughout the AA. The distribution of small business lending reflects adequate penetration, while the distribution of home mortgage lending reflects good distribution.

Additionally, the evaluation of home mortgage lending focused on total home mortgage lending, as individual product level volume was too low to perform a meaningful analysis.

Home Mortgage Lending

The geographic distribution of home mortgage lending is good. The bank's lending in 2024 in low-income census tracts was significantly below aggregate by number and by dollar, as well as to the percentage of owner-occupied units (demographic). Lending in moderate-income census tracts was significantly above aggregate by number and dollar and above the demographic figure. Given the low percentage of low-income census tracts in the AA, more emphasis was given to the performance in the moderate-income census tracts, which contributed to the overall rating. Lending in 2023 was consistent with 2024 performance, while lending in 2022 was below.

When evaluating lending by dispersion, while gaps or lapses were noted, it was explained by performance context. Notably, the level of competition in the AA, the distance of many census tracts from the bank's six branches, and a relatively low number of home

mortgage loans disbursed amongst the AA's 362 LMI census tracts contributed to the gaps noted. As a result, this did not impact the overall conclusion.

Table 27

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Phoenix Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.3	0	0.0	1.4	0	0.0	1.9	0	0.0	1.2	2.6
Moderate	3	37.5	18.7	980	14.3	13.4	0	0.0	19.9	0	0.0	14.4	21.7
Middle	0	0.0	37.8	0	0.0	32.6	2	28.6	42.0	572	14.6	36.6	36.8
Upper	5	62.5	41.2	5,880	85.7	52.5	5	71.4	36.1	3,347	85.4	47.7	38.8
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	6,860	100.0	100.0	7	100.0	100.0	3,919	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.5	0	0.0	1.0	0	0.0	2.2	0	0.0	1.6	2.6
Moderate	1	25.0	19.4	270	8.3	11.3	3	60.0	18.9	564	42.3	14.5	21.7
Middle	2	50.0	35.5	495	15.2	30.0	1	20.0	39.1	288	21.6	34.2	36.8
Upper	1	25.0	42.5	2,500	76.6	57.7	1	20.0	39.7	480	36.0	49.6	38.8
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	3,265	100.0	100.0	5	100.0	100.0	1,332	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.5	0	0.0	1.1	0	0.0	1.8	0	0.0	1.2	2.6
Moderate	0	0.0	14.1	0	0.0	10.1	1	33.3	15.1	303	30.9	10.8	21.7
Middle	0	0.0	32.8	0	0.0	25.8	1	33.3	36.9	126	12.9	29.3	36.8
Upper	1	100.0	51.5	121	100.0	63.0	1	33.3	46.1	550	56.2	58.7	38.8
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	121	100.0	100.0	3	100.0	100.0	979	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	18.2	0	0.0	10.5	0	0.0	15.1	0	0.0	6.5	9.9
Moderate	1	100.0	38.8	100	100.0	32.1	1	100.0	39.4	2,858	100.0	33.5	36.4
Middle	0	0.0	23.6	0	0.0	25.7	0	0.0	26.6	0	0.0	25.1	29.9
Upper	0	0.0	18.2	0	0.0	30.6	0	0.0	18.3	0	0.0	34.6	22.9
Unknown	0	0.0	1.2	0	0.0	1.1	0	0.0	0.5	0	0.0	0.3	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	100	100.0	100.0	1	100.0	100.0	2,858	100.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	2.2	0	0.0	1.9	0	0.0	1.9	0	0.0	1.6	2.6
Moderate	5	35.7	17.9	1,350	13.0	14.0	5	31.3	18.8	3,725	41.0	15.5	21.7
Middle	2	14.3	36.4	495	4.8	31.1	4	25.0	40.7	986	10.8	34.9	36.8
Upper	7	50.0	43.4	8,501	82.2	52.9	7	43.8	38.5	4,377	48.2	47.9	38.8
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.2
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	10,346	100.0	100.0	16	100.0	100.0	9,088	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is adequate. Lending in low-income census tracts was comparable to aggregate by number and by dollar as well as the percent of total businesses operating in those tracts (demographic). Lending in moderate-income census tracts was above aggregate by number, comparable by dollar, as well as comparable to the demographic figure. Lending levels in 2023 and 2022 were below the 2024 lending levels.

When evaluating lending by dispersion, while gaps or lapses were noted, these gaps were explained by performance context. Similar to home mortgage lending, the level of competition in the AA, the distance of many census tracts from the bank's branches, and a relatively low number of small business loans disbursed amongst the AA's 362 LMI census tracts contributed to the gaps noted. As a result, this did not impact the overall conclusion.

Table 28

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Phoenix Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	5	2.2	3.5	745	1.0	5.0	9	3.6	3.2	4,421	5.1	5.6	3.7
Moderate	50	22.0	17.8	15,333	20.9	20.5	57	23.0	17.3	16,807	19.2	19.8	19.3
Middle	59	26.0	28.3	18,536	25.2	25.9	86	34.7	29.4	31,197	35.7	27.0	30.5
Upper	110	48.5	49.8	38,392	52.3	47.1	93	37.5	49.1	34,390	39.3	46.3	46.0
Unknown	3	1.3	0.7	443	0.6	1.5	3	1.2	0.6	609	0.7	1.3	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.3	0	0.0	0.1	
Total	227	100.0	100.0	73,449	100.0	100.0	248	100.0	100.0	87,424	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank's lending has a poor distribution among individuals of different income levels and businesses of different sizes. The distribution was considered poor for both products evaluated.

Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. Lending to low-income borrowers was significantly below aggregate by number and by dollar as well as the percentage of families by family income (demographic figure). Lending to moderate-income borrowers was also below aggregate by number, significantly below by dollar and below the demographic figure.

Lending patterns in 2023 and 2022 were consistent with 2024.

Table 29

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Phoenix Metropolitan

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.5	0	0.0	1.1	0	0.0	2.4	0	0.0	1.1	20.6
Moderate	0	0.0	13.4	0	0.0	8.7	0	0.0	14.7	0	0.0	9.9	18.3
Middle	1	12.5	22.1	320	4.7	18.4	0	0.0	22.1	0	0.0	18.6	20.3
Upper	3	37.5	40.1	4,825	70.3	50.0	3	42.9	35.6	1,302	33.2	45.3	40.9
Unknown	4	50.0	21.9	1,715	25.0	21.9	4	57.1	25.2	2,617	66.8	25.1	0.0
Total	8	100.0	100.0	6,860	100.0	100.0	7	100.0	100.0	3,919	100.0	100.0	100.0
Refinance Loans													
Low	1	25.0	9.9	30	0.9	2.9	0	0.0	7.2	0	0.0	3.6	20.6
Moderate	0	0.0	19.1	0	0.0	7.0	0	0.0	16.6	0	0.0	10.5	18.3
Middle	0	0.0	20.9	0	0.0	8.8	0	0.0	18.3	0	0.0	14.1	20.3
Upper	0	0.0	34.5	0	0.0	21.1	0	0.0	32.9	0	0.0	40.4	40.9
Unknown	3	75.0	15.6	3,235	99.1	60.1	5	100.0	24.9	1,332	100.0	31.4	0.0
Total	4	100.0	100.0	3,265	100.0	100.0	5	100.0	100.0	1,332	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.1	0	0.0	3.6	0	0.0	6.8	0	0.0	3.6	20.6
Moderate	0	0.0	16.4	0	0.0	10.2	1	33.3	17.5	126	12.9	10.9	18.3
Middle	0	0.0	24.4	0	0.0	19.0	0	0.0	23.2	0	0.0	17.1	20.3
Upper	0	0.0	47.8	0	0.0	60.8	0	0.0	46.6	0	0.0	58.2	40.9
Unknown	1	100.0	5.3	121	100.0	6.4	2	66.7	5.9	853	87.1	10.3	0.0
Total	1	100.0	100.0	121	100.0	100.0	3	100.0	100.0	979	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	7.7	4.4	30	0.3	1.7	0	0.0	4.3	0	0.0	1.8	20.6
Moderate	0	0.0	14.8	0	0.0	8.3	1	6.7	15.7	126	2.0	10.0	18.3
Middle	1	7.7	22.2	320	3.1	16.1	0	0.0	21.6	0	0.0	17.6	20.3
Upper	3	23.1	40.3	4,825	47.1	44.0	3	20.0	36.4	1,302	20.9	45.1	40.9
Unknown	8	61.5	18.3	5,071	49.5	30.0	11	73.3	22.1	4,802	77.1	25.5	0.0
Total	13	100.0	100.0	10,246	100.0	100.0	15	100.0	100.0	6,230	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The borrower distribution of small business lending is poor. The bank's lending to businesses with revenues of $1MM or less was below aggregate by number, comparable by dollar, and significantly below the percentage of total businesses (demographic).

The bank's lending patterns in 2023 and 2022 were consistent with 2024.

Table 30

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Phoenix Metropolitan

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	58	25.6	55.5	20,516	27.9	31.6	55	22.2	54.5	20,683	23.7	31.8	93.6
Over $1 Million	126	55.5		41,415	56.4		177	71.4		59,399	67.9		5.1
Revenue Unknown	43	18.9		11,518	15.7		16	6.5		7,342	8.4		1.2
Total	227	100.0		73,449	100.0		248	100.0		87,424	100.0		100.0
By Loan Size													
$100,000 or Less	66	29.1	95.5	3,915	5.3	46.5	56	22.6	95.6	3,658	4.2	48.4	
$100,001 - $250,000	54	23.8	2.4	9,835	13.4	13.7	63	25.4	2.5	12,124	13.9	14.7	
$250,001 - $1 Million	107	47.1	2.1	59,699	81.3	39.8	129	52.0	1.9	71,642	81.9	36.9	
Total	227	100.0	100.0	73,449	100.0	100.0	248	100.0	100.0	87,424	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	14	24.1		928	4.5		8	14.5		472	2.3		
$100,001 - $250,000	13	22.4		2,355	11.5		17	30.9		3,315	16.0		
$250,001 - $1 Million	31	53.4		17,233	84.0		30	54.5		16,896	81.7		
Total	58	100.0		20,516	100.0		55	100.0		20,683	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

The bank is a leader in providing CD loans. The bank originated 91 CD loans totaling $215.6MM in this AA. Additionally, the bank originated five loans totaling $20.3MM that were within the state of Arizona, but outside the Phoenix Metropolitan AA. The following are examples of CD loans that were responsive to AA credit needs:

- A loan for $2.5MM was originated to a business that employs a majority of LMI individuals. The loan was for a revolving line of credit to help with business operations.

- A loan for $1.4MM was originated to a business that owns 18 properties that are considered affordable housing rentals. The purpose of the loan was for a revolving line of credit that is used to make any necessary repairs to new or existing rentals.
- One loan totaling $9MM, located in Flagstaff, Arizona (outside the Phoenix Metropolitan AA), was for the purpose of renovating an existing hotel that will employ LMI individuals in the area.

Table 31

Community Development Loans – Arizona / Phoenix Metropolitan AA		
Community Development Purpose	#	**$(000)**
Affordable Housing	9	$24,970
Community Services	6	$17,096
Economic Development	74	$169,862
Revitalization and Stabilization	2	$3,720
Outside	5	$20,297
Total Loans	**96**	**$235,944**

INVESTMENT TEST

The bank's performance under the investment test in the Phoenix Metropolitan AA is adequate, and the state of Arizona is low satisfactory. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits adequate responsiveness to the credit and CD needs of its AA.

Examples of CD investments in the AA include:

- Two donations totaling $750 were to an organization that focuses on providing affordable housing to LMI families and individuals in the area.
- Two donations totaling $17,500 were to a non-profit that helps children that are facing significant physical, emotional or financial challenges. The children helped are considered to be LMI.
- One new investment for $230,000 benefits a local school district by providing fleet and technology upgrades as well as various other upgrades across the district. The school district has over 86.0 percent of students eligible for free or reduced school lunch.

Table 32

Investments, Grants, and Donations – Arizona / Phoenix Metropolitan AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	3	$297	0	$0	3	$6	6	$302
Community Services	1	$587	1	$230	11	$84	13	$901
Economic Development	0	$0	0	$0	0	$0	0	0
Revitalization and Stabilization	0	$0	0	$0	0	$0	0	0
Outside	0	0	0	0	0	0	0	0
Total	4	$883	1	$230	14	$90	19	$1,203

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Phoenix Metropolitan AA is good, and the state of Arizona is rated high satisfactory.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates six branches and three ATMs in the AA. Of the six branches, two branches without ATMs are located in moderate-income census tracts, and four branches, one without an ATM, are located in upper-income census tracts. The proportion of branches in LMI census tracts exceeds the percentage of LMI census tracts in the AA.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank has made no changes to the branches or ATM locations in the AA since the previous evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's operations in the AA generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 33

Retail Banking and Community Development Services – Phoenix Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	33.3	0.0	66.7	0.0	100.0	6.2	26.6	32.8	32.1	2.4	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	0.0	100.0	0.0	100.0	5.2	26.8	35.2	32.5	0.4	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	6		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization		Total Services		Total Organizations	
	0		15		2		0		17		8	

1. *Based on <year> FFIEC census tract definitions.*

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank provides a relatively high level of CD services. During the evaluation period, bank representatives provided 17 services to 8 area organizations. The services were a mixture of board membership for organizations that provide community services to LMI individuals and families, financial education instruction to students from schools with majority populations eligible for free or reduced lunches, as well as providing financial expertise to assist area agencies that support affordable housing. Examples of these CD services include:

- One employee serves as a committee member for an organization that helps support small businesses. In their role, the employee helps to review SBA 504 loan projects for approval.
- Another employee serves as a board member for a local crisis center that provides services to vulnerable children, youth and families. These community services are targeted to LMI individuals and families.

STATE OF COLORADO/DENVER METROPOLITAN ASSESSMENT AREA

CRA rating for Colorado:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Outstanding

Major factors supporting the rating include:

Lending Test

- Lending levels reflect adequate responsiveness to AA credit needs, and the bank makes use of innovative and/or flexible lending practices in serving AA credit needs.
- The bank's distribution of loans by income level of geography is excellent.
- The bank's distribution of loans among businesses of different sizes is poor.
- The bank is a leader in making CD loans within its AA.

Investment Test

- The bank makes an adequate level of qualified CD investments and grants but is rarely in a leadership position. In addition, the bank makes rare use of innovative and/or complex investments to support CD initiatives but exhibits adequate responsiveness to the credit and CD needs throughout its Colorado AA.

Service Test

- The bank's delivery systems are accessible to geographies and/or individuals of different income levels throughout its AA.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals.
- The bank is a leader in providing CD services within its Colorado AA and is responsive to the available service opportunities.

SCOPE OF EXAMINATION

The scope of the review for the state of Colorado was consistent with the overall scope for the institution. A full-scope review was conducted for the Denver Metropolitan AA, the sole AA within the state. The overall state rating in Colorado is based exclusively on the

bank's performance in the Denver Metropolitan AA and is discussed concurrently with the state performance.

The analysis of loans originated in the state included 77 small business loans. Home mortgage loans were not evaluated in this AA due to low overall volume that would not render a meaningful analysis.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN COLORADO

The bank delineates one of its four AAs and operates one of its 27 branches in the state of Colorado. Loan and deposit products and services offered in the state mirror those discussed in the overall institution section of this report.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DENVER METROPOLITAN AA

The bank's Denver Metropolitan AA consists of Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park Counties in their entireties, which also comprise the Denver-Aurora-Centennial, Colorado MSA. Refer to Appendix C for a map of the AA and Appendix E for additional demographic data.

- The AA delineation was revised in April 2024 to take the entirety of the Denver-Aurora-Centennial, Colorado MSA. Previously, the bank's AA was comprised of Broomfield and Denver Counties in their entireties, as well as portions of Arapahoe, Adams and Jefferson Counties.
- The AA is comprised of 707 census tracts, including 37 low-, 179 moderate-, 258 middle-, 214 upper-, and 19 unknown-income census tracts.
- The AA for 2022 and 2023 was comprised of 593 census tracts, including 37 low-, 170 moderate-, 222 middle-, 145 upper-, and 19 unknown-income census tracts.
- At the previous evaluation, the AA was comprised of 522 census tracts, including 51 low-, 147 moderate-, 176 middle-, 140 upper-, and 8 unknown-income census tracts.
- The bank operates 1 of its 27 branches in this AA with a full-service ATM. The branch is located in a middle-income census tract.
- According to the June 30, 2025 FDIC Deposit Market Share Report, the bank ranked 57th out of 67 FDIC-insured institutions in the AA with a market share of 0.03 percent.
- Two community contacts recently conducted as part of CRA evaluations of other financial institutions with offices in the AA were reviewed to ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and for perspectives on local economic conditions.

The representatives were from a local community development organization and a local economic development organization.

Table 34

Population Change Assessment Area: Denver Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
Denver Metropolitan	2,703,972	2,963,821	9.6
Adams County, CO	471,206	519,572	10.3
Arapahoe County, CO	608,310	655,070	7.7
Broomfield County, CO	60,699	74,112	22.1
Clear Creek County, CO	9,136	9,397	2.9
Denver County, CO	649,654	715,522	10.1
Douglas County, CO	306,974	357,978	16.6
Elbert County, CO	23,855	26,062	9.3
Gilpin County, CO	5,605	5,808	3.6
Jefferson County, CO	552,344	582,910	5.5
Park County, CO	16,189	17,390	7.4
Colorado	5,278,906	5,773,714	9.4
Source: 2020 U.S. Census Bureau Decennial Census *2011-2015 U.S. Census Bureau: American Community Survey*			

- The AA's population increase between 2015 and 2020 was similar to the state of Colorado, with growth in all of the counties. Broomfield and Douglas Counties had the largest increase in populations at 22.1 percent and 16.6 percent, respectively, while Clear Creek had an increase of 2.9 percent.
- Approximately 51.3 percent of residents in the state of Colorado reside in the AA.
- A majority of the 2020 AA population resided in Denver and Arapahoe Counties, which is roughly 46.2 percent of the total AA population.
- A community contact noted that in 2023, Colorado had been one of the fastest growing populations as a state, which overall had impacted affordability in the AA. The contact also noted that 22.0 percent fewer small businesses are operating after the pandemic.

Table 35

Median Family Income Change Assessment Area: Denver Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Denver Metropolitan	88,302	103,157	16.8
Adams County, CO	72,786	83,853	15.2
Arapahoe County, CO	83,513	98,402	17.8
Broomfield County, CO	106,948	129,207	20.8
Clear Creek County, CO	94,577	109,327	15.6
Denver County, CO	76,243	93,236	22.3
Douglas County, CO	125,984	137,589	9.2
Elbert County, CO	105,472	115,382	9.4
Gilpin County, CO	82,701	111,832	35.2
Jefferson County, CO	94,579	108,867	15.1
Park County, CO	75,643	90,338	19.4
Colorado	81,753	92,752	13.5

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- Based on the 2020 ACS data, the portion of AA families living below the poverty level was 5.3 percent, which was below the state of Colorado figure of 6.1 percent. The portion of families living below the poverty level in the 10 AA counties ranged from 1.2 percent in Clear Creek County to 8.4 percent in Denver County.
- Growth rates in median family incomes were positive in all the AA counties and in the state of Colorado, with the highest rates in Gilpin County at 35.2 percent, and Denver County at 22.3 percent.
- The percentage of LMI families in the AA at 38.4 percent was similar to the state of Colorado at 38.1 percent. Percentages in the AA ranged from a high of 48.8 percent LMI families in Adams County, to a low of 21.5 percent in Douglas County.

Table 36

Housing Cost Burden Assessment Area: Denver Metropolitan						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Denver Metropolitan	82.1	56.1	46.6	66.3	41.4	21.2
Adams County, CO	84.4	50.3	52.0	65.4	39.7	24.4
Arapahoe County, CO	86.8	57.1	50.8	70.0	41.3	21.7
Broomfield County, CO	86.3	76.1	42.8	62.3	35.8	16.3
Clear Creek County, CO	71.1	38.9	50.0	40.2	47.3	22.2
Denver County, CO	76.7	52.7	42.3	68.1	39.1	22.7
Douglas County, CO	90.2	75.7	44.4	71.2	55.0	18.6
Elbert County, CO	60.4	26.0	31.2	69.8	39.6	23.8
Gilpin County, CO	81.5	36.0	49.2	79.7	43.8	24.3
Jefferson County, CO	84.2	58.4	48.2	61.5	40.9	19.1
Park County, CO	64.4	50.0	45.7	46.0	30.8	19.1
Colorado	80.2	54.4	46.8	64.2	40.6	21.5

Source: HUD, 2017-2021 Comprehensive Housing Affordability Strategy
Note: Cost Burden is housing cost that equals 30 percent or more of household income.

- The AA cost burden for both LMI renters and homeowners was generally consistent with figures for the state of Colorado, with the greatest burden among low-income renters when compared to low-income homeowners.
- A community contact noted that affordable housing is a need in the area, specifically for LMI census tracts. The contact also noted that housing even further away from the Denver metro area is expensive and that more people are leaving Colorado because of high housing costs.
- The median housing value in the ten AA counties ranged from $335,800 in Adams County, to a high of $493,500 in Douglas County, compared to $411,757 for the AA, and $369,900 for the state of Colorado.

Table 37

Unemployment Rates Assessment Area: Denver Metropolitan					
Area	2020	2021	2022	2023	2024
Denver Metropolitan	6.9	5.5	3.0	3.2	4.2
Adams County, CO	7.2	6.0	3.3	3.4	4.5
Arapahoe County, CO	7.4	5.8	3.1	3.3	4.2
Broomfield County, CO	6.0	4.5	2.6	3.1	4.1
Clear Creek County, CO	8.4	5.8	3.1	3.1	4.0
Denver County, CO	7.5	5.8	3.0	3.4	4.4
Douglas County, CO	5.3	4.1	2.5	2.9	3.9
Elbert County, CO	4.6	4.1	2.5	2.8	3.7
Gilpin County, CO	11.5	6.4	2.9	2.9	3.7
Jefferson County, CO	6.7	5.2	2.9	3.1	4.1
Park County, CO	6.6	5.1	3.1	3.5	4.2
Colorado	6.8	5.5	3.1	3.3	4.3
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- The industries with the most employers in the AA include the private sector, government, health care and social assistance, professional and technical services, and accommodation and food services.
- Additionally, the industries with most establishments in the AA include the private sector, professional and technical services, health care and social assistance, other services except public administration and construction.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER METROPOLITAN AA

LENDING TEST

The bank's performance under the lending test in the Denver Metropolitan AA is adequate, and the state of Colorado is rated low satisfactory. The lending test conclusion was bolstered by the volume of CD lending, which had a favorable impact on the conclusion.

Lending Activity

The bank's lending activities reflect adequate responsiveness to AA credit needs. The evaluation included 77 small business loans.

The bank makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers. A discussion of these products is highlighted in the overall Institution section of this evaluation.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AA.

Small Business Lending

The geographic distribution of small business lending is excellent. The bank's lending in low-income census tracts was below aggregate by number, significantly below aggregate by dollar and below the percentage of total businesses operating in the respective census tracts (demographic figure). The bank's lending in moderate-income census tracts was significantly above aggregate by both number and dollar, as well as the demographic figure. Given the low percentage of low-income census tracts in the AA compared to moderate-income census tracts, more emphasis was placed on lending in the moderate-income census tracts and supported the overall rating.

Lending in 2023 and 2022 was similar to 2024 performance.

Table 38

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Denver Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	2	20.0	5.5	130	2.6	6.5	1	2.4	4.1	123	1.3	5.5	4.2
Moderate	8	80.0	25.3	4,793	97.4	27.4	38	90.5	21.0	7,455	81.5	23.8	21.9
Middle	0	0.0	34.3	0	0.0	28.2	2	4.8	32.5	1,065	11.6	30.0	35.0
Upper	0	0.0	31.8	0	0.0	32.7	1	2.4	39.7	500	5.5	36.7	36.9
Unknown	0	0.0	3.0	0	0.0	5.2	0	0.0	2.4	0	0.0	3.9	2.0
Tract-Unk	0	0.0	0.1	0	0.0	0.0	0	0.0	0.3	0	0.0	0.1	
Total	10	100.0	100.0	4,923	100.0	100.0	42	100.0	100.0	9,143	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Businesses of Different Sizes

The bank's lending has a poor distribution to businesses of different sizes.

Small Business Lending

The borrower distribution of small business lending is poor. Lending to businesses with revenues of $1MM or less was significantly below aggregate by number, comparable by dollar and significantly below the percentage of total businesses (demographic figure).

Lending performance in 2023 and 2022 was similar to 2024 performance.

Table 39

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Denver Metropolitan

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	1	10.0	55.7	100	2.0	31.5	4	9.5	55.4	2,225	24.3	34.3	92.9
Over $1 Million	5	50.0		3,130	63.6		37	88.1		6,868	75.1		6.2
Revenue Unknown	4	40.0		1,693	34.4		1	2.4		50	0.5		0.9
Total	10	100.0		4,923	100.0		42	100.0		9,143	100.0		100.0
By Loan Size													
$100,000 or Less	4	40.0	94.8	260	5.3	41.8	18	42.9	95.4	1,117	12.2	46.5	
$100,001 - $250,000	0	0.0	2.8	0	0.0	14.7	12	28.6	2.6	1,815	19.9	14.5	
$250,001 - $1 Million	6	60.0	2.5	4,663	94.7	43.4	12	28.6	2.0	6,211	67.9	39.0	
Total	10	100.0	100.0	4,923	100.0	100.0	42	100.0	100.0	9,143	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	100.0		100	100.0		0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		4	100.0		2,225	100.0		
Total	1	100.0		100	100.0		4	100.0		2,225	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

The bank is a leader in providing CD loans. The bank originated eight CD loans totaling $17.5MM in this AA. Additionally, the bank originated one loan totaling $12.03MM that was within the state of Colorado, but outside the Denver Metropolitan AA. The following are examples of CD loans that were responsive to AA credit needs:

- The bank originated three loans totaling $9.0MM to a small business located in a low-income census tract. The loans provided working capital for the business operations.
- A loan for $2.5MM was originated to a business that has a majority of its employees that are considered LMI. The loan was a revolving line of credit for business operations.
- One loan totaling $12MM, located in Steamboat Springs, Colorado, was for the purpose of building a new hotel which would employ LMI individuals.

Table 40

Community Development Loans – Colorado / Denver Metropolitan AA		
Community Development Purpose	**#**	**$(000)**
Affordable Housing	0	$0
Community Services	0	$0
Economic Development	7	$15,894
Revitalization and Stabilization	1	$1,575
Outside	1	$12,000
Total Loans	**9**	**$29,469**

INVESTMENT TEST

The bank's performance under the investment test in the Denver Metropolitan AA is adequate, and the state of Colorado is low satisfactory. The bank has an adequate level of qualified CD investments and grants but is rarely in a leadership position. The bank makes rare use of innovative and/or complex investments but exhibits adequate responsiveness to the credit and CD needs of its AA.

Examples of CD investments in the AA include:

- The bank had four donations totaling $6,500 to a local non-profit that provides professional and comprehensive services to firms relocating or expanding in Colorado. The services provided are to both start-ups and established businesses that are considered small businesses based on their annual revenues.
- Two donations totaling $10,000 were to an organization that provides affordable housing to LMI families and individuals.

Table 41

Investments, Grants, and Donations – Denver Metropolitan AA								
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	0	$0	0	$0	2	$10	2	$10
Community Services	1	$161	0	$0	13	$16	14	$177
Economic Development	0	$	0	$0	4	$7	4	$7
Revitalization and Stabilization	0	$0	0	$0	0	$0	0	$0
Outside	0	0	0	0	0	0	0	0
Total	1	$161	0	$0	19	$33	20	$194

1. *Book Value of Investment*
2. *Original Market Value of Investment*

SERVICE TEST

The bank's performance under the service test in the Denver Metropolitan AA is excellent, and the state of Colorado is rated Outstanding.

Retail Banking Services

Branch locations and alternative delivery systems, such as drive-through facilities and online and mobile banking, are accessible to the bank's various geographies and to individuals of different income levels in the AA. The bank operates one branch with a full-service ATM. The branch is located in a middle-income census tract.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank made no changes to the branches or ATM locations in the AA since the previous evaluation.

The bank's products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank's operations in the AA generally reflect those of the overall institution, which is described in the overall Institution Retail Banking Services section of this evaluation.

Table 42

Retail Banking and Community Development Services – Denver Metropolitan AA												
Branch Accessibility	Location of Branches by Tract (%)						Percent of Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	5.2	25.3	36.5	30.3	2.7	100.0
	Location of ATMs by Tract (%)						Percent of Households by Tracts[1] (%)					
	Low	Mod	Mid	Upp	Unk	Total	Low	Mod	Mid	Upp	Unk	Total
	0.0	0.0	100.0	0.0	0.0	100.0	5.0	26.6	36.3	31.1	1.1	100.0
Changes in Branch Location	Number of Branches (#)						Net Change in Branch Locations (#)					
	Total Branches		Openings (#)		Closings (#)		Low	Mod	Mid	Upp	Unk	Total
	1		0		0		0	0	0	0	0	0
Community Development Services	Affordable Housing		Community Services		Economic Development		Revitalization & Stabilization			Total Services		Total Organizations
	9		6		0		0			15		4

1. *Based on <year> FFIEC census tract definitions.*

Note: Total percentages may vary by 0.1 percent due to automated rounding differences.

Community Development Services

The bank is a leader in providing CD services. During the evaluation period, bank representatives provided 15 services to 4 area organizations. The services were a mixture of board membership for organizations that provide community services to LMI individuals and families, financial education instruction to students from schools with majority populations eligible for free or reduced lunches, as well as providing financial expertise to assist area agencies that support affordable housing. Examples of these CD services include:

- One employee served on the board of a local organization that focuses on providing affordable housing to LMI families and individuals. This employee served on the board as well as the finance and executive committees.
- An employee served as a board member for a local non-profit that reviews applications for those in need of financial assistance. The applications are received from those facing catastrophic events in their lives and are considered LMI.

APPENDIX A – SCOPE OF EXAMINATION

Table A-1

Scope of Examination				
Financial Institution	**Products/Services Reviewed**			
First Fidelity Oklahoma City, OK	• Home Purchase Loans • Home Refinance Loans • Home Improvement Loans • Multifamily Loans	• Small Business (SB) Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services		
Time Period HMDA LAR and CRA SB Loans: January 1, 2022 to December 31, 2024 Community Development Activities: January 1, 2022 to December 31, 2024				
List of Affiliates Considered in this Evaluation				
Affiliates	**Affiliate Relationship**	**Products Reviewed**		
No affiliates were considered	Not applicable	None		
List of Assessment Areas and Type of Examination				
Assessment Area	**Type of Exam**	**Branches Visited**		**Community Contacts**
Oklahoma Oklahoma City MSA Tulsa Metropolitan	 Full Review Limited Review	 None None		 2 prior None
Arizona Phoenix Metropolitan	 Full Review	 None		 2 prior
Colorado Denver Metropolitan	 Full Review	 None		 2 prior

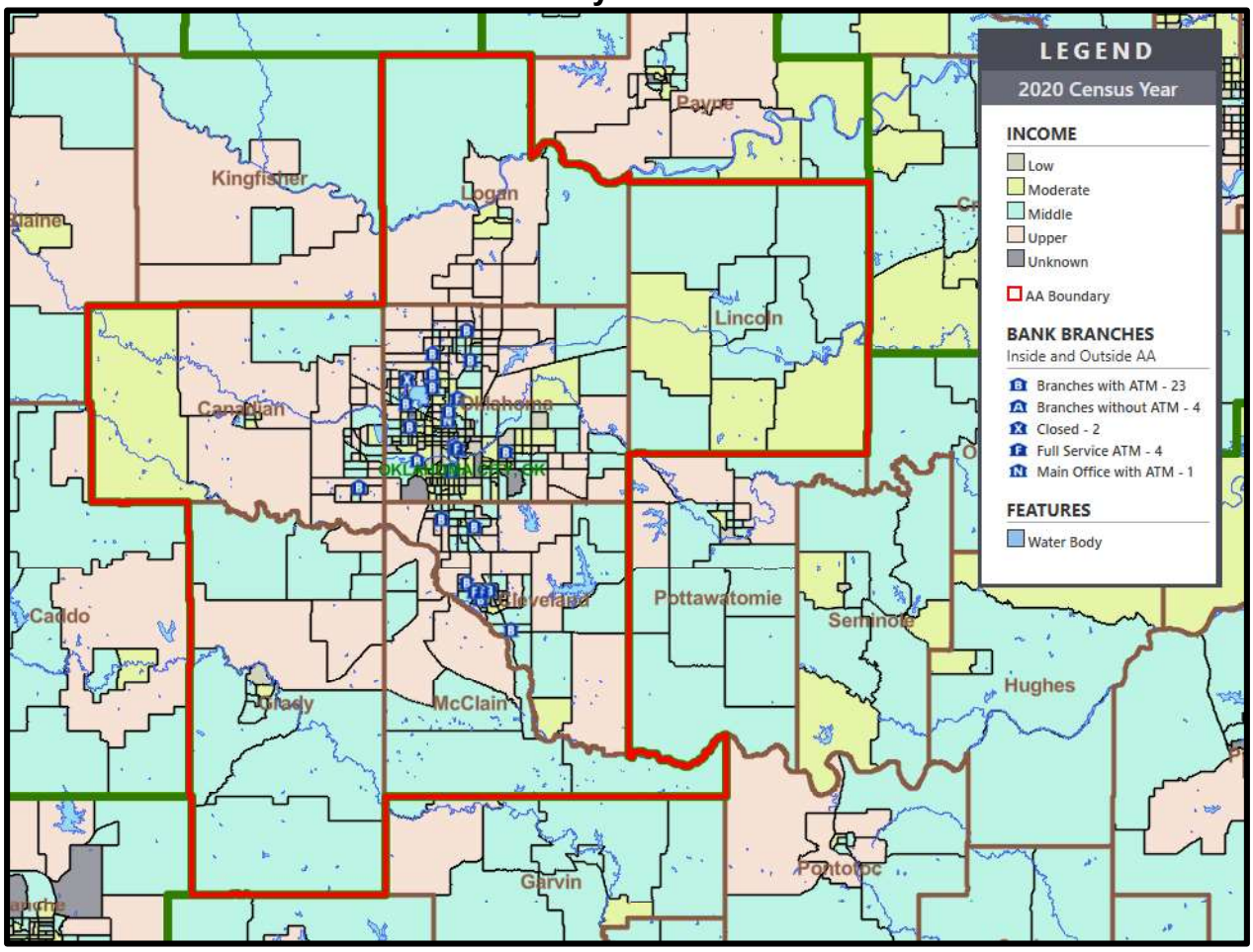
APPENDIX B – SUMMARY OF STATE RATINGS

Table B-1

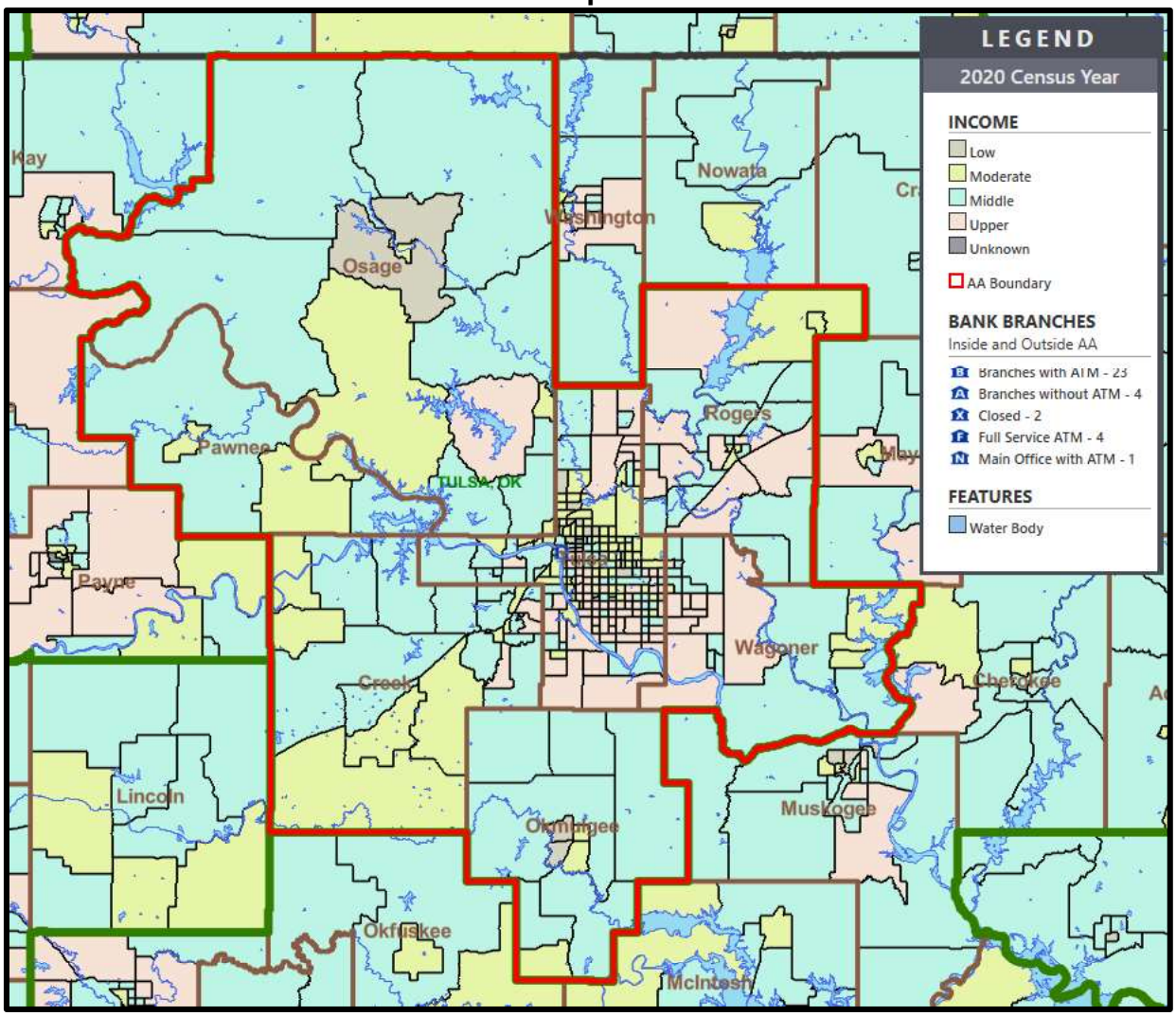
State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Oklahoma	High Satisfactory	Low Satisfactory	Outstanding	Satisfactory
Arizona	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Colorado	Low Satisfactory	Low Satisfactory	Outstanding	Satisfactory

APPENDIX C – MAPS OF THE ASSESSMENT AREAS

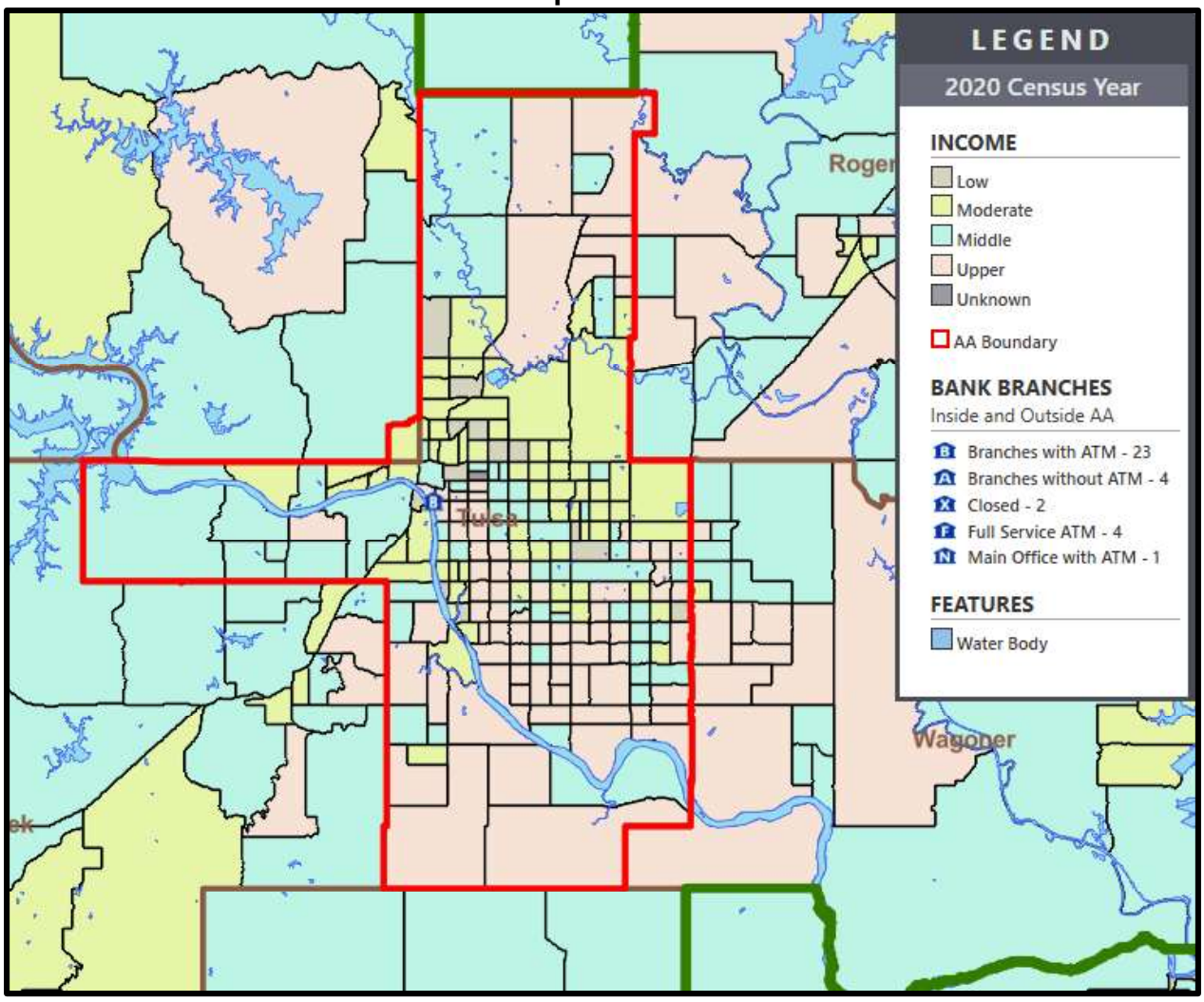
Map C-1
Oklahoma City MSA 2022-2024



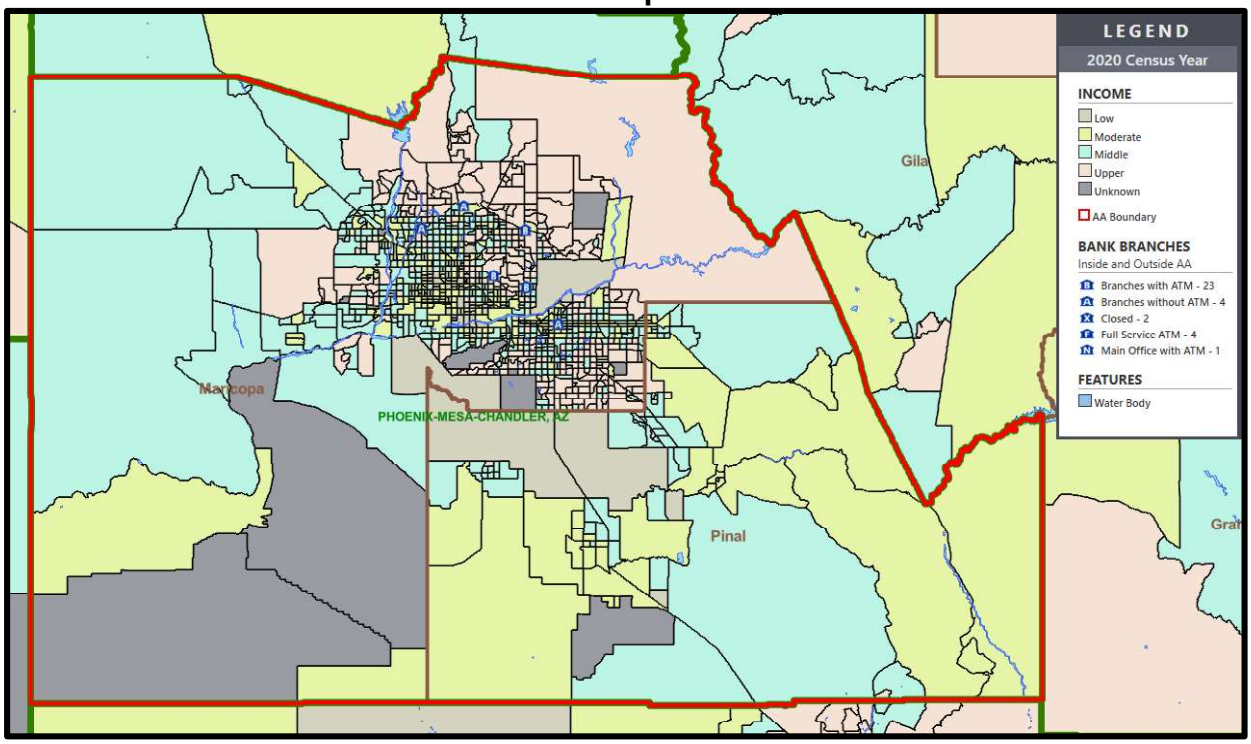
Map C-2
Tulsa Metropolitan 2024



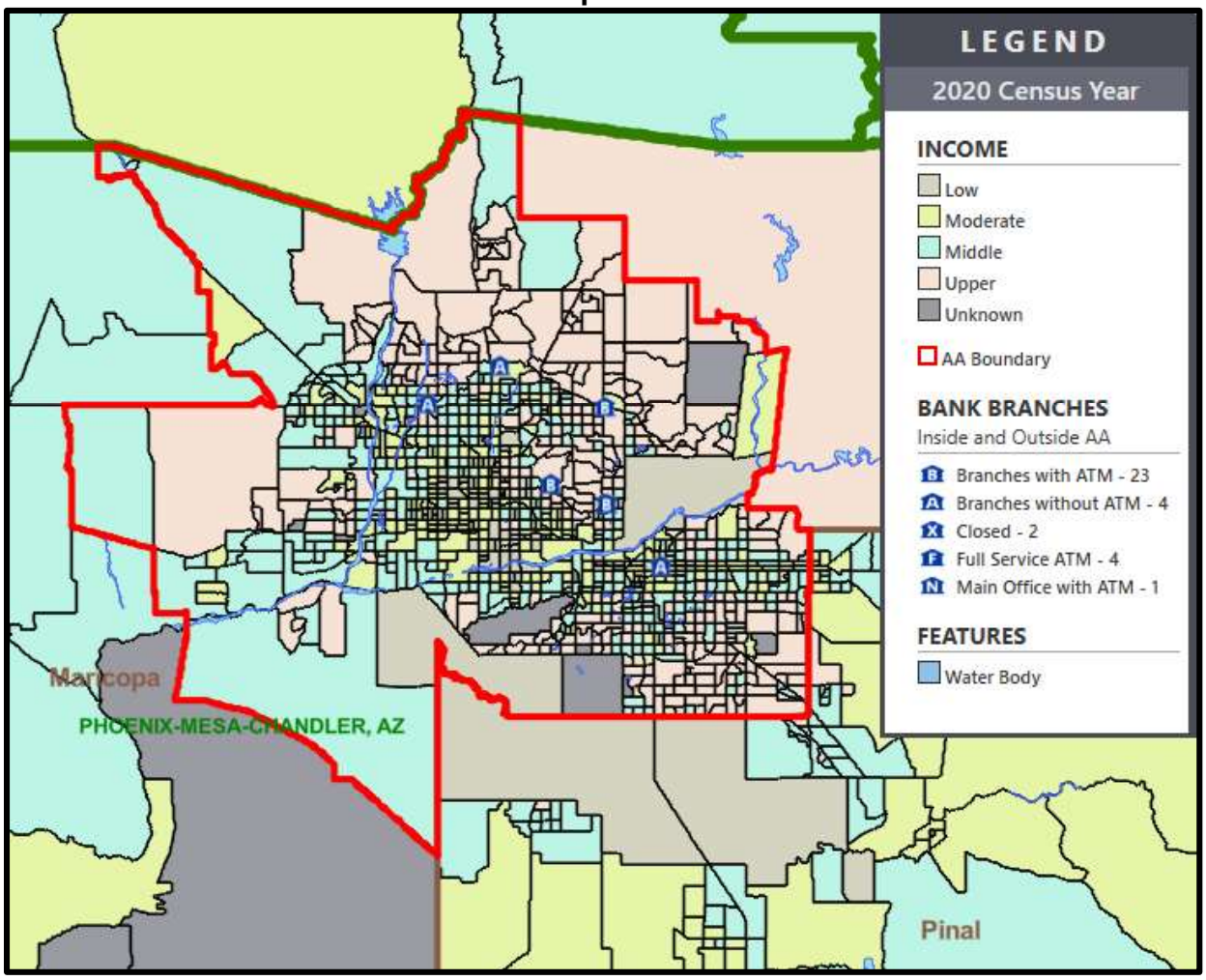
Map C-3
Tulsa Metropolitan 2022-2023



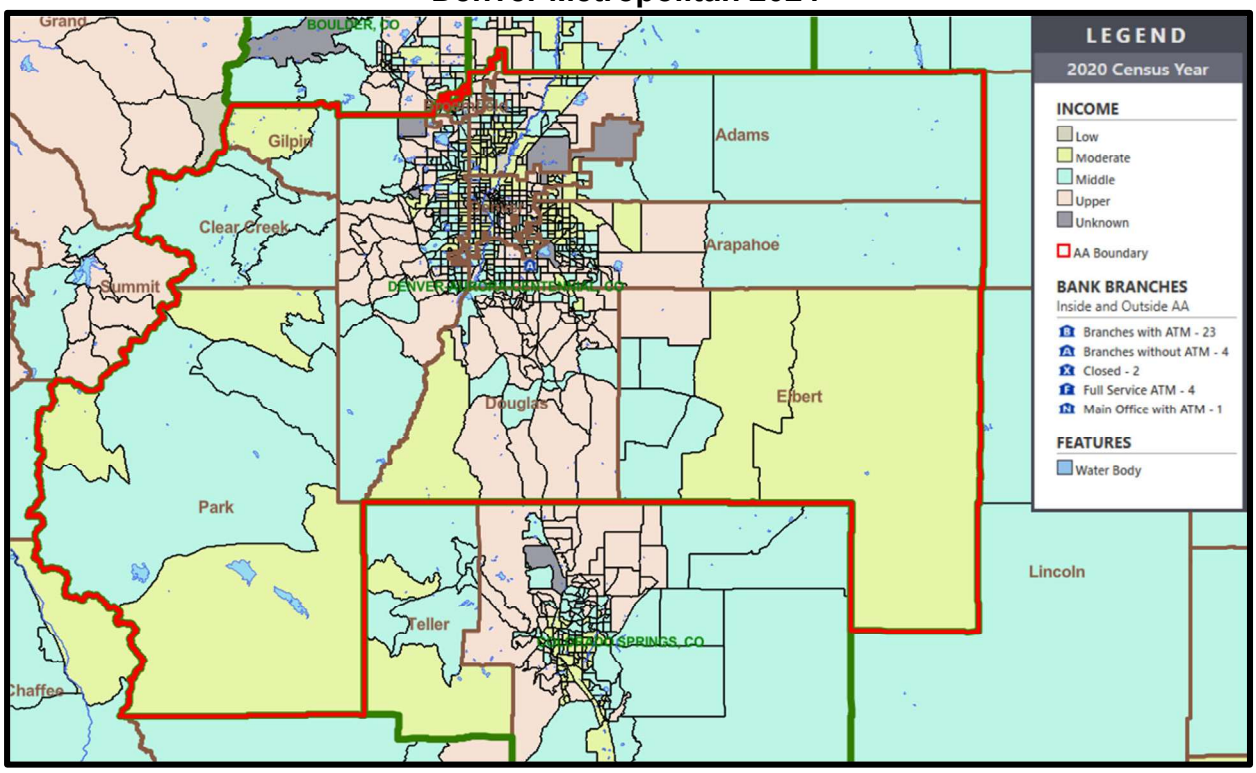
Map C-4
Phoenix Metropolitan 2024



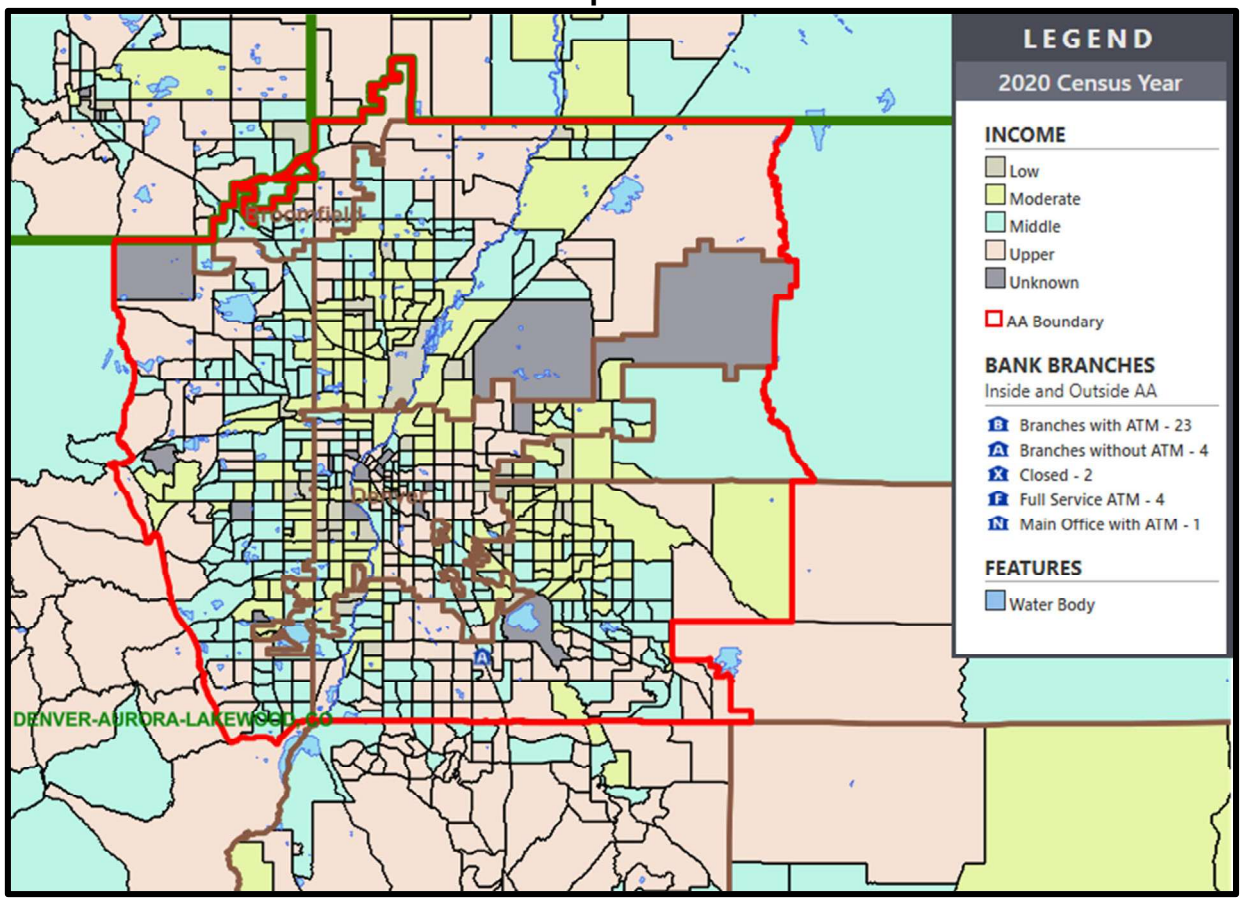
Map C-5
Phoenix Metropolitan 2022-2023



Map C-6
Denver Metropolitan 2024



Map C-7
Denver Metropolitan 2022-2023



APPENDIX D – ADDITIONAL FULL-SCOPE LENDING TABLES

Oklahoma City MSA

Table D-1

Distribution of 2022 Home Mortgage Lending By Income Level of Geography
Assessment Area: Oklahoma City MSA

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	2	8.7	2.4	78	2.9	1.5	3.4
Moderate	9	39.1	15.8	622	23.4	10.6	18.0
Middle	8	34.8	37.2	1,241	46.8	31.8	40.1
Upper	4	17.4	44.1	712	26.8	55.6	37.7
Unknown	0	0.0	0.6	0	0.0	0.5	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	2,653	100.0	100.0	100.0
Refinance Loans							
Low	8	10.8	2.4	716	6.5	1.3	3.4
Moderate	10	13.5	15.8	768	7.0	11.3	18.0
Middle	23	31.1	37.9	2,884	26.4	32.0	40.1
Upper	32	43.2	43.1	6,420	58.7	54.6	37.7
Unknown	1	1.4	0.9	150	1.4	0.7	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	74	100.0	100.0	10,938	100.0	100.0	100.0
Home Improvement Loans							
Low	3	12.5	2.5	113	6.0	1.8	3.4
Moderate	5	20.8	12.4	212	11.2	10.7	18.0
Middle	10	41.7	35.2	799	42.2	30.4	40.1
Upper	4	16.7	49.2	591	31.2	56.6	37.7
Unknown	2	8.3	0.7	180	9.5	0.6	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	1,895	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	14.0	0	0.0	12.6	7.3
Moderate	2	66.7	31.3	735	57.8	37.0	34.7
Middle	0	0.0	38.3	0	0.0	33.4	37.5
Upper	0	0.0	14.0	0	0.0	15.6	17.2
Unknown	1	33.3	2.5	537	42.2	1.4	3.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1,272	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	14	9.2	2.4	933	5.0	2.6	3.4
Moderate	30	19.6	15.7	2,485	13.3	13.3	18.0
Middle	56	36.6	37.3	5,733	30.6	32.0	40.1
Upper	49	32.0	44.0	8,703	46.5	51.4	37.7
Unknown	4	2.6	0.7	867	4.6	0.6	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	153	100.0	100.0	18,721	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories not displayed individually but are included in the total HMDA section of the table.

Table D-2

Distribution of 2022 Small Business Lending By Income Level of Geography
Assessment Area: Oklahoma City MSA

Geographic Income Level	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
Low	8	5.0	3.8	2,754	9.6	4.3	4.4
Moderate	30	18.8	19.5	3,724	13.0	21.5	21.5
Middle	61	38.1	32.6	9,174	31.9	30.6	35.0
Upper	56	35.0	41.7	11,677	40.6	41.1	36.2
Unknown	5	3.1	1.6	1,408	4.9	2.2	2.9
Tract-Unk	0	0.0	0.8	0	0.0	0.3	
Total	160	100.0	100.0	28,737	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-3

Distribution of 2022 Home Mortgage Lending By Borrower Income Level
Assessment Area: Oklahoma City MSA

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	2	8.7	6.2	68	2.6	3.4	21.1
Moderate	3	13.0	16.5	305	11.5	12.5	17.6
Middle	4	17.4	18.5	154	5.8	17.9	20.5
Upper	6	26.1	29.4	952	35.9	39.8	40.8
Unknown	8	34.8	29.5	1,174	44.3	26.4	0.0
Total	23	100.0	100.0	2,653	100.0	100.0	100.0
Refinance Loans							
Low	8	10.8	7.8	496	4.5	4.0	21.1
Moderate	15	20.3	17.2	823	7.5	12.1	17.6
Middle	15	20.3	20.1	1,301	11.9	17.6	20.5
Upper	24	32.4	29.4	5,534	50.6	39.6	40.8
Unknown	12	16.2	25.4	2,784	25.5	26.7	0.0
Total	74	100.0	100.0	10,938	100.0	100.0	100.0
Home Improvement Loans							
Low	6	25.0	6.9	235	12.4	4.1	21.1
Moderate	1	4.2	14.7	25	1.3	9.5	17.6
Middle	3	12.5	20.0	245	12.9	16.1	20.5
Upper	13	54.2	49.8	1,184	62.5	56.3	40.8
Unknown	1	4.2	8.5	206	10.9	14.0	0.0
Total	24	100.0	100.0	1,895	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	20	13.3	6.6	924	5.3	3.5	21.1
Moderate	27	18.0	16.3	1,580	9.1	12.3	17.6
Middle	28	18.7	18.8	2,168	12.4	17.6	20.5
Upper	54	36.0	30.8	8,613	49.4	40.2	40.8
Unknown	21	14.0	27.3	4,164	23.9	26.4	0.0
Total	150	100.0	100.0	17,449	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories not displayed individually but are included in the total HMDA section of the table.

Table D-4

Distribution of 2022 Small Business Lending By Revenue Size of Businesses
Assessment Area: Oklahoma City MSA

	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
By Revenue							
$1 Million or Less	53	33.1	52.7	8,851	30.8	38.6	91.3
Over $1 Million	66	41.3		15,251	53.1		7.4
Revenue Unknown	41	25.6		4,635	16.1		1.3
Total	160	100.0		28,737	100.0		100.0
By Loan Size							
$100,000 or Less	95	59.4	93.0	4,324	15.0	38.2	
$100,001 - $250,000	27	16.9	3.7	4,911	17.1	16.0	
$250,001 - $1 Million	38	23.8	3.3	19,502	67.9	45.8	
Total	160	100.0	100.0	28,737	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	35	66.0		1,780	20.1		
$100,001 - $250,000	5	9.4		801	9.0		
$250,001 - $1 Million	13	24.5		6,270	70.8		
Total	53	100.0		8,851	100.0		

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Phoenix Metropolitan

Table D-5

Distribution of 2022 Home Mortgage Lending By Income Level of Geography
Assessment Area: Phoenix Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	1	16.7	2.5	162	2.3	1.7	2.7
Moderate	0	0.0	19.0	0	0.0	13.4	20.8
Middle	0	0.0	35.4	0	0.0	30.4	34.4
Upper	5	83.3	42.9	6,744	97.7	54.5	42.0
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	6,906	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.1	0	0.0	1.4	2.7
Moderate	0	0.0	19.4	0	0.0	13.8	20.8
Middle	3	42.9	36.8	433	9.6	31.3	34.4
Upper	4	57.1	41.6	4,085	90.4	53.4	42.0
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	4,518	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.4	0	0.0	1.0	2.7
Moderate	0	0.0	12.0	0	0.0	8.7	20.8
Middle	0	0.0	31.3	0	0.0	25.2	34.4
Upper	2	100.0	55.3	274	100.0	65.0	42.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	274	100.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	14.7	0	0.0	16.4	10.0
Moderate	3	60.0	41.8	13,654	82.4	33.0	35.9
Middle	2	40.0	27.1	2,925	17.6	28.1	29.9
Upper	0	0.0	16.1	0	0.0	21.9	23.3
Unknown	0	0.0	0.2	0	0.0	0.6	0.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	16,579	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	1	5.0	2.2	162	0.6	3.0	2.7
Moderate	3	15.0	18.2	13,654	48.3	15.2	20.8
Middle	5	25.0	35.2	3,358	11.9	29.9	34.4
Upper	11	55.0	44.3	11,103	39.3	51.7	42.0
Unknown	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	28,277	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table D-6

Distribution of 2022 Small Business Lending By Income Level of Geography
Assessment Area: Phoenix Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
Low	2	0.9	3.6	776	1.1	5.2	3.7
Moderate	49	21.6	17.9	12,251	17.6	21.4	18.4
Middle	68	30.0	28.5	17,897	25.7	26.6	29.1
Upper	102	44.9	49.3	36,131	52.0	45.5	48.0
Unknown	6	2.6	0.7	2,468	3.5	1.3	0.8
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	227	100.0	100.0	69,523	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-7

Distribution of 2022 Home Mortgage Lending By Borrower Income Level
Assessment Area: Phoenix Metropolitan

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	3.4	0	0.0	1.4	20.4
Moderate	0	0.0	13.2	0	0.0	8.6	17.9
Middle	0	0.0	20.8	0	0.0	17.4	20.0
Upper	3	50.0	44.5	3,036	44.0	54.5	41.7
Unknown	3	50.0	18.0	3,870	56.0	18.2	0.0
Total	6	100.0	100.0	6,906	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	11.1	0	0.0	6.7	20.4
Moderate	1	14.3	20.1	91	2.0	15.1	17.9
Middle	1	14.3	20.5	610	13.5	18.8	20.0
Upper	3	42.9	31.5	1,417	31.4	41.0	41.7
Unknown	2	28.6	16.8	2,400	53.1	18.5	0.0
Total	7	100.0	100.0	4,518	100.0	100.0	100.0
Home Improvement Loans							
Low	1	50.0	9.9	35	12.8	7.3	20.4
Moderate	0	0.0	12.3	0	0.0	8.4	17.9
Middle	0	0.0	20.7	0	0.0	16.0	20.0
Upper	1	50.0	53.2	239	87.2	63.8	41.7
Unknown	0	0.0	3.9	0	0.0	4.6	0.0
Total	2	100.0	100.0	274	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	1	6.7	6.9	35	0.3	3.4	20.4
Moderate	1	6.7	15.5	91	0.8	10.7	17.9
Middle	1	6.7	20.6	610	5.2	17.5	20.0
Upper	7	46.7	41.0	4,692	40.1	50.5	41.7
Unknown	5	33.3	16.1	6,270	53.6	17.8	0.0
Total	15	100.0	100.0	11,698	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table D-8

Distribution of 2022 Small Business Lending By Revenue Size of Businesses
Assessment Area: Phoenix Metropolitan

	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
By Revenue							
$1 Million or Less	55	24.2	54.1	20,166	29.0	31.3	93.2
Over $1 Million	144	63.4		46,679	67.1		5.6
Revenue Unknown	28	12.3		2,678	3.9		1.3
Total	227	100.0		69,523	100.0		100.0
By Loan Size							
$100,000 or Less	71	31.3	95.4	3,717	5.3	45.3	
$100,001 - $250,000	51	22.5	2.4	9,723	14.0	13.9	
$250,001 - $1 Million	105	46.3	2.2	56,083	80.7	40.9	
Total	227	100.0	100.0	69,523	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	12	21.8		402	2.0		
$100,001 - $250,000	10	18.2		1,796	8.9		
$250,001 - $1 Million	33	60.0		17,968	89.1		
Total	55	100.0		20,166	100.0		

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Denver Metropolitan

Table D-9

Distribution of 2022 Home Mortgage Lending By Income Level of Geography
Assessment Area: Denver Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	3.7	0	0.0	2.6	3.6
Moderate	0	0.0	26.1	0	0.0	20.5	25.4
Middle	0	0.0	39.1	0	0.0	37.6	40.4
Upper	0	0.0	30.2	0	0.0	38.2	30.1
Unknown	0	0.0	0.8	0	0.0	1.1	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.6	0	0.0	2.7	3.6
Moderate	0	0.0	27.5	0	0.0	21.8	25.4
Middle	0	0.0	40.1	0	0.0	37.4	40.4
Upper	1	100.0	28.1	1,033	100.0	37.3	30.1
Unknown	0	0.0	0.6	0	0.0	0.8	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	1,033	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	2.3	0	0.0	1.9	3.6
Moderate	0	0.0	19.1	0	0.0	14.3	25.4
Middle	0	0.0	40.2	0	0.0	35.0	40.4
Upper	0	0.0	37.9	0	0.0	48.0	30.1
Unknown	0	0.0	0.6	0	0.0	0.8	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	12.9	0	0.0	12.1	8.7
Moderate	1	100.0	31.5	150	100.0	31.6	37.3
Middle	0	0.0	34.9	0	0.0	40.6	32.7
Upper	0	0.0	17.9	0	0.0	14.6	18.3
Unknown	0	0.0	2.7	0	0.0	1.1	2.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	150	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	0	0.0	3.5	0	0.0	3.5	3.6
Moderate	1	50.0	25.4	150	12.7	21.5	25.4
Middle	0	0.0	39.6	0	0.0	37.5	40.4
Upper	1	50.0	30.9	1,033	87.3	36.5	30.1
Unknown	0	0.0	0.7	0	0.0	1.0	0.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	1,183	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table D-10

Distribution of 2022 Small Business Lending By Income Level of Geography
Assessment Area: Denver Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
Low	0	0.0	5.6	0	0.0	7.1	5.0
Moderate	24	96.0	26.1	5,205	95.9	27.7	24.5
Middle	0	0.0	33.5	0	0.0	29.5	35.0
Upper	1	4.0	31.5	221	4.1	30.2	31.9
Unknown	0	0.0	3.3	0	0.0	5.5	3.7
Tract-Unk	0	0.0	0.1	0	0.0	0.0	
Total	25	100.0	100.0	5,426	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-11

Distribution of 2022 Home Mortgage Lending By Borrower Income Level
Assessment Area: Denver Metropolitan

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	4.8	0	0.0	2.1	22.5
Moderate	0	0.0	19.6	0	0.0	13.7	19.4
Middle	0	0.0	24.7	0	0.0	22.5	22.1
Upper	0	0.0	35.0	0	0.0	45.1	36.0
Unknown	0	0.0	16.0	0	0.0	16.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans							
Low	0	0.0	15.8	0	0.0	9.9	22.5
Moderate	0	0.0	23.2	0	0.0	19.1	19.4
Middle	0	0.0	20.2	0	0.0	19.5	22.1
Upper	1	100.0	24.2	1,033	100.0	33.3	36.0
Unknown	0	0.0	16.6	0	0.0	18.3	0.0
Total	1	100.0	100.0	1,033	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.7	0	0.0	4.6	22.5
Moderate	0	0.0	17.8	0	0.0	11.5	19.4
Middle	0	0.0	26.0	0	0.0	20.9	22.1
Upper	0	0.0	46.7	0	0.0	59.4	36.0
Unknown	0	0.0	2.7	0	0.0	3.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	8.6	0	0.0	4.5	22.5
Moderate	0	0.0	20.5	0	0.0	15.0	19.4
Middle	0	0.0	23.4	0	0.0	21.3	22.1
Upper	1	100.0	33.6	1,033	100.0	42.8	36.0
Unknown	0	0.0	13.8	0	0.0	16.4	0.0
Total	1	100.0	100.0	1,033	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table D-12

Distribution of 2022 Small Business Lending By Revenue Size of Businesses
Assessment Area: Denver Metropolitan

	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	2	8.0	53.3	1,250	23.0	32.7	92.3
Over $1 Million	19	76.0		1,705	31.4		6.7
Revenue Unknown	4	16.0		2,471	45.5		1.0
Total	25	100.0		5,426	100.0		100.0
By Loan Size							
$100,000 or Less	17	68.0	94.8	655	12.1	40.3	
$100,001 - $250,000	1	4.0	2.5	221	4.1	13.2	
$250,001 - $1 Million	7	28.0	2.6	4,550	83.9	46.5	
Total	25	100.0	100.0	5,426	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	0	0.0		0	0.0		
$100,001 - $250,000	0	0.0		0	0.0		
$250,001 - $1 Million	2	100.0		1,250	100.0		
Total	2	100.0		1,250	100.0		

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX E – DEMOGRAPHIC INFORMATION

Table E-1

2024 Oklahoma City MSA AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	30	7.2	16,348	4.8	5,259	32.2	71,032	21.1
Moderate	104	24.8	69,107	20.5	11,314	16.4	59,287	17.6
Middle	147	35.1	131,884	39.1	10,121	7.7	69,214	20.5
Upper	119	28.4	116,059	34.4	3,967	3.4	137,645	40.8
Unknown	19	4.5	3,780	1.1	1,426	37.7	0	0.0
Total AA	**419**	**100.0**	**337,178**	**100.0**	**32,087**	**9.5**	**337,178**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,467	11,460	3.4	33.2	17,614	51.1	5,393	15.6
Moderate	141,428	60,471	18.0	42.8	62,738	44.4	18,219	12.9
Middle	226,594	135,018	40.1	59.6	71,225	31.4	20,351	9.0
Upper	167,700	127,024	37.7	75.7	30,622	18.3	10,054	6.0
Unknown	8,154	2,874	0.9	35.2	4,108	50.4	1,172	14.4
Total AA	**578,343**	**336,847**	**100.0**	**58.2**	**186,307**	**32.2**	**55,189**	**9.5**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	2,476	4.8	2,156	4.6	285	7.3	35	5.6
Moderate	12,042	23.2	10,799	22.8	1,101	28.1	142	22.7
Middle	18,090	34.9	16,646	35.2	1,242	31.7	202	32.3
Upper	17,761	34.3	16,379	34.7	1,153	29.4	229	36.6
Unknown	1,444	2.8	1,283	2.7	143	3.6	18	2.9
Total AA	**51,813**	**100.0**	**47,263**	**100.0**	**3,924**	**100.0**	**626**	**100.0**
Percentage of Total Businesses:				**91.2**		**7.6**		**1.2**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	23	2.5	21	2.3	2	11.1	0	0.0
Moderate	119	13.0	115	12.8	3	16.7	1	100.0
Middle	400	43.7	394	43.9	6	33.3	0	0.0
Upper	370	40.4	363	40.5	7	38.9	0	0.0
Unknown	4	0.4	4	0.4	0	0.0	0	0.0
Total AA	**916**	**100.0**	**897**	**100.0**	**18**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.9**		**2.0**		**0.1**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-2

2023 Oklahoma City MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	30	7.2	16,348	4.8	5,259	32.2	71,032	21.1
Moderate	104	24.8	69,107	20.5	11,314	16.4	59,287	17.6
Middle	147	35.1	131,884	39.1	10,121	7.7	69,214	20.5
Upper	119	28.4	116,059	34.4	3,967	3.4	137,645	40.8
Unknown	19	4.5	3,780	1.1	1,426	37.7	0	0.0
Total AA	**419**	**100.0**	**337,178**	**100.0**	**32,087**	**9.5**	**337,178**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,467	11,460	3.4	33.2	17,614	51.1	5,393	15.6
Moderate	141,428	60,471	18.0	42.8	62,738	44.4	18,219	12.9
Middle	226,594	135,018	40.1	59.6	71,225	31.4	20,351	9.0
Upper	167,700	127,024	37.7	75.7	30,622	18.3	10,054	6.0
Unknown	8,154	2,874	0.9	35.2	4,108	50.4	1,172	14.4
Total AA	**578,343**	**336,847**	**100.0**	**58.2**	**186,307**	**32.2**	**55,189**	**9.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,642	4.6	2,295	4.4	313	7.0	34	4.7
Moderate	12,599	21.8	11,278	21.4	1,168	26.2	153	21.3
Middle	20,225	34.9	18,510	35.1	1,485	33.3	230	32.0
Upper	20,794	35.9	19,191	36.4	1,322	29.6	281	39.1
Unknown	1,647	2.8	1,453	2.8	173	3.9	21	2.9
Total AA	**57,907**	**100.0**	**52,727**	**100.0**	**4,461**	**100.0**	**719**	**100.0**
Percentage of Total Businesses:				**91.1**		**7.7**		**1.2**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	22	2.1	19	1.9	3	13.6	0	0.0
Moderate	123	11.9	119	11.8	3	13.6	1	100.0
Middle	443	43.0	437	43.4	6	27.3	0	0.0
Upper	438	42.5	428	42.5	10	45.5	0	0.0
Unknown	5	0.5	5	0.5	0	0.0	0	0.0
Total AA	**1,031**	**100.0**	**1,008**	**100.0**	**22**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.8**		**2.1**		**0.1**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-3

2022 Oklahoma City MSA AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	30	7.2	16,348	4.8	5,259	32.2	71,032	21.1
Moderate	104	24.8	69,107	20.5	11,314	16.4	59,287	17.6
Middle	147	35.1	131,884	39.1	10,121	7.7	69,214	20.5
Upper	119	28.4	116,059	34.4	3,967	3.4	137,645	40.8
Unknown	19	4.5	3,780	1.1	1,426	37.7	0	0.0
Total AA	**419**	**100.0**	**337,178**	**100.0**	**32,087**	**9.5**	**337,178**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	34,467	11,460	3.4	33.2	17,614	51.1	5,393	15.6
Moderate	141,428	60,471	18.0	42.8	62,738	44.4	18,219	12.9
Middle	226,594	135,018	40.1	59.6	71,225	31.4	20,351	9.0
Upper	167,700	127,024	37.7	75.7	30,622	18.3	10,054	6.0
Unknown	8,154	2,874	0.9	35.2	4,108	50.4	1,172	14.4
Total AA	**578,343**	**336,847**	**100.0**	**58.2**	**186,307**	**32.2**	**55,189**	**9.5**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,768	4.4	2,413	4.2	319	6.9	36	4.4
Moderate	13,351	21.5	11,979	21.1	1,209	26.3	163	19.8
Middle	21,779	35.0	19,978	35.2	1,534	33.4	267	32.4
Upper	22,538	36.2	20,852	36.7	1,353	29.4	333	40.4
Unknown	1,800	2.9	1,594	2.8	181	3.9	25	3.0
Total AA	**62,236**	**100.0**	**56,816**	**100.0**	**4,596**	**100.0**	**824**	**100.0**
Percentage of Total Businesses:				**91.3**		**7.4**		**1.3**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	21	1.9	18	1.6	3	13.0	0	0.0
Moderate	143	12.7	139	12.6	3	13.0	1	100.0
Middle	471	41.8	465	42.2	6	26.1	0	0.0
Upper	485	43.1	474	43.0	11	47.8	0	0.0
Unknown	6	0.5	6	0.5	0	0.0	0	0.0
Total AA	**1,126**	**100.0**	**1,102**	**100.0**	**23**	**100.0**	**1**	**100.0**
Percentage of Total Farms:				**97.9**		**2.0**		**0.1**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-4

2024 Phoenix Metropolitan AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	68	6.2	55,575	4.8	17,579	31.6	237,588	20.6
Moderate	294	26.6	281,382	24.4	43,459	15.4	210,743	18.3
Middle	362	32.8	404,720	35.1	28,593	7.1	233,930	20.3
Upper	354	32.1	408,984	35.4	14,387	3.5	471,624	40.9
Unknown	26	2.4	3,224	0.3	764	23.7	0	0.0
Total AA	**1,104**	**100.0**	**1,153,885**	**100.0**	**104,782**	**9.1**	**1,153,885**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	100,529	28,941	2.6	28.8	61,379	61.1	10,209	10.2
Moderate	528,802	243,525	21.7	46.1	223,447	42.3	61,830	11.7
Middle	683,450	413,162	36.8	60.5	200,910	29.4	69,378	10.2
Upper	623,707	435,736	38.8	69.9	131,919	21.2	56,052	9.0
Unknown	7,325	2,046	0.2	27.9	4,154	56.7	1,125	15.4
Total AA	**1,943,813**	**1,123,410**	**100.0**	**57.8**	**621,809**	**32.0**	**198,594**	**10.2**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	9,190	3.7	8,181	3.5	930	7.2	79	2.5
Moderate	48,367	19.3	44,195	18.8	3,664	28.5	508	16.3
Middle	76,530	30.5	72,505	30.8	3,244	25.3	781	25.1
Upper	115,469	46.0	108,980	46.3	4,758	37.1	1,731	55.6
Unknown	1,575	0.6	1,322	0.6	241	1.9	12	0.4
Total AA	**251,131**	**100.0**	**235,183**	**100.0**	**12,837**	**100.0**	**3,111**	**100.0**
Percentage of Total Businesses:				**93.6**		**5.1**		**1.2**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	40	2.0	36	1.8	4	4.5	0	0.0
Moderate	346	16.9	323	16.5	23	26.1	0	0.0
Middle	663	32.4	633	32.3	30	34.1	0	0.0
Upper	984	48.1	953	48.7	31	35.2	0	0.0
Unknown	13	0.6	13	0.7	0	0.0	0	0.0
Total AA	**2,046**	**100.0**	**1,958**	**100.0**	**88**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.7**		**4.3**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-5

2023 Phoenix Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	64	6.4	52,329	5.0	16,580	31.7	211,740	20.4
Moderate	257	25.7	249,244	24.0	39,109	15.7	186,363	17.9
Middle	310	31.0	340,441	32.7	24,660	7.2	207,794	20.0
Upper	347	34.7	394,821	38.0	13,548	3.4	433,701	41.7
Unknown	22	2.2	2,763	0.3	638	23.1	0	0.0
Total AA	**1,000**	**100.0**	**1,039,598**	**100.0**	**94,535**	**9.1**	**1,039,598**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	94,740	26,498	2.7	28.0	58,759	62.0	9,483	10.0
Moderate	466,275	207,816	20.8	44.6	209,117	44.8	49,342	10.6
Middle	581,640	343,081	34.4	59.0	185,342	31.9	53,217	9.1
Upper	602,759	419,911	42.0	69.7	129,681	21.5	53,167	8.8
Unknown	6,576	1,450	0.1	22.0	4,087	62.2	1,039	15.8
Total AA	**1,751,990**	**998,756**	**100.0**	**57.0**	**586,986**	**33.5**	**166,248**	**9.5**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	9,055	3.7	8,015	3.5	970	7.3	70	2.3
Moderate	45,156	18.4	41,040	17.9	3,654	27.7	462	15.2
Middle	71,153	29.0	67,110	29.3	3,323	25.2	720	23.7
Upper	117,831	48.1	111,090	48.6	4,970	37.7	1,771	58.3
Unknown	1,740	0.7	1,444	0.6	282	2.1	14	0.5
Total AA	**244,935**	**100.0**	**228,699**	**100.0**	**13,199**	**100.0**	**3,037**	**100.0**
Percentage of Total Businesses:				**93.4**		**5.4**		**1.2**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	32	1.8	29	1.7	3	4.3	0	0.0
Moderate	213	12.0	201	11.8	12	17.1	0	0.0
Middle	500	28.2	480	28.2	20	28.6	0	0.0
Upper	1,018	57.4	983	57.8	35	50.0	0	0.0
Unknown	9	0.5	9	0.5	0	0.0	0	0.0
Total AA	**1,772**	**100.0**	**1,702**	**100.0**	**70**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.0**		**4.0**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-6

2022 Phoenix Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	64	6.4	52,329	5.0	16,580	31.7	211,740	20.4
Moderate	257	25.7	249,244	24.0	39,109	15.7	186,363	17.9
Middle	310	31.0	340,441	32.7	24,660	7.2	207,794	20.0
Upper	347	34.7	394,821	38.0	13,548	3.4	433,701	41.7
Unknown	22	2.2	2,763	0.3	638	23.1	0	0.0
Total AA	**1,000**	**100.0**	**1,039,598**	**100.0**	**94,535**	**9.1**	**1,039,598**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	94,740	26,498	2.7	28.0	58,759	62.0	9,483	10.0
Moderate	466,275	207,816	20.8	44.6	209,117	44.8	49,342	10.6
Middle	581,640	343,081	34.4	59.0	185,342	31.9	53,217	9.1
Upper	602,759	419,911	42.0	69.7	129,681	21.5	53,167	8.8
Unknown	6,576	1,450	0.1	22.0	4,087	62.2	1,039	15.8
Total AA	**1,751,990**	**998,756**	**100.0**	**57.0**	**586,986**	**33.5**	**166,248**	**9.5**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	8,868	3.7	7,828	3.5	970	7.3	70	2.3
Moderate	44,054	18.4	39,889	17.9	3,697	27.8	468	15.5
Middle	69,444	29.1	65,396	29.4	3,371	25.4	677	22.4
Upper	114,749	48.0	107,990	48.5	4,965	37.4	1,794	59.3
Unknown	1,811	0.8	1,509	0.7	288	2.2	14	0.5
Total AA	**238,926**	**100.0**	**222,612**	**100.0**	**13,291**	**100.0**	**3,023**	**100.0**
Percentage of Total Businesses:				**93.2**		**5.6**		**1.3**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	31	1.8	28	1.7	3	4.4	0	0.0
Moderate	205	12.0	193	11.8	12	17.6	0	0.0
Middle	478	28.1	459	28.1	19	27.9	0	0.0
Upper	981	57.6	947	58.0	34	50.0	0	0.0
Unknown	7	0.4	7	0.4	0	0.0	0	0.0
Total AA	**1,702**	**100.0**	**1,634**	**100.0**	**68**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**96.0**		**4.0**		**0.0**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-7

2024 Denver Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	37	5.2	30,100	4.4	5,968	19.8	138,836	20.2
Moderate	179	25.3	169,549	24.7	15,695	9.3	124,952	18.2
Middle	258	36.5	243,634	35.5	9,052	3.7	150,661	21.9
Upper	214	30.3	239,625	34.9	4,840	2.0	272,611	39.7
Unknown	19	2.7	4,152	0.6	1,042	25.1	0	0.0
Total AA	**707**	**100.0**	**687,060**	**100.0**	**36,597**	**5.3**	**687,060**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	57,872	20,206	2.8	34.9	34,769	60.1	2,897	5.0
Moderate	310,340	150,923	21.2	48.6	140,625	45.3	18,792	6.1
Middle	419,202	267,466	37.6	63.8	130,534	31.1	21,202	5.1
Upper	356,031	269,287	37.9	75.6	71,619	20.1	15,125	4.2
Unknown	13,303	3,327	0.5	25.0	8,918	67.0	1,058	8.0
Total AA	**1,156,748**	**711,209**	**100.0**	**61.5**	**386,465**	**33.4**	**59,074**	**5.1**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	6,523	4.2	5,819	4.1	655	6.9	49	3.4
Moderate	33,696	21.9	31,040	21.7	2,436	25.6	220	15.2
Middle	53,931	35.0	50,671	35.4	2,791	29.4	469	32.3
Upper	56,828	36.9	53,008	37.0	3,165	33.3	655	45.2
Unknown	3,148	2.0	2,635	1.8	456	4.8	57	3.9
Total AA	**154,126**	**100.0**	**143,173**	**100.0**	**9,503**	**100.0**	**1,450**	**100.0**
Percentage of Total Businesses:				**92.9**		**6.2**		**0.9**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	39	2.5	33	2.1	6	21.4	0	0.0
Moderate	294	18.6	286	18.4	8	28.6	0	0.0
Middle	620	39.2	616	39.6	4	14.3	0	0.0
Upper	602	38.1	593	38.2	9	32.1	0	0.0
Unknown	27	1.7	26	1.7	1	3.6	0	0.0
Total AA	**1,582**	**100.0**	**1,554**	**100.0**	**28**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.2**		**1.8**		**0.0**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-8

2023 Denver Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	37	6.2	30,100	5.4	5,968	19.8	124,259	22.5
Moderate	170	28.7	163,729	29.6	15,435	9.4	107,367	19.4
Middle	222	37.4	206,468	37.4	8,015	3.9	121,996	22.1
Upper	145	24.5	147,910	26.8	3,243	2.2	198,737	36.0
Unknown	19	3.2	4,152	0.8	1,042	25.1	0	0.0
Total AA	**593**	**100.0**	**552,359**	**100.0**	**33,703**	**6.1**	**552,359**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	57,872	20,206	3.6	34.9	34,769	60.1	2,897	5.0
Moderate	296,899	143,492	25.4	48.3	138,871	46.8	14,536	4.9
Middle	357,651	228,249	40.4	63.8	115,664	32.3	13,738	3.8
Upper	237,447	169,978	30.1	71.6	56,445	23.8	11,024	4.6
Unknown	13,303	3,327	0.6	25.0	8,918	67.0	1,058	8.0
Total AA	**963,172**	**565,252**	**100.0**	**58.7**	**354,667**	**36.8**	**43,253**	**4.5**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	7,430	5.0	6,656	4.9	715	7.4	59	4.4
Moderate	36,399	24.7	33,572	24.7	2,591	26.6	236	17.5
Middle	51,650	35.1	48,612	35.7	2,602	26.8	436	32.3
Upper	46,810	31.8	43,205	31.7	3,065	31.5	540	40.0
Unknown	4,905	3.3	4,075	3.0	750	7.7	80	5.9
Total AA	**147,194**	**100.0**	**136,120**	**100.0**	**9,723**	**100.0**	**1,351**	**100.0**
Percentage of Total Businesses:				**92.5**		**6.6**		**0.9**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	43	4.2	37	3.7	6	26.1	0	0.0
Moderate	244	23.9	236	23.6	8	34.8	0	0.0
Middle	343	33.6	343	34.4	0	0.0	0	0.0
Upper	354	34.7	347	34.8	7	30.4	0	0.0
Unknown	37	3.6	35	3.5	2	8.7	0	0.0
Total AA	**1,021**	**100.0**	**998**	**100.0**	**23**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.7**		**2.3**		**0.0**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table E-9

2022 Denver Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	37	6.2	30,100	5.4	5,968	19.8	124,259	22.5
Moderate	170	28.7	163,729	29.6	15,435	9.4	107,367	19.4
Middle	222	37.4	206,468	37.4	8,015	3.9	121,996	22.1
Upper	145	24.5	147,910	26.8	3,243	2.2	198,737	36.0
Unknown	19	3.2	4,152	0.8	1,042	25.1	0	0.0
Total AA	**593**	**100.0**	**552,359**	**100.0**	**33,703**	**6.1**	**552,359**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	**% by tract**	**% by unit**	#	**% by unit**	#	**% by unit**
Low	57,872	20,206	3.6	34.9	34,769	60.1	2,897	5.0
Moderate	296,899	143,492	25.4	48.3	138,871	46.8	14,536	4.9
Middle	357,651	228,249	40.4	63.8	115,664	32.3	13,738	3.8
Upper	237,447	169,978	30.1	71.6	56,445	23.8	11,024	4.6
Unknown	13,303	3,327	0.6	25.0	8,918	67.0	1,058	8.0
Total AA	**963,172**	**565,252**	**100.0**	**58.7**	**354,667**	**36.8**	**43,253**	**4.5**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	7,432	5.0	6,659	4.8	716	7.1	57	3.9
Moderate	36,695	24.5	33,787	24.4	2,657	26.4	251	17.3
Middle	52,375	35.0	49,241	35.6	2,672	26.6	462	31.8
Upper	47,833	31.9	44,059	31.9	3,186	31.7	588	40.5
Unknown	5,475	3.7	4,551	3.3	830	8.2	94	6.5
Total AA	**149,810**	**100.0**	**138,297**	**100.0**	**10,061**	**100.0**	**1,452**	**100.0**
Percentage of Total Businesses:				**92.3**		**6.7**		**1.0**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	45	4.4	40	4.0	5	21.7	0	0.0
Moderate	243	23.9	235	23.6	8	34.8	0	0.0
Middle	338	33.2	338	34.0	0	0.0	0	0.0
Upper	352	34.6	345	34.7	7	30.4	0	0.0
Unknown	39	3.8	36	3.6	3	13.0	0	0.0
Total AA	**1,017**	**100.0**	**994**	**100.0**	**23**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**97.7**		**2.3**		**0.0**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX F – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Table F-1

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography
Assessment Area: Tulsa Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.4	0	0.0	1.3	0	0.0	2.1	0	0.0	1.1	2.9
Moderate	2	100.0	23.0	280	100.0	15.6	0	0.0	21.2	0	0.0	13.7	22.7
Middle	0	0.0	26.2	0	0.0	22.2	0	0.0	34.3	0	0.0	28.8	37.4
Upper	0	0.0	48.3	0	0.0	60.9	0	0.0	42.3	0	0.0	56.3	36.9
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	280	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.9	0	0.0	1.3	0	0.0	1.8	0	0.0	1.2	2.9
Moderate	0	0.0	23.1	0	0.0	16.4	1	50.0	20.4	115	41.8	14.2	22.7
Middle	0	0.0	30.5	0	0.0	26.3	0	0.0	37.2	0	0.0	34.9	37.4
Upper	0	0.0	44.5	0	0.0	56.1	1	50.0	40.5	160	58.2	49.7	36.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	275	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.9	0	0.0	1.6	0	0.0	1.7	0	0.0	1.5	2.9
Moderate	0	0.0	19.1	0	0.0	16.5	0	0.0	16.9	0	0.0	12.4	22.7
Middle	0	0.0	26.2	0	0.0	22.3	1	100.0	32.7	20	100.0	30.7	37.4
Upper	0	0.0	52.8	0	0.0	59.7	0	0.0	48.7	0	0.0	55.4	36.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	10.9	0	0.0	14.4	0	0.0	10.3	0	0.0	5.0	11.7
Moderate	0	0.0	35.9	0	0.0	22.7	0	0.0	45.4	0	0.0	42.3	38.2
Middle	0	0.0	28.3	0	0.0	24.0	0	0.0	24.7	0	0.0	19.6	28.1
Upper	0	0.0	25.0	0	0.0	38.9	0	0.0	19.6	0	0.0	33.2	20.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.3
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	0	0.0	2.3	0	0.0	2.7	0	0.0	2.0	0	0.0	1.3	2.9
Moderate	2	100.0	22.4	280	100.0	16.4	1	33.3	20.4	115	39.0	15.3	22.7
Middle	0	0.0	26.8	0	0.0	22.8	1	33.3	34.6	20	6.8	29.3	37.4
Upper	0	0.0	48.5	0	0.0	58.0	1	33.3	42.9	160	54.2	54.0	36.9
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	280	100.0	100.0	3	100.0	100.0	295	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-2

Distribution of 2022 Home Mortgage Lending By Income Level of Geography
Assessment Area: Tulsa Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	2.1	0	0.0	1.1	3.6
Moderate	0	0.0	18.8	0	0.0	12.2	23.7
Middle	0	0.0	28.2	0	0.0	23.7	27.5
Upper	2	100.0	50.9	524	100.0	62.9	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	524	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	1.2	0	0.0	0.6	3.6
Moderate	0	0.0	20.4	0	0.0	12.4	23.7
Middle	3	100.0	28.5	232	100.0	24.1	27.5
Upper	0	0.0	49.9	0	0.0	62.8	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	232	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.6	0	0.0	1.3	3.6
Moderate	0	0.0	16.8	0	0.0	13.2	23.7
Middle	0	0.0	24.9	0	0.0	21.7	27.5
Upper	0	0.0	56.6	0	0.0	63.7	45.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							**Multi-family Units %**
Low	0	0.0	11.5	0	0.0	9.1	12.3
Moderate	0	0.0	41.5	0	0.0	28.8	37.9
Middle	0	0.0	28.5	0	0.0	36.0	26.3
Upper	0	0.0	16.2	0	0.0	25.6	22.0
Unknown	0	0.0	2.3	0	0.0	0.6	1.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	0	0.0	1.9	0	0.0	2.2	3.6
Moderate	0	0.0	19.2	0	0.0	14.6	23.7
Middle	3	60.0	27.8	232	30.7	25.4	27.5
Upper	2	40.0	51.1	524	69.3	57.8	45.1
Unknown	0	0.0	0.0	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	756	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-3

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography
Assessment Area: Tulsa Metropolitan

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	3	20.0	4.0	1,162	27.1	5.5	5	26.3	3.0	1,228	31.2	4.7	4.3
Moderate	1	6.7	24.1	7	0.2	28.8	1	5.3	21.6	592	15.1	26.4	27.5
Middle	6	40.0	26.3	728	16.9	25.9	5	26.3	32.2	634	16.1	32.1	34.6
Upper	5	33.3	44.9	2,398	55.8	39.4	8	42.1	42.4	1,478	37.6	36.6	33.5
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.1
Tract-Unk	0	0.0	0.6	0	0.0	0.1	0	0.0	0.7	0	0.0	0.1	
Total	15	100.0	100.0	4,295	100.0	100.0	19	100.0	100.0	3,932	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-4

Distribution of 2022 Small Business Lending By Income Level of Geography
Assessment Area: Tulsa Metropolitan

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	4	33.3	4.0	1,264	34.5	6.1	4.3
Moderate	1	8.3	23.7	500	13.7	27.6	26.0
Middle	5	41.7	27.5	625	17.1	26.6	29.8
Upper	2	16.7	43.9	1,272	34.7	39.5	39.8
Unknown	0	0.0	0.1	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.7	0	0.0	0.2	
Total	12	100.0	100.0	3,661	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-5

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level
Assessment Area: Tulsa Metropolitan

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	5.4	0	0.0	2.7	0	0.0	4.4	0	0.0	2.0	21.5
Moderate	0	0.0	16.3	0	0.0	11.1	0	0.0	16.7	0	0.0	10.7	17.7
Middle	0	0.0	19.3	0	0.0	17.3	0	0.0	20.5	0	0.0	16.7	19.7
Upper	0	0.0	32.6	0	0.0	43.5	0	0.0	29.7	0	0.0	36.8	41.2
Unknown	2	100.0	26.4	280	100.0	25.4	0	0.0	28.6	0	0.0	33.8	0.0
Total	2	100.0	100.0	280	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Refinance Loans													
Low	0	0.0	7.8	0	0.0	4.2	0	0.0	5.7	0	0.0	2.6	21.5
Moderate	0	0.0	17.6	0	0.0	12.2	0	0.0	14.6	0	0.0	9.4	17.7
Middle	0	0.0	19.2	0	0.0	16.6	0	0.0	18.4	0	0.0	13.8	19.7
Upper	0	0.0	33.1	0	0.0	41.7	0	0.0	32.0	0	0.0	38.2	41.2
Unknown	0	0.0	22.3	0	0.0	25.2	2	100.0	29.3	275	100.0	36.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	275	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.3	0	0.0	3.0	0	0.0	5.9	0	0.0	3.3	21.5
Moderate	0	0.0	15.7	0	0.0	11.2	0	0.0	15.3	0	0.0	9.6	17.7
Middle	0	0.0	21.9	0	0.0	17.0	0	0.0	21.1	0	0.0	17.3	19.7
Upper	0	0.0	48.6	0	0.0	56.3	1	100.0	49.0	20	100.0	57.0	41.2
Unknown	0	0.0	8.4	0	0.0	12.5	0	0.0	8.7	0	0.0	12.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	20	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	5.9	0	0.0	3.0	0	0.0	5.0	0	0.0	2.2	21.5
Moderate	0	0.0	16.4	0	0.0	11.3	0	0.0	16.2	0	0.0	10.5	17.7
Middle	0	0.0	19.5	0	0.0	17.2	0	0.0	20.3	0	0.0	16.3	19.7
Upper	0	0.0	35.0	0	0.0	44.0	1	33.3	32.6	20	6.8	38.0	41.2
Unknown	2	100.0	23.1	280	100.0	24.6	2	66.7	25.8	275	93.2	33.0	0.0
Total	2	100.0	100.0	280	100.0	100.0	3	100.0	100.0	295	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table F-6

Distribution of 2022 Home Mortgage Lending By Borrower Income Level
Assessment Area: Tulsa Metropolitan

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	0	0.0	5.9	0	0.0	3.2	21.7
Moderate	0	0.0	16.7	0	0.0	12.0	17.3
Middle	0	0.0	18.2	0	0.0	16.6	18.9
Upper	1	50.0	32.3	412	78.6	42.4	42.2
Unknown	1	50.0	26.9	112	21.4	25.8	0.0
Total	2	100.0	100.0	524	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	9.5	0	0.0	5.0	21.7
Moderate	1	33.3	19.2	76	32.8	13.3	17.3
Middle	0	0.0	18.8	0	0.0	16.0	18.9
Upper	2	66.7	32.4	156	67.2	44.9	42.2
Unknown	0	0.0	20.0	0	0.0	20.8	0.0
Total	3	100.0	100.0	232	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	7.2	0	0.0	4.7	21.7
Moderate	0	0.0	16.1	0	0.0	12.6	17.3
Middle	0	0.0	20.6	0	0.0	16.9	18.9
Upper	0	0.0	49.6	0	0.0	56.1	42.2
Unknown	0	0.0	6.5	0	0.0	9.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	6.9	0	0.0	3.6	21.7
Moderate	1	20.0	17.1	76	10.1	12.2	17.3
Middle	0	0.0	18.4	0	0.0	16.4	18.9
Upper	3	60.0	34.0	568	75.1	43.5	42.2
Unknown	1	20.0	23.7	112	14.8	24.3	0.0
Total	5	100.0	100.0	756	100.0	100.0	100.0

Source: 2022 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Table F-7

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses
Assessment Area: Tulsa Metropolitan

	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	9	60.0	53.2	1,895	44.1	34.7	9	47.4	52.7	2,717	69.1	35.5	90.8
Over $1 Million	5	33.3		2,360	54.9		7	36.8		1,109	28.2		8.2
Revenue Unknown	1	6.7		40	0.9		3	15.8		106	2.7		1.0
Total	15	100.0		4,295	100.0		19	100.0		3,932	100.0		100.0
By Loan Size													
$100,000 or Less	5	33.3	92.2	257	6.0	32.3	10	52.6	92.7	445	11.3	36.4	
$100,001 - $250,000	3	20.0	3.7	502	11.7	14.6	2	10.5	3.8	350	8.9	16.0	
$250,001 - $1 Million	7	46.7	4.1	3,536	82.3	53.1	7	36.8	3.5	3,137	79.8	47.6	
Total	15	100.0	100.0	4,295	100.0	100.0	19	100.0	100.0	3,932	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	4	44.4		217	11.5		3	33.3		180	6.6		
$100,001 - $250,000	1	11.1		154	8.1		0	0.0		0	0.0		
$250,001 - $1 Million	4	44.4		1,524	80.4		6	66.7		2,537	93.4		
Total	9	100.0		1,895	100.0		9	100.0		2,717	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-8

Distribution of 2022 Small Business Lending By Revenue Size of Businesses
Assessment Area: Tulsa Metropolitan

	Bank And Aggregate Loans						Total Businesses
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
By Revenue							
$1 Million or Less	3	25.0	51.0	963	26.3	33.5	90.9
Over $1 Million	5	41.7		1,536	42.0		8.3
Revenue Unknown	4	33.3		1,162	31.7		0.9
Total	12	100.0		3,661	100.0		100.0
By Loan Size							
$100,000 or Less	6	50.0	91.9	343	9.4	31.7	
$100,001 - $250,000	0	0.0	3.9	0	0.0	15.9	
$250,001 - $1 Million	6	50.0	4.2	3,318	90.6	52.4	
Total	12	100.0	100.0	3,661	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	1	33.3		78	8.1		
$100,001 - $250,000	0	0.0		0	0.0		
$250,001 - $1 Million	2	66.7		885	91.9		
Total	3	100.0		963	100.0		

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-9

2024 Tulsa Metropolitan AA Demographics

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	16	5.1	11,228	4.5	4,351	38.8	54,015	21.5
Moderate	93	29.7	67,089	26.6	11,708	17.5	44,478	17.7
Middle	106	33.9	88,606	35.2	6,977	7.9	49,662	19.7
Upper	97	31.0	84,698	33.6	3,074	3.6	103,601	41.2
Unknown	1	0.3	135	0.1	26	19.3	0	0.0
Total AA	**313**	**100.0**	**251,756**	**100.0**	**26,136**	**10.4**	**251,756**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	23,615	7,291	2.9	30.9	12,597	53.3	3,727	15.8
Moderate	131,743	57,065	22.7	43.3	54,553	41.4	20,125	15.3
Middle	151,483	93,869	37.4	62.0	41,038	27.1	16,576	10.9
Upper	125,844	92,709	36.9	73.7	24,347	19.3	8,788	7.0
Unknown	1,185	104	0.0	8.8	796	67.2	285	24.1
Total AA	**433,870**	**251,038**	**100.0**	**57.9**	**133,331**	**30.7**	**49,501**	**11.4**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,801	4.3	1,558	4.1	229	6.7	14	3.4
Moderate	11,462	27.5	10,201	26.9	1,150	33.6	111	27.3
Middle	14,457	34.6	13,064	34.5	1,231	36.0	162	39.9
Upper	13,963	33.5	13,040	34.4	805	23.5	118	29.1
Unknown	53	0.1	43	0.1	9	0.3	1	0.2
Total AA	**41,736**	**100.0**	**37,906**	**100.0**	**3,424**	**100.0**	**406**	**100.0**
Percentage of Total Businesses:				**90.8**		**8.2**		**1.0**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	10	1.6	10	1.6	0	0.0	0	0.0
Moderate	118	18.8	117	18.8	1	16.7	0	0.0
Middle	307	48.8	305	49.1	2	33.3	0	0.0
Upper	194	30.8	189	30.4	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**629**	**100.0**	**621**	**100.0**	**6**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**98.7**		**1.0**		**0.3**

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-10

2023 Tulsa Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	13	6.2	9,472	5.9	3,988	42.1	34,728	21.7
Moderate	67	32.1	45,861	28.6	8,453	18.4	27,759	17.3
Middle	53	25.4	41,693	26.0	2,925	7.0	30,268	18.9
Upper	75	35.9	63,220	39.4	2,204	3.5	67,626	42.2
Unknown	1	0.5	135	0.1	26	19.3	0	0.0
Total AA	**209**	**100.0**	**160,381**	**100.0**	**17,596**	**11.0**	**160,381**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	19,591	5,458	3.6	27.9	11,311	57.7	2,822	14.4
Moderate	91,961	36,172	23.7	39.3	42,813	46.6	12,976	14.1
Middle	77,519	41,919	27.5	54.1	27,707	35.7	7,893	10.2
Upper	96,616	68,678	45.1	71.1	21,174	21.9	6,764	7.0
Unknown	1,185	104	0.1	8.8	796	67.2	285	24.1
Total AA	**286,872**	**152,331**	**100.0**	**53.1**	**103,801**	**36.2**	**30,740**	**10.7**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	1,593	4.4	1,370	4.2	215	7.0	8	2.8
Moderate	9,453	26.0	8,351	25.3	1,031	33.5	71	24.9
Middle	10,821	29.8	9,704	29.5	1,025	33.3	92	32.3
Upper	14,390	39.6	13,480	40.9	797	25.9	113	39.6
Unknown	52	0.1	42	0.1	9	0.3	1	0.4
Total AA	**36,309**	**100.0**	**32,947**	**100.0**	**3,077**	**100.0**	**285**	**100.0**
Percentage of Total Businesses:				**90.7**		**8.5**		**0.8**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	6	1.9	6	2.0	0	0.0	0	0.0
Moderate	44	14.3	43	14.3	1	16.7	0	0.0
Middle	90	29.2	88	29.3	2	33.3	0	0.0
Upper	168	54.5	163	54.3	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**308**	**100.0**	**300**	**100.0**	**6**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**97.4**		**1.9**		**0.6**

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table F-11

2022 Tulsa Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	13	6.2	9,472	5.9	3,988	42.1	34,728	21.7
Moderate	67	32.1	45,861	28.6	8,453	18.4	27,759	17.3
Middle	53	25.4	41,693	26.0	2,925	7.0	30,268	18.9
Upper	75	35.9	63,220	39.4	2,204	3.5	67,626	42.2
Unknown	1	0.5	135	0.1	26	19.3	0	0.0
Total AA	**209**	**100.0**	**160,381**	**100.0**	**17,596**	**11.0**	**160,381**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	19,591	5,458	3.6	27.9	11,311	57.7	2,822	14.4
Moderate	91,961	36,172	23.7	39.3	42,813	46.6	12,976	14.1
Middle	77,519	41,919	27.5	54.1	27,707	35.7	7,893	10.2
Upper	96,616	68,678	45.1	71.1	21,174	21.9	6,764	7.0
Unknown	1,185	104	0.1	8.8	796	67.2	285	24.1
Total AA	**286,872**	**152,331**	**100.0**	**53.1**	**103,801**	**36.2**	**30,740**	**10.7**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,636	4.3	1,409	4.1	217	6.9	10	3.0
Moderate	9,852	26.0	8,720	25.3	1,053	33.6	79	23.4
Middle	11,300	29.8	10,149	29.5	1,046	33.4	105	31.1
Upper	15,078	39.8	14,129	41.0	806	25.7	143	42.3
Unknown	56	0.1	46	0.1	9	0.3	1	0.3
Total AA	**37,922**	**100.0**	**34,453**	**100.0**	**3,131**	**100.0**	**338**	**100.0**
Percentage of Total Businesses:				**90.9**		**8.3**		**0.9**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6	1.9	6	2.0	0	0.0	0	0.0
Moderate	44	14.0	43	14.0	1	16.7	0	0.0
Middle	94	29.8	92	30.0	2	33.3	0	0.0
Upper	171	54.3	166	54.1	3	50.0	2	100.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**315**	**100.0**	**307**	**100.0**	**6**	**100.0**	**2**	**100.0**
Percentage of Total Farms:				**97.5**		**1.9**		**0.6**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX G – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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, home equity 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 nonrelatives 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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**.**

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such

activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated area: A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan 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). 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage commercial loans.

Small loan(s) to farm(s): A loan included in "loans to small farms" as defined in the instructions for preparation of the 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.

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

Products and Services Available

RETAIL CHECKING PRODUCTS

- First Option Checking (online only)
- Freedom Checking
- Freestyle Checking
- Fresh Start Checking
- Global Checking
- Maximizer Checking
- Premier Club
- Private Reserve Checking
- Traditional Checking
- Varsity Checking

RETAIL SAVINGS PRODUCTS

- Health Savings Account
- Looney Tunes Savings Club
- Money Market Account
- Money Market Investment Account
- Traditional Savings
- Varsity Savings

RETAIL LOAN PRODUCTS

- Credit Builder and other Deposit Secured Loans
- Credit Cards
- Home Equity Loans
- Home Equity Lines of Credit
- Mortgage Loans
- Personal Loans, including Auto, Boat, and RV Loans
- Personal Lines of Credit

RETAIL INSURANCE PRODUCTS

- Credit Life & Disability
- Mechanical Parts and Labor Vehicle Service Contracts
- Term Life Insurance
- Secure Guaranteed Auto Protection (GAP)

Revised 03/11/2026

- Whole Life Insurance

COMMERCIAL CHECKING PRODUCTS

- Business Budget Checking
- Business Checking with Interest
- Business Performance Checking
- Commercial Checking
- IOLTA Checking (Interest on Lawyer Trust Accounts)
- Non-Profit Checking

COMMERCIAL SAVINGS PRODUCTS

- Business Savings
- Capital Reserve Money Market Account
- Commercial Money Market Account

TREASURY PRODUCTS

- Account Analysis
- Advantage Sweep Account
- Automated Clearing House (ACH) Origination
- ACH Positive Pay
- Business Online Banking (GoBiz)
- Cash Vault Services
- Demand Deposit Marketplace
- Lockbox
- Maximum Asset Management
- Merchant Services
- Online Wire Origination
- PayExpress and AFA PayExpress
- Positive Pay
- Remote Deposit Capture (RDC)
- SmartSafe
- Target Balance Account
- Zero Balance Account

COMMERCIAL LOAN PRODUCTS

- Business Credit Cards
- Commercial Loans
- Commercial Real Estate Loans

- Equipment Loans
- Equipment Leasing
- Metafund
- Small Business Loans (including SBA)
- Small Business Secured Lines of Credit
- Working Capital Loans

EVERYDAY SERVICES

- Autobooks
- Bill Pay
- Debit Cards
- Direct Connect
- Direct Line 24 Telephone Banking
- Early Payday
- eStatements
- FFB Wallet
- Mobile Deposit
- Online/Mobile Banking (GoBankFFB-includes Zelle, UnifiMoney, Money360, etc.)
- Overdraft Options
- Pocket Your Change
- Quickbooks

INVESTMENT SERVICES

- Certificates of Deposit
- First Fidelity Financial Services
- Intrafi Time Deposits
- Retirement Accounts
- Sweep Investment Accounts
- Trust Services

OTHER PRODUCTS AND SERVICES

- Debit Card Rewards
- First Option
- Foreign Currency Purchase/Exchange
- Night Deposit
- Safe Deposit Box Rental*
- UltimateID
- Wire Transfers

Safe Deposit Boxes are unavailable at the following locations:

- Biltmore Office
- Corporate Office
- Midtown OKC Office
- Lindsey Street Office
- Denver Tech Center Office
- Mesa Office
- Nichols Hills Office
- Noble Office
- Quail Creek Office
- Gilbert Gateway Office

*Limited Products and Services are available at the following locations:

- Corporate Office (No Teller Transactions or Client Account Services)

First Fidelity Bank

Master Fee Schedule

	Fee Description	Amount
A	**Account Analysis Fee (Earnings Credit applies)**	$18.00 mo.
	Statement Entry	$0.20 ea.
	Deposit Item	$0.10 ea.
	Account Closing Fee with First Option (within 90 days - excludes Freedom Checking)	$30.00
	Account Reconciliation	
	QuickDisc - CD ROM (monthly/quarterly)	$50.00
	QuickDisc - CD ROM (annually)	$100.00
	Account Verification (mortgage)	$30.00
	Armored Car Services (Cash Vault)	
	Armored Car or Courier Services - Pricing for this service is negotiated. Contracts may be direct with the vendor. Clients depositing or requesting change orders more than $10,000.00, at one time, on a weekly basis, and / or clients depositing cash of $30,000.00 total per week, must utilize an Armored Car service.	
	Buying Coin (per roll)	$.03 per $100
	Buying Coin (per box)	$.03 per $100
	Buying Currency Straps	$.03 per $100
	Depositing Currency Straps	$.03 per $100
	Deposit FFB Bag of Coin	$.03 per $100
	Deposit Partial Bag of Coin	$.03 per $100
	Night Drop Deposits	$.03 per $100
	Smart Safe Service	
	Loomis Smart Safe (per location)	$75.00 mo.
	Loomis Smart Safe (per deposit)	$3.50 ea.
	Loomis Smart Safe (cash deposited per note)	$0.013 ea.
	Blue Line Smart Safe (per location)	$350.00 mo.
	Blue Line Smart Safe (per deposit)	$2.00 ea.
	Empyreal Smart Safe (per location)	$350.00 mo.
	Empyreal Smart Safe (per Deposit)	$2.00 ea.
	Lock Bag	$25.00 ea.
	Zipper Bag	$15.00 ea.
	Automated Clearing House (ACH) Services	
	ACH Origination Module	$30.00 mo.
	ACH Originated – Next Day per Item	$0.15 ea.
	ACH – Same Day per Item	$0.50 ea.
	Additional Entity	$10.00 ea.
	ACH Return Item	$5.00 ea.
	Electronic Data Interchange (EDI) Report-Online (per account)	$25.00 mo.

First Fidelity Bank

Master Fee Schedule

	Fee Description	Amount
	ATM Fee	
	FFB ATM	FREE
	Non-FFB ATM (Global Checking first 20/cycle FREE)	$1.00 ea.
	International ATM Transaction Exchange	2%
	Surcharge (non-client)	$3.00 ea.
B	**Bank Administration Institution (BAI) Maintenance Fee**	$50.00 mo.
	Bank-to-Bank Transfers	
	Incoming	FREE
	Outgoing	$4.00 ea.
	BillPay Fee	
	Basic Business BillPay (includes 10 bills per month)	FREE
	Additional Bills	$1.00 ea.
	Enhanced Business BillPay (includes 10 bills per month)	$5.00 mo.
	Additional Bills	$0.60 ea.
	Personal BillPay (unlimited)	FREE
	BSA Compliance Fee (for Money Service Business (MSB))	$300.00 mo.
	Business Budget Checking (includes 100 transactions)	FREE
	Excessive Transaction Fee	$0.40 ea.
	Business Checking with Interest - Below $1,000 Minimum Balance Fee	$18.00 mo.
	Statement Entry	$0.20 ea.
	Deposit Item	$0.10 ea.
	Business Performance Checking - Below $5,000 Minimum Balance Fee (includes 100 transactions)	$18.00 mo.
	Statement Entry	$0.20 ea.
	Deposit Item	$0.10 ea.
	Business Savings - Below $500 Minimum Balance Fee (includes 12 deposits)	$15.00 mo.
	Statement Entry	$0.20 ea.
	Deposit Item	$0.10 ea.
	Excessive Withdrawal/Transfer Fee (includes 3 withdrawals per month)	$15.00 ea.
C	**Cannabis Related Business (CRB) Fee**	
	One-time Account Application Fee	$500.00
	One-time Closing Account(s) Termination Fee	$500.00
	Tier I CRB Entity Fee	$500.00 mo.
	Tier I Late Production Reporting Fee	$100.00 mo.
	Tier II CRB Entity Fee	$250.00 mo.
	Tier III CRB Entity Fee	FREE
	Cash Verification Fee	
	Cash Verification - Armored Car Pass Through	
	Sealed Deposit Bag	$2.00 ea.

This list may not be all inclusive. All fees are applied per tax ID # unless specified by account.
Notify the Product Manager for review of missing/inaccurate fees. Member FDIC. Equal Housing Lender. **Effective 01/26.**

First Fidelity Bank

Master Fee Schedule

Fee Description	Amount
Plus the following multiplier based on per bag deposit amount:	
$0 - $2,500	$.20 per $100
$2,501 - $5,000	$.19 per $100
$5,001 - $7,500	$.18 per $100
$7,501 - $10,000	$.17 per $100
$10,001 - $12,500	$.16 per $100
$12,501 - $15,000	$.15 per $100
$15,001 - $17,500	$.14 per $100
$17,501 - $20,000	$.13 per $100
$20,001	$.12 per $100
Capital Reserve Money Market - Below $25,000 Minimum Balance Fee	$20.00 mo.
Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	$15.00 ea.
Cashier's Check	$6.00 ea.
Certificate of Deposit Early Withdrawal Penalty	2% of withdrawal amount
Charge Back/Return Check - Business	$7.00 ea.
Charge Off Processing Fee	$50.00
Check Cashing	$5.00 ea.
Non-Client (on us)	$5.00 ea.
Non-Client	$10.00 ea.
Check Printing Fee	Varies by style
Coin Counting Fee (non-client)	0.08 per $100
Collections	$15.00 ea.
Outgoing & Incoming	$15.00 ea.
Outgoing (non-client)	$25.00 ea.
Commercial Appraisal Review Fee	$750.00
Commercial Account Services	
Commercial Checking Account	$18.00 mo.
Per Statement Entry	$0.20 ea.
Per Deposited Item	$0.10 ea.
Bank Statement (mail)	$3.00 mo.
SFTP File Input or Output Delivery (per account)	$50.00 mo.
BAI Monthly Transmission (per account)	$50.00 mo.
Non-Sufficient Funds (NSF) Charge	$33.00 ea.
Stop Payment	$33.00 ea.
CRB Monthly Fee—Tier I	$500.00 ea.
CRB Monthly Fee—Tier II	$250.00 ea.
CRB Monthly Fee—Tier III	$0.00

First Fidelity Bank

Master Fee Schedule

	Fee Description	Amount
	Commercial Checking Fee (earnings credit applies)	$18.00 mo.
	Statement Entry	$0.20 ea.
	Deposit Item	$0.10 ea.
	Commercial Checking on Analysis Fee (earnings credit applies)	$18.00 mo.
	Statement Entry	$0.20 ea.
	Deposit Item	$0.10 ea.
	Commercial Evaluation Review Fee	$150.00
	Commercial Money Market Fee - Below $2,500 Minimum Balance Fee	$25.00 mo.
	Statement Entry	$0.20 ea.
	Excessive Deposit Item Fee (includes 25 deposits per month)	$0.10 ea.
	Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	$15.00 ea.
	Commercial Loan Documentation Fee	$275.00
	Commercial Loan Origination Fee	Varies
	Consumer Loan Documentation Fee	
	Secured Loan Documentation Fee	$100.00
	Unsecured Loan Documentation Fee	$100.00
	Real Estate Secured Loan Documentation Fee	$150.00
	Credit Card Fee	
	Personal:	
	Rewards & Signature Annual Fee	None
	Rewards & Signature Late Fee	$29.00
	Rewards & Signature Return Payment	$35.00 ea.
	Rewards & Signature Minimum Finance Charge	$.50
	Rewards & Signature Cash Advance	$10.00 ea. or 3% of advance (greater)
D	**Deposit Corrections**	
	Email Notification	$3.00 ea.
	Check Issued for Error on Deposit	$6.00 ea.
	Dormant Checking Account Fee (excludes Freedom Checking)	$10.00 mo.
	Dormant Savings Account Fee (per quarter)	$10.00 ea.
	Dual Statement Fee	$3.00 ea.
E	**Electronic Deposit Services**	
	Remote Deposit Service (per account)	$50.00 mo.
	Per Deposit	$1.00 ea.
	Deposited Item (per image)	$0.10 ea.
	Single Feed Scanner (purchase)	$300.00 ea.
	High Speed Batch Feed Scanner (purchase)	$600.00 ea.

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First Fidelity Bank

Master Fee Schedule

	Fee Description	Amount
F	**First Option with Ultimate ID Plus Fee**	$12.00 mo.
	First Option Early Account Closure Fee (within 90 days)	$30.00 ea.
	Foreign Currency Purchase or Exchange Fee	$25.00 + shipping
	Currency Purchase under $1,000.00	$7.00 ea.
	Fraud Prevention Services	
	ACH Positive Pay Module (per account)	$30.00 mo.
	ACH Positive Pay Exception Transaction	$5.00 ea.
	Check Positive Pay Module (per account)	$45.00 mo.
	Check Positive Pay Exception items	$3.00 ea.
	Per Item (check issue)	$0.03 ea.
	Freedom Checking Fee (no overdraft/insufficient/dormant fees)	$5.00 mo.
	Freestyle Checking	FREE
	Fresh Start Checking Fee	$12.00 mo.
G	**Garnishment Fee**	$75.00 ea.
	GoBizFFB Services	
	GoBizFFB Commercial Platform	$20.00 mo.
	GoBizFFB Essentials Platform	$7.00 mo.
	Mobile Deposit	$1.00 mo.
H	**Hold Mail Fee**	$5.00 mo.
	Health Savings Account (HSA)	FREE
I	**In-House Mortgage Origination Fee**	$799.00
	Insufficient Funds Fee (return item-max of 5 overdraft and/or insufficient fees per day)	
	Personal:	
	Per Presentment (excludes Freedom Checking)	$12.50 ea.
	Per Presentment (resulting in negative $5 balance or less)	FREE
	Per Presentment (item amount of $5 or less)	FREE
	Business:	
	Per Presentment	$33.00 ea.
	IntraFi Early Withdrawal Penalty	2% of withdrawal amount
	IOLTA Checking	FREE
	IRA Closing Fee	$35.00 ea.
	IRA Transfer Fee	$35.00 ea.
J	**Jumbo Mortgage Origination Fee**	$799.00

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First Fidelity Bank

Master Fee Schedule

	Fee Description	Amount
L	**Loan Payment Fee**	
	Loan Payment Late Fee	
	Personal	Greater of 5% of payment or as allowed under OK §2-203
	Business	Lesser of 5% of payment or $250
	Loan Payment Return Fee	$25.00 ea.
	Loan Payment One-Time by Telephone	$4.99 ea.
	Loan Payment One-Time Online	
	Personal	FREE
	Business	$2.99 ea.
	Loan Payment Recurring Online (Personal & Business)	FREE
	Looney Tunes Savings Club - Below $50 Minimum Balance Fee	$5.00 mo.
	Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	$1.00 ea.
M	**Maximizer Checking - Below $1,500 Minimum Balance Fee**	$12.00 mo.
	Maximum Asset Management Maintenance Fee (account service charges & per item charges apply)	$150.00 mo.
	Mobile Deposit Fee	
	Personal	FREE
	Business	$1.00 ea.
	Money Service Business	
	BSA Compliance (per account)	$300.00 mo.
	Money Market Account - Below $2,500 Minimum Balance Fee	$15.00 mo.
	Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	$15.00 ea.
	Money Market Investment - Below $25,000 Minimum Balance Fee	$20.00 mo.
	Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	$15.00 ea.
N	**Notary Fee (per visit)**	$5.00 ea.
	Non-Profit Checking - Below $1,000 Minimum Balance Fee	$18.00 mo.
	Statement Entry	$0.20 ea.
	Deposited Item	$0.10 ea.
O	**Overdraft Fee (paid item-max of 5 overdraft and/or insufficient fees per day)**	
	Personal:	
	Per Presentment (excludes Freedom Checking)	$25.00 ea.
	Per Presentment (resulting in negative $5 balance or less)	FREE
	Per Presentment (item amount of $5 or less)	FREE
	Business:	
	Per Presentment	$33.00 ea.
	7-Day Overdraft Processing Fee (assessed after 7 consecutive calendar days as a one-time fee per occurence)	$25.00 ea.

This list may not be all inclusive. All fees are applied per tax ID # unless specified by account.
Notify the Product Manager for review of missing/inaccurate fees. Member FDIC. Equal Housing Lender. **Effective 01/26.**

First Fidelity Bank

Master Fee Schedule

	Fee Description	Amount
P	**Paper Statement Fee**	
	Personal:	
	Per Cycle (excludes Freedom, Freestyle and Global Checking)	$3.00 mo.
	Per Cycle (PayExpress & AF PayExpress Cards)	$2.00 mo.
	Per Cycle (Traditional Checking)	FREE
	Business:	
	Per Cycle	$3.00 mo.
	Statement Printout (without images)	$3.00 ea.
	Payroll Services	
	PayExpress Payroll Card (per card)	$1.00 ea.
	PayExpress Payroll Card (employer one-time set up)	$10.00 ea.
	PayExpress Payroll Card ATM Withdrawal (includes 4 per statement cycle)	$1.00 ea.
	PayExpress Paper Statment	$2.00 ea.
	AFA PayExpress PIN Replacement Fee	$5.00 ea.
	AFA PayExpress Excessive ATM Withdrawal Fee (includes 5 per statement cycle)	$3.00 ea.
	AFA PayExpress/PayExpress Account Closure Fee	$10.00 ea.
	Personal Line of Credit Annual Fee (lines over $5,000)	$35.00
	Loan Advance	$5.00 ea.
	Pocket Your Change	FREE
	Private ATM (PATM) Operator Fees	
	5 or more ATMs	$250.00 mo.
	4 or less ATMs	$50.00 mo.
	Private Reserve Checking - Below $100,000 Minimum Balance Fee	$10.00 mo.
Q	**QuickDisc - CD ROM Fee**	
	Monthly/Quarterly	$50.00
	Annually	$100.00
R	**Research/Account Reconciliation Fee**	
	Minimum Charge	$25.00
	Per Hour	$25.00
	Per Item	$3.00 ea.

First Fidelity Bank

Master Fee Schedule

	Fee Description	Amount
S	**Safe Deposit Box Fee**	
	Annual Billing Fee (if automatic debit is not used)	$10.00
	Late Fee (after 60 days)	$25.00
	Replacement Key	$10.00 ea.
	Drilling Fee	$100.00 minimum, may vary
	Annual Box Rent by Size (availability varies by branch)	
	2 X 5	$25.00
	3 X 5	$30.00
	2 X 10	$35.00
	3 X 7 1/4	$35.00
	3 X 10	$40.00
	3 X 12 1/2	$40.00
	4 X 10	$45.00
	5 X 5	$35.00
	5 X 10	$50.00
	5 X 12 1/2	$55.00
	6 X 10	$65.00
	6 1/2 X 10	$70.00
	7 X 10	$75.00
	10 X 10	$100.00
	24 X 24	$350.00
	Secure File Transfer Protocol (SFTP) File Input or Output Delivery (per account)	$50.00 mo.
	Small Business Loan Documentation Fee	$275.00
	Small Business Loan Origination Fee	Varies
	Stop Payment Fee (valid for 12 months)	$33.00 ea.
S	**Sweep Accounts**	
	Advantage Sweep	$50.00 mo.
	Demand Deposit Marketplace	$70.00 mo.
	Maximum Asset Management	$150.00 mo.
T	**Target & Zero Balance Accounts**	$30.00 mo.
	Tax Levy	$75.00 ea.
	Temporary Checks (10 checks per request)	$3.00 ea.
	Traditional Savings - Below $200 Minimum Balance Fee	$6.00 mo.
	Excessive Withdrawal/Transfer Fee (includes 3 withdrawals per month)	$1.00 ea.
U	**Ultimate ID Plus Fee**	$6.00 mo.
V	**Varsity Checking**	FREE
	Varsity Savings - Below $100 Minimum Balance Fee	$5.00 mo.
	Excessive Withdrawal/Transfer Fee (includes 6 withdrawals per month)	$1.00 ea.

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First Fidelity Bank

Master Fee Schedule

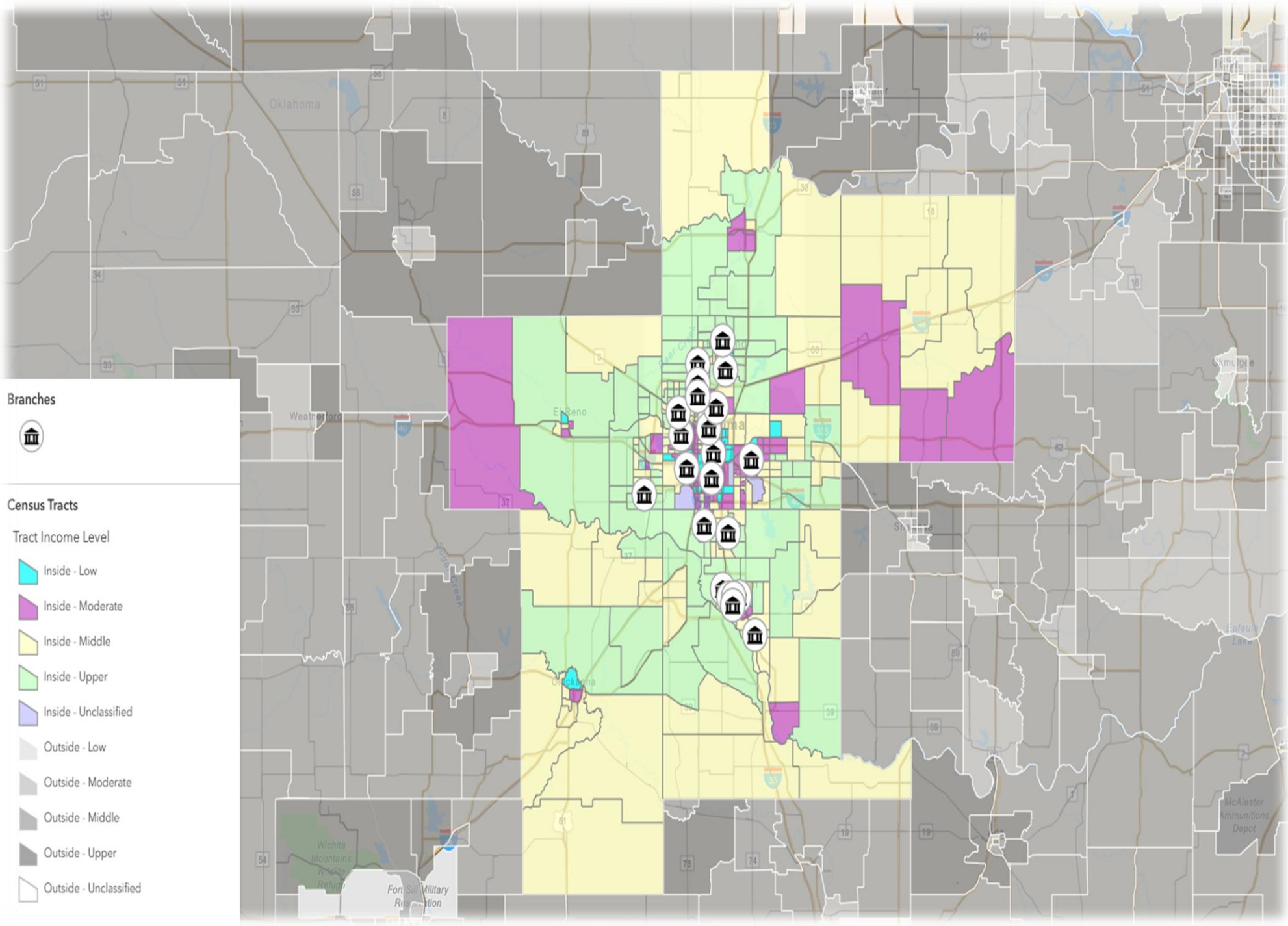
	Fee Description	Amount
W	**Wholesale Lockbox Services**	
	One-time Set Up	FREE
	Lockbox Maintenance	$125.00 mo.
	Per Item Processed	$0.40 ea.
	Per Package Mailed	$5.00 ea.
	Per Image	$0.10 ea.
	Value Added Keying (VAK) (per keystroke)	$0.02 ea.
	Image/Remittance File	$75.00 ea.
	Wire Transfer Services	
	Online Wire Transfer Module	$30.00 mo.
	Additional Entity	$10.00 mo.
	Wire Transfer Service (phone or fax)	$50.00 mo.
	Incoming Domestic Wire	$12.00 ea.
	Outgoing Domestic Wire (online)	$10.00 ea.
	Outgoing Domestic Wire (manual)	$25.00 ea.
	Incoming International Wire	$20.00 ea.
	Outgoing International Wire (online)	$45.00 ea.
	Outgoing International Wire (manual)	$75.00 ea.
	Draft	$45.00 ea.
	Tracer or Recall	$35.00 ea.
	Incoming Notification or Special Handling	$10.00 ea.
	Mail Advice	$10.00 ea.

Employee Personal Account Fees Waived
Maximizer Checking Account with no minimum balance requirement
Free Checks (one box per order - any style)
First Option
Debit Card Replacement
Coin Counting
Stop Payments
Bank-to-Bank Transfers
Cashier's Checks
Notary Services
One Small Safe Deposit Box (where available)

This list may not be all inclusive. All fees are applied per tax ID # unless specified by account.
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Assessment Area(s)

Oklahoma City MSA - Assessment Area Map



Tract Group Assessment Area - Detail

Institution: FIRST FIDELITY BANK

Assessment Area: 2026 Oklahoma City

Summary Only: False

2026 Oklahoma City Assessment Area Tract List

Area	Year	State	County	Tract	MSA
40: Oklahoma, 36420: Oklahoma City, OK MSA, 017: Canadian					
0038	2026	40	017	3001.00	36420
0038	2026	40	017	3002.01	36420
0038	2026	40	017	3002.02	36420
0038	2026	40	017	3003.00	36420
0038	2026	40	017	3004.00	36420
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0038	2026	40	017	3014.09	36420
0038	2026	40	017	3014.10	36420

40: Oklahoma, 36420: Oklahoma City, OK MSA, 027: Clevelanc					
0038	2026	40	027	2001.00	36420
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0038	2026	40	027	2018.01	36420
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0038	2026	40	027	2022.01	36420
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0038	2026	40	051	0005.02	36420
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0038	2026	40	083	6003.00	36420
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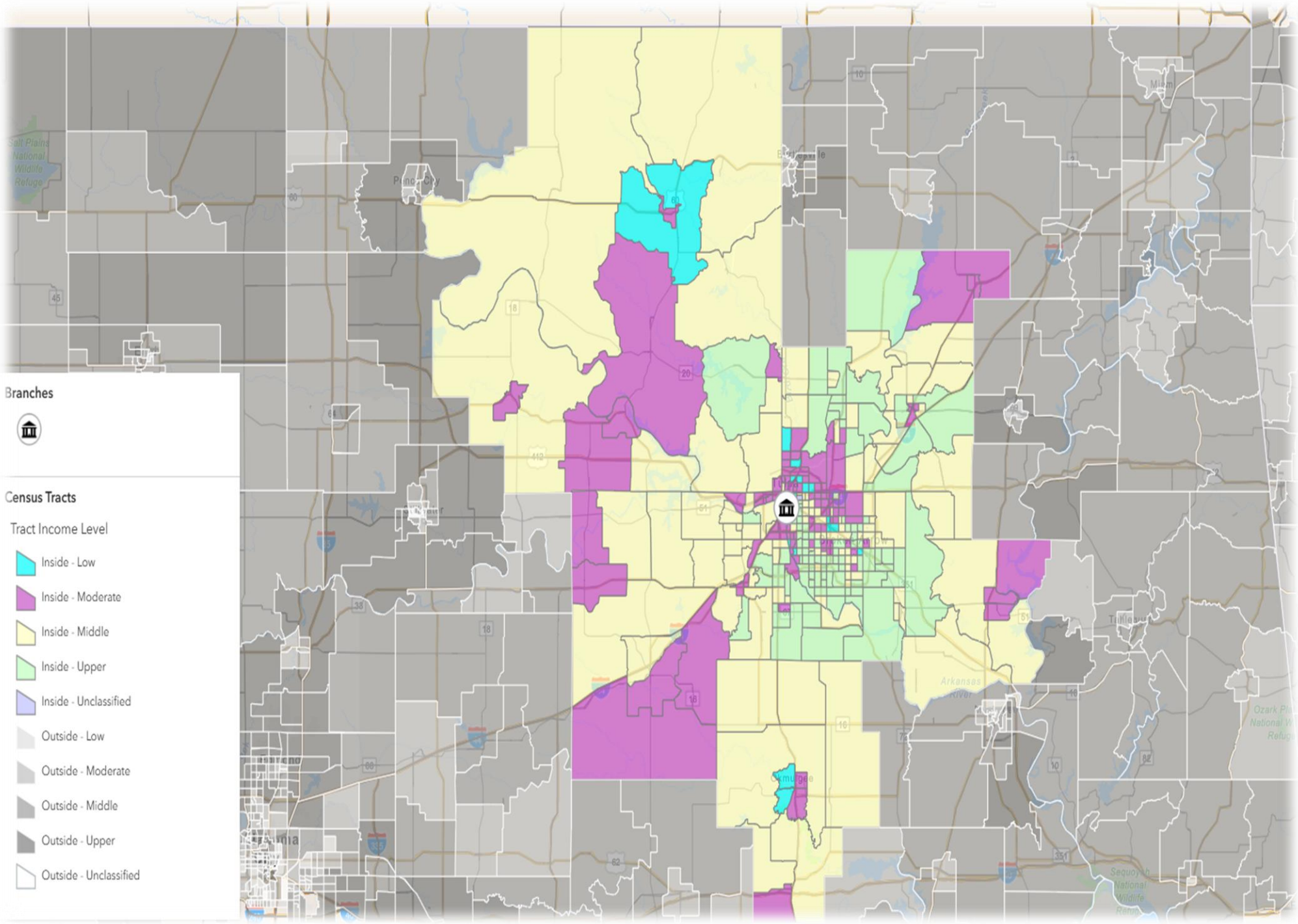
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0038	2026	40	109	9800.09	36420
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Tulsa MSA - Assessment Area Map



Tract Group Assessment Area - Detail

Institution: FIRST FIDELITY BANK

Assessment Area: 2026 Tulsa

Summary Only: False

2026 Tulsa Assessment Area Tract List

Area	Year	State	County	Tract	MSA
40: Oklahoma, 46140: Tulsa, OK MSA, 037: Creek County					
0039	2026	40	037	0201.01	46140
0039	2026	40	037	0201.02	46140
0039	2026	40	037	0201.03	46140
0039	2026	40	037	0206.02	46140
0039	2026	40	037	0206.03	46140
0039	2026	40	037	0206.04	46140
0039	2026	40	037	0207.02	46140
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0039	2026	40	037	0215.00	46140
0039	2026	40	037	0216.00	46140
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0039	2026	40	111	0009.01	46140
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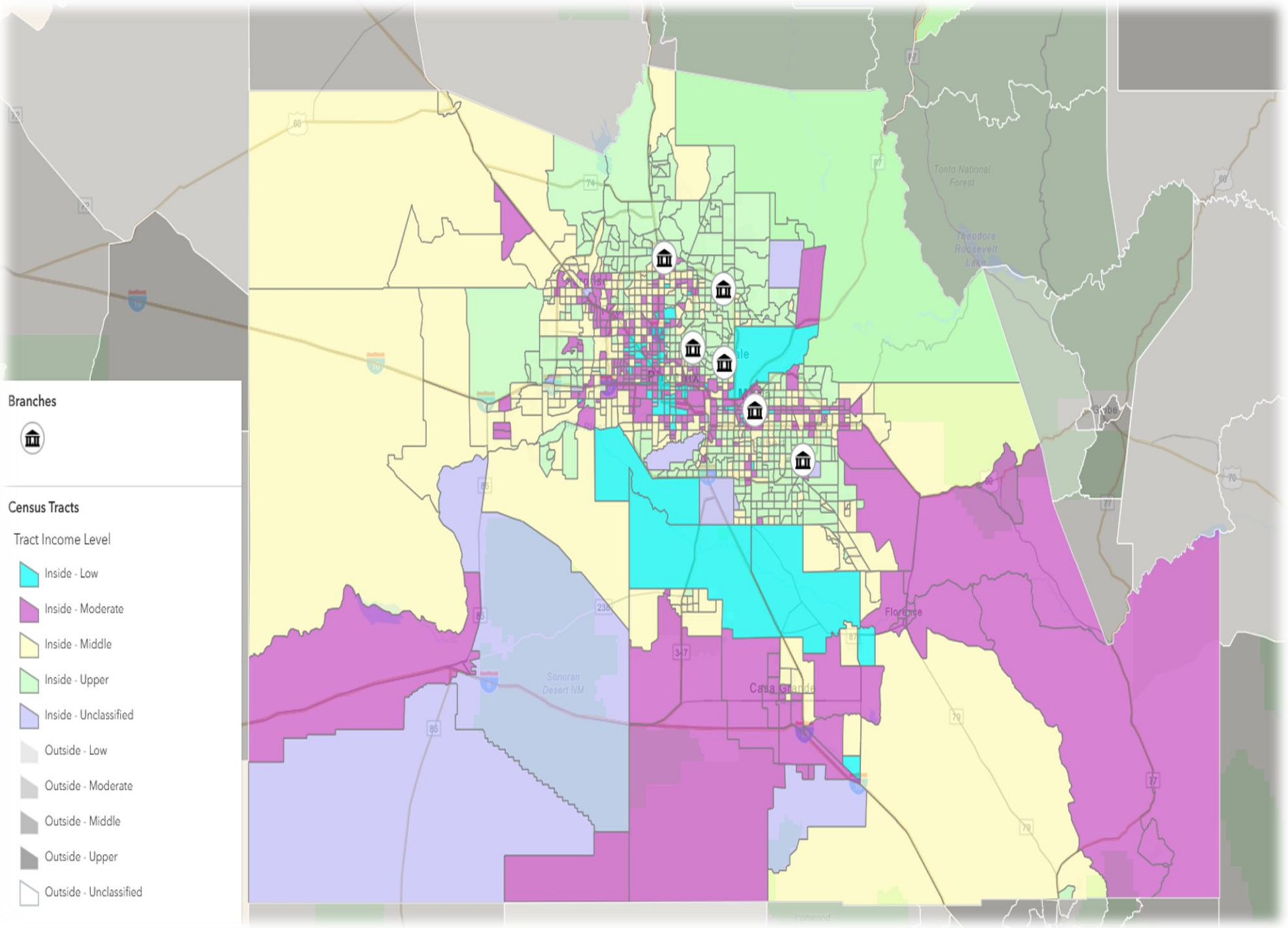
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Phoenix MSA - Assessment Area Map



Tract Group Assessment Area - Detail

Institution: FIRST FIDELITY BANK

Assessment Area: 2026 Phoenix

Summary Only: False

2026 Phoenix Assessment Area Tract List

Area	Year	State	County	Tract	MSA
04: Arizona, 38060: Phoenix-Mesa-Chandler, AZ MSA, 013: Ma					
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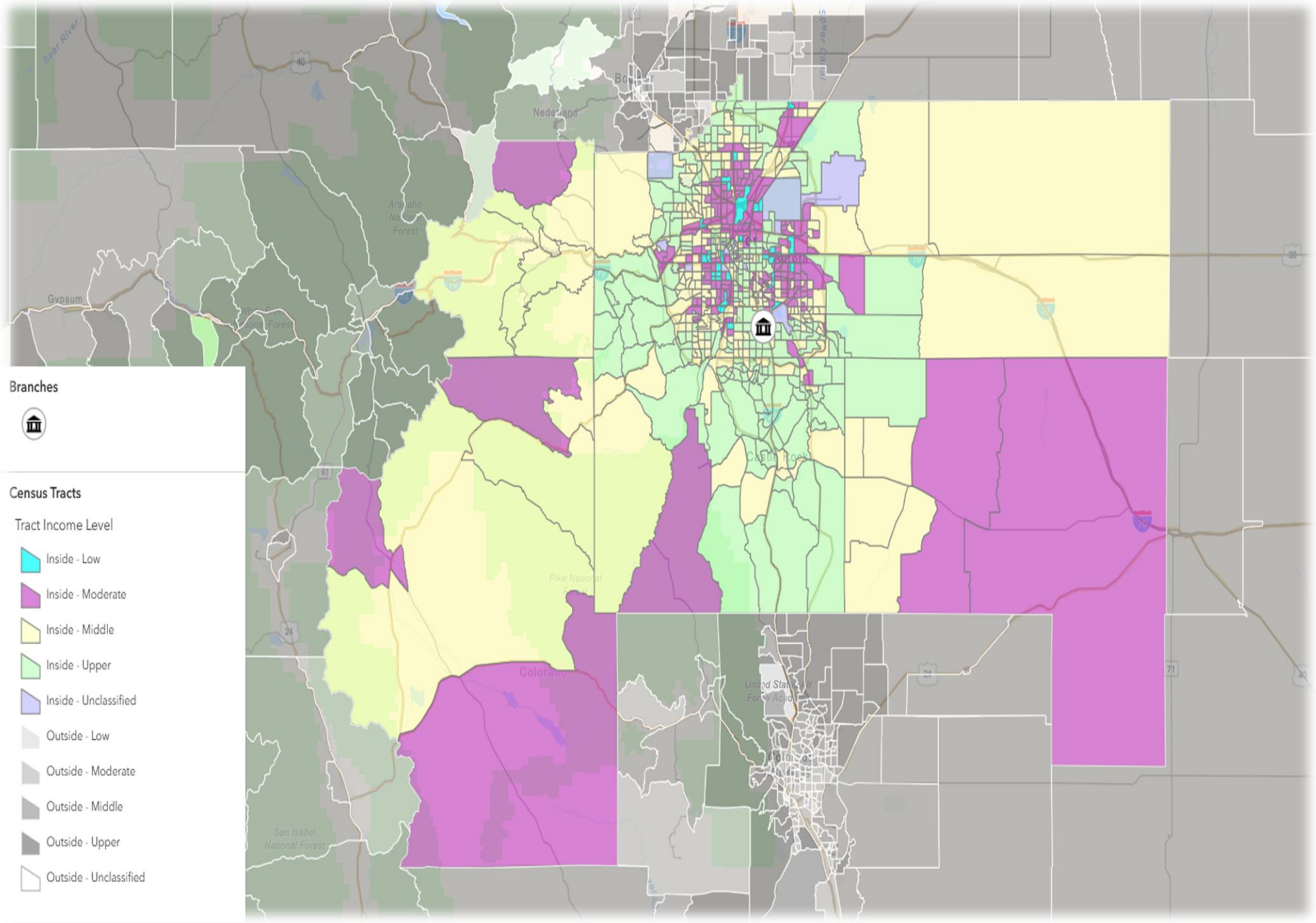
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Discovery>Reporting					
Copyright © 2026 M. 03/10/2026 4:37:13pm By Jaime Schmidt					

Denver MSA - Assessment Area Map



Tract Group Assessment Area - Detail

Institution: FIRST FIDELITY BANK

Assessment Area: 2026 Denver

Summary Only: False

2026 Denver Assessment Area Tract List

Area	Year	State	County	Tract	MSA
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0037	2026	08	005	0860.01	19740
0037	2026	08	005	0860.02	19740
0037	2026	08	005	0861.00	19740
0037	2026	08	005	0862.00	19740
0037	2026	08	005	0863.00	19740
0037	2026	08	005	0864.00	19740

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0037	2026	08	005	0866.00	19740
0037	2026	08	005	0867.00	19740
0037	2026	08	005	0868.01	19740
0037	2026	08	005	0868.02	19740
0037	2026	08	005	0869.00	19740
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0037	2026	08	005	0871.00	19740
0037	2026	08	005	0872.00	19740
0037	2026	08	005	0873.01	19740
0037	2026	08	005	0873.02	19740
0037	2026	08	005	9800.00	19740
08: Colorado, 19740: Denver-Aurora-Centennial, CO MSA, 014: Broomfield C					
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0037	2026	08	014	0301.00	19740
0037	2026	08	014	0302.00	19740
0037	2026	08	014	0303.00	19740
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0037	2026	08	014	0311.02	19740
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0037	2026	08	014	0311.04	19740
0037	2026	08	014	0312.01	19740
0037	2026	08	014	0312.02	19740
0037	2026	08	014	0313.00	19740
0037	2026	08	014	0314.01	19740
0037	2026	08	014	0314.02	19740
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0037	2026	08	014	9801.00	19740
0037	2026	08	014	9802.00	19740
0037	2026	08	014	9803.00	19740
08: Colorado, 19740: Denver-Aurora-Centennial, CO MSA, 019: Clear Creek C					
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0037	2026	08	019	0147.02	19740
0037	2026	08	019	0148.00	19740
0037	2026	08	019	0149.00	19740
08: Colorado, 19740: Denver-Aurora-Centennial, CO MSA, 031: Denver Count					
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0037	2026	08	031	9801.00	19740

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08: Colorado, 19740: Denver-Aurora-Centennial, CO MSA, 035: Douglas Coun					
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0037	2026	08	035	0141.15	19740
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0037	2026	08	035	0141.33	19740

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0037	2026	08	035	0141.35	19740
0037	2026	08	035	0141.38	19740
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0037	2026	08	035	0146.03	19740
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08: Colorado, 19740: Denver-Aurora-Centennial, CO MSA, 039: Elbert County					
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0037	2026	08	039	9612.04	19740
0037	2026	08	039	9612.05	19740
0037	2026	08	039	9612.06	19740
0037	2026	08	039	9612.07	19740
0037	2026	08	039	9612.08	19740
0037	2026	08	039	9612.09	19740
08: Colorado, 19740: Denver-Aurora-Centennial, CO MSA, 047: Gilpin County					
0037	2026	08	047	0138.01	19740
0037	2026	08	047	0138.02	19740
08: Colorado, 19740: Denver-Aurora-Centennial, CO MSA, 059: Jefferson Cou					
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0037	2026	08	059	0120.55	19740
0037	2026	08	059	0120.57	19740

0037	2026	08	059	0120.58	19740
0037	2026	08	059	0120.59	19740
0037	2026	08	059	0120.60	19740
0037	2026	08	059	0158.00	19740
0037	2026	08	059	0159.00	19740
0037	2026	08	059	0603.00	19740
0037	2026	08	059	0604.00	19740
0037	2026	08	059	0605.01	19740
0037	2026	08	059	9800.00	19740
0037	2026	08	059	9804.00	19740
0037	2026	08	059	9807.00	19740
0037	2026	08	059	9808.00	19740
08: Colorado, 19740: Denver-Aurora-Centennial, CO MSA, 093: Park County					
0037	2026	08	093	0001.01	19740
0037	2026	08	093	0001.02	19740
0037	2026	08	093	0002.00	19740
0037	2026	08	093	0003.00	19740
0037	2026	08	093	0004.00	19740
0037	2026	08	093	0005.00	19740
Discovery>Reporting					
Copyright © 2026 M.			Date: 03/10/2026 4:29:11pm By Jaime Schmidt		

Branch & ATM Information

Member FDIC First Fidelity Bank

Branch List and Hours of Operation

July 13, 2026

Branch Number & Name	Branch Name, Address, & Census Demographic Information	Tract Income Level	Tract Minority %	Hours of Operation	
001 Corporate	**5100 N Classen Blvd, Ste 500 Oklahoma City, OK 73118 36420/40/109/1001.00**	**Moderate**	43.75%	Lobby	8 am - 5 pm (M-F)
101 East Moore	**400 S Eastern Ave Moore, OK 73160 36420/40/027/2021.06**	Middle	34.39%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat)- appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
102 West Moore	**11919 S Pennsylvania Ave Oklahoma City, OK 73170 36420/40/027/2018.01**	Upper	35.63%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat)- appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
103 Capitol Hill	**700 SW 29th Oklahoma City, OK 73109 36420/40/109/1050.00**	Unknown	**84.09%**	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat)
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
104 Downtown Norman	**131 E Main St Norman, OK 73069 36420/40/027/2001.00**	Unknown	31.36%	Lobby	9 am - 5 pm (M-F)
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
105 Brookhaven	**3595 W Robinson Norman, OK 73072 36420/40/027/2015.05**	Upper	25.44%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
108 39th Expressway	**5800 NW 39th Expressway Oklahoma City, OK 73132 36420/40/109/1068.04**	**Moderate**	**57.56%**	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
109 Midwest City	**301 N Air Depot Midwest City, OK 73110 36420/40/109/1080.06**	Middle	48.25%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
110 Northwest Expressway	**6005 NW Expressway Oklahoma City, OK 73132 36420/40/109/1085.14**	Middle	**52.47%**	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
111 Quail Creek	**13144 N May Ave Oklahoma City, OK 73120 36420/40/109/1083.22**	**Moderate**	**64.79%**	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
113 Lindsey Street	**1337 W Lindsey St Norman, OK 73069 36420/40/027/2010.00**	Middle	36.93%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M - F), 9 am - 12 pm (Sat)
114 Edmond Kelly	**1109 N Kelly Ave Edmond, OK 73003 36420/40/109/1082.16**	Middle	33.72%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
115 Noble	**900 N Main St Noble, OK 73068 36420/40/027/2025.02**	**Middle**	**22.61%**	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
116 Meridian	**1400 S Meridian Oklahoma City, OK 73108 36420/40/109/1070.02**	**Moderate**	**61.62%**	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)

First Fidelity Bank
Member FDIC

Branch List and Hours of Operation

July 13, 2026

Branch Number & Name	Branch Name, Address, & Census Demographic Information	Tract Income Level	Tract Minority %	Hours of Operation	
117 Mustang	**1521 N Mustang Road Mustang, OK 73064 36420/40/017/3014.10**	Middle	26.84%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
118 Nichols Hills	**6404 Avondale Drive Oklahoma City, OK 73116 36420/40/109/1064.01**	Upper	14.26%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
119 Rose Creek	**2825 NW 164th Edmond, OK 73013 36420/40/109/1082.35**	Upper	41.68%	Lobby	9 am - 5 pm (M-F), 9 am - 12 pm (Sat) - appointment only
				Drive-in	8 am - 6 pm (M-F), 9 am - 12 pm (Sat)
122 Midtown OKC	**424 NW 10th Oklahoma City, OK 73103 36420/40/109/1025.00**	Upper	33.69%	Lobby	9 am - 5 pm (M-F)
151 Tulsa Midtown	**30 W 21st Street Tulsa, OK 74114 46140/40/143/0045.00**	Upper	17.75%	Lobby	9 am - 5 pm (M-F)
				Drive-in	8 am - 6 pm (M-F)
401 Biltmore	**6232 N 32nd St Phoenix, AZ 85018 38060/04/013/1078.00**	Upper	12.97%	Lobby	9 am - 5 pm (M-F)
402 Old Town Scottsdale	**7401 E Camelback Rd Scottsdale, AZ 85251 38060/04/013/2172.01**	Upper	23.09%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
				Drive-in	
403 Scottsdale Promenade	**16435 N Scottsdale Rd, Ste 150 Scottsdale, AZ 85260 38060/04/013/2168.16**	Upper	18.35%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
404 Deer Valley	**22841 N 19th Ave Phoenix, AZ 85027 38060/04/013/6147.00**	**Moderate**	40.47%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
				Drive-in	
406 Mesa	**63 E Main St Mesa, AZ 85201 38060/04/013/4214.00**	**Moderate**	44.47%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
407 Gilbert Gateway	**5114 S Power Rd Mesa, AZ 85212 38060/04/013/8148.02**	Middle	41.99%	Lobby	9 am - 5 pm (M-Th), 9 am - 6 pm (F)
				Drive-in	
501 Denver Tech Center	**5362 Greenwood Plaza Blvd Greenwood Village, CO 80111 19740/08/005/0067.12**	Upper	13.15%	Lobby	9 am - 5 pm (M-F)
				Drive-in	8 am - 5 pm (M-F)

First Fidelity Bank
Member FDIC

ATM Locations

July 13, 2026

ATM Location	Address & Census Demographic Information	Tract Income Level	Tract Minority %	ATM Service Capacity
001 Corporate	**5100 N Classen Blvd Oklahoma City, OK 73118 36420/40/109/1001.00**	**Moderate**	43.75%	Withdrawal Only
101 East Moore	**400 S Eastern Ave Moore, OK 73160 36420/40/027/2021.06**	Middle	34.39%	Deposit and Withdrawal
102 West Moore	**11919 S Pennsylvania Ave Oklahoma City, OK 73170 36420/40/027/2018.01**	Upper	35.63%	Deposit and Withdrawal
103 Capitol Hill (2 ATMs)	**700 SW 29th Oklahoma City, OK 73109 36420/40/109/1050.00**	Unknown	**84.09%**	Deposit and Withdrawal
104 Downtown Norman	**131 E Main St Norman, OK 73069 36420/40/027/2001.00**	Unknown	31.36%	Deposit and Withdrawal
105 Brookhaven	**3595 W Robinson Norman, OK 73072 36420/40/027/2015.05**	Upper	25.44%	Deposit and Withdrawal
108 39th Expressway	**5800 NW 39th Expressway Oklahoma City, OK 73122 36420/40/109/1068.04**	**Moderate**	**57.56%**	Deposit and Withdrawal
109 Midwest City	**301 N Air Depot Midwest City, OK 73110 36420/40/109/1080.07**	Middle	48.25%	Deposit and Withdrawal
110 NW Expressway	**6005 NW Expressway Oklahoma City, OK 73132 36420/40/109/1085.14**	Middle	52.47%	Deposit and Withdrawal
111 Quail Creek	**13144 N May Ave Oklahoma City, OK 36420/40/109/1083.55**	**Moderate**	**64.79%**	Deposit and Withdrawal
113 Lindsey Street	**1337 W Lindsey Norman, OK 73069 36420/40/027/2010.00**	Middle	36.93%	Deposit and Withdrawal
114 Edmond Kelly	**1109 N Kelly Ave Edmond, OK 73003 36420/40/109/1082.16**	Middle	33.72%	Deposit and Withdrawal

First Fidelity Bank
Member FDIC

ATM Locations

July 13, 2026

ATM Location	Address & Census Demographic Information	Tract Income Level	Tract Minority %	ATM Service Capacity
115 Noble	**900 N Main Noble, OK 73068 36420/40/027/2025.00**	Middle	22.60%	Deposit and Withdrawal
116 Meridian	**1400 S Meridian Oklahoma City, OK 73108 36420/40/109/1070.02**	**Moderate**	**61.62%**	Deposit and Withdrawal
117 Mustang	**1521 N Mustang Road Mustang, OK 73064 36420/40/017/3014.10**	Middle	26.84%	Deposit and Withdrawal
118 Nichols Hills	**6404 Avondale Drive Oklahoma City, OK 73116 36420/40/109/1064.01**	Upper	14.26%	Deposit and Withdrawal
119 Rose Creek	**2825 NW 164th Edmond, OK 73012 36420/40/109/1082.18**	Upper	41.68%	Deposit and Withdrawal
122 Midtown OKC	**424 NW 10th Oklahoma City, OK 73103 36420/40/109/1025.00**	Upper	36.69%	Deposit and Withdrawal
151 Tulsa Midtown	**30 W 21st Street Tulsa, OK 74114 46140/40/143/0045.00**	Upper	17.75%	Deposit and Withdrawal
401 Biltmore	**6232 N 32nd St Phoenix, AZ 85018 38060/04/013/1078.00**	Upper	12.97%	Deposit and Withdrawal
402 Old Town Scottsdale	**7401 E Camelback Rd Scottsdale, AZ 85251 38060/04/013/2172.01**	Upper	23.09%	Deposit and Withdrawal
403 N Scottsdale	**16435 N Scottsdale Rd, Ste 150 Scottsdale, AZ 85254 38060/04/013/2168.16**	Upper	18.35%	Deposit and Withdrawal
407 Gilbert Gateway	**5114 S Power Rd Mesa, AZ 85212 38060/04/013/8148.02**	Middle	41.99%	Deposit and Withdrawal
501 Denver Tech Center	**5362 Greenwood Plaza Blvd Greenwood Village, CO 80111 19740/08/005/0067.12**	Upper	13.15%	Deposit and Withdrawal

First Fidelity Bank
Member FDIC

ATM Locations

July 13, 2026

ATM Location	Address & Census Demographic Information	Tract Income Level	Tract Minority %	ATM Service Capacity
Normandy Creek Shopping Center	**2288 W Main St Norman, OK 73069 36420/40/027/2010.00**	Middle	36.93%	Deposit and Withdrawal
Main & Berry	**1190 W Main St Norman, OK 73069 36420/40/027/2005.00**	Middle	26.00%	Deposit and Withdrawal
American Fidelity	**9000 Cameron Parkway Oklahoma City, OK 73114 36420/40/109/1083.01**	**Moderate**	**72.34%**	Deposit and Withdrawal
Quail Creek Plaza Shopping Center	**10904 N May Ave, Ste A Oklahoma City, OK 73120 36420/40/109/1083.55**	Middle	**59.51%**	Deposit and Withdrawal

First Fidelity Bank
Member FDIC

Branch Locations Opened or Closed

July 13, 2026

Branch Name and Address	Demographic Information	Close/Open	Date
122 Downtown OKC **722 N Broadway Ave** **Oklahoma City, OK 73102**	36420/40/109/1099.00 Middle Income Census Tract	Close	7/31/2024
122 Midtown OKC **424 NW 10th** **Oklahoma City, OK 73103**	36420/40/109/1025.00 Upper Income Census Tract	Open	8/5/2024
123 MacArthur Boulevard **12215 N MacArthur Blvd** **Oklahoma City, OK 73162**	36/40/109/1085.29 Upper Income Census Tract	Close	12/13/2024
111 Quail Creek **13144 N May Ave** **Oklahoma City, OK 73120**	36420/40/109/1083.22 Moderate Census Tract	Open	12/16/2024
111 Quail Creek **10904 N May Ave** **Oklahoma City, OK 73120**	36420/40/109/1083.07 Middle Income Census Tract	Close	1/1/2025
405 Arrowhead **17235 N 75th Ave, Ste B100** **Glendale, AZ 85308**	38060/04/013/6178.00 Upper Income Census Tract	Close	6/27/2025
501 Denver Tech Center **5613 DTC Pkwy, Ste 810** **Greenwood Village, CO 80111**	19740/08/005/0068.59 Middle Income Census Tract	Close	7/18/2025
501 Denver Tech Center **5362 Greenwood Plaza Blvd** **Greenwood Village, CO 80111**	19740/08/005/0067.12 Upper Income Census Tract	Open	7/21/2025
407 Gilbert Gateway **5114 S Power Rd** **Mesa, AZ 85212**	38060/04/013/8148.02 Middle Income Census Tract	Open	11/3/2025

120 Edmond Broadway **2600 S Broadway** **Edmond, OK 73013**	36420/40/109/1083.04 Middle Income Census Tract	Close	7/10/2026
121 Coffee Creek **725 W Covell Rd** **Edmond, OK 73003**	36420/40/109/1082.24 Middle Income Census Tract	Close	7/10/2026
114 Edmond Kelly **1109 N Kelly Ave** **Edmond, OK 73003**	36420/40/109/1082.16 Middle Income Census Tract	Open	0713/2026

Community Reinvestment Act Disclosure Notice

The CRA data about our small business and small farm lending are available online for review. The data show geographic distribution of loans. These data are available online at the Federal Financial Institution Examination Council Web site (https://www.ffiec.gov). CRA data for many other financial institutions are also available at this Website.

Home Mortgage Disclosure Act Notice

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age and income of applicants and borrowers; and information about loan approvals and denials. These data are available online at the Consumer Financial Protection Bureau's Web site (www.consumerfinance.gov/hmda). HMDA data for many other financial institutions are also available at this Website.

Public Written Comments

Arizona District Office
3rd Party Lender Rankings
Fiscal Year 2025 1st Quarter
10/01/2024 through 12/31/2024

No. 1 Lender	No. 2. Lender:	No. 3 Lender:
First Fidelity Bank	**Glacier Bank**	**Bank of America**
10	**4**	**4**
$8,767,473	**$10,950,643**	**$3,773,600**

Lender	Count	Amount	Lender	Count	Amount
Celtic Bank	3	$12,194,046	Laguna Hills	1	$4,150,000
JPMorgan Chase	3	$5,372,504	Umpqua Bank	1	$2,224,433
First Bank of the Lake	3	$3,827,900	First-Citizens Bank & Trust	1	$882,000
BNC National Bank	2	$8,448,734	Mountain America FCU	1	$791,900
Southwest Heritage Bank	2	$5,069,412	America First FCU	1	$659,932
Comerica Bank	2	$4,533,500	Gainey Business Bank	1	$625,000
CalPrivate Bank	2	$3,695,000	1st Bank Yuma	1	$614,400
KS StateBank	2	$3,112,000	UNKNOWN	1	$609,547
Bell Bank	2	$1,352,430	U.S. Bank, National Association	1	$592,200
Gateway Commercial Bank	2	$975,000	Desert Financial CU	1	$575,000
Zions Bank	2	$517,053	Unison Bank	1	$547,500
United Business Bank	1	$8,750,000	Integro Bank	1	$480,000
Newtek Bank	1	$6,225,000	Sunwest Bank	1	$462,750

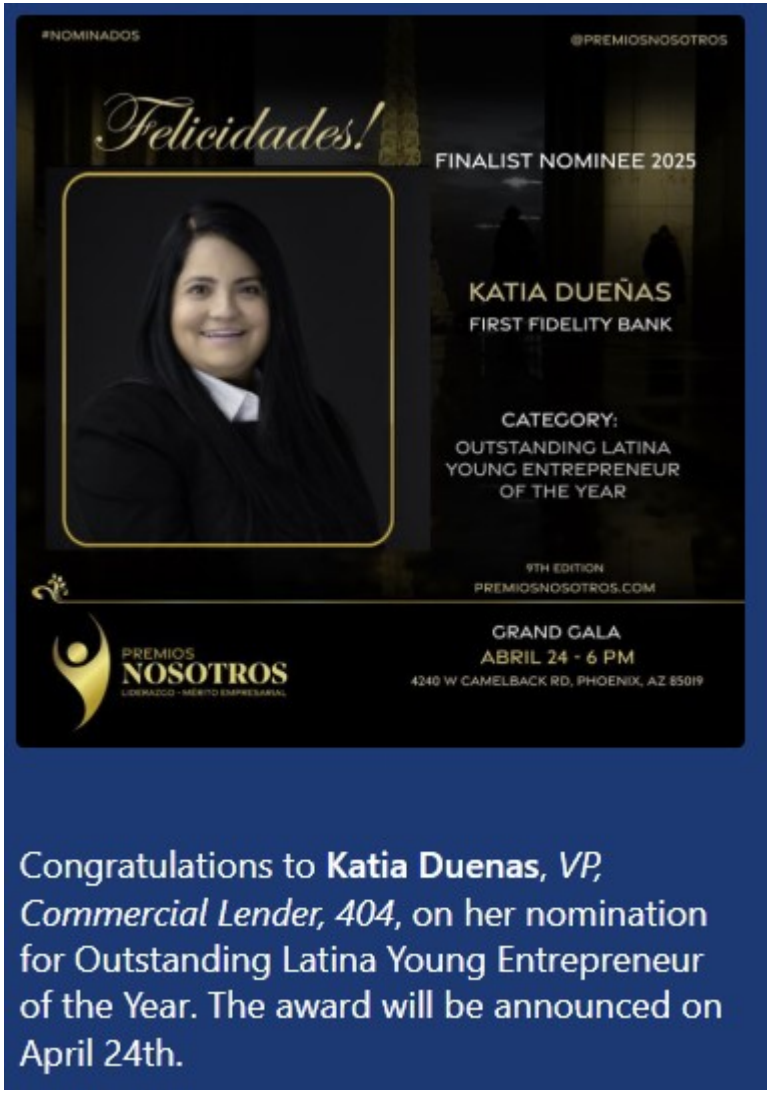
TOTALS	**61**	**$100,778,957**

504 3rd Party Production

Arizona Financial Credit Union	1	N/A
Live Oak Banking Company	1	N/A
TrustBank	1	N/A

Valerie Jury

From: Valerie Jury
Sent: Friday, March 28, 2025 10:22 AM
To: Katia Duenas
Subject: Congrats!



Valerie Jury
Executive Vice President,
Chief Operations Administrator
Corporate Office
Work 405-801-8270
Cell 405-664-8994



Arizona District Office
3rd Party Lender Rankings
Fiscal Year 2025 2nd Quarter
10/01/2024 through 3/31/2025

No. 1 Lender	No. 2. Lender:	No. 3 Lender:
First Fidelity Bank	**JPMorgan Chase**	**Glacier Bank**
19	**7**	**6**
$15,234,613	**$12,862,504**	**$12,691,917**

Lender	Count	Amount	Lender	Count	Amount
BNC National Bank	6	$9,759,731	Comerica Bank	2	$4,533,500
Zions Bank	4	$2,636,053	Mountain America FCU	2	$3,944,400
Celtic Bank	3	$12,194,046	CalPrivate Bank	2	$3,695,000
Integro Bank	3	$5,785,000	KS StateBank	2	$3,112,000
First Bank of the Lake	3	$3,827,900	Live Oak	2	$2,631,752
Wells Fargo	3	$2,700,000	First-Citizens Bank & Trust	2	$1,832,000
Gateway Commercial Bank	3	$2,497,500	UNKNOWN	2	$1,459,547
Meadows Bank	3	$2,486,100	Desert Financial CU	2	$1,125,000
Bell Bank	3	$2,113,222	Wallis Bank	1	$13,241,000
Bank of America	3	$1,985,000	United Business Bank	1	$8,750,000
CrossFirst Bank	3	$1,851,579	WaFd Bank	1	$8,577,230
Bank Five Nine	2	$6,679,000	Newtek Bank	1	$6,225,000
Southwest Heritage Bank	2	$5,069,412	Laguna Hills	1	$4,150,000

TOTALS	**110**	**$179,779,538**

Arizona District Office
3rd Party Lender Rankings
Fiscal Year 2025 3rd Quarter
10/01/2024 through 6/30/2025

No. 1 Lender	No. 2. Lender:	No. 3 Lender:
First Fidelity Bank	**BNC National Bank**	**JPMorgan Chase**
29	**13**	**11**
$25,707,445	**$17,089,405**	**$19,760,897**

Lender	Count	Amount	Lender	Count	Amount
Glacier Bank	8	$12,691,917	Desert Financial CU	3	$1,610,000
Meadows Bank	6	$7,850,000	MidFirst Bank	2	$12,182,000
Zions Bank	6	$3,048,553	Pinnacle Bank	2	$8,684,662
Busey Bank	5	$5,374,087	TrustBank	2	$6,425,000
Celtic Bank	4	$14,823,046	Laguna Hills	2	$5,672,000
Bank Five Nine	4	$11,864,000	Southwest Heritage Bank	2	$5,069,412
Bell Bank	4	$4,173,549	Comerica Bank	2	$4,533,500
Arizona Financial CU	4	$4,031,500	Pima FCU	2	$4,223,250
Bank of America	4	$2,781,125	Mountain America FCU	2	$3,944,400
Integro Bank	3	$5,785,000	Western Alliance Bank	2	$3,732,500
First Bank of the Lake	3	$3,827,900	CalPrivate Bank	2	$3,695,000
Wells Fargo Bank	3	$2,582,000	KS StateBank	2	$3,112,000
First-Citizens Bank & Trust	3	$1,832,000	Live Oak	2	$2,631,752

TOTALS	**164**	**$270,885,489**

Pathways to Entrepreneurship

Local business programs and relationships give students the keys to early entrepreneurship



By Zack Wright, Norman Transcript

Launching a business can be a daunting challenge that many young entrepreneurs aren't adequately prepared to handle.

Whether it's a lack of connections, financial literacy, or simply inexperience in handling all the operations of a business venture, many struggle to turn their ideas into a purchasable product.

But with the help of the Norman Chamber of Commerce and experiential, hands-on programs at the University of Oklahoma's Price College of Business, young business owners here in Norman are equipping themselves with skills, tools and experiences that position them at the forefront of the business industry.

There might be no better example of these transformative experiences than Jacob Baker, a Chamber member who participated in OU's First Fidelity Integrated Business Core Program as a student at the Price College of Business.

As explained by IBC Director Bobby Lepak, the program — which has been sponsored by First Fidelity Bank for the past 30 years — is a semester-long course that challenges students to create their own businesses. Students work through the struggles of running a business together with the ultimate goal of selling their products to nearby retailers and distributors.

"It's an experiential learning program where students learn core business concepts by actually running a business," said Lepak. "They start a company with their classmates, and those companies really do sell products, track inventory and accounting, get financing from the bank — all the components that go into running a business.

"They're basically learning business by running one," Lepak said, adding, "The program is in its 30th year with a long track record of success. Thousands of students have come through, and many have gone on to become successful businesspeople in their own right — whether as entrepreneurs, corporate executives, or managers."

Baker, who has since co-founded Luqi Grips, a company that sells paddle ball and tennis handle grips, said that a great portion of the success he's experienced is due to the business skills he developed in Lepak's program.

"The IBC program was a great experience," Baker said. "My team and I got to go to a bunch of events to sell our product, and it really helped me understand what goes into starting, running and operating an actual business."

"The analogy I like to use is you can read a sign that says the stove is hot or you can touch the stove itself," Lepak said of his program. "Which one of those experiences are you going to remember years down the road? That's what we do at IBC. These experiences stay with them and prepare them for business problems we can't simulate in a classroom.

"That's kind of the special sauce that makes IBC such a great program — the students are really doing it, not just reading about it."

Norman Chamber of Commerce CEO Scott Martin recognized the importance of programs like the IBC, noting that its presence is a great opportunity for local economic growth and innovation.

"Norman's really blessed to have incredible educational institutions in Norman Public Schools, the Moore Norman Technology Center and the University of Oklahoma," Martin said. "All three of them have incredibly robust and engaging startup programs that encourage entrepreneurship at all levels.

"And frankly, I'd like to say that Norman's the startup capital of Oklahoma," he added. "They're generating a ton of startups and entrepreneurs out of the university, and we need to capitalize on that. We need to have the next best thing — whatever it may be — starting here in our backyard."

With so many talented and motivated young minds waiting to bring their ideas to life, Martin and the Chamber offer $50 memberships for students. Baker said that although the IBC program has helped him learn the ins and outs of running a business, the Chamber has been a tremendous help in developing his leadership and networking skills with other business owners.

"I joined as a student and started going to meetings to go to places to meet bankers, local CEOs, nonprofits and other business administrators," Baker said. "I get to go to their special events with guest speakers, so it's like getting five years of networking in one year by the quality and quantity of how many events they participate in…It's just been great from a professional and leadership development standpoint."

Lepak added that the Chamber and the IBC have a great relationship thanks to their members' commitment to the success of the students and young entrepreneurs who call Norman home.

"A lot of Chamber members are licensed vendors for university-branded apparel and promotional products, which is what our students typically sell," Lepak said. "So we have great relationships with those vendors because they're suppliers. The Chamber also mentors and provides educational support to students learning these steps to success.

Lepak added that several Chamber members have helped IBC students over the years, by being good business collaborators and providing networking and support aspects often overlooked.

Lepak later explained that at the end of the semester, his students amass their total profits and distribute the earnings to local charities. According to a press release from sponsor First Fidelity Bank, the program has donated $1.8 million toward local nonprofit charities and initiatives.

However, the story doesn't stop there as students often have to buy products and miscellaneous items from local small businesses themselves, creating a cycle that has resulted in $13 million in economic impact amongst Norman businesses since 2000, the release adds.

"That's a great story for us," Lepak said. "But it highlights something that I think the Norman Chamber recognizes and really understands, which is that local business makes your community better. There's a big positive impact from supporting your local Chamber members because the money that goes into the community stays in that community to help improve other things within it.

"Those funds and expenses circulated in the Norman community, and that's what makes our quality of life better," said Lepak. "We can definitely see that from our activity and the economic impact that IBC had. But when you extend that to the impact of all Chamber members, it's huge. And certainly a massive benefit to the City of Norman."

With so much growth in an already budding city that continues to add new housing, businesses and infrastructure, Martin hopes that these efforts to nurture Norman's young entrepreneurs translate to jobs and growth that will continue to attract businesses and families looking for a place to call home.

"We want to engage with these students because they are the next generation of business owners for our community," Martin said. "When you think about Norman thriving and growing, it's going to revolve around jobs that attract more business. So we want to partner with entrepreneurs and our local education entities to help create that kind of environment.

"Norman is uniquely positioned just south of the OKC metro area, so we pull a ton of business from people near Oklahoma City to come shop, work and eat," added Martin. "And so what we want to do is create an environment that not only retains our local graduates but also attracts those folks in the metro… It's just such a vital investment in the growth and quality of life here in Norman."

What is OU's First Fidelity Integrated Business Core Program?

A semester-long course that challenges students to create their own businesses. Students work through the struggles of running a business together with the ultimate goal of selling their products to nearby retailers and distributors.



Chamber members and young entrepreneurs Jacob Baker and James Baranowski with CEO Scott Martin.

NORMAN PUBLIC SCHOOLS

Arizona District Office
3rd Party Lender Rankings
Fiscal Year 2025 4th Quarter
10/01/2024 through 9/30/2025

No. 1 Lender	No. 2. Lender:	No. 3 Lender:
First Fidelity Bank	**JPMorgan Chase**	**BNC National Bank**
40	**17**	**16**
$38,912,665	**$30,172,914**	**$19,368,423**

Lender	Count	Amount	Lender	Count	Amount
Glacier Bank	10	$16,189,391	KS StateBank	4	$8,425,227
Arizona Financial Credit Union	7	$7,331,675	Integro Bank	4	$7,172,315
Celtic Bank	6	$28,091,017	Desert Financial CU	4	$2,310,000
Western Alliance Bank	6	$15,382,500	Pinnacle Bank	3	$17,275,825
Meadows Bank	6	$7,991,500	Mountain America FCU	3	$8,075,000
Bell Bank	6	$7,486,297	Southwest Heritage Bank	3	$6,069,412
Busey Bank	6	$6,351,787	CalPrivate Bank	3	$4,250,711
Bank of America	6	$5,445,500	First Bank of the Lake	3	$3,827,900
Zions Bank	6	$3,572,984	Columbia Bank	3	$2,614,025
Bank Five Nine	5	$13,861,500	WaFd Bank	2	$8,828,775
Wells Fargo	5	$5,828,829	TrustBank	2	$6,425,000
First-Citizens Bank & Trust	5	$5,624,000	Laguna Hills	2	$5,672,000
MidFirst Bank	4	$16,435,650	Comerica Bank	2	$4,533,500

TOTALS	**222**	**$401,114,389**

504 3rd Party Production

Pima FCU	2	$4,223,250
Live Oak	2	$2,631,752
Unison Bank	2	$1,983,500
FWBank	2	$1,854,000
Gateway Commercial Bank	2	$1,378,556
OneAZ CU	2	$756,722
Western State Bank	1	$21,875,000
Wallis Bank	1	$13,241,000
United Business Bank	1	$8,750,000
SMBC MANUBANK	1	$6,500,000
Newtek Bank	1	$6,225,000
Midwest Bank	1	$3,838,921
Truist Bank	1	$3,750,000
Starion Bank	1	$1,427,000
Servbank	1	$1,275,000
First Savings Bank	1	$900,000
Zenith Bank and Trust	1	$857,500
Prestamos CDFI	1	$850,000
Cache Valley Bank	1	$700,000
Mission Bank	1	$700,000
America First FCU	1	$659,932
Gainey Business Bank	1	$625,000
1st Bank Yuma	1	$614,400
U.S. Bank	1	$592,200
Sunwest Bank	1	$521,850
Harvest Commercial Capital	1	$442,484
First International Bank & Trust	1	$415,000

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George Lyons IOLTA Partnering Award

Good afternoon & congratulations to your financial institution!

The Arizona Bar Foundation for Legal Services & Education is excited to take this opportunity to congratulate your financial institution for remitting all the interest earned on the Arizona IOLTA accounts. **You are one of the 2026 Arizona financial institutions to be recognized as a George Lyons Partnering Financial Institution Nominee.** With this recognition, you will be included in the "Arizona Attorney" magazine sent to ~20,000 licensed attorneys in Arizona.

The Foundation will also select and present the **George Lyons IOLTA Partnering Award** to one deserving financial institution at the State Bar Convention, Thursday, June 25th, at the Westin La Paloma Resort & Spa, in Tucson, Arizona. The winning financial institution is acknowledged during the Awards Ceremony, also

honoring Lyons' Den award winners, our Top 50 Pro Bono Attorneys and five other attorneys, judges, and organizations for their outstanding contributions to Arizona's justice system. The awardee is given a plaque and two tickets to attend the Foundation luncheon with attendance of approximately two hundred attorneys, members of the judiciary, and other stakeholders in the Arizona justice system.

To be eligible for the George Lyons Partnering Award, you must submit the attached application and include how your financial institution supported Arizona communities through any of the civics/law related education and/or legal services efforts listed.

Applications MUST be submitted via e-mail to AZIOLTA@azflse.org by Friday, February 27, 2026 in order to be considered.

Please see our website for further information and to view previous awardees:
https://azbf.org/awards/george-lyons-award

We hope you take the time to complete your nomination so you can be recognized for your contribution to the great work resulting from Arizona's IOLTA program. The Arizona Foundation for Legal Services & Education is truly grateful for your participation in the IOLTA program.

Learn More About the Award

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Arizona District Office
3rd Party Lender Rankings
Fiscal Year 2026 2nd Quarter
10/01/2025 through 3/31/2026

No. 1 Lender	No. 2. Lender:	No. 3 Lender:
First Fidelity Bank	**Arizona Financial Credit Union**	**Glacier Bank**
16	**12**	**6**
$16,946,854	**$9,291,924**	**$12,091,501**

Lender	Count	Amount	Lender	Count	Amount
Bank of America	6	$3,614,375	Zions Bank	1	$3,000,000
JPMorgan Chase	4	$4,163,808	Harvest Small Bus. Finance	1	$2,916,000
Wells Fargo	2	$5,961,500	Celtic Bank	1	$2,608,000
Meadows Bank	2	$3,807,800	Western State Bank	1	$2,587,600
MidFirst Bank	2	$2,860,000	Bank Five Nine	1	$1,911,000
State Bank of Southern Utah	2	$2,687,500	Gateway Commercial Bank	1	$1,642,000
Western Alliance Bank	2	$1,555,000	LendingClub	1	$1,412,012
Live Oak Banking Company	1	$8,695,000	Bell Bank	1	$1,411,307
City National Bank	1	$7,755,080	Northwest Bank	1	$1,199,000
The Kansas State Bank	1	$5,898,150	Western Alliance	1	$1,182,000
CalPrivate Bank	1	$4,400,000	Alerus Financial	1	$1,140,000
Unison Bank	1	$3,332,000	Integro Bank	1	$1,087,571
Columbia Banking System	1	$3,281,450	Evolve Bank and Trust	1	$1,059,967

TOTALS	**87**	**$128,180,315**

504 3rd Party Production

BNC National Bank	1	$1,024,225
Endeavor Bank	1	$880,000
Columbia Bank	1	$776,362
Velocity Commerical Capital	1	$764,343
Southwest Heritage Bank	1	$757,500
Harvest Commercial Capital	1	$713,000
Gainey Business Bank	1	$712,246
First International Bank & Trust	1	$710,000
First Merchants Corporation	1	$684,000
First-Citizens Bank & Trust	1	$415,000
Western Bank	1	$401,320
OneAZ CU	1	$325,000
Mission Bank	1	$262,500
Pima FCU	1	$256,420