



PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BOKF, National Association

Charter Number: 13679

One Williams Center
Tulsa, OK 74142

Office of the Comptroller of the Currency

Midsized Bank Supervision
425 S. Financial Place, Suite 1700
Chicago, IL 60605

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 bank. This evaluation is not, and should not 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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Overall CRA Rating

Bank's CRA Rating: This bank is rated Outstanding.

The following table indicates the performance level of BOKF, National Association (BOKF or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	BOKF, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the performance of the state of Colorado, Oklahoma, and Texas rating areas. The relatively high use of innovative and flexible lending programs was considered in arriving at the overall Lending Test rating. The performance of the bank's community development (CD) loans had a positive impact in several rating areas.
- The Investment Test rating is based on the performance across all rating areas, with the majority rated excellent. The state rating areas of Colorado, Oklahoma, and Texas received greater weight. The bank has an excellent level of qualified CD investments and grants across the rating areas, statewide, and at the national level.
- The Service Test rating is based on the performance across all rating areas, which was good. Branch distribution in several of the bank's Assessment Areas (AA) was good when considering near to branches.

Lending in Assessment Area

A high percentage of the bank's loans are in its AAs.

The bank originated and purchased 66.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage

does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	28,351	64.1	15,848	35.9	44,199	5,463,290	54.3	4,595,302	45.7	10,058,592
Small Business	4,643	90.1	511	9.9	5,154	1,312,707	86.0	213,508	14.0	1,526,215
Small Farm	4	100.0	0	0.0	4	722	100.0	0	0.0	722
Total	32,998	66.9	16,359	33.1	49,357	6,776,719	58.5	4,808,810	41.5	11,585,529

Home mortgage loans, which represent 89.5 percent of the total number of loans, are considered the primary product as they have a greater direct impact and are more responsive to credit needs of all AAs, including low- and moderate-income (LMI) communities in the bank's AA. Conclusions are factored into the overall analysis of the geographic distribution of lending by income level of geography.

Description of Bank

BOKF is an interstate bank headquartered in Tulsa, Oklahoma. BOKF is a wholly owned subsidiary of BOK Financial Corporation (BOKFC). The bank has operations in eight states and began as an energy bank in 1910 during the early century oil boom. As of December 31, 2019, BOKF had total assets of \$42.1 billion and Tier One Capital of \$3.4 billion.

Other BOKFC subsidiaries include BOK Financial Securities, Inc., a broker/dealer that primarily engages in retail and institutional securities sales and municipal bond underwriting; BOK Financial Private Wealth, Inc., an investment adviser to high net worth clients; and BOK Financial Insurance, Inc., a broker providing insurance services. Affiliate activities during the evaluation period were not considered in evaluating the bank's performance.

According to the June 30, 2019, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, the bank had total deposits of \$25.5 billion. Based on deposits, BOKF is the largest institution in Oklahoma, the fifth largest in New Mexico, and seventh largest in Colorado.

As of December 31, 2019, the bank reported total loans of \$21.9 billion, representing 52.0 percent of total assets. The loan portfolio consisted of approximately \$10.5 billion commercial loans or 47.7 percent of total loans, \$8.6 billion commercial real estate loans or 39.1 percent of total loans, \$2.5 billion 1-4 family residential loans or 11.2 percent of total loans, and \$425 million consumer loans or 1.9 percent of total loans.

The bank currently operates 125 full-service branch offices, 13 loan production offices (LPO), and 186 deposit-taking automated teller machines (ATM) across 12 AAs in eight states: Arizona (AZ), Arkansas (AR), Colorado (CO), Kansas (KS), Missouri (MO), New Mexico (NM), Oklahoma (OK), and Texas (TX). Refer to Appendix A for a summary of the AAs and respective counties. BOKF operates as separate brands in the states they are located: Bank of Albuquerque in NM, Bank of Oklahoma in OK, Bank of Texas in TX, and BOK Financial in AZ, AK, CO, KS, and MO. On February 17, 2017, BOKF acquired Missouri Bank and Trust Company of Kansas City, Missouri along with six full-service branches in Kansas and Missouri. In addition, BOKF acquired CoBiz Bank (CoBiz), Denver, Colorado on October 1, 2018 and with this merger the bank acquired 15 new branches in Arizona and Colorado. BOKF opened 19 branches and closed 22 branches during the evaluation period. On April 30, 2018, BOKF closed a branch in Maryland (MD) and ceased operations in the state. The bank employs over 4,700 team members across its footprint.

The bank's strategy is to provide a comprehensive range of nationally competitive financial products and services in a personalized and responsive manner. Products and services include loans and deposits, cash management services, fiduciary and insurance services, mortgage banking and brokerage and trading services to middle-market businesses, financial institutions and consumers. Commercial banking represents a significant part of the bank's business with a culture that emphasizes building relationships by making high quality loans and providing a full range of financial products and services to their customers. The bank offers a variety of commercial, retail, insurance, and wealth management financial services products. Retail banking services include overdraft facilities, drive-in and night deposit services, safe deposit facilities, international banking services, and remote deposit

capture. In addition to branches and ATMs, the bank's delivery systems include 24/7 telephone banking, online banking, and mobile banking.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in its AAs during the evaluation period. BOKF's CRA performance was rated "Outstanding" in the last public evaluation dated May 1, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's performance under the large bank Lending, Investment, and Service Tests. For the Lending Test, we analyzed home mortgage loans that the bank reported under the Home Mortgage Disclosure Act (HMDA), and small loans made to businesses and small loans to farms the bank reported under the CRA. All loan types were reviewed for the period of January 1, 2017 through December 31, 2019. Primary loan products, for purposes of this review, are products in which the bank originated at least 20 loans within an AA during one or more of the analysis periods within the overall evaluation period. Multifamily loans and small loans to farms are not primary loan products and the bank did not originate or purchase any small loans to farms during the evaluation period; therefore, we did not evaluate these products separately. However, we did consider multifamily loans meeting the CD definition as part of the evaluation of CD lending.

The OCC compared bank loan data for all applicable years in the state rating area to: demographic data using the U.S. Census American Community Survey (ACS); Federal Financial Institutions Examination Council (FFIEC) adjusted median family incomes; 2018 and 2019 Dun and Bradstreet (D&B) small business demographic data; 2018 peer mortgage loan data reported under HMDA; and 2018 peer small business data reported under CRA.

In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA and CRA, 2017 through 2019 data was analyzed and aggregated unless noted in the Scope of Evaluation section for the state. There were changes to the U.S. Census 2015 ACS and recent updates to HMDA data field collection; however, these changes did not impact the bank's AA. Analysis of data related to calendar years 2017 and later is based on the 2011-2015 ACS. Performance Tables O, P, Q, R, S, and T in Appendix D include data covered by the analysis period 2017 through 2019.

Bank and branch deposit data is as of June 30, 2019, based on information from the FDIC. The distribution of bank branches is compared to U.S. Census 2015 ACS population estimates.

The evaluation period for CD loans, the Investment Test, and the Service Test was January 1, 2017 through December 31, 2019. With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

Refer to the “Scope” section under each State Rating section for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings and the MMSA ratings.

Refer to the “Scope” section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The state of Colorado, Oklahoma, and Texas rating areas carried the greatest weight in the conclusions because these areas represented the bank’s most significant market in terms of deposit concentration, branch distribution, and reportable loans. As of June 30, 2019, deposits in these rating areas comprised 85.3 percent of BOKF’s total deposits. Additionally, 76.8 percent of the bank’s branches were located in these states, and 70.4 percent of reportable loan originations were generated in these states. The state of Maryland rating area had no weight in the evaluation due to the closing of the bank’s operations in the state.

In evaluating the bank’s performance under the Lending Test, we placed greater weight on the bank’s distribution of home mortgage loans than the distribution of small business loans based on the volume.

In addition, affordable housing is a need identified in the AAs. Generally, equal emphasis is given to the geographic distribution of loans and lending by borrower income level. Greater weight was generally given to performance compared to aggregate lenders than to performance relative to demographic factors in lending.

Other Performance

Product Innovation and Flexibility

SBA Express

BOKF developed the SBA Express, an innovative and flexible loan program for businesses. The SBA Express loan program is designed for new and growing businesses that need help funding working capital, inventory and equipment, acquiring owner occupied real estate or building or expanding a commercial real estate property. The funds can be used for many business needs, and there is also an available revolving line of credit maximum of \$350 thousand and up to a 10-year term. This loan has the fastest turnaround time for approvals and the lowest rates.

During the evaluation, the bank leveraged this program to originate 57 loans totaling over \$7.34 million throughout the bank’s AAs. The bank originated two loans totaling \$212 thousand in the Kansas City KS-MO MMSA, 13 loans totaling \$1.6 million in the state of Arizona, 17 loans totaling \$3.7 million in the state of Colorado, one loan totaling \$145 thousand in the state of New Mexico, 11 loans totaling \$771 thousand in the state of Oklahoma, and 13 loans totaling \$961 thousand in the state of Texas.

Federal Home Loan Bank of Topeka's Affordable Housing Program

The bank partners with the Federal Home Loan Bank of Topeka (FHLB) to sponsor projects utilizing the Affordable Housing Program (AHP). FHLB members, in partnership with public and private housing development organizations, prepare a detailed application for this competitive program. The AHP was created by Congress through the Financial Institutions Reform, Recovery and Enforcement Act in 1989. The AHP is funded each year with 10 percent of FHLB net income. FHLB's competitive AHP, implemented in 1990, in partnership with its members and project sponsors, addresses the housing needs of very low-, low-, and moderate-income households by providing gap financing for owner-occupied and rental projects. The AHP is the largest privately funded housing grant program in the United States.

During the evaluation period, BOKF sponsored 19 programs, 11 of which were awarded AHP funds. The bank leveraged these programs totaling \$7.6 million in the states of CO, OK, and TX.

Other Loan Programs

BOKF participates in many housing finance agencies bond programs. Refer to the "Product Innovation and Flexibility" section under each State and MMSA Rating section for details regarding the programs that were considered.

Near to Branches

The service test includes an evaluation of the availability and effectiveness of a bank's systems for delivering retail banking services, including the current distribution of the bank's branches among different income geographies.

A near to branch is a branch in a middle- or upper-income area that is proximate to an LMI area and serves that area. These branches are in a reasonable distance from LMI census tract they are serving. The bank provided adequate evidence showing that the branch serves customers in the LMI area. The bank had 18 branches in middle or upper-income census tracts that were considered near to branches.

Refer to the "Retail Banking Services" section under each State and MMSA Rating section for details regarding the branches that were considered near to.

Other Services

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, online banking, and Apple Pay. Some services that supplement the bank's branches are:

- BOKF offers interpreters via Language Line, a third-party vendor, for customers who prefer or only speak in a foreign language. This service is available 24 hours a day, seven days a week.

- The bank's ExpressBank delivery systems is a call center that allows live bankers to be available to customers outside of normal banking hours Monday through Friday and Saturday.
- BOKF customers can access two ATM networks that dramatically increase the bank's footprint. The TransFund ATM network, a division of the bank, has approximately 586 ATMs in Arizona, Iowa, Nebraska, New Mexico, Oklahoma, and Texas. The MoneyPass ATM network has approximately 32,952 ATMs for cash withdrawals in almost every state of the U.S., including a few foreign countries.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development (HUD), and the Consumer Financial Protection Bureau (CFPB), as applicable.

The OCC has not identified that this bank (or any affiliate whose loans have been considered as part of the bank's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

Multistate Metropolitan Statistical Area Rating

Kansas City KS-MO MMSA

CRA rating for the Kansas City KS-MO MMSA¹:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits adequate geographic distribution of loans in its AA.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes;
- The bank is a leader in making CD loans. CD loans had a significantly positive impact in the AA and in the overall Lending Test rating;
- The bank has a significant level of qualified investments, particularly those that are not routinely provided by private investors, occasionally in a leadership position;
- The bank's branches are reasonably accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals; and
- The bank provides a good level of CD services.

Description of Bank's Operations in Kansas City KS-MO MMSA

The Kansas City KS-MO MMSA is comprised of the complete counties of Johnson and Wyandotte in KS and Jackson in MO. In 2019, the bank added the complete counties of Platte and Clay in MS as part of an acquisition. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 463 CTs, of which 78 are low- income and 103 are moderate-income.

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$772.9 million in deposits in the Kansas City MMSA which represented 3.0 percent of the bank's total deposits. BOKF was ranked 16th out of 91 banks, with a presence in the AA, with a market share of 1.4 percent. Primary competitors within the AA are the following: UMB Bank, N.A., which ranked first in deposit market share (23.9 percent) with 28 branches; Commerce Bank, which ranked second in deposit market share (12.1 percent) with 41 branches; and Bank of America, N.A., which ranked third in deposit market share (10.8 percent) with 35 offices.

BOKF provides a full range of loan and deposit products and services in the state. The bank operates six full-service branches: none located in LMI Census Tract (CT), two are located in middle-income CTs, and four are located in upper-income CTs. In addition, the bank has seven deposit-taking ATMs throughout the AA. The branches represent 4.8 percent of the bank's total branch network.

The bank made 10.3 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Metropolitan Statistical Area: Kansas City KS-MO MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	463	16.8	22.2	29.2	27.6	4.1
Population by Geography	1,732,280	10.4	21.8	33.8	33.7	0.3
Housing Units by Geography	746,566	12.2	22.9	34.4	30.0	0.5
Owner-Occupied Units by Geography	435,668	6.6	18.0	35.5	39.7	0.2
Occupied Rental Units by Geography	242,654	17.6	30.2	34.4	17.1	0.7
Vacant Units by Geography	68,244	28.7	28.5	27.1	13.7	2.0
Businesses by Geography	134,935	7.6	18.8	32.4	39.1	2.1
Farms by Geography	3,388	5.2	16.8	36.8	40.9	0.3
Family Distribution by Income Level	433,865	21.4	17.2	20.0	41.4	0.0
Household Distribution by Income Level	678,322	23.7	16.7	17.4	42.2	0.0
Median Family Income MSA		\$72,623	Median Housing Value			\$164,056
			Median Gross Rent			\$858
			Families Below Poverty Level			9.3%
<i>Source: 2015 ACS Census and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Kansas City KS-MO MMSA was 3.2 percent, down from 4.1 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of Kansas was 3.3 percent and 4.7 percent for the state of Missouri.

Housing Characteristics

According to the 2010 U.S. Census, there were 746,566 total housing units in the AA. Owner-occupied units represented 58.4 percent of the total housing units in the AA, and 32.5 percent were rental occupied units. There were 31.0 percent of all owner-occupied units and 47.0 percent of renter-occupied units were located in low-income CTs. There were 45.8 percent of all owner-occupied units and 42.8 percent of renter-occupied units were located in moderate-income CTs.

There were 605,792 single family (1-4 unit) homes and 132,296 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 77.1 percent single family and 21.6 percent of multifamily. The distribution of housing units in moderate-income CTs was 78.5 percent single family and 20.2 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$82,400. According to Realtor.com data, the median housing value in the AA is \$240,000 and \$300,049 in 2017 and 2019, respectively, reflecting a 25.1 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$41,200 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$191,870 mortgage with a payment of \$1,030 per month. A moderate-income borrower making \$65,920 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$306,992 mortgage with a payment of \$1,648 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,610.

Community Contacts

The OCC made three community contacts in the AA, which include two housing agency and an economic development corporation. A review of community contacts indicated that the following are identified needs within the community, which consists the entire AA:

- First-time homebuyer programs

- Small Business training
- Small Business loans
- Small Business Counseling
- Job Training/Educational Seminars
- Financial Literacy
- Credit Counseling

Scope of Evaluation in Kansas City KS-MO MMSA

The Kansas City KS-MO MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

Due to an acquisition, the AA expanded into two additional counties. In evaluating the geographic distribution and borrower income criteria under the Lending Test for HMDA and CRA data was analyzed over two analysis periods, 2017 through 2018 and 2019 due to changes to the AA. In evaluating the bank's performance under the Lending Test, we placed greater weight on the 2019 analysis period than the 2017 through 2018 as it represents the more recent production within the evaluation period.

The MMSA possesses several challenges to banks in the rating area, including BOKF:

- In performing the analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for LMI families somewhat impacts these borrowers' ability to purchase homes.
- In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.
- In performing the analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Kansas City KS-MO MMSA

LENDING TEST

The bank's performance under the Lending Test in the Kansas City KS-MO MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Kansas City KS-MO MMSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Kansas City KS-MO MMSA	1,498	802	0	15	2,315
Statewide (KS)	-	-	-	4	4

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Kansas City KS-MO MMSA	351,749	206,216	0	25,754	583,719
Statewide (KS)	-	-	-	17,608	17,608

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$772.9 million in deposits with a deposit market share of 1.4 percent. The bank ranked 16th in total deposits out of 91 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top 0.05 percent of lenders, 28th out of 570 lenders, originating home mortgage loans in the AA. The bank's ranking for loans is weaker than the ranking for deposits. The bank's market share of 0.8 percent in loans is weaker than the deposit market share. The five largest mortgage lenders have captured 26.4 percent of the market.

According to 2018 peer small business data, BOKF ranked 19th out of 174 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.8 percent in loans is weaker than the deposit. The five largest small business lenders have captured 60.9 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans is adequate.

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

During the 2017-2018 analysis period, the bank's distribution of home mortgage loans to LMI geographies is good. The proportion of loans in low-income geographies well below the proportion of owner-occupied housing units and near to the aggregate distribution. The proportion of loans in moderate-income geographies was below the proportion of owner-occupied housing units and near to the aggregate distribution.

During the 2019 analysis period, the bank's distribution of home mortgage loans to LMI geographies is adequate. The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied housing units and near to the aggregate distribution. The proportion of loans in moderate-income geographies was below the proportion of owner-occupied housing units and near to the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business is good.

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

During the 2017-2018, analysis period, the distribution of small loans to businesses in LMI geographies was adequate. The proportion of small loans to businesses exceeds the percentage of businesses in low-income geographies and the aggregate distribution. The proportion of small loans to businesses was well below the percentage of businesses in moderate-income geographies and the aggregate distribution.

During the 2019, analysis period, the distribution of small loans to businesses in LMI geographies was good. The proportion of small loans to businesses exceeds the percentage of businesses in low-income geographies and the aggregate distribution. The proportion of small loans to businesses was near the percentage of businesses in moderate-income geographies and the aggregate distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed BOKF's home mortgage and small

business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans to LMI borrowers is excellent.

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

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to low-income borrowers. These issues were considered in evaluating the bank's performance in the AA.

During 2017-2018, the bank's distribution of home mortgage loans to LMI borrowers is good. The proportion of loans was well below the percentage of low-income families and below the aggregate distribution. The proportion of loans exceeded the percentage of moderate-income families and the aggregate distribution.

During 2019, the bank's distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans was below the percentage of low-income families and near to the aggregate distribution. The proportion of loans exceeded the percentage of moderate-income families and the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business by revenue is poor.

Refer to Table R in the "MMSA" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

During 2017-2018, the distribution of the bank's loans to small businesses by revenue is very poor. The proportion of loans was significantly below the proportion of small businesses and the aggregate distribution of loans to those businesses.

During 2019, the distribution of the bank's loans to small businesses by revenue is poor. The proportion of loans was significantly below the proportion of small businesses and below the aggregate distribution of loans.

Community Development Lending

BOKF is a leader in making CD loans. CD loans had a significantly positive impact in the AA and in the overall Lending Test rating. CD loans in the AA supported needs in every CD category.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF has an excellent level of CD loans in the Kansas City KS-MO MMSA that were highly responsive to community needs. During the evaluation, BOKF extended 15 CD loans in the AA totaling \$25.7 million. The level and responsiveness of CD loans had a significant positive impact on the lending test.

Noteworthy CD loans include:

- A \$4.2 million loan to renovate and convert a historic property, formerly an elementary school, into senior housing. The project involved complex financing that included Community Development Block Grant (CDBG) funds, Low Income Housing Tax Credit (LIHTC), state and federal historic tax credits. The units will be restricted for residents 55 years of age and older whose incomes are no more than 60 percent of the area median income.
- A \$2.8 million loan to rehabilitate and preserve affordable multifamily housing. The project involved complex financing included CDBG funds, LIHTC and United States Department of Agriculture (USDA) rural development financing. The units are restricted for residents whose incomes are no more than 60 percent of the area median income.
- Two loans totaling \$4.9 million to finance the rehabilitation of a historic building and revitalization of an LMI area. The project will support food-related businesses and economic development by creating over 50 jobs that will benefit LMI individuals. The project involved complex financing included new market tax credit (NMTC) investment.

Statewide

CD lending in the broader statewide area included 4 loans totaling \$17.6 million. This included a \$2.8 million loan to rehabilitate a multifamily development in Herington, KS, with all of the units rent-restricted to LMI families. The project involved complex financing that included CDBG funds, LIHTC and USDA rural development financing.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the “Other Performance” section under the Scope of the Evaluation section for additional details regarding other programs.

BOKF works in conjunction with the Missouri Housing Development Commission (MHDC) to offer the First Place program, which provides assistances to first-time homebuyers and veterans. A forgivable second mortgage can be utilized with an MHDC first mortgage to assist with down payment and closing cost. BOKF leveraged this program to originate 25 loans totaling \$3.7 million in the Kansas City KS-MO MMSA during the evaluation period.

INVESTMENT TEST

The bank’s performance under the Investment Test in the Kansas City KS-MO MMSA is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the Kansas City KS-MO MMSA is good. We considered the investment opportunities with direct benefit within the AA and the bank’s capacity to address those needs.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Kansas City KS-MO MMSA	6	5,792	46	558	52	100.0	6,350	100.0	2	474

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

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

The bank has a good level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$6.4 million, with current period investments of \$308 thousand, prior period investments of \$5.8 million, and qualified grants of \$250 thousand. Investments benefiting the AA during the evaluation represented 6.6 percent of allocated tier 1 capital. The bank also had \$474 thousand in unfunded commitments remaining at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$5.7 million in qualifying CD investment activity and \$71 thousand in two qualifying mortgage backed securities (MBS) supporting mortgages to LMI borrowers.

Grants made were to organizations providing affordable housing and services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$15 thousand in grants to an organization that is dedicated to revitalizing, stabilizing, and reinvesting in local neighborhoods.
- \$15 thousand in grants to an organization that provides HUD Certified housing counseling with the goal of empowering LMI individuals and families for long-term financial & homeownership success.
- \$32 thousand in grants to a nonprofit organization that provides a variety of community services through partner organizations that primarily target LMI individuals and families.

SERVICE TEST

The bank’s performance under the Service Test in Kansas City KS-MO MMSA is rated Low Satisfactory.

Based on a full-scope review, the bank’s performance in the Kansas City KS-MO MMSA is adequate.

Retail Banking Services

BOKF’s branch distribution and retail service performance is adequate.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Kansas City KS-MO MMSA	100.0	6	100.0	0.0	0.0	33.3	66.7	10.4	21.8	33.8	33.7

The bank's branches are reasonably accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has six branches within the AA, with no branches in LMI CTs. However, three of the six branches are near to two low-income CTs and one moderate-income CT. Accounting for the near to branches the percentage of the bank's branches in LMI geographies is below the percentage of population living in the LMI geographies. The bank has seven deposit-taking ATMs located in the AA, with no ATMs in LMI CTs. Six of the ATMs are located at the branches while one free-standing ATM is in an upper-income CT. The percentage of ATMs in LMI CTs is below the level of population in the LMI areas. ATM distribution is consistent with the bank's branch distribution.

During the assessment period, the bank did not open or close any branches in the Kansas City KS-MO MMSA AA.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with all six branches offering Saturday hours.

Community Development Services

The bank provides a relatively high level of CD services.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

BOKF employees from various lines of business provided technical assistance to 20 different CD organizations totaling 798 hours during the evaluation period. BOKF employees served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families.

Examples of some of these services:

- An employee served on the board of a nonprofit that has six shelters in the Kansas City KS-MO MMSA and has outreach programs such as court advocacy, training for medical staff at area hospitals to spot domestic abuse, children's advocacy, legal assistance, and transitional and permanent housing.
- Several employees volunteered to assist a nonprofit that provides financial literacy to LMI students, including work-readiness, and entrepreneurship.
- An employee serves as a board member on a nonprofit that provides developmental opportunities for LMI children.
- An employee serves as a board member for a nonprofit group that prepares children in LMI areas for success in school and life. Programs include Head Start, Early Childhood Mental Health and Wellness, and parenting resources and education.

- An employee serves as a committee member on a nonprofit housing organization that educates and assists individuals on the process of buying a home, obtaining a mortgage loan, and responsible home ownership.

State Rating

State of Arizona

CRA rating for the State of Arizona²:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	High Satisfactory
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits an adequate geographic distribution of loans in its AA.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.
- The bank is a leader in making CD loans. CD loans had a significantly positive impact in the AA and in the overall Lending Test rating.
- The bank has a significant level of qualified investments, particularly those that are not routinely provided by private investors, occasionally in a leadership position.
- The bank's branches are reasonable accessible to essentially all portions of the AA, including LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of CD services.

Description of Bank's Operations in Arizona

BOKF has one AA within the state of Arizona, which is the Phoenix-Mesa-Chandler MSA.

Based on FDIC Deposit Market Share data as of June 30, 2019, BOKF had a 0.9 percent deposit market share in Arizona and is ranked 13th out of 68 banks doing business in the state.

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Phoenix-Mesa-Chandler MSA

The Phoenix-Mesa-Chandler MSA consist of the complete county of Maricopa. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 916 CTs, of which 105 are low- income and 206 are moderate-income.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$1.3 billion in deposits in the Phoenix-Mesa-Chandler MSA which represented 5.2 percent of the bank's total deposits. BOKF was ranked 11th out of 62 banks, with a presence in the AA, with a market share of 1.2 percent. Primary competitors within the AA are the following: JPMorgan Chase Bank, N.A., which ranked first in deposit market share (23.1 percent) with 155 offices, Wells Fargo Bank, N.A., which ranked second in deposit market share (19.8 percent) with 136 offices, and Bank of America, N.A., which ranked third in deposit market share (19.2 percent) with 96 offices.

BOKF provides a full range of loan and deposit products and services in the state. The bank operates five full-service branches: none in LMI CTs, one located in a middle-income CT, and four are located in upper-income CTs. In addition, the bank has 4 deposit-taking ATMs throughout the AA. The branches represent four percent of the bank's total branch network.

The bank made 6.8 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Phoenix-Mesa-Chandler MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	419,998	6.2	15.9	28.4	48.9	0.5
Farms by Geography	7,681	6.1	18.0	29.4	46.2	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA		\$63,686	Median Housing Value			\$203,811
			Median Gross Rent			\$993
			Families Below Poverty Level			12.6%
<i>Source: 2015 ACS Census and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Phoenix-Mesa-Chandler MSA was 4.0 percent, down from 4.5 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of Arizona was 4.5 percent.

Housing Characteristics

According to the 2010 U.S. Census, there were 1,668,555 total housing units in the AA. Owner-occupied units represented 52.5 percent of the total housing units in the AA, and 34.0 percent were rental occupied units. There were 24.4 percent of all owner-occupied units and 59.4 percent of renter-occupied units were located in low-income CTs. There were 42.3 percent of all owner-occupied units and 42.8 percent of renter-occupied units were located in moderate-income CTs.

There were 1,250,780 single family (1-4 unit) homes and 331,100 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 55.5 percent single family and 38.3 percent of multifamily. The distribution of housing units in moderate-income CTs was 63.8 percent single family and 26.1 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$69,100. According to Realtor.com data, the median housing value in the AA is \$320,047 and \$374,545 in 2017 and 2019, respectively, reflecting a percent change of 17.1 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,550 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$160,900 mortgage with a payment of \$863 per month. A moderate-income borrower making \$55,280 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$257,441 mortgage with a payment of \$1,382 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$2,010.

Community Contacts

The OCC made two community contacts in the AA, which includes a local financial stability coalition. A review of community contacts indicated that the following are identified needs within the community, which consists the entire AA:

- First-time homebuyer programs
- Small Business training
- Small Business loans/credit cards
- Small Business Counseling
- Microlending for Small Business
- Job Training/Educational Seminars
- Financial Literacy
- Credit Counseling
- Consumer Loans/Credit Cards

The state of Arizona possesses several challenges to banks in the rating area, including BOKF.

- In performing the analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for LMI families somewhat impacts these borrowers' ability to purchase homes.
- In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and

community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank’s ability to make small loans to businesses.

- In performing the analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Arizona

Scope of Evaluation in Arizona

For the state of Arizona, we completed a full-scope review of the Phoenix-Mesa-Chandler MSA. The Phoenix-Mesa-Chandler MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

LENDING TEST

The bank’s performance under the Lending Test in Arizona is rated High Satisfactory.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Phoenix-Mesa-Chandler MSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Phoenix-Mesa-Chandler MSA	1,172	489	0	12	1,673	99.5	100.0
Statewide	-	-	-	9	9	0.5	0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Phoenix-Mesa-Chandler MSA	313,374	173,295	0	56,567	543,236	88.6	100.0
Statewide	-	-	-	70,118	70,118	11.4	0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$1.32 billion in deposits with a deposit market share of 1.2 percent. The bank ranked 11th in total deposits out of 62 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top ten percent of lenders, 90th out of 853 lenders, originating home mortgage loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.2 percent in loans is weaker than the deposit market share. The five largest mortgage lenders have captured 25.6 percent of the market.

According to 2018 peer small business data, BOKF ranked 50th out of 195 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.1 percent in loans is weaker than the deposit market share. The five largest small business lenders have captured 70.4 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans is adequate.

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

The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied housing units and well below the aggregate distribution. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied housing units and below the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to businesses is excellent.

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

The proportion of small loans to businesses exceeded the percentage of businesses in LMI geographies and the aggregate distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed BOKF's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans to LMI borrowers is adequate.

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

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to LMI borrowers. These issues were considered in evaluating the bank's performance in the AA.

The proportion of loans was well below the percentage of low-income families and below the aggregate distribution. The proportion of loans was near to the percentage of moderate-income families and well below the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business by revenue is poor.

Refer to Table R in the state of Arizona section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The proportion of loans was well below the proportion of small businesses and well below aggregate distribution of loans to those businesses.

Community Development Lending

BOKF is a leader in making CD loans. CD loans had a significantly positive impact in the AA and in the overall Lending Test rating. CD loans in the AA primarily supported community services, revitalization, and affordable housing.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF has an excellent level of CD loans in the Phoenix-Mesa-Chandler MSA that were highly responsive to community needs. During the evaluation, BOKF extended 12 CD loans in the AA totaling \$56.5 million. The level and responsiveness of CD loans had a significant positive impact on the lending test.

Noteworthy CD loans include:

- A \$1.6 million loan to an expanding business, in a federal opportunity zone, to build a new location and create jobs that will benefit LMI individuals.
- A \$7.3 million loan to a nonprofit organization that provides homeless, transitional, and permanent housing for LMI families. This loan financed the construction to build 54 multifamily housing units, that are restricted for LMI families. The project involved complex financing that included CDBG funds and LIHTC.

Statewide

CD lending in the broader statewide area included 9 loans totaling \$70 million. This included two loans totaling \$25 million to renovate and expand an existing tribal-owned entertainment center that will also include a new hotel. The project will create over 200 new jobs for LMI individuals in this Maricopa community in Arizona.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

Phoenix-Mesa-Chandler MSA

BOKF works in conjunction with the Maricopa County Industrial Development Authority (IDA) to offer affordable housing assistance programs for LMI individuals and families in the Maricopa County only. Borrowers may receive a five percent assistance for down payment and closing costs. The IDA provides homebuyer education course as part of the program. BOKF leveraged these programs to originate 10 loans totaling \$2.2 million in the Phoenix-Mesa-Chandler MSA during the evaluation period.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Arizona is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Phoenix-Mesa-Chandler MSA is good. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Phoenix-Mesa-Chandler MSA	9	3,223	60	4,431	69	100.0	7,654	100.0	5	2,775
Statewide	3	3,151	0	0	3	0.0	3,151	0.0	0	0

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

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

Conclusions for the Area Receiving a Full-Scope Review

The bank has a significant level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$7.7 million, with current period investments of \$4.1 million, prior period investments of \$3.2 million, and qualified grants of \$335 thousand. Investments benefiting the AA during the evaluation represented 5.9 percent of allocated tier 1 capital. The bank also had \$2.8 million in unfunded commitments remaining at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$3.1 million in qualifying CD investment activity and \$77 thousand in four qualifying MBS supporting mortgages to LMI borrowers.

A \$947 thousand investment that supported affordable housing in the AA demonstrated innovation and complexity. The investment was in a fund that is devoted to the preservation and rehabilitation of workforce and affordable housing. The goal of this fund is to create socially responsible communities and a quality standard of living for tenants. This investment facilitated renovations to a 528-unit multifamily complex in Phoenix.

Grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$28 thousand in grants to a nonprofit organization that teaches students critical skills in financial literacy, workforce readiness, and entrepreneurship.
- \$18 thousand in grants to a nonprofit organization that provides home ownership counseling, financial access, and neighborhood development.
- \$32 thousand in grants to a nonprofit organization that provides a variety of community services through partner organizations that primarily target LMI individuals and families.

Statewide

We considered the ongoing impact from investments made prior to the current evaluation period across Arizona. The remaining balances consisted of \$3.1 million in qualifying CD investment activity and \$35 thousand in one qualifying MBS supporting mortgages to LMI borrowers.

SERVICE TEST

The bank's performance under the Service Test in Arizona is rated High Satisfactory.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix-Mesa-Chandler MSA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Phoenix-Mesa-Chandler MSA	100.0	5	100.0	0.0	0.0	25.0	75.0	11.1	22.9	31.3	34.7

Phoenix-Mesa-Chandler MSA

BOKF's branch distribution and retail service performance is adequate.

The bank's branches are reasonably accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has five branches within the AA, with no branches in LMI CTs. However, two of the five branches are near to moderate-income CTs. Accounting for the near to branches the percentage of the bank's branches in LMI geographies is below the percentage of population in the LMI geographies. The bank has four deposit-taking ATMs located in the AA, with no ATMs in LMI CTs. ATM distribution is consistent with the bank's branch distribution.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Phoenix-Mesa-Chandler MSA	4	3	0	0	0	+1

The opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, BOKF acquired four branches in connection to the CoBiz acquisition. As a result of having BOKF and CoBiz branches in close proximity, the bank closed three branches with two branches being in upper-income CTs and one branch in a middle-income CT. The net result of opening and closing of branches during the evaluation period resulted in a net gain of one branch in an upper-income geography within the AA.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with four of the branches offering Saturday hours.

Community Development Services

The bank provides a relatively high level of CD services.

Phoenix-Mesa-Chandler MSA

BOKF provides a relatively high level of CD services in the Phoenix-Mesa-Chandler MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

BOKF employees from various lines of business provided technical assistance to 12 different CD organizations totaling 1,592 hours during the evaluation period. BOKF staff served on boards and committees for organizations that promote affordable housing and community services targeted to LMI individuals and families.

Examples of some of these services:

- Several officers and employees of the bank served on the board, committees, and were volunteers of a nonprofit works to increase the number of college-going students in Arizona by providing them with tools and resources needed to become college bound, focused and prepared through leadership training and mentoring.
- An employee served as a board member to a nonprofit while several employees volunteered to provide financial literacy to LMI students, including work-readiness, and entrepreneurship.
- An employee served on the board and various committees of an organization that educates LMI youth in developing self-esteem, values, and skills.
- An employee served on the board of a nonprofit organization that focuses on education, ending hunger, and homelessness, including increasing financial stability for families.

State of Arkansas

CRA rating for the State of Arkansas³:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits an excellent geographic distribution of loans in its AA.
- The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.
- The bank has made a relatively high level of CD loans. CD loans had a positive impact in the AA and in the overall Lending Test rating.
- The bank has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position.
- The bank provides an adequate level of CD services.

Description of Bank's Operations in Arkansas

BOKF has one AA within the state of Arkansas, which is the Fayetteville-Springdale-Rogers MSA.

Based on FDIC Deposit Market Share data as of June 30, 2019, BOKF had a 0.3 percent deposit market share in Arkansas and is ranked 53rd out of 117 banks doing business in the state.

Fayetteville-Springdale-Rogers MSA

The Fayetteville-Springdale-Rogers MSA consist of the complete counties of Benton and Washington. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-

³ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

income geographies. According to 2010 U.S. Census data, the AA consists of 81 CTs, of which 2 are low- income and 15 are moderate-income.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$185.8 million in deposits in the Fayetteville-Springdale-Rogers MSA which represented 0.7 percent of the bank's total deposits. BOKF was ranked 14th out of 30 banks, with a presence in the AA, with a market share of 1.7 percent. Primary competitors within the AA are the following: Arvest Bank, which ranked first in deposit market share (45.6 percent) with 46 offices, First Security Bank, which ranked second in deposit market share (7.78 percent) with 19 offices, and Bank of America, N.A., which ranked third in deposit market share (5.6 percent) with 5 offices.

BOKF provides a full range of loan and deposit products and services in the state. The bank operates two full-service branches and two deposit-taking ATMs located in middle-income CTs. The branches represent 1.6 percent of the bank's total branch network.

The bank made 6.3 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Fayetteville-Springdale-Rogers MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	81	2.5	18.5	48.1	30.9	0.0
Population by Geography	454,630	2.6	20.3	44.3	32.8	0.0
Housing Units by Geography	185,720	3.1	19.5	44.0	33.4	0.0
Owner-Occupied Units by Geography	102,054	0.7	15.4	46.2	37.7	0.0
Occupied Rental Units by Geography	65,338	6.8	26.6	39.4	27.3	0.0
Vacant Units by Geography	18,328	3.1	17.2	48.6	31.1	0.0
Businesses by Geography	29,045	1.8	16.9	45.4	35.8	0.0
Farms by Geography	1,022	1.6	14.8	51.3	32.4	0.0
Family Distribution by Income Level	114,420	19.5	18.2	20.2	42.0	0.0
Household Distribution by Income Level	167,392	22.3	16.5	18.4	42.7	0.0
Median Family Income MSA		\$60,876	Median Housing Value			\$157,293
			Median Gross Rent			\$757
			Families Below Poverty Level			10.9%

Source: 2015 ACS Census and 2019 D&B Data
 Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Fayetteville-Springdale-Rogers MSA was 2.5 percent, down from 2.7 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of Arkansas was 3.5 percent.

Housing Characteristics

According to the 2010 U.S. Census, there were 185,720 total housing units in the AA. Owner-occupied units represented 55.0 percent of the total housing units in the AA, and 35.2 percent were rental occupied units. There were 27.3 percent of all owner-occupied units and 64.4 percent of renter-occupied units were located in low-income CTs. There were 37.3 percent of all owner-occupied units and 53.8 percent of renter-occupied units were located in moderate-income CTs.

There were 147,533 single family (1-4 unit) homes and 27,811 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 65.8 percent single family and 32.0 percent of multifamily. The distribution of housing units in moderate-income CTs was 66.8 percent single family and 29.2 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$64,500. According to Realtor.com data, the median housing value in the AA is \$248,875 and \$275,050 in 2017 and 2019, respectively, reflecting a percent change of 10.5 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,250 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$150,189 mortgage with a payment of \$806 per month. A moderate-income borrower making \$51,600 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$240,303 mortgage with a payment of \$1,290 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,476.

Community Contacts

The OCC made two community contacts in the AA, which are a housing development agency and an economic development organization. A review of community contacts indicated that the following are identified needs within the community, which consists the entire AA:

- Affordable Housing
- Funding for Nonprofit Organizations

- Financial Literacy
- Credit Counseling
- Job Training/Educational Seminars
- Public Transportation
- Small Business loans
- Consumer Loans

The state of Arkansas possesses several challenges to banks in the rating area, including BOKF.

- The low number of low-income CTs and owner-occupied housing units can present a challenge for banks when attempting to originate home mortgages in these geographies. As such, the bank's performance in moderate-income CTs carried greater weight when coming to overall product conclusions.
- In performing the analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for LMI families somewhat impacts these borrowers' ability to purchase homes.
- In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.
- In performing the analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Arkansas

Scope of Evaluation in Arkansas

For the state of Arkansas, we completed a full-scope review of the Fayetteville-Springdale-Rogers MSA. The Fayetteville-Springdale-Rogers MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

LENDING TEST

The bank's performance under the Lending Test in Arkansas is rated Outstanding.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Fayetteville-Springdale-Rogers MSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Fayetteville-Springdale-Rogers MSA	1,480	49	0	1	1,530	100.0	100.0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Fayetteville-Springdale-Rogers MSA	229,159	12,895	0	60,000	302,054	100.0	100.0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$185.8 million in deposits with a deposit market share of 1.7 percent. The bank ranked 14th in total deposits out of 30 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top two percent of lenders, 6th out of 375 lenders, originating home mortgage loans in the AA. The bank's rank in loans is stronger than the rank in deposits. The bank's market share of 2.3 percent in loans is weaker than the deposit market share. The five largest mortgage lenders have captured 38.9 percent of the market.

According to 2018 peer small business data, BOKF ranked 35th out of 95 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.2 percent in loans is weaker than the deposit market share. The five largest small business lenders have captured 57.9 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans is excellent.

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

The proportion of loans in low-income geographies was below the proportion of owner-occupied housing units and exceeds the aggregate distribution. The proportion of loans in moderate-income geographies exceeds the proportion of owner-occupied housing units and the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business is excellent.

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

The proportion of small loans to businesses was significantly below the percentage of businesses in low-income geographies and the aggregate distribution. The proportion of small loans to businesses was near to the percentage of businesses in moderate-income geographies and exceeds the aggregate distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed BOKF's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans to LMI borrowers is excellent.

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

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to LMI borrowers. These issues were considered in evaluating the bank's performance in the AA.

The proportion of loans was near to the percentage of low-income families and exceeded the aggregate distribution. The proportion of loans exceeded the percentage of moderate-income families and the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business by revenue is very poor.

Refer to Table R in the state of Arkansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The proportion of loans was significantly below the proportion of small businesses and the aggregate distribution.

Community Development Lending

BOKF has made a relatively high level of CD loans. Community development loans had a positive impact in the AA and in the overall Lending Test rating. CD loans in the AA supported community services.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF has a good level of CD loans in the Fayetteville-Springdale-Rogers MSA that were responsive to community needs. During the evaluation, BOKF extended one CD loan in the AA totaling \$60 million. The loan financed skilled nursing facilities in the AA that primarily benefitted LMI seniors.

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Arkansas is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Fayetteville-Springdale-Rogers MSA is excellent. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Fayetteville-Springdale-Rogers MSA	7	158	14	1,514	21	100.0	1,672	100.0	0	0
Statewide	1	169	0	0	1	0.0	169	0.0	1	36

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

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

Conclusions for the Area Receiving a Full-Scope Review

The bank has an excellent level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives. Qualified investments totaled \$1.7 million, with current period investments of \$1.4 million, prior period investments of \$158 thousand, and qualified grants of \$90 thousand. Investments benefiting the AA during the evaluation represented 6.7 percent of allocated tier 1 capital. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$158 thousand in seven qualifying MBS supporting mortgages to LMI borrowers.

Grants made were to organizations providing affordable housing and services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$11 thousand in grants to a nonprofit organization that helps LMI families build and improve places to call home.
- \$26 thousand in grants to two nonprofit organizations that provide direct financial assistance to low-income single parents pursuing career-related courses of study to gain sufficient employment to meet the basic needs of their families.
- \$40 thousand in grants to a nonprofit organization that provides non-medical services to homebound seniors to promote independence, dignity, and quality of life.

Statewide

We considered the ongoing impact from investments made prior to the current evaluation period across Arkansas. The remaining balances consisted of \$169 thousand in qualifying CD investment activity.

SERVICE TEST

The bank’s performance under the Service Test in Arkansas is rated Low Satisfactory.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Fayetteville-Springdale-Rogers MSA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Fayetteville-Springdale-Rogers MSA	100.0	2	100.0	0.0	0.0	100.0	0.0	2.6	20.3	44.3	32.8

Fayetteville-Springdale-Rogers MSA

BOKF's branch distribution and retail service performance is poor.

The bank's branches are unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has two branches within the AA, with no branches in LMI CTs. The percentage of the bank's branches in LMI geographies is well below the percentage of population living in those geographies. The bank has two deposit-taking ATMs located in the AA, with none in LMI CTs. The percentage of ATMs in LMI CTs is well below the level of population in the LMI areas. ATM distribution is consistent with the bank's branch distribution.

During the evaluation period, the bank did not open or close any branches in the AA.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with both branches offering Saturday hours.

Community Development Services

The bank provides an adequate level of CD services.

Fayetteville-Springdale-Rogers MSA

BOKF provides a relatively adequate level of CD services in the AA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

BOKF employees from various lines of business provided technical assistance to six different CD organizations totaling 98 hours during the evaluation period. BOKF staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- An employee served on the board of a nonprofit that provides free medical services to senior citizens to help promote their independence.
- An employee volunteered to assist a nonprofit that provide financial literacy to LMI students, including work-readiness, and entrepreneurship.
- An employee volunteered to assist new refugee families that are relocating to Northwest Arkansas, including sharing resources they will need to build their new life.

State of Colorado

CRA rating for the State of Colorado⁴:	Satisfactory
The Lending Test is rated:	High Satisfactory
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits a good geographic distribution of loans in its AA.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.
- The bank has made a relatively high level of CD loans. CD loans had a positive impact in the AA and in the overall Lending Test rating.
- The bank has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position.
- The bank's branches are accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of CD services.

Description of Bank's Operations in Colorado

BOKF has one AA within the state of Colorado, which is the Denver-Aurora CSA. The AAs consist of whole MSAs or counties.

Based on FDIC Deposit Market Share data as of June 30, 2019, BOKF had a 2.6 percent deposit market share in Arkansas and is ranked 7th out of 131 banks doing business in the state.

⁴ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Denver-Aurora CSA

The Denver-Aurora CSA consists of the two MSAs which were combined for analysis purposes. These MSAs are the Boulder MSA is comprised of the Boulder County, and Denver-Aurora-Lakewood MSA. The Boulder MSA consist of the Boulder County. The Denver-Aurora-Lakewood MSA is comprised of the counties of Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 673 CTs, of which 56 are low- income and 161 are moderate-income.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$3.7 billion in deposits in the Denver-Aurora CSA which represented 14.6 percent of the bank's total deposits. BOKF was ranked 6th out of 70 banks, with a presence in the AA, with a market share of 3.8 percent. Primary competitors within the AA are the following: Wells Fargo Bank, N.A., which ranked first in deposit market share (25 percent) with 90 offices, First Bank, which ranked second in deposit market share (13.4 percent) with 71 offices, and U.S. Bank, N.A., which ranked third in deposit market share (12.6 percent) with 82 offices.

BOKF provides a full range of loan and deposit products and services in the state. The bank operates 15 full-service branches: two are located in low-income CTs, two are located in moderate-income CTs, six are located in middle-income CTs, and five are located in upper-income CTs. In addition, the bank has 11 deposit-taking ATMs throughout the AA. The branches represent 12 percent of the bank's total branch network.

The bank made 3.3 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Assessment Area: Denver-Aurora CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	673	8.3	23.9	33.6	33.0	1.2
Population by Geography	2,959,219	8.6	24.2	33.8	33.4	0.1
Housing Units by Geography	1,202,662	8.3	23.6	35.2	32.8	0.0
Owner-Occupied Units by Geography	716,247	4.5	18.8	35.1	41.5	0.0
Occupied Rental Units by Geography	425,829	14.3	31.6	35.3	18.8	0.0
Vacant Units by Geography	60,586	11.2	25.1	35.7	28.0	0.0

Businesses by Geography	405,007	6.3	19.5	32.8	41.2	0.3
Farms by Geography	7,745	7.3	19.4	32.8	40.1	0.4
Family Distribution by Income Level	715,893	21.5	17.4	20.3	40.8	0.0
Household Distribution by Income Level	1,142,076	23.8	16.4	17.9	41.9	0.0
Median Family Income MSA 14500 Boulder, CO MSA		\$96,926	Median Housing Value			\$293,480
Median Family Income MSA 19740 Denver-Aurora-Lakewood, CO MSA		\$80,820	Median Gross Rent			\$1,089
			Families Below Poverty Level			7.9%
<p>Source: 2015 ACS Census and 2019 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</p>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Denver-Aurora CSA was 2.5 percent, down from 2.6 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of Colorado was 2.5 percent.

Housing Characteristics

According to the 2010 U.S. Census, there were 1,202,662 total housing units in the AA. Owner-occupied units represented 59.6 percent of the total housing units in the AA, and 35.4 percent were rental occupied units. There were 32.3 percent of all owner-occupied units and 60.9 percent of renter-occupied units were located in low-income CTs. There were 47.4 percent of all owner-occupied units and 47.3 percent of renter-occupied units were located in moderate-income CTs.

There were 856,449 single family (1-4 unit) homes and 324,177 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 51.2 percent single family and 44.6 percent of multifamily. The distribution of housing units in moderate-income CTs was 62.0 percent single family and 34.4 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$89,900. According to Realtor.com data, the median housing value in the AA is \$529,440 and \$497,550 in 2017 and 2019, respectively, reflecting a percent change of 6.0 percent decrease.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$44,950 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$209,333 mortgage with a payment of \$1,123 per month. A moderate-income borrower making \$71,920 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$334,934 mortgage with a payment of \$1,798 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$2,670.

Community Contacts

The OCC made a community contact in the AA, which include an economic development agency, small business administration, and a local chamber of commerce. A review of community contact indicated that the following are identified needs within the community, which consists the entire AA:

- Technical Job Training
- Affordable Housing
- Small Business Training
- Small Business Counseling
- Small Business and Farm loans
- Microlending
- Transportation

The state of Colorado possesses several challenges to banks in the rating area, including BOKF.

- In performing the analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for LMI families somewhat impacts these borrowers' ability to purchase homes.
- In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.
- In performing the analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Colorado

Scope of Evaluation in Colorado

For the state of Colorado, we completed a full-scope review of the Denver-Aurora CSA. The Denver-Aurora CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

LENDING TEST

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

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Denver-Aurora CSA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Denver-Aurora CSA	2,432	635	1	22	3,090	99.9	100.0
Statewide	-	-		2	2	0.1	0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Denver-Aurora CSA	729,595	209,314	150	42,497	981,556	98.8	100.0
Statewide	-	-	-	12,028	12,028	1.2	0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$3.7 billion in deposits with a deposit market share of 3.8 percent. The bank ranked 6th in total deposits out of 70 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top six percent of lenders, 47th out of 823 lenders, originating home mortgage loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.5 percent in loans is weaker than the deposit market share. The five largest mortgage lenders have captured 21.8 percent of the market.

According to 2018 peer small business data, BOKF ranked 53rd out of 212 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's

market share of 0.1 percent in loans is weaker than the deposit market share. The five largest small business lenders have captured 70.1 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans is good.

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

The proportion of loans in low-income geographies exceeds the proportion of owner-occupied housing units and was near to the aggregate distribution. The proportion of loans in moderate-income geographies was near to the proportion of owner-occupied housing units and the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business is excellent.

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

The proportion of small loans to businesses exceeded the percentage of businesses in LMI geographies and the aggregate distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed BOKF's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans to LMI borrowers is good.

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

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to LMI borrowers. These issues were considered in evaluating the bank's performance in the AA.

The proportion of loans was well below the percentage of low-income families and below the aggregate distribution. The proportion of loans exceeds the percentage of moderate-income families and was near to the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business by revenue is poor.

Refer to Table R in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The proportion of loans was significantly below the proportion of small businesses and well below aggregate distribution.

Community Development Lending

BOKF has made a relatively high level of CD loans. CD loans had a positive impact in the AA and in the overall Lending Test rating. CD loans in the AA primarily supported community services, revitalization and affordable housing.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF has a good level of CD loans in the Denver-Aurora CSA that were responsive to community needs. During the evaluation, BOKF extended 22 CD loans in the AA totaling \$42.4 million. The level and responsiveness of CD loans had a positive impact on the lending test.

Noteworthy CD loans include:

- A \$1 million loan to finance pre-development costs for an affordable multifamily housing project that will build 22 units for LMI families. The project involved complex financing that included LIHTC.
- A \$1.1 million operating line of credit to a community organization that provides medical services to LMI families in a community where 66 percent patients are at or below poverty and 89 percent are uninsured or Medicaid recipients.

Statewide

CD lending in the broader statewide area included 2 loans totaling \$12 million. The loans financed four multifamily housing developments, with all of the units rent-restricted to those with incomes less than 60 percent of the AMI. The project involved complex financing that included Colorado Public Finance Authority investments.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the “Other Performance” section under the Scope of the Evaluation section for additional details regarding other programs.

Denver-Aurora CSA

BOKF works in conjunction with the Colorado Housing and Finance Authority (CHFA) to offer affordable housing assistance programs to LMI individuals as well as persons with a permanent disability. CHFA encourages homeownership counseling and education to access these programs. These affordable loan products are offered under the agency’s programs, which may include down payment assistance, closing cost assistance, and tax credits. BOKF leveraged these programs to originate 77 loans totaling \$11.7 million in the Denver-Aurora CSA during the evaluation period.

INVESTMENT TEST

The bank’s performance under the Investment Test in the state of Colorado is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Denver-Aurora CSA is excellent. We considered the investment opportunities with direct benefit within the AA and the bank’s capacity to address those needs.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Denver-Aurora CSA	16	11,119	49	14,242	65	100.0	25,361	100.0	8	9,561
Statewide	6	340	0	0	6	0.0	340	0.0	2	618

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

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

Conclusions for the Area Receiving a Full-Scope Review

The bank has an excellent level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs and occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$25.4 million, with current period investments of \$13.8 million, prior period investments of \$11.1 million, and qualified grants of \$399 thousand. Investments benefiting the AA during the evaluation represented 7.0 percent of allocated tier 1 capital. The bank also had \$9.6 million in unfunded commitments remaining at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$10.5 million in qualifying CD investment activity and \$589 thousand in seven qualifying MBS supporting mortgages to LMI borrowers.

A \$156 thousand SBIC investment that supported economic development demonstrated innovation and complexity. This new type of investment for the bank supported a fund that seeks to incubate and invest in transformative financial services technology companies. This investment gave the bank an opportunity to join other regional banks to form the Fintech Investors Alliance to invest and shape small fintech companies that can address banking technology hurdles.

A \$5 million LIHTC investment and another \$2.9 million investment that supported affordable housing in the AA demonstrated innovation and complexity. This LIHTC investment facilitated a 50-unit senior LIHTC property in Aurora, Colorado. The second investment was in a fund that is devoted to the preservation and rehabilitation of workforce and affordable housing. The goal of this fund is to create

socially responsible communities and a quality standard of living for tenants This investment facilitated renovations to a 561-unit multifamily complex in Glendale, Colorado and a 434-unit multifamily complex in Denver.

Grants made were to organizations providing economic development assistance and affordable housing and services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$10 thousand grant to a nonprofit organization that provides business development and lending services to small businesses.
- \$11 thousand in grants to a nonprofit organization that provides affordable housing for individuals and families who cannot access decent housing in the broader market place.
- \$75 thousand in grants to a nonprofit organization that provides a variety of community services through partner organizations that primarily target LMI individuals and families.

Statewide

We considered the ongoing impact from investments made prior to the current evaluation period across Colorado. The remaining balances consisted of \$224 thousand in qualifying CD investment activity and \$116 thousand in two qualifying MBS supporting mortgages to LMI borrowers.

SERVICE TEST

The bank’s performance under the Service Test in Colorado is rated High Satisfactory.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Denver-Aurora CSA is good.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Denver-Aurora CSA	100.0	15	100.0	13.3	13.3	40.0	33.4	8.6	24.2	33.8	33.4

Denver-Aurora CSA

BOKF's branch distribution and retail service performance is good.

The bank's branches are accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 15 branches within the AA, with two branches in low-income CTs, and two branches in moderate-income CTs. The percentage of the bank's branches in LMI CTs is near to the percentage of population living in those geographies. The bank has 11 deposit-taking ATMs located in the AA, with one in a low-income CT, and none in moderate-income CTs. The percentage of ATMs in LMI CTs is near to the level of population in the LMI areas. ATM distribution is consistent with the bank's branch distribution.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Denver-Aurora CSA	6	3	+1	+1	0	+1

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank acquired CoBiz which resulted in BOKF acquiring six branches. Due to close proximity to BOKF branches, three branches were closed; however, the net effect was that BOKF acquired one additional branch in a low-income geography and one additional branch in a moderate-income geography. In addition, the bank acquired a new branch in a middle-income geography.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with nine of the 14 branches offering Saturday hours.

Community Development Services

The bank provides a good level of CD services.

Denver-Aurora CSA

BOKF provides a relatively high level of CD services in the Denver-Aurora CSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

BOKF employees from various lines of business provided technical assistance to 12 different CD organizations totaling 548 hours during the evaluation period. BOKF staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- An employee served on the board that assists LMI families in rural and urban communities in helping parents to prepare their children for preschool.
- An employee served on the board of a nonprofit that provides residential care and community-based services for neglected, abused, or homeless children.
- Several employees volunteered to assist a nonprofit that provides financial literacy to LMI students, including work-readiness, and entrepreneurship.
- Several employees taught financial literacy and basic economics to LMI elementary school students.
- An employee served on the board of a nonprofit that provides scholarships to low-income students to attend private schools.

State of Maryland

CRA rating for the State of Maryland⁵:	Satisfactory
The Lending Test is rated:	Low Satisfactory
The Investment Test is rated:	Low Satisfactory
The Service Test is rated:	Needs to Improve

The major factors that support this rating include:

- Lending activity adequate responsiveness to credit needs in its AAs, considering the bank's strategy within the rating area.
- The bank's single branch in this AA was closed during the evaluation period.

Description of Bank's Operations in Maryland

BOKF has one AA within the state of Maryland, which is the Baltimore-Columbia-Towson MSA. The AAs consist of the partial MSA.

The bank had one branch, which has been designated as a Limited Service Facility Office. This type of office can accept deposits and payments; however, may not offer any other services. The account housed at this branch is for a managed health care organization and serves enrollees of Maryland's Health Choice program. A business decision was made to set up a branch office in order to maintain the relationship. The insurance administrator in the state takes the position that only a bank maintaining an account in Maryland could provide the account services to the insurance provider whom the account was opened on behalf of. Therefore, the bank opened the branch to maintain the account located in Maryland. The intent in setting up this branch was not to utilize the branch for any purpose other than to maintain the insurance company's relationship. BOKF has one contract employee that works two hours a month at the branch. The branch in Howard County was closed on April 30, 2018.

Based on FDIC Deposit Market Share data as of June 30, 2019, BOKF has no reported deposits in the state.

Baltimore-Columbia-Towson MSA

The Baltimore-Columbia-Towson MSA consist of the complete Howard county.

⁵ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 55 CTs, of which none are LMI.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Baltimore-Columbia-Towson MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	0.0	0.0	25.5	74.5	0.0
Population by Geography	304,115	0.0	0.0	27.0	73.0	0.0
Housing Units by Geography	113,490	0.0	0.0	28.9	71.1	0.0
Owner-Occupied Units by Geography	79,666	0.0	0.0	21.9	78.1	0.0
Occupied Rental Units by Geography	28,889	0.0	0.0	47.2	52.8	0.0
Vacant Units by Geography	4,935	0.0	0.0	35.5	64.5	0.0
Businesses by Geography	32,530	0.0	0.0	27.0	73.0	0.0
Farms by Geography	623	0.0	0.0	16.7	83.3	0.0
Family Distribution by Income Level	80,937	10.8	10.6	17.2	61.5	0.0
Household Distribution by Income Level	108,555	12.1	9.7	14.9	63.3	0.0
Median Family Income MSA		\$87,788	Median Housing Value			\$425,400
			Median Gross Rent			\$1,577
			Families Below Poverty Level			3.8%
<i>Source: 2015 ACS Census and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community Contacts

The OCC made a community contact in the AA, which a neighborhood housing agency. A review of community contact indicated that the following are identified needs within the community, which consists the entire AA:

- Transportation for LMI residents
- Financial Literacy
- Accessible Banking Products with less restrictions
- Small Dollar Loans for LMI individuals
- Flexible Auto Loans

- Grants for Nonprofit organizations
- Homebuyer Education

Scope of Evaluation in Maryland

For the state of Maryland, we completed a full-scope review of the Baltimore-Columbia-Towson MSA. The Baltimore-Columbia-Towson MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

The bank did not originate or purchase a sufficient volume of home mortgage, small business, and small farm loans during the evaluation period to perform a meaningful analysis. Furthermore, there are no LMI CTs in the AA. The bank’s business model and strategy were considered when evaluating the performance in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Maryland

LENDING TEST

The bank’s performance under the Lending Test in Maryland is rated Low Satisfactory.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Baltimore-Columbia-Towson MSA is adequate.

Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Baltimore-Columbia-Towson MSA	18	0	0	0	18	100.0	100.0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Baltimore-Columbia-Towson MSA	8,018	0	0	0	8,018	100.0	100.0

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

BOKF's lending activity in the Baltimore MD is adequate, when considering there are no reported deposits.

Community Development Lending

The bank has made no CD loans.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF's level of CD lending had a neutral impact on its overall lending performance in the AA. Although there were no CD loans originations during the evaluation period, the bank has a limited presence in the state due to the bank's one limited purpose branch.

Product Innovation and Flexibility

The bank makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the Investment Test in Maryland is rated Low Satisfactory.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Baltimore-Columbia-Towson MSA is adequate.

The bank has no qualified CD investments or grants. The bank's business model and strategy were considered when evaluating the performance in the AA.

SERVICE TEST

The bank’s performance under the Service Test in Maryland is rated Needs to Improve.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Baltimore-Columbia-Towson MSA is poor.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Baltimore-Columbia-Towson MSA	100.0	0	100.0	0	0	0	0	0.0	0.0	27.0	73.0

Delivery systems are unreasonably inaccessible to portions of the AA, particularly LMI geographies and/or LMI individuals. The branch was designated as a limited service facility. There are no LMI CTs in the AA. The branch was established based on state law to service a sole deposit relationship and was not operated for the public. Branch hours were adequate to serve the one deposit relationship.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Baltimore-Columbia-Towson MSA	0	1	0	0	-1	0

During the evaluation period, the bank closed the only branch and ceased operations in the AA.

Community Development Services

The bank provided no CD services. The bank’s business model and strategy were considered when evaluating the performance in the AA.

State of New Mexico

CRA rating for the State of New Mexico⁶:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits an excellent geographic distribution of loans in its AA.
- The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.
- The bank has made a relatively high level of CD loans. CD loans had a positive impact in the AA and in the overall Lending Test rating.
- The bank has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position.
- The bank's branches are readily accessible to all portions of the AA, particularly LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of CD services.

Description of Bank's Operations in New Mexico

BOKF has one AA within the state of New Mexico, which is the Albuquerque-Santa Fe-Las Vegas CSA. The AAs consist of whole MSAs or counties.

Based on FDIC Deposit Market Share data as of June 30, 2019, BOKF had a 4.6 percent deposit market share in New Mexico and is ranked fifth out of 56 banks doing business in the state.

⁶ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Albuquerque-Santa Fe-Las Vegas CSA

The Albuquerque-Santa Fe-Las Vegas CSA consists of the two MSAs which were combined for analysis purposes. These MSAs are the Albuquerque MSA and Santa Fe MSA. The Albuquerque MSA is comprised of the counties of Bernalillo, Sandoval, Tarrant, and Valencia. Santa Fe MSA consist of the Santa Fe County.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 253 CTs, of which 13 are low- income and 71 are moderate-income.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$1.5 billion in deposits in the Albuquerque-Santa Fe-Las Vegas CSA which represented 5.8 percent of the bank's total deposits. BOKF was ranked 3rd out of 22 banks, with a presence in the AA and a market share of 8.2 percent. Primary competitors within the AA are the following: Wells Fargo Bank, N.A., which ranked first in deposit market share (31.9 percent) with 38 offices, Bank of America, N.A., which ranked second in deposit market share (19.2 percent) with 18 offices, and Bank of the West, which ranked fourth in deposit market share (8.2 percent) with 19 offices.

BOKF provides a full range of loan and deposit products and services in the state. The bank operates 16 full-service branches: one is located in a low-income CT, five are located in moderate-income CTs, six are located in middle-income CTs, and four are located in upper-income CTs. In addition, the bank has 20 deposit-taking ATMs throughout the AA. The branches represent 12.8 percent of the bank's total branch network.

The bank made 6.2 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	253	5.1	28.1	35.2	30.4	1.2
Population by Geography	1,049,839	5.4	29.3	34.4	30.6	0.3
Housing Units by Geography	450,333	5.7	27.6	35.2	31.3	0.2
Owner-Occupied Units by Geography	270,825	2.6	24.8	36.4	36.0	0.1
Occupied Rental Units by Geography	133,788	11.7	32.4	32.9	22.6	0.4
Vacant Units by Geography	45,720	6.4	29.6	35.0	28.7	0.3
Businesses by Geography	88,472	7.7	21.1	34.0	36.5	0.6

Farms by Geography	2,006	4.2	23.8	36.4	35.4	0.1
Family Distribution by Income Level	254,230	24.1	15.9	18.6	41.5	0.0
Household Distribution by Income Level	404,613	25.6	15.4	16.8	42.2	0.0
Median Family Income MSA - 10740 Albuquerque, NM MSA		\$60,032	Median Housing Value			\$208,999
Median Family Income MSA - 42140 Santa Fe, NM MSA		\$64,734	Median Gross Rent			\$857
			Families Below Poverty Level			14.1%
<i>Source: 2015 ACS Census and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Albuquerque-Santa Fe-Las Vegas CSA was 4.5 percent, down from 5.8 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of New Mexico was 4.8 percent.

Housing Characteristics

According to the 2010 U.S. Census, there were 450,333 total housing units in the AA. Owner-occupied units represented 60.1 percent of the total housing units in the AA, and 29.7 percent were rental occupied units. There were 27.8 percent of all owner-occupied units and 60.9 percent of renter-occupied units were located in low-income CTs. There were 54.2 percent of all owner-occupied units and 34.9 percent of renter-occupied units were located in moderate-income CTs.

There were 347,326 single family (1-4 unit) homes and 60,208 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 49.8 percent single family and 37.4 percent of multifamily. The distribution of housing units in moderate-income CTs was 67.0 percent single family and 16.3 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$65,000. According to Realtor.com data, the median housing value in the AA is \$230,050 and \$269,950 in 2017 and 2019, respectively, reflecting a percent change of 17.3 percent increase.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,500 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$151,353 mortgage with a payment of \$812 per month. A moderate-income borrower making \$52,000 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$242,166 mortgage with a payment of \$1,300 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,449.

Community Contacts

The OCC made two community contacts in the AA, with a statewide small business development corporation and an economic development association. A review of community contacts indicated that the following are identified needs within the community, which consists the entire AA:

- Small Business and Small Farm loan programs
- Small business training
- Financial Literacy
- Affordable Housing
- Flexible Mortgage Loan programs
- Affordable Healthcare
- Job Training
- Improve and Enhance Broadband capabilities

The state of New Mexico possesses several challenges to banks in the rating area, including BOKF.

- In performing the analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for LMI families somewhat impacts these borrowers' ability to purchase homes.
- In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.
- In performing the analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN New Mexico

Scope of Evaluation in New Mexico

For the state of New Mexico, we completed a full-scope review of the Albuquerque-Santa Fe-Las Vegas CSA. The Albuquerque-Santa Fe-Las Vegas CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. Ratings are based primarily on results of the full-scope areas.

LENDING TEST

The bank's performance under the Lending Test in New Mexico is rated Outstanding.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Albuquerque-Santa Fe-Las Vegas CSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Albuquerque-Santa Fe-Las Vegas CSA	4,886	363	1	22	5,272	100.0	100.0
Statewide	-	-	-	2	2	0.0	-

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Albuquerque-Santa Fe-Las Vegas CSA	820,795	79,335	42	88,245	988,417	95.4	100.0
Statewide	-	-	-	47,222	47,222	4.6	-

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$1.5 billion in deposits with a deposit market share of 8.2 percent. The bank ranked 3rd in total deposits out of 22 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top one percent of lenders, first out of 420 lenders, originating home mortgage loans in the AA. The bank's rank in loans is stronger than the rank in deposits. The bank's market share of 5.9 percent in loans is weaker than the deposit market share. The four largest mortgage lenders have captured 20.2 percent of the market.

According to 2018 peer small business data, BOKF ranked 18th out of 125 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.6 percent in loans is weaker than the deposit market share. The five largest small business lenders have captured 61.2 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans is excellent.

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

The proportion of loans in low-income geographies was below the proportion of owner-occupied housing units and exceeded the aggregate distribution. The proportion of loans in moderate-income geographies was near to the proportion of owner-occupied housing units and exceeded the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business is excellent.

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

The proportion of small loans to businesses exceeded the percentage of businesses in LMI geographies and the aggregate distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed BOKF's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans to LMI borrowers is excellent.

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

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to LMI borrowers. These issues were considered in evaluating the bank's performance in the AA.

The proportion of loans was below the percentage of low-income families and exceeds the aggregate distribution. The proportion of loans exceeds the percentage of moderate-income families and the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business by revenue is adequate.

Refer to Table R in the state of New Mexico section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The proportion of loans was significantly below the proportion of small businesses and near to the aggregate distribution.

Community Development Lending

BOKF has made a relatively high level of CD loans. Community development loans had a positive impact in the AA and in the overall Lending Test rating. CD loans in the AA primarily supported community services and revitalization.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF has a good level of CD loans in the Albuquerque-Santa Fe-Las Vegas CSA that were responsive to community needs. During the evaluation, BOKF extended 22 CD loans in the AA totaling \$88.2 million. The level and responsiveness of CD loans had a positive impact on the lending test.

Noteworthy CD loans include:

- A \$3 million loan to finance public infrastructure improvements in a moderate-income area. The complex project also includes the use of tax increment financing.

Statewide

CD lending in the broader statewide area included 2 loans totaling \$47.2 million. The loans financed two tribal-owned entertainment centers that employ over 1,300 individuals in the Mescalero and Espanola communities in New Mexico.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the “Other Performance” section under the Scope of the Evaluation section for additional details regarding other programs.

Albuquerque-Santa Fe-Las Vegas CSA

BOKF works in conjunction with the New Mexico Mortgage Finance Authority to offer affordable housing assistance programs to first time and non-first time homebuyers. These affordable loan products are offered under the agency’s programs, which may include down payment assistance, closing cost assistance, counseling and tax credits. BOKF leveraged these programs to originate 910 loans totaling \$82.4 million in the Albuquerque-Santa Fe-Las Vegas CSA during the evaluation period.

INVESTMENT TEST

The bank’s performance under the Investment Test in the state of New Mexico is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Albuquerque-Santa Fe-Las Vegas CSA is excellent. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Albuquerque-Santa Fe-Las Vegas CSA	14	10,677	43	2,516	57	100.0	13,193	100.0	0	0
Statewide	1	1	0	0	1	0.0	1	0.0	0	0

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

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

Conclusions for the Area Receiving a Full-Scope Review

The bank has an excellent level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$13.2 million, with current period investments of \$2.1 million, prior period investments of \$10.7 million, and qualified grants of \$371 thousand. Investments benefiting the AA during the evaluation represented 6.7 percent of allocated tier 1 capital. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$9.3 million in qualifying CD investment activity and \$1.3 million in 13 qualifying MBS supporting mortgages to LMI borrowers.

A \$13.3 million investment that supported affordable housing and revitalization and stabilization in the AA demonstrated innovation and complexity. This investment supported a larger neighborhood revitalization effort within the Trumbull neighborhood of Albuquerque's International District. The 85-unit scattered site development focuses on transforming vacant lots in the surrounding area. This multifamily development is 100 percent affordable for all residents. This project complements an existing multifamily property and will contribute to the urban village experience.

Grants made were to organizations providing economic development assistance and affordable housing and services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$10 thousand in grants to a loan fund that assists financially underserved small businesses and nonprofits start, grow, and thrive.
- \$11 thousand in grants to a nonprofit organization that helps families build and improve places to call home.
- \$15 thousand in grants to a nonprofit organization that teaches students critical skills in financial literacy, workforce readiness, and entrepreneurship.

Statewide

We considered the ongoing impact from investments made prior to the current evaluation period across New Mexico. The remaining balances consisted of \$136 in qualifying CD investment activity.

SERVICE TEST

The bank’s performance under the Service Test in New Mexico is rated Outstanding.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Albuquerque-Santa Fe-Las Vegas CSA is excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Albuquerque-Santa Fe-Las Vegas CSA	100.0	16	100.0	6.3	31.3	37.4	25.0	5.4	29.4	34.5	30.7

Albuquerque-Santa Fe-Las Vegas CSA

BOKF's branch distribution and retail service performance is excellent.

The bank's branches are readily accessible to all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 16 branches within the AA, with one branch in a low-income CT, and five branches in moderate-income CTs. The percentage of the bank's branches in LMI geographies exceeds the percentage of population living in those geographies. In addition, the bank has one branch in an upper-income geography and two branches in middle-income geographies which were near to seven nearby LMI CTs. When considering these near to branches, performance improved in the AA. The bank has 21 deposit-taking ATMs with 18 ATMs located in the branches and three ATMs located at free-standing locations. Combined, the bank has one ATM located in low-income CT and seven ATMs located in moderate-income CTs. The percentage of ATMs in low-income CTs is near to the level of population in low-income geographies. In addition, the percentage of ATMs in moderate-income CTs exceeds the level of population in moderate-income geographies. ATM distribution is consistent with the bank's branch distribution.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Albuquerque-Santa Fe-Las Vegas CSA	0	2	0	0	-2	0

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed two branches in middle-income geographies in the AA and did not have any branch openings.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with nine of the 16 branches offering Saturday hours.

Community Development Services

The bank provides a relatively high level of CD services.

Albuquerque-Santa Fe-Las Vegas CSA

BOKF provides a relatively high level of CD services in the Albuquerque-Santa Fe-Las Vegas CSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

BOKF employees from various lines of business provided technical assistance to 27 different CD organizations totaling 899 hours during the evaluation period. BOKF staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- Two officers of the bank served on the board and various committees of a nonprofit that provides community services to LMI individuals.
- One employee served on the board of a nonprofit and several employees volunteered to assist a nonprofit that provides financial literacy to LMI students, including work-readiness, and entrepreneurship.
- Two officers served on the board of an economic development organization that provides small businesses with consulting, training, and low-cost loans which assist low-income women and diverse entrepreneurs in New Mexico to create a pathway out of poverty through sustained self-employment.
- One employee served on the board and one employee volunteered services for an economic development organization that recruits new employers and assists local employers to grow and generate quality job opportunities for Albuquerque metro areas.
- Several officers and employees served a nonprofit organization by serving on the board of Directors and by teaching LMI students' financial literacy.

State of Oklahoma

CRA rating for the State of Oklahoma⁷:	Outstanding
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits a good geographic distribution of loans in its AAs.
- The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.
- The bank is a leader in making CD loans. CD loans had a significantly positive impact in the AA and in the overall Lending Test rating.
- The bank has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position.
- The bank's branches are accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of CD services.

Description of Bank's Operations in Oklahoma

BOKF has four AAs within the state of Oklahoma. These AAs are comprised of the Enid MSA Oklahoma City MSA, Tulsa MSA, and OK Non-MSA. The AAs consist of whole MSAs or counties. The non-metropolitan areas were combined for analysis purposes.

Refer to Appendix A for more information of all AAs under review.

⁷ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$12.1 billion in deposits in the state which represented 47.4 percent of the bank's total deposits. BOKF was ranked first out of 223 banks, with a presence in the state, with a market share of 13.1 percent. Primary competitors within the AA are the following: MidFirst Bank, which ranked second in deposit market share (7.3 percent) with 49 offices, Banc First, which ranked third in deposit market share (7.3 percent) with 114 offices, and Arvest Bank, which ranked fourth in deposit market share (5.2 percent) with 97 offices

BOKF provides a full range of loan and deposit products and services in the state. The bank operates 50 full-service branches and 107 deposit-taking ATMs throughout the rating area. The branches represent 40 percent of the bank's total branch network.

The bank made 54.1 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Enid MSA

Enid MSA consists of the Garfield County. The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 12 CTs, of which none are low-income and three are moderate-income.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$76.1 million in deposits in the Enid MSA which represented 0.6 percent of the bank's total deposits. BOKF was ranked 5th out of 14 banks, with a presence in the AA, with a market share of five percent. Primary competitors within the AA are the following: Stride Bank, N.A., which ranked first in deposit market share (32.4 percent) with 4 offices, Security National Bank of Enid, which ranked second in deposit market share (20.3 percent) with 3 offices, and the Bank of Kremlin, which ranked third in deposit market share (16 percent) with 5 offices.

The bank operates one full-service branch and one deposit-taking ATM, which is located in an upper-income CT. The branch represents 0.8 percent of the bank's total branch network.

The bank made 1.6 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Enid MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	25.0	50.0	25.0	0.0
Population by Geography	62,192	0.0	30.4	44.2	25.4	0.0
Housing Units by Geography	26,856	0.0	30.1	43.0	26.9	0.0

Owner-Occupied Units by Geography	15,938	0.0	26.6	40.3	33.2	0.0
Occupied Rental Units by Geography	7,999	0.0	33.0	49.7	17.2	0.0
Vacant Units by Geography	2,919	0.0	41.3	39.4	19.3	0.0
Businesses by Geography	4,223	0.0	32.1	41.3	26.5	0.0
Farms by Geography	261	0.0	18.8	45.2	36.0	0.0
Family Distribution by Income Level	16,911	19.0	19.9	22.3	38.8	0.0
Household Distribution by Income Level	23,937	21.8	17.0	20.1	41.2	0.0
Median Family Income MSA		\$57,419	Median Housing Value			\$97,211
			Median Gross Rent			\$746
			Families Below Poverty Level			9.9%
<i>Source: 2015 ACS Census and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Enid MSA was 3.1 percent, down from 4.2 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of Oklahoma was 3.4 percent.

Housing Characteristics

According to the 2010 U.S. Census, there were 26,856 total housing units in the AA. Owner-occupied units represented 59.4 percent of the total housing units in the AA, and 29.8 percent were rental occupied units. There were 52.4 percent of all owner-occupied units and 32.7 percent of renter-occupied units were located in moderate-income CTs.

There were 23,664 single family (1-4 unit) homes and 1,994 multifamily (five plus unit) housing units in the AA. The distribution of housing units in moderate-income CTs was 96.8 percent single family and 3.6 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$60,500. According to Realtor.com data, the median housing value in the AA is \$162,450 and \$159,250 in 2017 and 2019, respectively, reflecting a 1.9 percent decrease.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$30,250 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$140,875 mortgage with a payment of \$756 per month. A moderate-income borrower making \$48,400 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$225,400 mortgage with a payment of \$1,210 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$854.

Community Contacts

The OCC made two community contacts in the AA, which include a local nonprofit and the county development authority. A review of community contacts indicated that the following are identified needs within the community, which consists the entire AA:

- Affordable Housing
- Small Farm loans
- Home Loans for repairs

Oklahoma City MSA

The Oklahoma City MSA is comprised of the counties of Canadian, Cleveland, and Oklahoma.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 332 CTs, of which 28 are low- income and 99 are moderate-income.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$2.9 billion in deposits in the Oklahoma City MSA which represented 11.4 percent of the bank's total deposits. BOKF was ranked 4th out of 67 banks, with a presence in the AA, with a market share of 9.3 percent. Primary competitors within the AA are the following: MidFirst Bank, which ranked first in deposit market share (16.8 percent) with 31 offices, JPMorgan Chase Bank, N.A., which ranked second in deposit market share (11.3 percent) with 18 offices, and Bank of America, N.A., which ranked third in deposit market share (10.3 percent) with 13 offices.

The bank operates 19 full-service branches: one is located in a moderate-income CT, 11 are located in middle-income CTs, six are located in upper-income CTs, and one is located in a non-income CT. In addition, the bank has 35 deposit-taking ATMs throughout the AA. The branches represent 15.2 percent of the bank's total branch network.

The bank made 20.7 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Oklahoma City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	332	8.4	29.8	35.2	23.8	2.7
Population by Geography	1,149,287	7.0	25.2	37.7	29.9	0.3
Housing Units by Geography	482,612	6.9	27.3	37.4	28.0	0.3
Owner-Occupied Units by Geography	270,023	3.9	19.3	40.4	36.4	0.1
Occupied Rental Units by Geography	163,706	10.7	37.9	33.7	17.1	0.7
Vacant Units by Geography	48,883	11.3	36.4	34.0	17.7	0.6
Businesses by Geography	107,446	4.5	21.8	34.8	35.7	3.2
Farms by Geography	2,687	3.4	17.3	39.7	38.6	0.9
Family Distribution by Income Level	278,956	21.5	17.3	20.3	40.9	0.0
Household Distribution by Income Level	433,729	23.5	16.7	17.9	41.8	0.0
Median Family Income MSA		\$64,058	Median Housing Value			\$139,259
			Median Gross Rent			\$808
			Families Below Poverty Level			11.5%
<i>Source: 2015 ACS Census and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Oklahoma City MSA was 3.1 percent, down from 4.1 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of Oklahoma was 3.4 percent.

Housing Characteristics

According to the 2010 U.S. Census, there were 482,612 total housing units in the AA. Owner-occupied units represented 55.9 percent of the total housing units in the AA, and 33.9 percent were rental occupied units. There were 31.3 percent of all owner-occupied units and 52.3 percent of renter-occupied units were located in low-income CTs. There were 39.5 percent of all owner-occupied units and 46.9 percent of renter-occupied units were located in moderate-income CTs.

There were 383,819 single family (1-4 unit) homes and 79,666 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 77.3 percent single family and 20.4 percent of multifamily. The distribution of housing units in moderate-income CTs was 73.6 percent single family and 24.0 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$69,300. According to Realtor.com data, the median housing value in the AA is \$217,550 and \$250,050 in 2017 and 2019, respectively, reflecting a percent change of 14.9 percent.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,650 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$161,366 mortgage with a payment of \$866 per month. A moderate-income borrower making \$55,440 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$258,186 mortgage with a payment of \$1,386 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,342.

Community Contacts

The OCC made two community contacts in the AA, which include a housing agency and an economic development corporation. A review of community contacts indicated that the following are identified needs within the community, which consists the entire AA:

- First-time homebuyer programs
- Small Business training
- Small Business loans
- Small Business Counseling
- Job Training/Educational Seminars
- Financial Literacy
- Credit Counseling

Tulsa MSA

Tulsa MSA is comprised of the counties of Creek, Tulsa, Rogers, and Wagoner.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 246 CTs, of which 17 are low- income and 69 are moderate-income.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$8.6 billion in deposits in the Tulsa MSA which represented 33.9 percent of the bank's total deposits. BOKF was ranked first out of 51 banks, with a presence in the AA, with a market share of 33.9 percent. The AA represents the largest deposit market of the entire bank. Primary competitors within the AA are the following: Arvest Bank, which ranked second in deposit market share (7.2 percent) with 28 offices, and Bank of America, N.A., which ranked third in deposit market share (6.1 percent) with 12 offices, and Banc First which ranked fourth in deposit market share (4.3 percent) with 18 offices.

The bank operates 23 full-service branches: one is located in a low-income CT, three are located in moderate-income CTs, ten are located in middle-income CTs, and nine are located in upper-income CTs. In addition, the bank has 57 deposit-taking ATMs throughout the AA. The branches represent 18.4 percent of the bank's total branch network.

The bank made 28.6 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Tulsa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	246	6.9	28.0	37.4	27.6	0.0
Population by Geography	858,677	5.8	25.2	38.2	30.7	0.0
Housing Units by Geography	371,398	6.2	26.9	38.2	28.7	0.0
Owner-Occupied Units by Geography	214,658	3.1	19.4	40.9	36.5	0.0
Occupied Rental Units by Geography	118,436	10.4	37.2	34.8	17.6	0.0
Vacant Units by Geography	38,304	10.3	36.8	33.8	19.1	0.0
Businesses by Geography	82,531	3.2	21.7	37.6	37.5	0.0
Farms by Geography	2,237	2.4	15.3	48.3	34.0	0.0
Family Distribution by Income Level	221,196	21.0	17.4	20.3	41.3	0.0
Household Distribution by Income Level	333,094	23.5	16.3	17.9	42.3	0.0
Median Family Income MSA		\$61,182	Median Housing Value			\$137,534
			Median Gross Rent			\$777
			Families Below Poverty Level			11.2%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
 (*) The NA category consists of geographies that have not been assigned an income classification.

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Tulsa MSA was 3.4 percent, down from 4.7 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of Oklahoma was 3.4 percent.

Housing Characteristics

According to the 2010 U.S. Census, there were 371,398 total housing units in the AA. Owner-occupied units represented 57.8 percent of the total housing units in the AA, and 31.9 percent were rental occupied units. There were 29.1 percent of all owner-occupied units and 53.7 percent of renter-occupied units were located in low-income CTs. There were 41.7 percent of all owner-occupied units and 44.1 percent of renter-occupied units were located in moderate-income CTs.

There were 288,800 single family (1-4 unit) homes and 59,804 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 72.6 percent single family and 25.4 percent of multifamily. The distribution of housing units in moderate-income CTs was 71.7 percent single family and 21.9 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$65,800. According to Realtor.com data, the median housing value in the AA is \$196,550 and \$249,500 in 2017 and 2019, respectively, reflecting a percent change of 26.9 percent.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$32,900 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$153,216 mortgage with a payment of \$822 per month. A moderate-income borrower making \$52,640 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$245,146 mortgage with a payment of \$1,316 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,339.

Community Contacts

The OCC made three community contacts in the AA, which includes a local community service organization, a chamber of commerce, and a city representative. A review of community contacts indicated that the following are identified needs within the community, which consists the entire AA:

- Affordable Housing
- Financial Literacy

- Credit Counseling
- Small Business training

The state of Oklahoma possesses several challenges to banks in the rating area, including BOKF.

- The low number of low-income CTs and owner-occupied housing units can present a challenge for banks when attempting to originate home mortgages in these geographies. As such, the bank's performance in moderate-income CTs carried greater weight when coming to overall product conclusions.
- In performing the analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for LMI families somewhat impacts these borrowers' ability to purchase homes.
- In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank's ability to make small loans to businesses.
- In performing the analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Oklahoma

Scope of Evaluation in Oklahoma

For the state of Oklahoma, we completed a full-scope review of the Enid MSA, Oklahoma City MSA, and Tulsa MSA. The Enid MSA was selected for analysis using full-scope procedures as it has not received a full-scope analysis previously. The Oklahoma City MSA was selected for analysis using full-scope procedures as it ranks as BOKF's second highest market for deposits (24.1 percent) and reportable loans (38.2 percent) in the state. The Tulsa MSA was selected for analysis using full-scope procedures because it had the largest percent of deposits (71.5 percent), reportable loans (52.8 percent), and branch distribution (46.0 percent) within the state. It is also the largest deposit market share (33.9 percent) for the bank. In addition, the deposit market share indicates the bank is important to the AA. Ratings are based primarily on results of the full-scope areas. We completed a limited-scope review of OK Non-MSA.

In the Enid MSA, the bank did not originate or purchase a sufficient volume of small business loans during the evaluation period to perform a meaningful analysis.

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on the full-scope reviews, the bank's performance in the Oklahoma City MSA is excellent, and Enid MSA and Tulsa MSA are good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Enid MSA	367	10	0	0	377	2.8	0.6
Oklahoma City MSA	4,501	538	0	21	5,060	38.2	24.1
Tulsa MSA	6,472	500	1	29	7,002	52.8	71.5
OK Non-MSA	730	83	0	5	818	6.2	3.8
Statewide	-	-	-	2	2	0.0	-

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Enid MSA	37,526	815	0	0	38,341	1.7	0.6
Oklahoma City MSA	701,820	133,677	0	122,187	957,684	41.7	24.1
Tulsa MSA	978,743	134,970	250	58,896	1,172,859	51.1	71.5
OK Non-MSA	79,486	14,154	0	28,763	122,403	5.3	3.8
Statewide	-	-	-	5,015	5,015	0.2	-

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Enid MSA

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$76 million in deposits with a deposit market share of 5.1 percent. The bank ranked 5th in total deposits out of 14 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top two percent of lenders, 2nd out of 129 lenders, originating home mortgage loans in the AA. The bank's rank in loans is stronger than the rank in deposits. The bank's market share of 9.6 percent in loans is stronger than the deposit market share. The four largest mortgage lenders have captured 30.9 percent of the market.

According to 2018 peer small business data, BOKF ranked 19th out of 51 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.9 percent in loans is weaker than the deposit market share. The five largest small business lenders have captured 57.1 percent of the market.

Oklahoma City MSA

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$2.9 billion in deposits with a deposit market share of 9.3 percent. The bank ranked 4th in total deposits out of 67 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top nine percent of lenders, 4th out of 477 lenders, originating home mortgage loans in the AA. The bank's rank in loans is equal to the rank in deposits. The bank's market share of 4.3 percent in loans is weaker than the deposit market share. The four largest mortgage lenders have captured 20.5 percent of the market.

According to 2018 peer small business data, BOKF ranked 24th out of 122 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.9 percent in loans is weaker than the deposit market share. The five largest small business lenders have captured 52.8 percent of the market.

Tulsa MSA

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$8.6 billion in deposits with a deposit market share of 33.9 percent. The bank ranked first in total deposits out of 51 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top three percent of lenders, first out of 403 lenders, originating home mortgage loans in the AA. The bank's rank in loans is equal to the rank in deposits. The bank's market share of 9.4 percent in loans is weaker than the deposit market share. The four largest mortgage lenders have captured 21.3 percent of the market.

According to 2018 peer small business data, BOKF ranked 18th out of 116 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of one percent in loans is weaker than the deposit market share. The five largest small business lenders have captured 55.7 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans is good.

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

Enid MSA

During the evaluation period, the bank's distribution of home mortgage loans to LMI geographies is good. There were no low-income tracts in this AA. The lending analysis is based on the distribution in moderate-income geographies. The proportion of loans in moderate-income geographies was below the proportion of owner-occupied housing units and exceeded the aggregate distribution in moderate-income geographies

Oklahoma City MSA

During the evaluation period, the bank's distribution of home mortgage loans to LMI geographies is good. The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied housing units and below the aggregate distribution. The proportion of loans in moderate-income geographies was below the proportion of owner-occupied housing units and exceeds the aggregate distribution.

Tulsa MSA

During the evaluation period, the bank's distribution of home mortgage loans to LMI geographies is adequate. The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied housing units and exceeds the aggregate distribution. The proportion of loans in moderate-income geographies was well below the proportion of owner-occupied housing units and below the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business is excellent.

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

Enid MSA

The bank did not originate or purchase a sufficient volume of small business loans during the evaluation period to perform a meaningful analysis.

Oklahoma City MSA

During the evaluation period, the distribution of small loans to businesses in LMI geographies was excellent. The proportion of small loans to businesses exceeded the percentage of businesses in LMI geographies and the aggregate distribution.

Tulsa MSA

During the evaluation period, the distribution of small loans to businesses in LMI geographies was excellent. The proportion of small loans to businesses exceeded the percentage of businesses in LMI geographies and the aggregate distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed BOKF's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans to LMI borrowers is excellent.

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

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to low-income borrowers. These issues were considered in evaluating the bank's performance in the rating area.

Enid MSA

During the evaluation period, the bank's distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans was near to the percentage of low-income families and exceeds the aggregate distribution. The proportion of loans exceeds the percentage of moderate-income families and the aggregate distribution.

Oklahoma City MSA

During the evaluation period, the bank's distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans was below the percentage of low-income families and exceeds the aggregate distribution. The proportion of loans exceeds the percentage of moderate-income families and the aggregate distribution.

Tulsa MSA

During the evaluation period, the bank's distribution of home mortgage loans to LMI borrowers is excellent. The proportion of loans was below the percentage of low-income families and exceeds the aggregate distribution. The proportion of loans exceeds the percentage of moderate-income families and the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business by revenue is adequate.

Refer to Table R in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Enid MSA

The bank did not originate or purchase a sufficient volume of small business during the evaluation period to perform a meaningful analysis.

Oklahoma City MSA

During the evaluation period, the distribution of the bank's loans to small businesses by revenue is adequate. The proportion of loans was well below the proportion of small businesses and near to aggregate distribution of loans to those businesses.

Tulsa MSA

During the evaluation period, the distribution of the bank's loans to small businesses by revenue is adequate. The proportion of loans was significantly below the proportion of small businesses and near to aggregate distribution of loans to those businesses.

Community Development Lending

Enid MSA

The bank has made no CD loans. This had a neutral impact on the lending test as there are CD loan opportunities in the AA.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Oklahoma City MSA

BOKF is a leader in making CD loans. CD loans had a significantly positive impact in the AA and in the overall Lending Test rating. CD loans in the AA primarily supported affordable housing, community services and revitalization.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF has an excellent level of CD loans in the Oklahoma City MSA that were responsive to community needs. During the evaluation, BOKF extended 21 CD loans in the AA totaling \$122.1 million. The level and responsiveness of CD loans had a positive impact on the lending test.

Noteworthy CD loans include:

- A \$9.5 million loan to construct a 72 -unit housing development for seniors with all units rent-restricted for LMI. The project involved complex financing that included CDBG funds and LIHTC.
- Two loans totaling \$18 million to construct two multifamily housing projects that will provide 149-units of affordable housing for seniors with rents in both projects restricted for those with incomes less than 80 percent of AMI. The projects involved complex financing that included CDBG funds and LIHTC.
- Two loans totaling \$6.2 million to finance the acquisition and renovation of a retail center in an LMI area. The renovated center will support stabilization of the LMI area, retain and attract new businesses to the low-occupancy center and support job creation for LMI residents.

Tulsa MSA

BOKF has made an adequate level of CD loans. Community development loans had a positive impact in the AA and in the overall Lending Test rating. CD loans in the AA primarily supported affordable housing and community services.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF has an adequate level of CD loans in the Tulsa MSA that were responsive to community needs. During the evaluation, BOKF extended 29 CD loans in the AA totaling \$58.9 million. The level and responsiveness of CD loans had a neutral impact on the lending test.

Noteworthy CD loans include:

- A \$5.6 million loan to rehabilitate a housing development for seniors with all units rent-restricted for LMI. The project involved complex financing that included CDBG funds, LIHTC and HUD Section 8 rental subsidies.
- A \$5 million loan to the local housing authority to refinance an affordable multifamily housing for seniors. The project involved complex financing that included CDBG funds and HUD Section 8 rental subsidies.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

BOKF works in conjunction with the Oklahoma Housing Finance Agency to offer affordable housing assistance programs to first time and non-first time homebuyers. These affordable loan products are offered under the agency's programs, which may include down payment assistance, forgivable loans, grants, homebuyer closing cost assistance, homebuyer counseling, and tax credits. BOKF leveraged these programs to originate 32 loans totaling \$3.1 million in the Enid MSA, 178 loans totaling \$22.5 million in the Oklahoma City MSA, 115 loans totaling \$14.5 million in the Tulsa MSA, and 18 loans totaling \$1.8 million across the state during the evaluation period.

Section 184 Indian Home Loan Guarantee Program

In partnership with Oklahoma Tulsa County Home Finance Authority, the bank offers the Section 184 Indian Home Loan Guarantee Program, which is a home mortgage product specifically designed for American Indian and Alaska Native families, Alaska villages, tribes, or tribally designated housing entities. With Section 184 financing borrowers can get into a home with a low down payment and flexible underwriting. Section 184 loans can be used, both on and off native lands, for new construction, rehabilitation, purchase of an existing home, or refinance. BOKF leveraged these programs to originate 24 loans totaling \$2.6 million in the Tulsa MSA during the evaluation period.

Conclusions for the Area Receiving a Limited-Scope Review

Based on limited-scope review, the bank's performance under the Lending Test in the Oklahoma Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas and is excellent.

Refer to Tables O through T in the state of Oklahoma section of Appendix D for the facts and data that support these conclusions.

Statewide

CD lending in the broader statewide area included 2 loans totaling \$5 million. This included a \$2.8 million loan to rehabilitate a multifamily development in Kingfisher, OK. All of the units are rent restricted to LMI families. The project involved complex financing that included CDBG funds, LIHTC and HUD Section 8 rental subsidies.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Oklahoma is rated Outstanding.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Enid MSA	1	485	0	0	1	0.6	485	0.6	0	0
Oklahoma City MSA	20	21,017	49	35,998	69	24.1	57,015	24.1	0	0
Tulsa MSA	23	11,093	147	39,895	170	71.5	50,988	71.5	1	34
Oklahoma Non-MSA	12	11,598	20	6,645	32	3.8	18,243	3.8	0	0
Statewide	14	11,860	6	48	20	0.0	11,908	0.0	1	319

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

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance is excellent in the Oklahoma City MSA and the Tulsa MSA, and adequate in the Enid MSA. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Enid MSA

The bank has an adequate level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank does not use innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$492 thousand, with prior period investments of \$485 thousand and qualified grants of \$7 thousand. Investments benefiting the AA during the evaluation period represented 4.8 percent of allocated tier 1 capital. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$485 thousand in one qualifying CD investment activity.

All grants made were to organizations providing services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$5 thousand in grants to a nonprofit organization established to improve public education outcomes in the local public school system. The initiative offers teacher grants for innovative classroom activities and scholarships for financially disadvantage students to gain college credits. Approximately 79 percent of students are LMI.
- \$2 thousand grant to a nonprofit organization that provides free food to LMI individuals and families.

Oklahoma City MSA

The bank has an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs and occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$57 million, with current period investments of \$35.5 million, prior period investments of \$21 million, and qualified grants of \$448 thousand. Investments benefiting the AA during the evaluation represented 14.6 percent of allocated tier 1 capital. There were no unfunded commitments at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$19.6 million in qualifying CD investment activity and \$1.4 million in 14 qualifying MBS supporting mortgages to LMI borrowers.

A \$10 million LIHTC investment that supported affordable housing in the AA demonstrated innovation and complexity. This project also qualified for Federal Historic Tax Credits and Oklahoma Historic Tax Credits. The investment facilitated the adaptive reuse of a historic former elementary school in Oklahoma City. The project will create a 52-unit senior housing property. A certain number of units will be set aside for targeted populations, including homeless persons, persons with mental/physical disabilities, or veterans.

Another \$6.4 million LIHTC investment that supported affordable housing in the AA also demonstrated innovation and complexity. The investment facilitated the rehabilitation of a 100-unit senior housing project in El Reno, Oklahoma. All units will be offered to families earning less than 60 percent of AMI. Ten percent of units will be set aside for veterans.

Combined investments of \$35.5 million in a proprietary LIHTC that supports affordable housing in the AA demonstrated leadership and complexity. The bank established this fund as a vehicle to provide ongoing investments in multifamily affordable housing across multiple AAs. Current period investments in the Oklahoma City MSA included five properties with a total of 371 housing units.

Grants made were to organizations providing economic development assistance and affordable housing and services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$240 thousand in grants to a nonprofit organization that leads efforts to grow existing industries, recruit new businesses, and develop an active entrepreneurial environment for quality job creation.
- \$30 thousand in grants to a nonprofit organization that provides down payment assistance, homeownership counseling, and foreclosure prevention.
- \$35 thousand in grants to a nonprofit organization that provides programs including homeless assistance, Headstart, economic development, outpatient treatment, home repair and weatherization, and homebuyer programs.

Tulsa MSA

The bank has a good level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$51 million, with current period investments of \$36.7 million, prior period investments of \$11.1 million, and qualified grants of \$3.2 million. Investments benefiting the AA during

the evaluation represented 4.4 percent of allocated tier 1 capital. The bank also had \$34 thousand in unfunded commitments remaining at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$9.6 million in qualifying CD investment activity and \$1.5 million in 17 qualifying MBS supporting mortgages to LMI borrowers.

A \$4 million NMTC investment that supported affordable housing, economic development, and revitalization and stabilization in the AA demonstrated innovation and complexity. The project also qualified as an Oklahoma State Historic Tax Credit. The investment facilitated the rehabilitation of a blighted warehouse in the Brady Arts District of downtown Tulsa. The project included the development of 14 apartments at below market rents, as well as, artist studio and small business spaces. Ground floor retail and restaurant space is also offered at below market rents. The building is now home to almost a dozen retail businesses and created more than 100 jobs.

Combined investments of \$24.7 million in a proprietary LIHTC that supports affordable housing in the AA demonstrated leadership and complexity. The bank established this fund as a vehicle to provide ongoing investments in multifamily affordable housing across multiple AAs. Current period investments in the Tulsa MSA included four properties with a total of 279 housing units.

Grants made were to organizations providing economic development assistance and affordable housing and services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$39 thousand in grants to a nonprofit organization that provides families with a path to homeownership. The organization offers affordable, no-to-low interest mortgages to families that complete the homeownership program.
- \$735 thousand in grants to a nonprofit organization that supports growth in existing and new business, public and private educational institutions, and flourishing communities and downtowns in Tulsa and northeast Oklahoma.
- \$5 thousand grant to a nonprofit that provides free dental services to LMI individuals. Services included exams, x-rays, cleanings, and other dental procedures.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, Oklahoma Non-MSA performance is consistent with the state of Oklahoma's overall Outstanding performance under the Investment Test.

Statewide

We considered the ongoing impact from investments made during and prior to the current evaluation period across Oklahoma. Current period investments consisted of qualified grants of \$48 thousand. The remaining prior period balances consisted of \$11.5 million in qualifying CD investment activity and \$351 thousand in nine qualifying MBS supporting mortgages to LMI borrowers.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Oklahoma City MSA and Tulsa MSA is good while the performance in the Enid MSA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Enid MSA	0.6	1	2.0	0.0	0.0	0.0	100.0	0.0	30.4	44.2	25.4
Oklahoma City MSA	23.5	19	38.0	0.0	5.3	57.9	31.6	7.0	25.2	37.9	29.9
Tulsa MSA	72.0	23	46.0	4.4	13.0	43.5	39.1	5.8	25.2	38.2	30.8
OK Non-MSA	3.9	7	14.0	14.3	28.6	42.9	14.2	4.2	19.6	53.2	23.0

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Enid MSA	0	0	0	0	0	0
Oklahoma City MSA	2	2	0	0	0	0
Tulsa MSA	1	1	0	0	0	0
OK Non-MSA	0	1	0	0	0	-1

Enid MSA

BOKF's branch distribution and retail service performance is adequate.

The bank's branches are reasonably accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has one branch in the AA, with no branches in moderate-income CTs. There are no low-income geographies in the AA and only three moderate-income geographies out of a total of 12 geographies that make up the Enid MSA. As a result, we determined the bank's branch and ATM distribution in the Enid MSA is reasonable. In addition, although the bank's branch is located in an upper-income CT, there is a moderate-income CT near to this branch where the bank has a significant number of bank customers. The bank has one deposit-taking ATM located in the AA, with none in moderate-income CTs. The percentage of ATMs in LMI CTs is below the level of population in the LMI geographies. ATM distribution is consistent with the bank's branch distribution.

During the evaluation period, the bank did not open or close any branches in the Enid MSA.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. The bank's branch in this AA operates during traditional banking hours, including Saturday hours.

Oklahoma City MSA

BOKF's branch distribution and retail service performance is good.

The bank's branches are accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 19 branches within the AA, with no branches in a low-income CTs and one branch in a moderate-income CT. The percentage of the bank's branches in low-income CTs is below the percentage of population living in those geographies. The percentage of the bank's branch in the moderate-income CT is below the percentage of population living in those geographies. In addition, the bank has two branches in upper-income CTs and eight branches in middle-income CTs which were near to ten nearby LMI CTs. The analysis showed a good penetration of LMI individuals in these ten nearby LMI CTs. The bank has 35 deposit-taking ATMs with 24 ATMs located in the branches and 11 ATMs being free-standing locations. Combined the bank has one ATM located in a low-income CT and eight ATMs located in moderate-income CTs. The bank's distribution of free-standing ATMs accounted for one ATM in a low-income CT and five ATMs in moderate-income CTs which was greater than the ATMs located in the branch distribution and provided greater accessibility to LMI geographies and LMI individuals.

The opening and closing of branches have not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank opened two branches and closed two branches in the AA. In 2017, the bank closed one branch in an upper-income CT and opened a branch in an upper-income CT. This branch was relocated from a

grocery store to its own site. In 2018, the bank closed one branch in an unknown income level CT and opened another branch in the same CT.

Business hours do not vary in a way that inconveniences the various portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, including 15 of 19 branches being open for Saturday hours.

Tulsa MSA

BOKF's branch distribution and retail service performance is good.

The bank's branches are reasonably accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 23 branches located within the AA, with one branch located in a low-income CT and three branches located in moderate-income CTs. In addition, the bank had three middle-income branches and four upper-income branches which were near to seven moderate-income CTs. The analysis showed a good penetration of moderate-income individuals. The bank has 57 deposit-taking ATMs with 33 ATMs located in the branches and 24 ATMS being free-standing locations. Combined the bank has four ATMs located in low-income CTs and 15 ATMs located in moderate-income CTs. The bank's distribution of free-standing ATMs accounted for two ATMs in low-income CTs and 11 ATMs in moderate-income CTs which was greater than the ATMs located in the branch distribution and provided greater accessibility to LMI geographies and LMI individuals.

The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed one branch in a middle-income CT and opened a branch in an upper-income CT. The closed branch was relocated from a grocery store to a stand-alone, free-standing site.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with 19 of the 23 branches offering Saturday hours.

Community Development Services

The bank provides a relatively high level of CD services.

Enid MSA

BOKF provides a limited level of CD services in the Enid MSA.

CD services were limited in helping the bank address community needs. A BOKF employee provided technical assistance by serving on the organization's finance committee to a CD organization totaling six hours during the evaluation period.

Oklahoma City MSA

BOKF is a leader in providing CD services in the Oklahoma City MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

BOKF employees from various lines of business provided technical assistance to 29 different CD organizations totaling 1,628 hours during the evaluation period. BOKF staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- An employee served on the board of a nonprofit and several employees volunteered to assist a nonprofit that provides financial literacy to LMI students, including work-readiness, and entrepreneurship.
- Several employees volunteered to teach financial literacy and college readiness, including career choices, to LMI students.
- An employee serves on the Board and several employees volunteered to teach first time homebuyer classes for a nonprofit organization that assist LMI families with purchasing their first home.
- An officer of the bank serves as a board member for a nonprofit organization that provides temporary housing and meals to LMI individuals. In addition, the organization assists these individuals find permanent housing.
- Employees volunteered to teach first time homebuyer and financial budgeting classes to LMI families.
- Several employees participated in teaching financial education classes that included teaching basic economics, free enterprise, and basic finance.

Tulsa MSA

BOKF is a leader in providing CD services in the Tulsa MSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent level of CD services, consistent with its capacity and expertise to conduct specific activities.

BOKF employees from various lines of business provided technical assistance to 67 different CD organizations totaling 5,706 hours during the evaluation period. BOKF staff served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- A couple of employees served on the board and various committees of a nonprofit that provides financial literacy to LMI students, including work-readiness, and entrepreneurship. In addition, several employees provided financial literacy, work-readiness, and entrepreneurship to LMI students.
- Several employees served on Boards and various committees for a nonprofit organization that assists LMI families with basic services. This community services organization works closely with service providers, governments and other funders to identify health and human service problems in communities and develops plans to address them. In addition, this organization assists nonprofit agencies in recruiting and training volunteers and provides volunteer resources in the area of management and technical assistance, training and board leadership employee served on the board of an organization that awards funds to the community. The support is provided to nonprofits that provide vital services throughout the community and to LMI individuals and families.
- An employee serves on the board of a nonprofit that provides Emergency Shelter for ages 12-18, provides programs for youth homelessness, Health Services, Community Based Counseling, individual and family counseling, substance abuse counseling, and works with the juvenile justice system and Office of Juvenile Affairs on behalf of the youth.
- An employee served on the board of an affordable housing nonprofit organization with the purpose of ensuring that all residents of the state of Oklahoma flourish in safe, affordable homes and to help communities develop safe and affordable housing options for all residents.
- An employee is a board member of a Tulsa based community development financial institution that provides financing to small and emerging businesses in the Tulsa area.
- An employee is a board member of a community services organization that provides LMI people with emergency shelter, food, clothing, medical assistance, and housing assistance.

Conclusions for the Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance in the OK Non-MSA is consistent with the bank's overall High Satisfactory performance under the Service Test in the state and is considered good.

State of Texas

CRA rating for the State of Texas⁸: Outstanding

The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs;
- The bank exhibits a good geographic distribution of loans in its AA.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.
- BOKF has made a relatively high level of CD loans. CD loans had a positive impact in the AA and in the overall Lending Test rating.
- The bank has an excellent level of qualified investments, particularly those that are not routinely provided by private investors, often in a leadership position.
- The bank's branches are readily accessible to essentially all portions of the AA, particularly LMI geographies and/or LMI individuals.
- The bank provides an excellent level of CD services.

Description of Bank's Operations in Texas

BOKF has two AAs within the state of Texas. These AAs are comprised of the Dallas-Fort Worth CSA and Houston-The Woodlands-Sugar Land MSA. The AAs consist of whole MSAs or counties.

Refer to Appendix A for more information of all AAs under review.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$5.9 billion in deposits in the state which represented 23.3 percent of the bank's total deposits. BOKF was ranked 21st out of 510

⁸ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

banks, with a presence in the state, with a market share of 0.7 percent. Primary competitors within the AA are the following: JPMorgan Chase Bank, N.A., which ranked first in deposit market share (21.9 percent) with 556 offices, Bank of America, N.A., which ranked second in deposit market share (14.7 percent) with 364 offices, and USAA Federal Savings Bank, which ranked third in deposit market share (8.6 percent) with one office.

BOKF provides a full range of loan and deposit products and services in the state. The bank operates 31 full-service branches and 35 deposit-taking ATMs throughout the rating area. The branches represent 24.8 percent of the bank's total branch network.

The bank made 13 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Dallas-Fort Worth CSA

The Dallas-Fort Worth CSA consists of the two MSAs which were combined for analysis purposes. These MSAs are the Dallas-Fort Worth-Arlington MSA which is comprised of the counties of Collin, Dallas, Denton, and Tarrant, and Sherman-Denison MSA, which is comprised of the Grayson County.

The AA meets the requirement of the regulation and does not arbitrarily exclude low- or moderate-income geographies. According to 2010 U.S. Census data, the AA consists of 1,201 CTs, of which 162 are low- income and 318 are moderate-income.

Based on the June 30, 2019, FDIC Deposit Market Share data, BOKF had \$4.3 billion in deposits in the Dallas-Fort Worth CSA which represented 16.7 percent of the bank's total deposits. BOKF was ranked 12th out of 151 banks, with a presence in the AA, with a market share of 1.5 percent. Primary competitors within the AA are the following: Bank of America, N.A., which ranked first in deposit market share (29.5 percent) with 135 offices, JPMorgan Chase Bank, N.A., which ranked second in deposit market share (22.3 percent) with 209 offices, and Texas Capital Bank, N.A., which ranked third in deposit market share (6.6 percent) with 7 offices.

The bank operates 20 full-service branches: two are located in a low-income CT, seven are located in moderate-income CTs, two are located in middle-income CTs, and nine are located in upper-income CTs. In addition, the bank has 21 deposit-taking ATMs throughout the AA. The branches represent 16 percent of the bank's total branch network.

The bank made 5.5 percent of its loan originations and purchases compared to total bank loans during the evaluation period in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Dallas-Fort Worth CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,201	13.5	26.5	26.1	33.3	0.6
Population by Geography	6,116,375	11.5	26.0	27.7	34.7	0.1
Housing Units by Geography	2,346,136	11.9	24.7	28.4	34.8	0.2
Owner-Occupied Units by Geography	1,262,541	5.4	20.2	29.3	45.1	0.1
Occupied Rental Units by Geography	902,792	19.2	30.3	27.8	22.3	0.3
Vacant Units by Geography	180,803	20.7	28.2	25.8	25.0	0.3
Businesses by Geography	619,341	7.0	19.1	25.5	47.7	0.7
Farms by Geography	10,731	5.3	17.4	29.3	47.6	0.5
Family Distribution by Income Level	1,484,297	23.7	16.4	18.0	41.9	0.0
Household Distribution by Income Level	2,165,333	24.0	16.5	17.7	41.8	0.0
Median Family Income MSA 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$178,543
Median Family Income MSA 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Gross Rent			\$979
Median Family Income MSA 43300 Sherman-Denison, TX MSA		\$60,873	Families Below Poverty Level			11.7%
<i>Source: 2015 ACS Census and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Employment Factors

According to the U.S. Bureau of Labor and Statistics, as of December 2019, the unemployment rate in the Dallas-Fort Worth CSA was 3.1 percent, down from 4.0 percent in January 2017. The national unemployment as of December 2019 was 3.5 percent; the unemployment rate for the state of Texas was 3.5 percent.

Housing Characteristics

According to the 2010 U.S. Census, there were 2,346,136 total housing units in the AA. Owner-occupied units represented 53.8 percent of the total housing units in the AA, and 38.5 percent were

rental occupied units. There were 24.8 percent of all owner-occupied units and 61.8 percent of renter-occupied units were located in low-income CTs. There were 43.9 percent of all owner-occupied units and 47.3 percent of renter-occupied units were located in moderate-income CTs.

There were 1,659,531 single family (1-4 unit) homes and 633,161 multifamily (five plus unit) housing units in the AA. The distribution of housing units in low-income CTs was 47.5 percent single family and 50.4 percent of multifamily. The distribution of housing units in moderate-income CTs was 67.1 percent single family and 30.5 percent multifamily.

The AA is a high cost housing area, limiting access to affordable home ownership among low- and moderate-income borrowers.

The 2019 FFIEC adjusted median family income (AMFI) in the AA is \$83,100. According to Realtor.com data, the median housing value in the AA is \$350,045 and \$335,550 in 2017 and 2019, respectively, reflecting a percent change of 4.2 percent decrease.

Assuming a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$41,550 per year (or less than 50 percent of the 2019 FFIEC AMFI in the AA) could afford a \$193,500 mortgage with a payment of \$1,039 per month. A moderate-income borrower making \$66,480 per year (or less than 80 percent of the 2019 FFIEC AMFI in the AA) could afford a \$309,600 mortgage with a payment of \$1,662 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$1,801.

Community Contacts

The OCC made three community contacts in the AA, which consisted of an economic development corporation, a county official, and a small business development corporation. A review of community contacts indicated that the following are identified needs within the community and within the entire AA:

- First-time homebuyer programs
- Small Business training
- Small Business loans
- Small Business Counseling
- Job Training/Educational Seminars
- Financial Literacy
- Credit Counseling

The state of Texas possesses several challenges to banks in the rating area, including BOKF.

- In performing the analysis of home mortgage lending, we considered the general affordability of housing to LMI borrowers. The relatively high housing costs compared to income levels for LMI families somewhat impacts these borrowers' ability to purchase homes.
- In performing the analysis of loans to small businesses, we considered the environment for small business lending, which is very competitive. Large interstate banks, regional banks, and

community banks compete for this business in the AA. The large number of competing banks and dominance from the top five lenders somewhat affects the bank’s ability to make small loans to businesses.

- In performing the analysis of investments, competition in the AA is high, with large interstate, regional banks, and community banks competing for qualified investments in the market.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Texas

Scope of Evaluation in Texas

For the state of Texas, we completed a full-scope review of the Dallas-Fort Worth CSA. The Dallas-Fort Worth CSA was selected for analysis using full-scope procedures because it had the largest percent of the bank’s deposits (71.7 percent), reportable loans (42.4 percent), and branch distribution (64.5 percent) within the state. It is also the second largest deposit market share (16.7 percent) for the bank. Ratings are based primarily on results of the full-scope areas. We completed a limited-scope review of Houston-The Woodlands-Sugar Land MSA.

LENDING TEST

The bank’s performance under the Lending Test in Texas is rated Outstanding

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Dallas-Fort Worth CSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Dallas-Fort Worth CSA	3,170	751	1	26	3,948	68.0	71.6%
Houston-The Woodlands-Sugar Land MSA	1,477	347	0	19	1,843	31.7	28.4%
Statewide	-	-	-	18	18	0.3	-

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Dallas-Fort Worth CSA	802,773	216,487	280	78,316	1,097,856	60.3	71.6%
Houston-The Woodlands-Sugar Land MSA	379,607	103,586	0	159,311	642,504	35.3	28.4%
Statewide	-	-	-	80,941	80,941	4.4	-

*The tables present the data for all AAs. The narrative below addresses performance in full-scope areas only.

Dallas-Fort Worth CSA

According to FDIC Deposit Market Share data as of June 30, 2019, BOKF had \$4.3 billion in deposits with a deposit market share of 1.5 percent. The bank ranked 12th in total deposits out of 151 banks in the AA.

According to 2018 peer mortgage data, BOKF ranked in the top five percent of lenders, 4th out of 974 lenders, originating home mortgage loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 5.2 percent in loans is weaker than the deposit market share. The five largest mortgage lenders have captured 26.5 percent of the market.

According to 2018 peer small business data, BOKF ranked 43rd out of 250 lenders originating small business loans in the AA. The bank's rank in loans is weaker than the rank in deposits. The bank's market share of 0.2 percent in loans is weaker than the deposit market share. The five largest small business lenders have captured 63.9 percent of the market.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans is good.

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

Dallas-Fort Worth CSA

The proportion of loans in low-income geographies was well below the proportion of owner-occupied housing units and near to the aggregate distribution. The proportion of loans in moderate-income

geographies was below the proportion of owner-occupied housing units and near to the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business is excellent.

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

Dallas-Fort Worth CSA

The proportion of small loans to businesses exceeded the percentage of businesses in LMI geographies and the aggregate distribution.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed BOKF's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. No unexplained, conspicuous gaps were identified.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Overall the bank's distribution of home mortgage loans to LMI borrowers is good.

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

Dallas-Fort Worth CSA

The high cost of housing during the review period significantly impacted the bank's ability to make home mortgage loans to LMI borrowers. These issues were considered in evaluating the bank's performance in the AA.

The proportion of loans was well below the percentage of low-income families and exceeds the aggregate distribution. The proportion of loans was near to the percentage of moderate-income families and exceeds the aggregate distribution.

Small Loans to Businesses

Overall the bank's distribution of small loans to business by revenue is poor.

Refer to Table R in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Dallas-Fort Worth CSA

The proportion of loans was significantly below the proportion of small businesses and well below aggregate distribution of loans to those businesses.

Community Development Lending

BOKF is a leader in making CD loans. CD loans had a significantly positive impact in the AA and in the overall Lending Test rating. CD loans in the AA primarily supported affordable housing, community services and revitalization.

Refer to the Number of Loans table in the Lending Activity section, for the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

BOKF has an excellent level of CD loans in the Dallas-Fort Worth CSA that were responsive to community needs. During the evaluation, BOKF extended 26 CD loans in the AA totaling \$78.3 million. The level and responsiveness of CD loans had a positive impact on the lending test.

Noteworthy CD loans include:

- Two loans totaling \$9.9 million to construct 646 units of multifamily housing in two developments. 311 of the units are rent restricted to LMI families making less than 60 percent of the AMI. The projects involved complex financing that included CDBG funds and LIHTC.

Product Innovation and Flexibility

The bank uses innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the "Other Performance" section under the Scope of the Evaluation section for additional details regarding other programs.

Dallas-Fort Worth CSA

BOKF works in conjunction with the Southeast Texas Housing Finance Corporation (SETH) to offer affordable housing assistance programs to first time and non-first time homebuyers. These affordable loan products are offered under the agency's programs, which may include down payment assistance, forgivable loan, grants, no monthly payments, online homebuyer education course, closing cost assistance, and tax credits. BOKF leveraged these programs to originate 3 loans totaling \$416 thousand in the Dallas-Fort Worth CSA during the evaluation period.

Conclusions for the Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Houston-The Woodlands-Sugar Land MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O through T in the state of Texas section of Appendix D for the facts and data that support these conclusions.

Statewide

CD lending in the broader statewide area included 18 loans totaling \$80.9 million. This included 7 loans totaling \$34 million loan to construct or rehabilitate multifamily development that provide over 250 units of affordable housing in Texas cities that are outside the bank's AA. All of the projects involved complex financing that included CDBG funds, LIHTC, historic tax credits or USDA rural development financing.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Texas is rated Outstanding.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Dallas-Fort Worth CSA	34	21,228	82	8,511	116	71.6	29,739	71.6	7	7,415
Houston-The Woodlands-Sugar Land MSA	21	4,769	45	12,288	66	28.4	17,057	28.4	3	3,523
Statewide	8	6,411	1	5,196	9	0.0	11,607	0.0	2	363

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

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

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Dallas-Fort Worth CSA is excellent. We considered the investment opportunities with direct benefit within the AA and the bank's capacity to address those needs.

Dallas-Fort Worth CSA

The bank has an excellent level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified investments totaled \$29.7 million, with current period investments of \$7.9 million, prior period investments of \$21.2 million, and qualified grants of \$631 thousand. Investments benefiting the AA during the evaluation represented 6.5 percent of allocated tier 1 capital. The bank also had \$7.4 million in unfunded commitments remaining at the end of the evaluation period.

Consideration was given to the ongoing impact of investments made prior to the current evaluation period within the AA. The remaining balances consisted of \$19.3 million in qualifying CD investment activity and \$1.9 million in 21 qualifying MBS supporting mortgages to LMI borrowers.

A \$5.6 million investment in a proprietary LIHTC that supports affordable housing in the AA demonstrated leadership and complexity. The bank established this fund as a vehicle to provide ongoing investments in multifamily affordable housing across multiple AAs. Current period investments in the Dallas-Fort Worth CSA included one property with a total of 48 housing units.

A \$156 thousand SBIC investment that supported economic development demonstrated innovation and complexity. This new type of investment for the bank supported a fund that seeks to incubate and invest in transformative financial services technology companies. This investment gave the bank an opportunity to join other regional banks to form the Fintech Investors Alliance to invest and shape small fintech companies that can address banking technology hurdles.

Grants made were to organizations providing economic development assistance and affordable housing and services benefiting LMI individuals and families within the AA.

Examples of qualified grants in this AA include:

- \$10 thousand in grants to a nonprofit organization that revitalizes neighborhoods through the development of affordable housing, economic development, and educational and counseling programs.

- \$15 thousand to a Community Development Financial Institution (CDFI) that provides technical assistance and financing for development or renovation of housing, community facilities, and commercial properties in low-income areas of Dallas and Collin Counties.
- \$4,250 grant to a nonprofit organization that restores and empowers formerly trafficked girls and sexually exploited women and their children by providing access to education, job training, interim financial assistance, mental health and spiritual support.

Conclusions for the Area Receiving a Limited-Scope Review

Based on limited-scope reviews, Houston-The Woodlands-Sugar Land MSA performance is consistent with the state of Texas’ overall Outstanding performance under the Investment Test.

Statewide

We considered the ongoing impact from investments made during and prior to the current evaluation period across Texas. Current period investments consisted of \$5.2 million in qualifying CD investment activity. The remaining prior period balances consisted of \$6.2 million in qualifying CD investment activity and \$171 thousand in nine qualifying MBS supporting mortgages to LMI borrowers. Unfunded commitments totaled \$363 thousand.

SERVICE TEST

The bank’s performance under the Service Test in Texas is rated Outstanding.

Conclusions for the Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Dallas-Fort Worth CSA is excellent.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Dallas-Fort Worth CSA	71.6	20	64.5	10.0	35.0	10.0	45.0	11.5	26.0	27.7	34.8
Houston-The Woodlands-Sugar Land MSA	28.4	11	35.5	0.0	18.2	18.2	63.6	12.9	27.1	26.0	34.0

Dallas-Fort Worth CSA

BOKF's branch distribution and retail service performance is excellent.

The bank's branches are readily accessible to all portions of the AA, particularly LMI geographies and/or LMI individuals. The bank has 20 branches within the AA, with two branches in low-income CTs, and seven branches in moderate-income CTs. The percentage of the bank's branches in low-income CTs is near to the percentage of population living in those geographies. The percentage of the bank's branches in moderate-income CTs exceeds the percentage of population living in those geographies. In addition, the bank had two branches in upper-income CTs that had a positive impact that benefited two moderate-income CTs. The analysis showed a good penetration of LMI individuals in these two moderate-income CTs. The bank has 21 deposit-taking ATMs with 20 ATMs located in the branches and two ATMs located at free-standing locations. Combined, the bank has two ATMs located in low-income CTs and six ATMs located in moderate-income CTs. The percentage of ATMs in low-income CTs is near to the level of population of low-income geographies. In addition, the percentage of ATMs in moderate-income CTs exceeds the level of population in moderate-income geographies. ATM distribution is consistent with the bank's branch distribution.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Dallas-Fort Worth CSA	0	2	0	-1	0	-1
Houston-The Woodlands-Sugar Land MSA	0	2	0	0	0	-2

The opening and closing of branches have generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, the bank closed two branches in this AA with one branch being in a moderate-income CT and one branch being in an upper-income geography within the AA. The moderate-income branch was located less than five miles from three other branches and this branches performance was weaker.

Business hours do not vary in a way that inconveniences portions of the AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours, with 19 of 20 branches offering Saturday hours. The one branch closed on Saturday is in an upper-income CT.

Community Development Services

The bank provides an excellent level of CD services.

Dallas-Fort Worth CSA

BOKF provides an excellent level of CD services in the Dallas-Fort Worth CSA.

CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities.

BOKF employees from various lines of business provided technical assistance to 34 different CD organizations totaling 1,455 hours during the evaluation period. BOKF employees served on boards and committees for organizations that promote affordable housing, community services targeted to LMI individuals and families, and economic development.

Examples of some of these services:

- An employee serves on the board of a nonprofit that provides financial literacy to LMI students, including work-readiness, and entrepreneurship. In addition, several employees provided financial literacy, work-readiness, and entrepreneurship to LMI students.
- An employee served on the board of a nonprofit organization which provides services to LMI children and their families. This organization pairs a volunteer with one child in one of three core mentoring programs.
- An employee is on the board of a nonprofit with a mission to support, educate, and empower LMI individuals and families in multi-culture communities that includes shelter, legal services, counseling, and education.
- An employee serves on the board and various committees for a nonprofit organization that assists LMI families with basic services such as health, food, and shelter needs.
- An employee serves on the board for a nonprofit that provides job training and employment for persons with disabilities and disadvantages to assist them in transforming their lives through the power of jobs.
- An employee is on the board of a U.S. Treasury certified CDFI Fund which provides financing for development or renovation of housing, community facilities, and commercial properties.

Conclusions for the Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance in the Houston-The Woodlands-Sugar Land MSA is weaker than the bank's performance in the state and is considered good. Weaker performance is due to branch distribution in the AA. The weaker performance did not have an impact on the bank's overall Service Test performance rating for the state.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2017 to 12/31/2019	
Bank Products Reviewed:	Home mortgage, small business, CD loans, qualified investments, and CD services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		
Kansas City KS-MO MMSA	Full-scope	Counties of Johnson and Wyandotte in KS; and Clay*, Jackson, Platte* in MO
State of Arizona		
Phoenix-Mesa-Chandler MSA	Full-scope	Maricopa County
State of Arkansas		
Fayetteville-Springdale-Rogers MSA	Full-scope	Counties of Benton and Washington
State of Colorado		
Denver-Aurora CSA	Full-scope	Counties of Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, and Jefferson
State of Maryland		
Baltimore-Columbia-Towson MSA	Full-scope	Howard County**
State of New Mexico		
Albuquerque-Santa Fe-Las Vegas CSA	Full-scope	Counties of Bernalillo, Sandoval, Santa Fe, Tarrant, and Valencia
State of Oklahoma		

Enid MSA	Full-scope	Garfield County
Oklahoma City MSA	Full-scope	Counties of Canadian, Cleveland, and Oklahoma
Tulsa MSA	Full-scope	Counties of Creek, Rogers, Tulsa, and Wagoner
Non-MSA	Limited-scope	Counties of Delaware, Kay, Muskogee, McIntosh, Payne, Pittsburg, and Washington
State of Texas		
Dallas-Fort Worth CSA	Full-scope	Counties of Collin, Denton, Dallas, Tarrant, and Grayson
Houston-The Woodlands-Sugar Land MSA	Limited-scope	Counties of Fort Bend, Harris, and Montgomery

* Entered the AA in 2019.

** Exited the AA in April 2018

Appendix B: Summary of MMSA and State Ratings

RATINGS BOKF N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank Rating
BOKF, N.A.	Outstanding	Outstanding	Satisfactory	Outstanding
MMSA or State:				
Kansas City KS-MO MMSA	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State of Arizona	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of Arkansas	Outstanding	Outstanding	Low Satisfactory	Outstanding
State of Colorado	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of Maryland	Low Satisfactory	Low Satisfactory	Needs to Improve	Satisfactory
State of New Mexico	Outstanding	Outstanding	Outstanding	Outstanding
State of Oklahoma	Outstanding	Outstanding	High Satisfactory	Outstanding
State of Texas	Outstanding	Outstanding	Outstanding	Outstanding

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and

sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.

- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Multistate Metropolitan Statistical Area Rating

Kansas City KS-MO MMSA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Kansas City KS-MO MMSA	931	216,612	100.0	50,767	8.2	3.5	4.1	18.3	14.3	16.3	32.6	29.2	33.7	40.7	52.7	45.7	0.2	0.2	0.2
Total	931	216,612	100.0	50,767	8.2	3.5	4.1	18.3	14.3	16.3	32.6	29.2	33.7	40.7	52.7	45.7	0.2	0.2	0.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Kansas City KS-MO MMSA	567	135,137	100.0	65,538	6.6	3.0	3.2	18.0	13.9	16.1	35.5	29.8	35.7	39.7	53.1	44.8	0.2	0.2	0.2
Total	567	135,137	100.0	65,538	6.6	3.0	3.2	18.0	13.9	16.1	35.5	29.8	35.7	39.7	53.1	44.8	0.2	0.2	0.2

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

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Kansas City KS-MO MMSA	931	216,612	100.0	50,767	22.3	6.0	8.0	17.2	22.7	19.1	19.5	21.7	21.3	41.0	47.5	36.2	0.0	2.1	15.4
Total	931	216,612	100.0	50,767	22.3	6.0	8.0	17.2	22.7	19.1	19.5	21.7	21.3	41.0	47.5	36.2	0.0	2.1	15.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Kansas City KS-MO MMSA	567	135,137	100.0	65,538	21.4	6.9	8.0	17.2	23.3	19.5	20.0	23.5	21.6	41.4	44.1	35.7	0.0	2.3	15.2
Total	567	135,137	100.0	65,538	21.4	6.9	8.0	17.2	23.3	19.5	20.0	23.5	21.6	41.4	44.1	35.7	0.0	2.3	15.2

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

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-2018

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Kansas City KS -MO MMSA	642	163,499	100.0	28,704	8.8	9.7	8.4	16.9	8.4	15.2	30.6	30.4	28.1	41.1	46.1	45.0	2.5	5.5	3.2
Total	642	163,499	100.0	28,704	8.8	9.7	8.4	16.9	8.4	15.2	30.6	30.4	28.1	41.1	46.1	45.0	2.5	5.5	3.2

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2019

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Kansas City KS-MO MMSA	160	42,717	100.0	33,942	7.6	8.1	7.1	18.8	16.3	17.2	32.4	30.6	29.9	39.1	40.0	43.1	2.1	5.0	2.7
Total	160	42,717	100.0	33,942	7.6	8.1	7.1	18.8	16.3	17.2	32.4	30.6	29.9	39.1	40.0	43.1	2.1	5.0	2.7

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2018	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Kansas City KS-MO MMSA	642	163,499	100.0	28,704	81.5	0.0	43.1	7.1	0.0	11.4	100.0	
Total	642	163,499	100.0	28,704	81.5	0.0	43.1	7.1	0.0	11.4	100.0	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Kansas City KS-MO MMSA	160	42,717	100.0	33,942	83.2	26.3	43.2	6.1	54.4	10.7	19.4
Total	160	42,717	100.0	33,942	83.2	26.3	43.2	6.1	54.4	10.7	19.4

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-2018		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt		
Kansas City KS-MO MMSA	0	0	0.0	174	6.2	0.0	1.7	16.2	0.0	6.9	33.8	0.0	36.8	43.4	0.0	54.6	0.4	0.0	0.0		
Total	0	0	0.0	174	6.2	0.0	1.7	16.2	0.0	6.9	33.8	0.0	36.8	43.4	0.0	54.6	0.4	0.0	0.0		

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt
Kansas City KS-MO MMSA	0	0	0.0	254	5.2	0.0	1.2	16.8	0.0	5.9	36.8	0.0	47.2	40.9	0.0	45.7	0.3	0.0	0.0
Total	0	0	0.0	254	5.2	0.0	1.2	16.8	0.0	5.9	36.8	0.0	47.2	40.9	0.0	45.7	0.3	0.0	0.0

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-2018	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Kansas City KS-MO MMSA	0	0	0.0	174	94.3	0.0	48.3	3.4	0.0	2.4	0.0	
Total	0	0	0.0	174	94.3	0.0	48.3	3.4	0.0	2.4	0.0	

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas City KS-MO MMSA	0	0	0.0	254	95.3	0.0	46.9	2.7	0.0	2.0	0.0
Total	0	0	0.0	254	95.3	0.0	46.9	2.7	0.0	2.0	0.0

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

State Rating

State of Arizona

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Phoenix-Mesa-Chandler MSA	1,172	313,374	100.0	190,706	4.6	2.0	4.0	18.8	11.4	15.8	34.7	29.0	35.5	41.9	57.3	44.1	0.0	0.2	0.6	
Total	1,172	313,374	100.0	190,706	4.6	2.0	4.0	18.8	11.4	15.8	34.7	29.0	35.5	41.9	57.3	44.1	0.0	0.2	0.6	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Phoenix-Mesa-Chandler MSA	1,172	313,374	100.0	190,706	21.8	3.6	5.1	16.9	10.3	15.9	19.2	21.8	20.4	42.2	62.8	40.9	0.0	1.5	17.8
Total	1,172	313,374	100.0	190,706	21.8	3.6	5.1	16.9	10.3	15.9	19.2	21.8	20.4	42.2	62.8	40.9	0.0	1.5	17.8

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
Phoenix-Mesa-C handler MSA	489	173,295	100.0	104,551	6.2	9.8	6.9	15.9	24.9	16.5	28.4	19.2	26.8	48.9	44.0	49.3	0.5	2.0	0.6		
Total	489	173,295	100.0	104,551	6.2	9.8	6.9	15.9	24.9	16.5	28.4	19.2	26.8	48.9	44.0	49.3	0.5	2.0	0.6		

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Phoenix-Mesa-Chandler MSA	489	173,295	100.0	104,551	89.7	15.7	46.2	3.5	76.9	6.9	43.4	
Total	489	173,295	100.0	104,551	89.7	15.7	46.2	3.5	76.9	6.9	43.4	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-2019**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt
Phoenix-Mesa-Chandler MSA	0	0	0.0	357	6.1	0.0	1.7	18.0	0.0	14.3	29.4	0.0	34.2	46.2	0.0	49.3	0.3	0.0	0.6
Total	0	0	0.0	357	6.1	0.0	1.7	18.0	0.0	14.3	29.4	0.0	34.2	46.2	0.0	49.3	0.3	0.0	0.6

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Phoenix-Mesa-Chandler MSA	0	0	0.0	357	94.8	0.0	40.1	3.2	0.0	1.9	0.0
Total	0	0	0.0	357	94.8	0.0	40.1	3.2	0.0	1.9	0.0

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

State of Arkansas

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Fayetteville-Springdale-Rogers MSA	1,480	229,159	100.0	19,703	0.7	0.5	0.4	15.4	18.4	10.7	46.2	39.7	43.0	37.7	41.3	45.9	0.0	0.0	0.0
Total	1,480	229,159	100.0	19,703	0.7	0.5	0.4	15.4	18.4	10.7	46.2	39.7	43.0	37.7	41.3	45.9	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-2019**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Fayetteville-Springdale-Rogers MSA	1,480	229,159	170.9	19,703	19.5	17.4	6.2	18.2	24.7	14.9	20.2	20.7	19.3	42.0	36.4	41.8	0.0	0.8	17.9
Total	1,480	229,159	170.9	19,703	19.5	17.4	6.2	18.2	24.7	14.9	20.2	20.7	19.3	42.0	36.4	41.8	0.0	0.8	17.9

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
Fayetteville-Springdale-Rogers MSA	49	12,895	100.0	8,274	1.8	0.0	0.9	16.9	14.3	13.6	45.4	32.7	47.7	35.8	53.1	37.7	0.0	0.0	0.0		
Total	49	12,895	100.0	8,274	1.8	0.0	0.9	16.9	14.3	13.6	45.4	32.7	47.7	35.8	53.1	37.7	0.0	0.0	0.0		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Fayetteville-Springdale-Rogers MSA	49	12,895	100.0	8,274	82.6	7.7	46.5	4.9	92.3	12.5	100.0	
Total	49	12,895	100.0	8,274	82.6	7.7	46.5	4.9	92.3	12.5	100.0	

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt		
Fayetteville-Springdale-Rogers MSA	0	0	0.0	771	1.6	0.0	0.0	14.8	0.0	7.1	51.3	0.0	75.9	32.4	0.0	17.0	0.0	0.0	0.0		
Total	0	0	0.0	771	1.6	0.0	0.0	14.8	0.0	7.1	51.3	0.0	75.9	32.4	0.0	17.0	0.0	0.0	0.0		

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Fayetteville-Springdale-Rogers MSA	0	0	0.0	771	95.2	0.0	88.1	2.3	0.0	2.4	0.0	
Total	0	0	0.0	771	95.2	0.0	88.1	2.3	0.0	2.4	0.0	

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

State of Colorado

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt		
Denver-Aurora CSA	2,432	729,595	100.0	164,065	4.5	4.7	4.8	18.8	17.1	19.5	35.1	33.6	34.6	41.5	44.5	41.1	0.0	0.0	0.0		
Total	2,432	729,595	100.0	164,065	4.5	4.7	4.8	18.8	17.1	19.5	35.1	33.6	34.6	41.5	44.5	41.1	0.0	0.0	0.0		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2017-2019		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	
Denver-Aurora CSA	2,432	729,595	100.0	164,065	21.5	5.2	6.2	17.4	17.2	18.5	20.3	25.8	23.0	40.8	50.7	37.2	0.0	1.2	15.2	
Total	2,432	729,595	100.0	164,065	21.5	5.2	6.2	17.4	17.2	18.5	20.3	25.8	23.0	40.8	50.7	37.2	0.0	1.2	15.2	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
Denver-Aurora CSA	635	209,314	122.4	92,731	6.3	16.5	7.5	19.5	22.2	20.2	32.8	26.9	31.5	41.2	33.4	40.5	0.3	0.9	0.3		
Total	635	209,314	122.4	92,731	6.3	16.5	7.5	19.5	22.2	20.2	32.8	26.9	31.5	41.2	33.4	40.5	0.3	0.9	0.3		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Denver-Aurora CSA	635	209,314	100.0	92,731	90.1	14.9	48.2	3.5	68.7	6.4	42.7	
Total	635	209,314	100.0	92,731	90.1	14.9	48.2	3.5	68.7	6.4	42.7	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt		
Denver-Aurora CSA	1	150	100.0	420	7.3	0.0	3.6	19.4	0.0	10.5	32.8	0.0	40.0	40.1	100.0	46.0	0.4	0.0	0.0		
Total	1	150	100.0	420	7.3	0.0	3.6	19.4	0.0	10.5	32.8	0.0	40.0	40.1	100.0	46.0	0.4	0.0	0.0		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues 2017-2019

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Denver-Aurora CSA	1	150	100.0	420	95.8	100.0	62.6	2.3	0.0	1.9	0.0
Total	1	150	100.0	420	95.8	100.0	62.6	2.3	0.0	1.9	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

State of Maryland

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-2018

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Baltimore-Columbia-Towson MSA	18	8,018	100.0	10,646	0.0	0.0	0.0	0.0	0.0	0.0	21.9	11.1	22.8	78.1	88.9	77.2	0.0	0.0	0.0
Total	18	8,018	100.0	10,646	0.0	0.0	0.0	0.0	0.0	0.0	21.9	11.1	22.8	78.1	88.9	77.2	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2018		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Baltimore-Columbia-Townson MSA	18	8,018	100.0	10,646	10.8	0.0	3.6	10.6	0.0	11.6	17.2	33.3	18.5	61.5	66.7	51.8	0.0	0.0	14.5		
Total	18	8,018	100.0	10,646	10.8	0.0	3.6	10.6	0.0	11.6	17.2	33.3	18.5	61.5	66.7	51.8	0.0	0.0	14.5		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2018		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
Baltimore-Columbia-Towson MSA	0	0	0.0	10,189	0.0	0.0	0.0	0.0	0.0	0.0	27.2	0.0	25.7	72.8	0.0	74.3	0.0	0.0	0.0		
Total	0	0	0.0	10,189	0.0	0.0	0.0	0.0	0.0	0.0	27.2	0.0	25.7	72.8	0.0	74.3	0.0	0.0	0.0		

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-2018

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Baltimore-Columbia-Townson MSA	0	0	0.0	10,189	84.0	0.0	46.4	7.0	0.0	9.1	0.0
Total	0	0	0.0	10,189	84.0	0.0	46.4	7.0	0.0	9.1	0.0

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

State of New Mexico

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt		
Albuquerque-Santa Fe-Las Vegas CSA	4,886	820,795	100.0	29,947	2.6	1.8	1.7	24.8	21.6	19.7	36.4	37.4	36.9	36.0	39.1	41.6	0.1	0.1	0.1		
Total	4,886	820,795	100.0	29,947	2.6	1.8	1.7	24.8	21.6	19.7	36.4	37.4	36.9	36.0	39.1	41.6	0.1	0.1	0.1		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2019		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt		
Albuquerque-Santa Fe- Las Vegas CSA	4,886	820,795	100.0	29,947	24.1	9.6	6.7	15.9	24.2	17.6	18.6	25.6	21.3	41.5	39.8	38.8	0.0	0.8	15.8		
Total	4,886	820,795	100.0	29,947	24.1	9.6	6.7	15.9	24.2	17.6	18.6	25.6	21.3	41.5	39.8	38.8	0.0	0.8	15.8		

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt		
Albuquerque-Santa Fe-Las Vegas CSA	363	79,335	318.4	18,456	7.7	13.5	8.8	21.1	26.4	22.7	34.0	30.3	31.2	36.5	29.5	36.9	0.6	0.3	0.3		
Total	363	79,335	318.4	18,456	7.7	13.5	8.8	21.1	26.4	22.7	34.0	30.3	31.2	36.5	29.5	36.9	0.6	0.3	0.3		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Albuquerque-Santa Fe-Las Vegas CSA	363	79,335	100.0	18,456	87.3	39.5	45.4	4.1	54.4	8.7	70.5	
Total	363	79,335	100.0	18,456	87.3	39.5	45.4	4.1	54.4	8.7	70.5	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-2019		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt		
Albuquerque-Santa Fe-Las Vegas CSA	1	42	100.0	126	4.2	0.0	7.9	23.8	0.0	31.0	36.4	100.0	40.5	35.4	0.0	20.6	0.1	0.0	0.0		
Total	1	42	100.0	126	4.2	0.0	7.9	23.8	0.0	31.0	36.4	100.0	40.5	35.4	0.0	20.6	0.1	0.0	0.0		

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Albuquerque-Santa Fe-Las Vegas CSA	1	42	100.0	126	96.5	100.0	57.1	2.2	0.0	1.2	0.0	
Total	1	42	100.0	126	96.5	100.0	57.1	2.2	0.0	1.2	0.0	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

State of Oklahoma

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	
Enid MSA	367	37,526	3.0	1,305	0.0	0.0	0.0	26.6	19.6	13.9	40.3	42.5	45.7	33.2	37.9	40.5	0.0	0.0	0.0	
OK Non-MSA	730	79,486	6.0	7,328	0.9	0.0	0.7	15.9	12.6	15.6	58.9	59.2	53.5	24.4	28.2	30.1	0.0	0.0	0.0	
Oklahoma City MSA	4,501	701,820	37.3	37,109	3.9	1.5	2.0	19.3	15.2	15.2	40.4	37.8	38.8	36.4	45.3	43.8	0.1	0.1	0.2	
Tulsa MSA	6,472	978,743	53.6	25,289	3.1	1.1	1.1	19.4	12.3	14.6	40.9	35.7	40.6	36.5	50.9	43.6	0.0	0.0	0.0	
Total	12,070	1,797,574	100.0	71,031	3.0	1.2	1.5	19.0	13.6	15.0	43.4	38.1	41.1	34.5	47.0	42.3	0.0	0.1	0.1	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Enid MSA	367	37,526	3.0	1,305	19.0	12.0	6.5	19.9	25.3	17.9	22.3	30.0	20.8	38.8	32.7	35.7	0.0	0.0	19.1
OK Non-MSA	730	79,486	8.5	7,328	21.8	7.9	5.0	17.5	16.3	12.5	19.6	27.3	17.8	41.1	47.7	41.6	0.0	0.8	23.0
Oklahoma City MSA	4,501	701,820	37.3	37,109	21.5	9.7	5.9	17.3	21.9	16.5	20.3	22.4	18.5	40.9	44.3	32.1	0.0	1.7	26.8
Tulsa MSA	6,472	978,743	53.6	25,289	21.0	7.7	5.7	17.4	18.6	16.4	20.3	23.9	18.4	41.3	46.8	35.3	0.0	3.0	24.2
Total	12,070	1,797,574	100.0	71,031	21.3	8.6	5.8	17.4	19.9	16.1	20.3	23.7	18.5	41.0	45.5	34.3	0.0	2.3	25.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-2019

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Enid MSA	10	815	2.7	708	0.0	0.0	0.0	32.1	10.0	26.0	41.3	40.0	41.7	26.5	50.0	32.3	0.0	0.0	0.0
OK Non-MSA	83	14,154	7.3	4,592	7.1	21.7	5.0	18.9	14.5	18.1	50.8	36.1	50.7	23.2	27.7	26.2	0.0	0.0	0.0
Oklahoma City MSA	538	133,677	47.6	19,662	4.5	7.8	5.0	21.8	21.7	20.6	34.8	33.8	34.1	35.7	31.2	37.7	3.2	5.4	2.7
Tulsa MSA	500	134,970	44.2	15,464	3.2	5.2	2.8	21.7	23.2	20.8	37.6	41.2	38.3	37.5	30.4	38.1	0.0	0.0	0.0
Total	1,131	283,616	100.0	40,426	4.2	7.6	4.1	21.7	21.8	20.5	37.6	37.3	37.7	35.0	30.8	36.4	1.6	2.6	1.3

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Enid MSA	10	815	1.9	708	81.5	100.0	32.6	5.6	0.0	12.9	100.0	
OK Non-MSA	83	14,154	7.3	4,592	81.1	25.0	49.1	5.1	45.8	13.9	79.5	
Oklahoma City MSA	538	133,677	47.6	19,662	87.0	44.1	46.1	4.3	43.5	8.7	73.8	
Tulsa MSA	500	134,970	45.9	15,464	86.4	39.2	42.7	5.0	53.2	8.6	70.8	
Total	1,131	283,616	100.0	40,426	86.0	40.7	44.9	4.7	48.0	9.3	73.0	

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-2019

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt
Enid MSA	0	0	0.0	86	0.0	0.0	0.0	18.8	0.0	15.1	45.2	0.0	44.2	36.0	0.0	40.7	0.0	0.0	0.0
OK Non-MSA	0	0	0.0	1,054	2.0	0.0	0.1	12.1	0.0	11.5	64.1	0.0	69.2	21.8	0.0	19.3	0.0	0.0	0.0
Oklahoma City MSA	0	0	0.0	379	3.4	0.0	1.6	17.3	0.0	4.7	39.7	0.0	58.8	38.6	0.0	34.0	0.9	0.0	0.8
Tulsa MSA	1	250	100.0	290	2.4	0.0	0.3	15.3	0.0	10.3	48.3	100.0	60.7	34.0	0.0	28.6	0.0	0.0	0.0
Total	1	250	100.0	1,809	2.7	0.0	0.4	15.8	0.0	10.1	47.2	100.0	64.5	34.0	0.0	24.9	0.4	0.0	0.2

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Enid MSA	0	0	0.0	86	98.9	0.0	47.7	0.4	0.0	0.8	0.0	
OK Non-MSA	0	0	0.0	1,054	98.1	0.0	83.0	0.4	0.0	1.5	0.0	
Oklahoma City MSA	0	0	0.0	379	96.8	0.0	69.9	1.6	0.0	1.6	0.0	
Tulsa MSA	1	250	100.0	290	96.6	0.0	69.7	1.5	100.0	2.0	0.0	
Total	1	250	100.0	1,809	97.0	0.0	76.5	1.3	100.0	1.7	0.0	

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

State of Texas

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt	% of Owner-Occupied Housing Units	% Bank Loans	Aggt
Dallas-Fort Worth CSA	3,170	802,773	68.2	202,197	5.4	2.9	3.3	20.2	13.8	14.2	29.3	24.8	30.7	45.1	58.4	51.7	0.1	0.1	0.1
Houston-The Woodlands-Sugar Land MSA	1,477	379,607	31.8	148,468	5.8	4.3	3.0	22.1	14.8	14.4	27.5	24.0	27.9	44.6	57.0	54.6	0.1	0.0	0.1
Total	4,647	1,182,380	100.0	350,665	5.6	3.4	3.2	21.1	14.1	14.3	28.4	24.5	29.5	44.9	57.9	53.0	0.1	0.0	0.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt	% Families	% Bank Loans	Aggt
Dallas-Fort Worth CSA	3,170	802,773	68.2	202,197	23.7	5.3	4.0	16.4	13.7	13.1	18.0	19.1	19.5	41.9	60.3	45.6	0.0	1.6	17.8
Houston-The Woodlands-Sugar Land MSA	1,477	379,607	31.8	148,468	25.1	7.3	3.9	16.2	16.5	14.6	16.9	21.9	19.4	41.9	52.1	42.9	0.0	2.2	19.2
Total	4,647	1,182,380	100.0	350,665	24.4	6.0	4.0	16.3	14.5	13.8	17.5	20.0	19.5	41.9	57.7	44.4	0.0	1.8	18.4

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-2019

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt	% Businesses	% Bank Loans	Aggt
Dallas-Fort Worth CSA	751	216,487	68.4	156,442	7.0	12.3	7.2	19.1	25.0	19.6	25.5	20.5	24.5	47.7	40.2	47.9	0.7	2.0	0.8
Houston-The Woodlands-Sugar Land MSA	347	103,586	47.7	150,524	10.2	13.3	10.6	18.6	21.6	18.6	22.2	21.9	22.4	48.9	42.7	48.2	0.2	0.6	0.2
Total	1,098	320,073	100.0	306,966	8.4	12.6	8.9	18.9	24.0	19.1	24.0	20.9	23.5	48.2	41.0	48.0	0.4	1.5	0.5

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Dallas-Fort Worth CSA	751	216,487	69.2	156,442	87.4	24.4	42.3	4.3	67.5	8.3	71.4	
Houston-The Woodlands-Sugar Land MSA	347	103,586	31.6	150,524	87.0	33.7	40.5	5.1	58.7	7.9	72.3	
Total	1,098	320,073	100.0	306,966	87.2	27.2	41.4	4.7	64.8	8.1	71.7	

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-2019

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt	% Farms	% Bank Loans	Aggt
Dallas-Fort Worth CSA	1	280	100.0	859	5.3	0.0	1.0	17.4	0.0	10.5	29.3	0.0	38.1	47.6	100.0	50.4	0.5	0.0	0.0
Houston-The Woodlands-Sugar Land MSA	0	0	0.0	566	6.1	0.0	2.1	16.6	0.0	11.1	26.7	0.0	31.8	50.5	0.0	54.9	0.1	0.0	0.0
Total	1	280	100.0	1,425	5.6	0.0	1.5	17.1	0.0	10.7	28.3	0.0	35.6	48.8	100.0	52.2	0.3	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-2019**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Dallas-Fort Worth CSA	1	280	100.0	859	95.5	0.0	49.4	2.3	0.0	2.1	100.0
Houston-The Woodlands-Sugar Land MSA	0	0	0.0	566	95.2	0.0	51.9	2.6	0.0	2.2	0.0
Total	1	280	100.0	1,425	95.4	0.0	50.4	2.4	0.0	2.2	100.0

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