



PUBLIC DISCLOSURE

November 17, 2025

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Liberty National Bank
Charter Number: 23516

629 S.W. C Avenue
Lawton, OK 73501

Office of the Comptroller of the Currency

8282 S. Memorial Drive Suite 300
Tulsa, OK 74133

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the full-scope assessment area (AA) in the state of Oklahoma and the full-scope AA in the state of Texas with more weight given to the state of Oklahoma. Liberty National Bank’s (LNB or bank) loan to deposit (LTD) ratio is reasonable and averaged 73.85 percent during the evaluation period.
- A majority of the bank’s loans were originated inside the AA during the evaluation period.
- LNB exhibited reasonable distribution of loans to low- and moderate-income (LMI) geographies.
- LNB exhibited reasonable distribution of loans to LMI borrowers and businesses with less than \$1 million in gross annual revenues.
- The Community Development (CD) Test rating is based on the full-scope AA in the state of Oklahoma and the full-scope AA in the state of Texas with more weight given to the state of Oklahoma. LNB’s CD activity exhibited adequate responsiveness to the needs of the bank’s AA.

Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AAs the bank’s LTD ratio was reasonable. Liberty National Bank’s (LNB or bank) quarterly LTD ratio for this CRA performance evaluation averaged 73.85 percent. The LTD ratio has primarily trended up since the prior CRE PE from the low of 67.29 percent in the fourth quarter 2021 to 72.39 percent in the fourth quarter 2024. We compared the LTD ratio to five similarly situated banks (peer banks) in their respective market area. For peer banks, the LTD ratio ranged from an average low of 41 percent to a high of 107 percent.

Lending in Assessment Area

A majority of the bank’s loans were inside its AAs. The bank originated and purchased 65.9 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.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	282	66.35	143	33.65	425	57,302	46.09	67,019	53.91	124,321
Small Business	51	63.75	29	36.25	80	7,732	53.83	6,633	46.17	14,365
Total	333	65.94	172	34.06	505	65,034	46.89	73,652	53.11	138,686

Source: 1/1/2022 - 12/31/2024 Bank Data.
 Due to rounding, totals may not equal 100.0%

Description of Institution

LNB is a multistate community bank headquartered in Lawton, Oklahoma. It is a subsidiary of B.O.E. Bancshares, Incorporated, a one bank holding company, also headquartered in Lawton, Oklahoma. The bank has eight full-service branches in Oklahoma and one in Texas. In September 2022, the Texas branch was opened in Plano in the Dallas metropolitan area. The Oklahoma branches are located in Apache, Blanchard, Chickasha, Elgin, Lawton, and Oklahoma City. Each Oklahoma branch has an Automated Teller Machine (ATM) and another 14 stand-alone ATMs in those communities. There is no ATM at the Plano branch. All branches aside from the Plano branch have a drive-thru.

LNB's primary focus is to serve the financial needs of commercial and consumer customers within its AAs. LNB meets these needs by providing traditional loan and deposit services, as well as online banking, internet bill-pay, mobile banking, and telephone banking. The bank also offers various government guaranteed loan products. Bank lobby and drive through services are offered Monday through Friday 8:00 AM to 5:00 PM at all locations. Limited Saturday hours are offered at all drive-through locations.

As of December 31, 2024, LNB assets totaled \$1.3 billion, deposits totaled \$1.2 billion, and tier one capital totals \$115 million. Net loans and leases total \$846 million or 65.8 percent of total assets. By dollar volume, the loan portfolio consists of 72.8 percent real estate loans, 16.8 percent commercial businesses, 5.6 percent agricultural, 4.9 percent of other loans, and less than 1 percent individual loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. LNB's prior CRA Performance Evaluation (PE) was dated September 28, 2022, and resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period includes all reported activity from January 1, 2022, to December 31, 2024. During the evaluation period, the only MSA boundary change is the addition of the Dallas/Plano/Irving MSA with the opening of the Texas branch. This partial MSA is limited to only Collin County, Texas. The Lawton MSA, Oklahoma City Partial MSA, and Oklahoma Non-MSA have not changed over the period.

The OCC evaluated the bank using the intermediate small bank performance criteria, which includes a lending test and CD test. The lending test evaluates the bank's record of meeting credit needs of its AA through lending activities. The CD test includes CD lending, investment, and service components. The CD test evaluates responsiveness to CD needs in its AAs.

Selection of Areas for Full-Scope Review

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

combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. When evaluating the bank’s overall performance, the state of Oklahoma carried the greatest weight as it accounts for 95.76 percent of total bank deposits and 95.20 percent of all new origination for HMDA and small businesses.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. 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.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The borrower distribution of loans to differing income levels is reasonable.
- Geographic distribution of loans reflects reasonable distributions.
- The bank exhibited adequate responsiveness to community development needs through CD loans, qualified investments and CD services considering the capacity, community, and opportunities for CD.

Description of Institution's Operations in Oklahoma

LNB delineated three AAs in the state of Oklahoma: the Lawton MSA, Oklahoma City Partial MSA, and Oklahoma Non-MSA. The Lawton MSA comprises all geographies in Commanche and Cotton counties. The Oklahoma City Partial MSA includes all geographies in Cleveland, Grady, and McClain counties. The Oklahoma Non-MSA comprises all geographies in Caddo County.

According to the June 30, 2024, FDIC Summary of Deposits reports, LNB branches in Oklahoma totaled 95.8 percent of total deposits. LNB operates eight of nine branches in Oklahoma, representing 88.9 percent of total branches. Competition in the state of Oklahoma is strong. According to the June 30, 2024, FDIC Deposit Market Share Report, the bank has \$1.09 billion in deposits with a deposit market share of 0.79 percent, ranking 22 out of 201 banks in the state.

We referenced one community contact during the evaluation period for the Lawton MSA. The local housing and community development agency supports public service organizations, developing and maintaining public parks and streets, and providing housing opportunities to low- and moderate-income families. The demographic of the area is lower income that has stabilized following the pandemic, although there is a lack of desirable housing.

Lawton MSA

The following table provides a summary of demographics, including housing and business information for the Lawton MSA for the evaluation period.

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

Assessment Area(s) - Lawton MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	40	7.50	25.00	42.50	17.50	7.50
Population by Geography	126,652	5.92	21.67	46.51	22.25	3.64
Housing Units by Geography	54,659	7.97	23.60	45.51	20.64	2.28
Owner-Occupied Housing by Geography	24,708	5.01	14.57	49.60	29.82	0.99
Occupied Rental Units by Geography	20,748	9.92	33.73	40.41	12.38	3.56
Vacant Units by Geography	9,203	11.52	25.00	46.01	14.59	2.88
Businesses by Geography	3,352	6.62	31.74	35.86	23.00	2.77
Farms by Geography	204	2.45	9.31	47.06	41.18	0.00
Family Distribution by Income Level	29,491	22.38	17.46	18.73	41.43	0.00
Household Distribution by Income Level	45,456	23.57	15.65	18.68	42.10	0.00
Unemployment rate (%)	5.77	16.75	6.20	5.42	4.02	3.40
Households Below Poverty Level (%)	15.14	27.12	21.54	12.71	7.16	37.64
Median Family Income (30020 - Lawton, OK MSA)		\$65,335		Median Housing Value		\$101,850
Median Family Income (30020 - Lawton, OK MSA) for 2024		\$71,200		Median Gross Rent		\$749
				Families Below Poverty Level		11.99
FFIEC File - 2020 Census FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

The Lawton MSA is in southwest Oklahoma and includes the entirety of Commanche and Cotton Counties. The bank operates three branches and 10 ATMs in the AA. As of the June 20, 2024, FDIC Market Share Report, in the Lawton MSA the bank ranked first out of 12 banks with a deposit market share of 33.27 percent.

Scope of Evaluation in Oklahoma

Examiners conducted a full scope review of the Lawton MSA based on the branch locations and market share of deposits. The Lawton MSA represents 50 percent of LNB’s originated home mortgage loans and small business loans in the state of Oklahoma during the evaluation period. The Oklahoma City Partial MSA and the Oklahoma non-MSA received a limited-scope review. LNB’s primary lending products in the AA are home mortgage loans and small business loans. Please refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Area Receiving Full-Scope Review

Based on a full-scope review, the bank’s lending performance in the state of Oklahoma was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

Home Mortgage Loans

The percent of home mortgage loans originated or purchased in low-income geographies was slightly below the percentage of owner-occupied housing units and higher than the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies was below both the percentage of owner-occupied housing units and aggregate percentage of all reporting lenders.

Refer to table 7 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.

Small Loans to Businesses

The percentage of small loans to businesses originated to low-income geographies exceeded both the percentage to businesses and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses originated to moderate-income geographies exceeded both the percentage of businesses and aggregate percentage of all reporting lenders.

Refer to table 9 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.

Lending Gap Analysis

Examiners analyzed lending patterns and reviewed summary reports and maps of home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans in the AAs. Examiners did not identify any unexplained or conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families and only slightly below the aggregate percentage of all reported lenders. The percentage of home mortgage loans to moderate-income borrowers was significantly below the percentage of moderate-income families and only slightly below the aggregate percentage of all reporting lenders.

Refer to table 8 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.

Small Loans to Businesses

The percentage of small loans to business with gross annual revenues of \$1 million or less was well below the percentage of businesses and close to the aggregate percentage of all reporting lenders.

Refer to table 10 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Responses to Complaints

During the evaluation, the bank has not received any CRA related complaints.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Oklahoma City Partial MSA was consistent with the bank's overall performance under the Lending Test in the full scope area.

Based on limited-scope reviews, the bank's performance under the Lending Test in the Oklahoma non-MSA was weaker than the bank's overall performance under the Lending Test in the full scope area.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope and limited-scope reviews, the bank exhibited adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Full-scope:				
Lawton MSA	10	50.00	49,615	81.63
Limited-scope:				
Oklahoma City Partial MSA	6	30.00	4,925	8.10
Oklahoma non-MSA	4	20.00	6,238	10.27
Total	20	100.00	60,778	100.00

During the evaluation period, LNB made 10 loans totaling \$49.6 million in the full scope AA consisting of community service (\$32.1 million), revitalize/stabilize (\$14.5 million), and economic development (\$3 million).

The following are examples of CD loans the bank originated or purchased in this AA:

- The bank originated a \$16 million loan to an organization that provides medical care to patients who are mostly Medicare or Medicaid recipients.
- The bank originated a \$10 million loan to a public school with majority low- and moderate-income (LMI) students to fund necessary school improvements.
- The bank originated three loans totaling approximately \$9.2 million focusing on infrastructure and road development for an LMI area.

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, set forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including grants and donation, including prior period investments that remain outstanding as of the end of the evaluation period.

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-scope:										
Lawton MSA	0	0	60	2,653	60	44.12	2,653	53.52	0	0
Limited-scope:										
Oklahoma City Partial MSA	1	130	62	2,161	63	46.32	2,291	46.22	0	0
Oklahoma non-MSA	0	0	13	13	13	9.56	13	0.26	0	0
Total	1	130	135	4,827	136	100.00	4,957	100.00	0	0

LNB qualified investments total \$5 million with approximately half going to the Lawton MSA and the Oklahoma City Partial MSA. Qualified investments across all LNB AAs, including municipal bonds and

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

donations, largely focus on supporting local schools, food and housing initiatives, and economic development.

The following are examples of qualified investments in the Lawton MSA:

- The bank purchased approximately \$2 million in municipal bonds to provide funds for improvements, transportation, or equipment in local school districts.
- The bank donated approximately \$117,500 to a public school system with primarily LMI students. These donations support the school budget, teachers, supplies, and reduced or free lunch system.

Extent to Which the Bank Provides Community Development Services

During the three-year evaluation period, employees provided 551 service hours for the Lawton MSA (232 hours), Oklahoma City Partial MSA (264.5 hours), and Oklahoma non-MSA (54.5 hours). The majority of services hours were employees serving as board members or committee members for different nonprofits focused on community improvement, education, medical services, and technical or financial expertise.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the Oklahoma City Partial MSA was consistent with the bank's overall performance under the CD Test in the full scope area(s).

The bank's performance under the CD test in the Oklahoma non-MSA was weaker than the bank's overall performance under the CD Test in the full scope area(s).

State Rating

State of Texas

CRA rating for the State of Texas²: Needs to Improve

The Lending Test is rated: Needs to Improve

The Community Development Test is rated: Needs to Improve

The major factors that support this rating include:

- The bank did not originate or purchase a sufficient number of home mortgage or small business loans in the AA to perform a meaningful analysis.
- Community development was exclusively comprised of a small volume of qualified investments. The bank made no CD loans in its AA in Texas. The bank did not provide any CD services, which had a negative impact on service performance.

Description of Institution's Operations in Texas

LNB delineated one AA in the state of Texas. In September 2022, a new branch was opened in the Dallas metro area or more specifically Plano, Texas. The branch is located in an office building. The Dallas/Plano/Irving AA is a partial MSA limited to Collin County.

According to the June 30, 2024, FDIC Summary of Deposits reports, the branch in Texas totaled 4.2 percent of total bank deposits. LNB operates one of nine branches in Texas. The Texas branch does not have an ATM.

Competition in the Dallas/Plano/Irving MSA is strong. According to the June 30, 2024, FDIC Deposit Market Share Report in the state of Texas, the bank has \$48.3 million in deposits with a deposit market share of 0.11 percent, resulting in a ranking of 51 out of 70 institutions.

The OCC referenced one community contact during the evaluation period for this AA. The organization supports increasing availability of affordable housing to low-income families in a strong economic and a high-income area. The typical demographics of the area are high income individuals. The area is going through a period of transition from a historically low-income area to more moderate- or upper-income area, which is reflected in the increases in the cost of housing. The majority of jobs available are lower paying and service oriented.

Dallas/Plano/Irving MSA

The following table provides a summary of demographics, including housing and business information for the Dallas/Plano/Irving MSA for the evaluation period.

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

Assessment Area(s) - Dallas-Plano-Irving MSA						
						2022 - 2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	200	1.00	6.00	28.50	62.50	2.00
Population by Geography	988,254	0.76	5.29	27.63	65.56	0.75
Housing Units by Geography	350,086	1.13	5.66	30.08	62.36	0.76
Owner-Occupied Housing by Geography	216,589	0.01	3.02	24.41	72.29	0.27
Occupied Rental Units by Geography	112,111	2.96	9.94	39.60	46.02	1.48
Vacant Units by Geography	21,386	2.91	9.87	37.71	47.55	1.97
Businesses by Geography	61,085	0.24	4.08	32.01	62.54	1.13
Farms by Geography	1,440	0.35	6.60	36.60	55.56	0.90
Family Distribution by Income Level	245,803	12.36	12.30	17.93	57.41	0.00
Household Distribution by Income Level	328,700	14.50	12.49	15.90	57.11	0.00
Unemployment rate (%)	3.98	11.94	3.13	4.04	3.88	5.32
Households Below Poverty Level (%)	5.92	21.30	12.84	7.65	4.02	28.99
Median Family Income (19124 - Dallas-Plano-Irving, TX MD)		\$88,315		Median Housing Value		\$331,550
Median Family Income (19124 - Dallas-Plano-Irving, TX MD) for 2024		\$110,300		Median Gross Rent		\$1,493
				Families Below Poverty Level		4.24
FFIEC File - 2020 Census FFIEC File - 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Texas

Examiner conducted a full-scope review of the Dallas/Plano/Irving MSA. The bank did not originate or purchase a sufficient number of home mortgage or small business loans in the AA to perform a meaningful analysis. When evaluating performance under the CD test, the business model was considered due to the limited branch and ATM footprint in the state. There are no limited-scope AAs in the state of Texas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank’s performance under the Lending Test in Texas is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s lending performance in the state of Texas was poor.

Distribution of Loans by Income Level of the Geography

The bank exhibited poor geographic distribution of loans in the state.

Home Mortgage Loans

The bank did not originate or purchase a sufficient number of home mortgage loans in the AA to perform a meaningful analysis.

Refer to table 7 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.

Small Loans to Businesses

The bank did not originate or purchase a sufficient number of small business loans in the AA to perform a meaningful analysis.

Refer to table 9 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.

Lending Gap Analysis

The bank did not originate or purchase a sufficient number of home mortgage loans or small business loans in the AA to perform a meaningful analysis.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

The bank did not originate or purchase a sufficient number of home mortgage loans in this AA to perform a meaningful analysis.

Refer to table 8 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.

Small Loans to Businesses

The bank did not originate or purchase a sufficient number of small loans to businesses in this AA to perform a meaningful analysis.

Refer to table 10 in the state of Texas 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.

Responses to Complaints

During the evaluation, the bank has not received any CRA related complaints.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Texas is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited poor responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Full-scope:				
Dallas/Plano/Irving MSA	0	0	0	0

During the evaluation period, the bank did not make any CD loans in the AA. LNB's relatively new presence in a very competitive market is a contributing factor to the lack of CD loans. They operate one branch in the AA inside an office building and has 0.11 percent of deposit market share.

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, set forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including grants and donations, and prior period investments that remain outstanding as of the end of the evaluation period.

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Dallas/Plano/Irving MSA	0	0	5	6	5	100.00	6	100.00	0	0

The following are examples of qualified investments in the AA:

- The bank made five separate donations totaling \$5,950 to an on-the-job training program for women who learn new skills or trades to work towards becoming gainfully employed.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, there have been no qualified service hours in the AA.

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

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 MSA(s) and non-MSA(s) 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:	01/01/22 to 12/31/24	
Bank Products Reviewed:	Home mortgage, small business Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Oklahoma		
Lawton MSA	Full-scope	AA consists of all census tracts in Comanche and Cotton Counties
Oklahoma City Partial MSA	Limited-scope	AA consists of all census tracts in Cleveland, Grady, and McClain Counties
Oklahoma non-MSA	Limited-scope	AA consists of all census tracts in Caddo and Stephens Counties
State of Texas		
Dallas/Plano/Irving MSA	Full-scope	AA consists of partial census tracts in Collin County.

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Liberty National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Oklahoma	Satisfactory	Satisfactory	Satisfactory
Texas	Needs to Improve	Needs to Improve	Needs to Improve

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the 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 low- and moderate-income 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): Loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): 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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/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 7. 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 8. 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 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - Compares 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 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 10. 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 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - Compares 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 to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.

- Table 12. 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 \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: (1) the percentage distribution of farms with revenues of greater than \$1 million; and, (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

State of Oklahoma

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2022 - 2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Lawton MSA	132	18,985	48.89	9,090	5.01	4.55	3.31	14.57	12.88	14.26	49.60	51.52	51.72	29.82	30.30	29.58	0.99	0.76	1.12
OK Non-MSA	34	3,566	12.59	3,915	--	--	--	5.75	5.88	3.19	60.07	58.82	56.60	34.18	35.29	40.15	--	--	--
OKC MSA	104	32,063	38.52	32,146	0.51	2.88	0.47	4.38	6.73	4.68	57.34	56.73	54.71	37.19	31.73	39.46	0.58	1.92	0.66
Total	270	54,615	100.00	45,151	1.23	3.33	1.00	6.36	9.63	6.48	56.37	54.44	54.27	35.48	31.48	37.53	0.57	1.11	0.70

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2022 - 2024

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Lawton MSA	132	18,985	48.89	9,090	22.38	3.79	4.14	17.46	8.33	11.20	18.73	6.82	20.51	41.43	51.52	35.63	--	29.55	28.53
OK Non-MSA	34	3,566	12.59	3,915	19.40	2.94	6.56	18.04	--	15.07	20.39	2.94	19.36	42.16	35.29	37.16	--	58.82	21.84
OKC MSA	104	32,063	38.52	32,146	17.33	2.88	5.67	16.14	6.73	16.24	23.30	7.69	20.59	43.23	25.00	33.40	--	57.69	24.10
Total	270	54,615	100.00	45,151	18.63	3.33	5.44	16.66	6.67	15.12	21.99	6.67	20.46	42.73	39.26	34.18	--	44.07	24.79

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024		
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Lawton MSA	27	3,103	35.06	3,128	6.62	7.41	5.37	31.74	33.33	26.25	35.86	33.33	37.21	23.00	25.93	28.87	2.77	--	2.30		
OK Non-MSA	28	2,343	36.36	1,989	--	--	--	10.58	3.57	7.09	54.67	57.14	53.95	34.75	39.29	38.96	--	--	--		
OKC MSA	22	4,059	28.57	14,024	0.79	--	0.51	6.27	--	4.53	55.06	72.73	51.38	34.20	27.27	41.59	3.68	--	2.00		
Total	77	9,505	100.00	19,141	1.71	2.60	1.25	11.13	12.99	8.34	51.72	53.25	49.33	32.34	31.17	39.24	3.11	--	1.84		

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues													2022 - 2024	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available				
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans			
Lawton MSA	27	3,103	35.06	3,128	82.46	51.85	60.23	3.46	40.74	14.08	7.41			
OK Non-MSA	28	2,343	36.36	1,989	82.31	71.43	60.23	3.60	25.00	14.09	3.57			
OKC MSA	22	4,059	28.57	14,024	88.79	72.73	56.09	2.57	22.73	8.64	4.55			
Total	77	9,505	100.00	19,141	86.98	64.94	57.20	2.84	29.87	10.19	5.20			

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Texas

Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Dallas-Plano-Irving MSA	12	2,687	100.00	112,483	0.01	--	0.02	3.02	16.67	4.84	24.41	58.33	32.22	72.29	25.00	62.39	0.27	--	0.52
Total	12	2,687	100.00	112,483	0.01	--	0.02	3.02	16.67	4.84	24.41	58.33	32.22	72.29	25.00	62.39	0.27	--	0.52

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Dallas-Plano-Irving MSA	12	2,687	100.00	112,483	12.36	--	1.82	12.30	8.33	7.53	17.93	--	16.83	57.41	8.33	52.22	--	83.33	21.59
Total	12	2,687	100.00	112,483	12.36	--	1.82	12.30	8.33	7.53	17.93	--	16.83	57.41	8.33	52.22	--	83.33	21.59

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, -- HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024		
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Dallas-Plano-Irving MSA	4,442		100.00	83,478	0.24	--	0.19	4.08	--	4.04	32.01	--	25.41	62.54	100.00	68.82	1.13	--	1.54		
Total	4,442	100.00	83,478	0.24	--	0.19	4.08	--	4.04	32.01	--	25.41	62.54	100.00	68.82	1.13	--	1.54			

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022 - 2024	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Dallas-Plano-Irving MSA	4,442		100.00	83,478	90.27	50.00	55.78	2.17	50.00	7.56	--		
Total	4,442	100.00	83,478	90.27	50.00	55.78	2.17	50.00	7.56	--			

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, -- CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%