



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## Public Disclosure

July 5, 2006

## Community Reinvestment Act Performance Evaluation

**Stillwater National Bank and Trust Company**  
Charter Number: 5347

**608 South Main Street**  
**Stillwater, Oklahoma 74074**

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**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 following table indicates the performance level of **Stillwater National Bank and Trust Company (SNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Stillwater National Bank & Trust Company Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
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 geographic distribution of small loans to businesses by income of the area is good, while the geographic distribution of home mortgage loans by income of the area is only adequate.
- The distribution of small loans to businesses by borrower income is excellent, but the distribution of home mortgage loans by borrower income is poor.
- CD lending has a positive impact on the bank's performance.
- SNB provided an adequate amount of CD investments within the AAs.
- The bank's retail delivery systems are adequately accessible to geographies and individuals of different income levels.

## ***Definitions and Common Abbreviations***

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include 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 household and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

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

**Metropolitan Statistical Area (MSA):** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county 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 (Multi):** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) 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 One 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## ***Description of Institution***

Stillwater National Bank and Trust Company (SNB) is an interstate bank that was originally chartered June 16, 1894 to meet the deposit and credit needs of individuals and businesses located in Stillwater, Oklahoma. SNB has since expanded its operations and currently offers commercial and consumer lending, deposit and investment services, and specialized cash management, consulting and other financial services from offices in Oklahoma City, Tulsa, and Chickasha, Oklahoma; and Austin, Dallas, and San Antonio, Texas; and on the internet through *SNB DirectBanker®*. SNB is wholly owned by Southwest Bancorp, Inc. (Southwest), a financial holding company headquartered in Stillwater. Southwest also owns SNB Bank of Wichita; Wichita, Kansas.

SNB has ten full-service branches in addition to the main bank in Stillwater. The six Oklahoma branches are located in Stillwater (2), Tulsa (2), Oklahoma City (1) and Chickasha (1). The four Texas branches are located in Dallas (1), Frisco (1), Austin (1), and San Antonio (1). The bank also operates a loan production office (LPO) in Leawood, Kansas. The bank's geographic expansion is based on the identification of markets with concentrations of customers in the bank's traditional area of expertise: healthcare and health professionals, businesses and their managers and owners; and commercial and commercial real estate lending.

There are no legal, financial or other factors impeding SNB's ability to help meet the credit needs of its communities. The bank is adequately capitalized and operates profitably. As of March 31, 2006, the bank reported a net loan to deposit ratio of 102.36% with net loans representing 59.63% of the bank's total assets. Tier One Capital was at \$186 million on this date. We noted over the evaluation period, SNB has increased gross loans by 81.7%. This is through acquisitions and a lending philosophy focused on developing relationships with businesses, professionals and their principals.



The following table shows the portfolio composition and changes over the evaluation period:

<b>Loan Portfolio Composition (in 000s)</b>					
<b>Loan Type</b>	<b>12/31/2001</b>		<b>12/31/2005</b>		<b>% Change During Period</b>
	<b>\$ Amount</b>	<b>% of Portfolio</b>	<b>\$ Amount</b>	<b>% of Portfolio</b>	
Real Estate	\$499,681	53.67	\$939,343	55.53	87.99
Commercial	\$290,944	31.25	\$336,850	19.91	15.78
Individuals	\$118,213	12.70	\$387,202	22.89	227.55
Agricultural	\$6,713	0.72	\$8,694	0.51	29.51
Other	\$15,495	1.66	\$19,595	1.16	26.46
<b>Total Gross Loans</b>	<b>\$931,046</b>	<b>100.00</b>	<b>\$1,691,684</b>	<b>100.00</b>	<b>81.70</b>

SNB's last CRA examination was dated May 6, 2002. The bank was rated "Satisfactory". A review of OCC records, as well as SNB's CRA Public File, did not reveal any complaints relating to the CRA performance of the bank since the prior performance evaluation.

## ***Scope of the Evaluation***

### **Evaluation Period/Products Evaluated**

This Performance Evaluation (PE) assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed their residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small business and small farm loans, and community development (CD) loans. With the exception of CD loans, the evaluation period for the Lending Test is January 1, 2002 through December 31, 2005. For CD loans and the Investment and Service Tests, the evaluation period is May 7, 2002 through July 4, 2006. The Investment Test included a review of investments, grants, and donations made in the bank's assessment areas (AA) that meet the definition of community development investments. The Service Test included a review of retail and community development services provided in the bank's AAs.

### **Data Integrity**

Prior to this CRA examination, we verified the accuracy of data available to the public in accordance with the HMDA and CRA regulation. This public data included home mortgage purchase, refinance and improvement loans; and small business and small farm loans. We also verified the bank's reporting of CD loans, investments and services.

Our review noted inaccuracies in the reporting of small business loans. Several loans were incorrectly coded regarding the reporting of gross annual revenues. Also, some loans were double counted on the submitted reports. Management corrected these errors prior to this performance evaluation and established systems to prevent future reporting errors. Based on the corrections made by management, we now consider the lending data to be materially accurate.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, a sample of AAs within that state was selected for full-scope reviews. Please refer to the "Scope" section under the Oklahoma and Texas state rating for details regarding how the areas were selected and why they are representative of the bank's overall performance.

## **Ratings**

The bank's overall rating is a blend of the state ratings. Performance in the state of Oklahoma received far more weight in the overall rating as this state accounts for 98% of deposits, 91% of HMDA, CRA reportable and CD loans, and 64% of offices. The state ratings are based primarily on those areas that received full-scope reviews. Please refer to the "Scope" section under the Oklahoma and Texas state rating for details regarding how the areas were weighted in arriving at the overall rating.

## **Other**

Numerous community contacts were made during the assessment period by the OCC and other regulatory agencies to better understand the public's perception of SNB's and other bank's performance in the noted AAs. The community contacts were also made to determine credit needs and opportunities in the AAs. A total of ten community contacts made during the review period in the AAs that received full-scope reviews were relied on for this evaluation. Please refer to the "Scope" section under the Oklahoma and Texas state rating for details regarding community contacts.

## ***Fair Lending Review***

We found no evidence of illegal discrimination or other illegal credit practices.

# **STATE OF OKLAHOMA**

## **CRA Rating for Oklahoma: Satisfactory**

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating:

- The geographic distribution of small loans to businesses by income of the area is good, while the geographic distribution of home mortgage loans by income of the area is only adequate.
- The distribution of small loans to businesses by borrower income is excellent, but the distribution of home mortgage loans by borrower income is poor.
- CD lending has a positive impact on the bank's performance.
- SNB provided an adequate amount of CD investments within the AAs.
- The bank's retail delivery systems are reasonably accessible to geographies and individuals of different income levels.

## **Description of SNB's Operations in Oklahoma**

SNB's AAs in the State of Oklahoma consist of Payne County, the Oklahoma City Region, and Tulsa County. The Oklahoma City Region includes two counties located in the Oklahoma City, MSA: Oklahoma County and Grady County. Tulsa County is located in the Tulsa, MSA. The largest cities in these AAs include Oklahoma City, Tulsa, Stillwater and Chickasha.

The bank operates seven offices within the state. The Oklahoma offices maintain 98% of SNB's total deposits and 91% of the total number of SNB's loans. Competition in the AA includes numerous smaller community banks and other regional banks such as Bank of Oklahoma and BancFirst.

Refer to the market profiles for the State of Oklahoma in *Appendix C* for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Oklahoma**

Our analysis included full-scope examination procedures for the three Oklahoma AAs. The ratings for the State of Oklahoma are based upon results of these reviews. Please refer to the table in *Appendix A* for additional information on the scope of our review.

Evaluating performance within Oklahoma, the overall conclusions were weighted slightly heavier in the Payne County AA as it represents 57 percent of total deposits and is where SNB is headquartered. Lending products are fairly equally distributed between Payne County and the Oklahoma City Region with slightly less in Tulsa County. As for loan product analysis, small business loans were weighted slightly heavier than HMDA products as they make up the largest share of total reportable loans and are reflective of the bank's primary lending strategy. As for HMDA products, home purchase and refinance loans were weighted considerably heavier than home improvement loans since they represent approximately 93 percent of the total number of HMDA reportable loans. We gave little weight to small farm loans since the number of small farm originations was less than 1 percent of the total number of HMDA and CRA reportable loans.

We conducted one community contact interview in both the Oklahoma City Region and Tulsa County AAs for this examination. We also relied on three community contacts in Payne County and two in both the Oklahoma City Region and Tulsa County AAs that were previously performed in the evaluation period. All contacts were involved in affordable housing, economic development, or community services. Identified needs in the AA's are primarily affordable housing and small business development.

## ***LENDING TEST***

SNB's performance under the lending test in Oklahoma is rated "Low Satisfactory".

### ***Lending Activity***

Please refer to Table 1 in Appendix D for the facts and data used to evaluate the bank's lending activity.

SNB's lending activity in the Payne County, Oklahoma City Region, and Tulsa County AA's is good.

#### **PAYNE COUNTY**

In the Payne County AA, 56 percent, 43 percent, and 1 percent of the loans originated/purchased were home mortgage loans, small loans to businesses, and small loans to farms, respectively. Among home mortgage loans in the AA,; 70 percent, 7 percent, and 23 percent were for home purchase, home improvement, and home mortgage refinance loans, respectively. Multifamily loans represented less than 1 percent of total loans in this AA.

SNB's lending activity is good in this AA. SNB ranks 1<sup>st</sup> in terms of deposits among FDIC-insured institutions with a 64 percent market share. Based on 2004 peer mortgage data, SNB ranks 1<sup>st</sup> among financial institutions in home purchase loans with a 12 percent market share, and 2<sup>nd</sup> in home improvement and home refinance loans with a 9 percent and 4 percent market share, respectively. Based on 2004 peer small business data, SNB ranks 1<sup>st</sup> among financial institutions for small loans to businesses with a 13 percent market share. Small farm lending is not considered since it represents such a nominal volume. While SNB's market share of home mortgage and small loans to businesses and farms is lower than its deposit market share, this performance remains good considering the competition from larger regional banks and non-bank financial institutions, and SNB's dominant position.

#### **OKLAHOMA CITY REGION**

In the Oklahoma City Region AA, 32 percent and 68 percent of the loans originated/purchased were home mortgage loans, and small loans to businesses, respectively. Among home mortgage loans in the AA, 58 percent, 10 percent, and 32 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. There were no multifamily loans in this AA.

SNB's lending activity is good in this AA. SNB ranks 8<sup>th</sup> in terms of deposits among FDIC-insured institutions with a 3 percent market share. Based on 2004 peer mortgage data, SNB ranks 9<sup>th</sup> among financial institutions in home purchase loans with a 0.4 percent market share, 19<sup>th</sup> in home improvement loans with a 0.2 percent market share, and 16<sup>th</sup> in home refinance loans with a 0.2 percent market share, respectively. Based on 2004 peer small business data, SNB ranks 7<sup>th</sup> among financial institutions for small loans to businesses with a 2 percent market share.

Small farm lending is not considered since it represents such a nominal volume. While SNB's market share of home mortgage loans is near its deposit market share, this performance remains good considering the competition from larger regional banks and non-bank financial institutions.

**TULSA COUNTY**

In the Tulsa County AA, 37 percent and 63 percent of the loans originated/purchased were home mortgage loans, and small loans to businesses, respectively. Among home mortgage loans in the AA, 67 percent, 8 percent, and 25 percent were home purchase, home improvement, and home mortgage refinance loans, respectively. There were three multifamily loans in this AA.

SNB's lending activity is adequate in this AA. SNB ranks 6<sup>th</sup> in terms of deposits among FDIC-insured institutions with a 3 percent market share. Based on 2004 peer mortgage data, SNB ranks 13<sup>th</sup> among financial institutions in home purchase loans with a 0.3 percent market share, 19<sup>th</sup> in home improvement loans with a 0.3 percent market share, and 21<sup>st</sup> in home refinance loans with a 0.1 percent market share, respectively. Based on 2004 peer small business data, SNB ranks 8<sup>th</sup> among financial institutions for small loans to businesses with a 1 percent market share. Small farm lending is not considered since it represents such a nominal volume. While SNB's market share of home mortgage is lower than its deposit market share, this performance remains adequate considering the competition from larger regional banks and non-bank financial institutions.



## **DISTRIBUTION OF LOANS BY INCOME LEVEL OF THE GEOGRAPHY**

The geographic distribution of SNB's home mortgage loans and small loans to businesses is adequate. The number of multifamily loans and small loans to farms originated/purchased in Oklahoma is not significant enough to perform a meaningful analysis. Given lending volumes, we placed more weight on the distribution of small loans to businesses and home purchase loans than on home improvement and home refinance loans.

### ***Home Mortgage Loans***

Please refer to Tables 2, 3, 4, and 5 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

### ***Home Purchase Loans***

#### **PAYNE COUNTY**

The geographic distribution of home purchase loans is excellent. In 2004-2005, home purchase loans in low-income and in moderate-income geographies exceed owner-occupied housing units within those geographies. Market share in low-income and moderate-income geographies approximates the bank's overall market share. In 2002, SNB's distribution of loans also exceeds the demographics while market share in low-income and moderate-income geographies exceeds the bank's overall market share. In 2003, SNB's distribution of loans exceeds demographics while market share in low-income geographies exceeds the bank's overall market share and in moderate-income geographies is somewhat lower than overall market share.

#### **OKLAHOMA CITY REGION**

The geographic distribution of home purchase loans is poor. In 2004-2005, home purchase loans in low-income geographies are somewhat lower than owner-occupied housing units within those geographies. Home purchase loans in moderate-income geographies are significantly lower than owner-occupied housing units within those geographies. Overall market share is low for this product in this AA and does not provide meaningful data for analysis. In 2002 and 2003, SNB's performance is similar.

#### **TULSA COUNTY**

The geographic distribution of home purchase loans is poor. In 2004-2005, home purchase loans in low-income geographies are somewhat lower than owner-occupied housing units within those geographies. Home purchase loans in moderate-income geographies are significantly lower than owner-occupied housing units within those geographies. Overall market share is low for this product in this AA and does not

provide meaningful data for analysis. In 2002 and 2003, SNB's performance is similar.

### ***Home Improvement Loans***

#### **PAYNE COUNTY**

The geographic distribution of home improvement loans is good. In 2004-2005, home improvement loans in low-income geographies exceed owner-occupied housing units within these geographies. There were no loans in moderate-income geographies. Market share in low-income geographies exceeds the bank's overall market share. In 2002 and 2003, SNB's distribution of loans in low-income and moderate-income geographies exceeded the demographics and market share in these geographies exceeded the bank's overall market share.

#### **OKLAHOMA CITY REGION**

The geographic distribution of home improvement loans is poor. In 2004-2005, there was one home improvement loan in a moderate-income geography and none in low-income geographies. In 2002 and 2003, SNB made no home improvement loans in low-income or moderate-income geographies. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

#### **TULSA COUNTY**

The geographic distribution of home improvement loans is poor. In 2004-2005, there were no home improvement loans in low-income or moderate-income geographies. In 2002 and 2003, SNB made no home improvement loans in low-income geographies and one in moderate-income geographies. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

### ***Home Mortgage Refinance Loans***

#### **PAYNE COUNTY**

The geographic distribution of home refinance loans is excellent. In 2004-2005, home refinance loans in low-income and in moderate-income geographies exceed owner-occupied housing units within those geographies. Market share in low-income geographies exceed and moderate-income geographies approximates the bank's overall market share. In 2002 and 2003, SNB's performance is similar.

**OKLAHOMA CITY REGION**

The geographic distribution of home refinance loans is poor. In 2004-2005, home refinance loans in low-income geographies are somewhat lower than owner-occupied housing units within those geographies. Home refinance loans in moderate-income geographies are significantly lower than owner-occupied housing units within those geographies. Overall market share is low for this product in this AA and does not provide meaningful data for analysis. In 2002 and 2003, SNB's performance is similar.

**TULSA COUNTY**

The geographic distribution of home refinance loans is poor. In 2004-2005, home refinance loans in low-income geographies exceed owner-occupied housing units within those geographies. Home refinance loans in moderate-income geographies are significantly lower than owner-occupied housing units within those geographies. Overall market share is low for this product in this AA and does not provide meaningful data for analysis. In 2002 and 2003, SNB's performance is similar.

***Small Loans to Businesses***

Please refer to Table 6 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

**PAYNE COUNTY**

The geographic distribution of small loans to businesses is excellent. In 2004-2005, small loans to businesses in a low-income geography significantly exceeded the percentage of businesses within this geography. SNB's market share of loans in low-income geographies significantly exceeds its overall market share. Small loans to businesses in moderate-income geographies is almost the percentage of businesses within those geographies. The bank's market share of loans in moderate-income geographies exceeds its overall market share. In 2002 and 2003, SNB's performance is similar.

**OKLAHOMA CITY REGION**

The geographic distribution of small loans to businesses is adequate. In 2004-2005, small loans to businesses in low-income geographies exceeded the percentage of businesses within these geographies. SNB's market share of loans in the low-income geographies exceeds its overall market share. Small loans to businesses in moderate-income geographies are somewhat lower than the percentage of businesses within those geographies. The bank's market share of loans in moderate-income geographies approximates its overall market share. In 2002 and 2003, SNB's performance is similar.

## **TULSA COUNTY**

The geographic distribution of small loans to businesses is good. In 2004-2005, small loans to businesses in low-income geographies is almost the percentage of businesses within these geographies. SNB's market share of loans in the low-income geographies approximates its overall market share. Small loans to businesses in moderate-income geographies approximates the percentage of businesses within those geographies. The bank's market share of loans in moderate-income geographies exceeds its overall market share. In 2002 and 2003, SNB's performance is similar.

### ***Small Loans to Farms***

The number of small loans to farms originated/purchased is not significant enough to perform a meaningful analysis.

### **Lending Gap Analysis**

We reviewed reports detailing SNB's lending activity for home mortgage loans and small loans to businesses and farms to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in lending.

### **Inside/Outside Ratio**

A substantial majority, 82 percent, of home mortgage loans originated/purchased by SNB during the evaluation period was within the bank's AAs in Oklahoma and Texas. SNB also originated/purchased 75 percent of small loans to businesses and farms within its AAs.

## **DISTRIBUTION OF LOANS BY INCOME LEVEL OF THE BORROWER**

The borrower distribution of SNB's home mortgage loans and small loans to businesses reflects adequate dispersion among borrowers of different income.

### ***Home Mortgage Loans***

Please refer to Tables 8, 9, and 10 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations/purchases.

In evaluating the borrower distribution of home mortgage loans, we considered the number of households that live below the poverty level and the barriers that this may have on home ownership. The percentage of total households below poverty was 23 percent, 14 percent, and 11 percent in Payne County, Oklahoma City Region, and Tulsa County, respectively.

## ***Home Purchase Loans***

### **PAYNE COUNTY**

SNB has done an adequate job of addressing the low- and moderate-income borrower credit needs for home purchase loans. In 2004-2005, home purchase loans to low-income borrowers are lower than the percentage of AA families who are low-income. Market share to low-income borrowers is lower than the bank's overall market share. Home purchase loans to moderate-income borrowers are somewhat lower than the percentage of AA families who are moderate-income. Market share to moderate-income borrowers is near the bank's overall market share. In the periods 2002 and 2003, SNB's performance is similar.

### **OKLAHOMA CITY REGION**

SNB has done a poor job of addressing the low- and moderate-income borrower credit needs for home purchase loans. In 2004-2005, home purchase loans to low-income borrowers are lower than the percentage of AA families who are low-income. Home purchase loans to moderate-income borrowers are near the percentage of AA families who are moderate-income. In the periods 2002 and 2003, SNB's performance is worse as home purchase loans to moderate-income borrowers are lower than the percentage of AA families who are moderate-income. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

### **TULSA COUNTY**

SNB has done a poor job of addressing the low- and moderate-income borrower credit needs for home purchase loans. In 2004-2005, home purchase loans to low-income borrowers are lower than the percentage of AA families who are low-income. Home purchase loans to moderate-income borrowers approximate the percentage of AA families who are moderate-income. In the periods 2002 and 2003, SNB's performance is worse as home purchase loans to moderate-income borrowers are lower than the percentage of AA families who are moderate-income. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

## ***Home Improvement Loans***

### **PAYNE COUNTY**

SNB has done an adequate job of addressing the low- and moderate-income borrower credit needs for home improvement loans, although SNB does not generate a significant volume of home improvement loans. In 2004-2005, home improvement loans to low-income borrowers are lower than the percentage of AA families who are low-income. Market share to low-income borrowers exceeds the bank's overall market share. There were no home improvement loans to moderate-income borrowers. In the periods 2002 and 2003, SNB's performance was better as the market share and distribution of the bank's loans was either almost or exceeded the demographics.

### **OKLAHOMA CITY REGION**

SNB has done a poor job of addressing the low- and moderate-income borrower credit needs for home improvement loans, although SNB does not generate a significant volume of home improvement loans. In 2004-2005, home improvement loans to low-income borrowers are lower than the percentage of AA families who are low-income. Home improvement loans to moderate-income borrowers are lower than the percentage of AA families who are moderate-income. In the periods 2002 and 2003, SNB's performance is worse as home improvement loans to low-income and moderate-income borrowers are significantly lower than the percentage of AA families who are low-income or moderate-income. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

### **TULSA COUNTY**

SNB has done a poor job of addressing the low- and moderate-income borrower credit needs for home improvement loans, although SNB does not generate a significant volume of home improvement loans. In 2004-2005, home improvement loans to low-income borrowers are lower than the percentage of AA families who are low-income. Home improvement loans to moderate-income borrowers are lower than the percentage of AA families who are moderate-income. In 2002, SNB's performance is worse as home improvement loans to low-income and moderate-income borrowers are significantly lower than the percentage of AA families who are low-income or moderate-income. However, in 2003 performance was better as the bank exceeded the demographic for low-income borrowers although it was still significantly below demographics for moderate-income borrowers. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

## ***Home Mortgage Refinance Loans***

### **PAYNE COUNTY**

SNB has done a poor job of addressing the low- and moderate-income borrower credit needs for home refinance loans. In 2004-2005, home refinance loans to low-income and moderate-income borrowers are lower than the percentage of AA families who are low-income or moderate-income. Market share to low-income borrowers is near the bank's overall market share. Market share to moderate-income borrowers is lower than the bank's overall market share. In the periods 2002 and 2003, SNB's performance is similar.

### **OKLAHOMA CITY REGION**

SNB has done a poor job of addressing the low- and moderate-income borrower credit needs for home refinance loans. In 2004-2005, home refinance loans to low-income and moderate-income borrowers are lower than the percentage of AA families who are low-income or moderate-income. In the periods 2002 and 2003, SNB's performance is similar. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

### **TULSA COUNTY**

SNB has done a poor job of addressing the low- and moderate-income borrower credit needs for home refinance loans. In 2004-2005, home refinance loans to low-income and moderate-income borrowers are lower than the percentage of AA families who are low-income or moderate-income. In the periods 2002 and 2003, SNB's performance is similar. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

## ***Small Loans to Businesses***

Please refer to Table 11 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

### **PAYNE COUNTY**

The borrower distribution of small loans to businesses is excellent. In 2004-2005, the percentage of SNB's loans extended to businesses with revenues of \$1 million or less significantly exceeds the percentage of area businesses that have revenue levels of \$1 million or less. Accordingly, SNB's market share of the \$1 million or less borrowers exceeds the overall market share of businesses within this category. In 2003, the bank exceeds both the demographics and market share percentages. In 2002, SNB's distribution of small loans to businesses was slightly less than the demographic percentage distribution although their loan percentages significantly exceeded the overall market share.

### **OKLAHOMA CITY REGION**

The borrower distribution of small loans to businesses is excellent. In 2004-2005, the percentage of SNB's loans extended to businesses with revenues of \$1 million or less significantly exceeds the percentage of area businesses that have revenue levels of \$1 million or less. SNB's market share to the \$1 million or less borrowers also exceeds the overall market share. Performance is similar in 2003. In 2002, SNB's distribution of small loans to businesses exceeds the demographic and market share.

### **TULSA COUNTY**

The borrower distribution of small loans to businesses is good. In 2004-2005, the percentage of SNB's loans extended to businesses with revenues of \$1 million or less is almost the same percentage of area businesses that have revenue levels of \$1 million or less. SNB's market share to the \$1 million or less borrowers exceeds its overall market share. In 2002 and 2003, SNB's distribution of small loans to businesses is near the demographic percentage, although it exceeds the market share.

### ***Small Loans to Farms***

Please refer to Table 12 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms. The number of small loans to farms originated/purchased is not significant enough to perform a meaningful analysis.

### ***Community Development Lending***

Please refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development (CD) lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

CD lending has a positive impact on the Lending Test conclusions, particularly in the Oklahoma City Region. CD lending also has a positive impact in both Tulsa County and Payne County. Additionally, the bank originated a substantial amount of CD loans in the broader Oklahoma statewide area. The bank's CD loans primarily help to provide affordable housing and to revitalize and stabilize low-moderate income (LMI) areas, particularly in areas designated as either federal or state Enterprise Zones. The opportunities for CD lending in the Oklahoma City Region and Tulsa County are high (please refer to each area's Market Profile in Appendix B). The dollar amount of CD loans originated by SNB in the Oklahoma City Region, as well as in the broader Oklahoma statewide area, is considered significant.

#### **PAYNE COUNTY**

The bank originated an adequate level of CD loans within the Payne County AA during the evaluation period. SNB originated three CD loans totaling \$1.8 million. This includes a \$1.7 million loan (see below) and two loans totaling \$110 thousand to non-profit organizations that provide services to LMI individuals.

SNB originated a \$1.7 million loan to finance Phase II construction of an affordable housing project. LMI families can qualify for reduced rents. The project is located in the Oklahoma Department of Commerce Enterprise Zone in Payne County.

#### **OKLAHOMA CITY REGION**

The bank originated an excellent level of CD loans within the Oklahoma City Region AA during the evaluation period. SNB originated eighteen CD loans totaling \$28.4 million. This includes nine loans totaling \$11.0 million for affordable housing, eight loans totaling \$17.0 million for revitalization and stabilization of LMI areas, and one loan for \$500 thousand for services targeted to LMI individuals. A few examples of CD loans are provided below.



SNB originated two loans totaling \$6.7 million for construction costs to renovate a multi-purpose commercial building located in the federally designated Oklahoma City Empowerment Zone and Enterprise Community. Renovation of this historic site will not only help revitalize the area, but will create economic development in the form of new retail businesses, commercial tenant space, and provide housing in the downtown area.

SNB originated and renewed loans for a total qualified amount of \$6.6 million to purchase and renovate a building located within the boundaries of the Oklahoma City Neighborhood Revitalization Strategy Area and surrounded by the Oklahoma Enterprise Community. The renovation will bring new tenants to an area in need of revitalization.

SNB originated a loan totaling \$3.8 million to construct a 100 unit affordable senior citizen apartment complex. Seventy percent of the units will rent for less than the median monthly rent for the MSA. The project is located in a moderate-income census tract within an Enterprise Zone.

#### **TULSA COUNTY**

The bank originated a satisfactory level of CD loans within the Tulsa County AA during the evaluation period. SNB originated five CD loans totaling \$9.3 million. Two loans totaling \$2.8 million were for the revitalization and stabilization of an LMI area. SNB originated 3 CD loans totaling \$6.4 million for affordable housing. Examples of the bank's CD loans are provided below.

The bank originated two loans totaling \$2.8 million to purchase and renovate a historic building in downtown Tulsa. The building is located in a moderate-income census tract in Tulsa's downtown Enterprise Zone. The building was added to the National Register of Historic Places and the State Registry of Historic Places in April 2004.

SNB originated two loans totaling \$6.3 million to an entity that purchased and renovated two affordable apartment complexes located in Tulsa with a combined 179 units. Affordable housing has been recognized as a critical need in Tulsa County.

#### **STATEWIDE REGION**

The bank originated an excellent level of CD loans in the broader statewide region (Oklahoma City, OK MSA) that includes the bank's AAs. SNB originated five CD loans totaling \$25.0 million. This includes three loans totaling \$20.7 million for affordable housing and two loans totaling \$4.3 million to revitalize and stabilize a LMI area. Three examples are provided below.

SNB originated two loans totaling \$18.2 million to fund the construction of affordable student housing. The project will consist of a 276 unit apartment complex located on the University of Oklahoma campus. Rents will be considerably lower than the median monthly gross rent for the area.

SNB originated a loan totaling \$2.5 million to purchase a “Section 8” apartment complex in Norman, Oklahoma. The apartment complex is located in a moderate-income census tract and is in one of Cleveland County’s Enterprise Zones.

SNB originated a loan totaling \$3.0 million for a residential/retail development in a distressed area in southeast Norman, Oklahoma. The property is located in a moderate-income census tract within an Enterprise Zone. This project will revitalize an LMI area and bring new businesses and jobs to the area.

### ***Product Innovation and Flexibility***

SNB does not currently offer any loan products which would be considered innovative and flexible.

## ***INVESTMENT TEST***

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in the State of Oklahoma is rated "Low Satisfactory". Based on full scope reviews, the bank's investment performance in Payne County, the Oklahoma City Region, and Tulsa County is adequate. Investments originated in the bank's greater statewide area are good.

Please refer to Table 14 in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

SNB has made current period qualified investments totaling \$6.1 million, or roughly 3 percent of Tier I Capital, during the evaluation period of May 6, 2002 through July 4, 2006. SNB has also made a prior period investment totaling \$1.0 million which is pro-rated by management among the bank's Oklahoma AAs by deposit share. Overall, investments are distributed throughout the three AAs with the majority, 67 percent, located in the broader Oklahoma statewide region that benefits the bank's assessment area. This is followed by the Oklahoma City Region with 17 percent, Payne County with 12 percent and Tulsa County with 4 percent.

#### **PAYNE COUNTY**

SNB has an adequate level of qualified investments in the Payne County AA totaling \$719 thousand. Investments include a prior period investment in the State of Oklahoma MetaFund, with the Payne County AA's pro-rata portion at \$588 thousand. Other investments represent donations of \$131 thousand to local non-profit organizations that provide affordable housing, urban renewal, and other social services targeting LMI individuals or families.

#### **OKLAHOMA CITY REGION**

SNB has an adequate level of qualified investments in the Oklahoma City Region AA totaling \$1.0 million. SNB invested \$750 thousand in Low Income Housing Tax Credits associated with a low-income apartment complex in Oklahoma City. SNB also made a prior period investment in the State of Oklahoma MetaFund with the Oklahoma City Region AA's pro-rata portion of the equity investment at \$232 thousand. Other investments consisted of donations of \$47 thousand to local non-profit organizations that provide services to LMI families.

#### **TULSA COUNTY**

SNB has an adequate level of qualified investments in the Tulsa County AA totaling \$217 thousand. Investments include the Tulsa County AA's pro-rata portion of the prior period investment in the State of Oklahoma MetaFund totaling \$180 thousand. Other investments represent donations of \$37 thousand to non-profit organizations that provide affordable housing, urban renewal, and other social services targeting LMI individuals or families.

**STATEWIDE REGION**

SNB has a good level of qualified investments that were originated in the bank's broader Oklahoma statewide area. SNB and the MetaFund formed MetaMarkets OK, LLC, a Community Development Financial Institution (CDFI), in order to take advantage of New Markets Tax Credit financing. SNB made a \$3.75 million investment in the MetaMarkets, who in turn loaned the same amount to a manufacturer located in Wewoka, Oklahoma. New Markets Tax Credits associated with the project currently totals \$309 thousand. The manufacturer provided needed job creation in a distressed area of the state with high unemployment and high poverty. Jobs were a significant need at the time of this investment as unemployment rates exceeded 11 percent in the area. Wewoka is located in a county that was adjacent to the Oklahoma City, Oklahoma MSA in the period of the investment and benefits the bank's AA.

## ***SERVICE TEST***

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in Payne County is excellent. Performance in the Oklahoma City Region is good and in Tulsa County is poor.

#### ***Retail Banking Services***

Under the Service Test, we focused on branch locations; the availability and effectiveness of alternative delivery systems; reasonableness of business hours and services in meeting the needs of the assessment areas; and, level of CD services. Our evaluation of branch locations noted that relatively few offices exist in each AA. Please refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

In the Payne County AA, the branch distribution in low-income and moderate-income geographies is excellent as it significantly exceeds the population distribution in these geographies. Of the three offices, two are in moderate-income geographies and one is in a low-income geography. In the Oklahoma City Region and Tulsa County AAs, there are no branches in low-income geographies. The Oklahoma City Region has one branch in a moderate-income geography. Slightly more weight is given to the distribution of branches in Payne County as the majority of loans and deposits are generated in this AA. There have been no branch openings and closings during the evaluation period.

Banking hours and services offered throughout the AAs are good and provide accessibility to banking products and services. Lobby and drive-through hours for Monday through Saturday are generally the same at all branches. Extended hours on Saturday are provided at all drive-through facilities. There were no differences noted between banking hours in branches serving either low-income or moderate-income areas versus those in middle- and upper-income areas.

SNB's alternative delivery systems have an overall positive impact on the accessibility of bank products and services. The bank's network of 58 ATM locations, owned either by the bank or the bank's subsidiary, Cash Source, Inc., improve overall accessibility of bank products and services, especially to customers in both low-income and moderate-income geographies. The distribution of ATMs in low-income geographies in the Payne and Tulsa County AAs exceeds the percentage of population in these tracts. The Oklahoma City Region AA has no ATMs in low-income tracts. The distribution of ATMs in moderate-income geographies exceeds the population distribution in these tracts in each of the three full-scope AAs. Overall, there are 6 ATMs (10 percent) in low-income areas and 27 ATMs (47 percent) in moderate-income areas.

Another positive alternative delivery system is the bank's two business development offices. One is on the Oklahoma State University (OSU) campus, a moderate-income tract in Payne County. The other is on the Oklahoma University Medical School campus in Oklahoma City, which is adjacent to moderate-income tracts. While not branches, each office is staffed with personnel to help in completing applications for loan and deposit accounts. Each office also has terminals for any existing customers to access their accounts to transact business.

Other alternative delivery systems include ExpressLine 24, an automated 24-hour telephone banking product, the Sale and Service Center, a toll-free full-service telephone center which has extended business hours Monday-Friday and on Saturday, and *SNB DirectBanker®*, an internet banking product available to consumers and small business subscribers.

### ***Community Development Services***

Overall, the level of CD services has a slightly positive impact on the rating. The number of CD services that benefit LMI individuals in the Payne County AA is good. Bank personnel are active in providing financial expertise to organizations whose primary purpose is to provide affordable housing or community services for both low-income and moderate-income persons. Employees have also helped to develop loan program guidelines for nonprofit affordable housing groups. The number of CD services that ultimately benefit LMI individuals in the Oklahoma City Region and Tulsa County are adequate. Performance in these two AAs has primarily been associated with organizations whose primary purpose is to provide community services or economic development assistance.

# **STATE OF TEXAS**

## **CRA Rating for Texas: Satisfactory**

The Lending Test is rated: Low Satisfactory  
The Investment Test is rated: High Satisfactory  
The Service Test is rated: Needs Improvement

The major factors that support this rating:

- The geographic distribution of small loans to businesses by income of the area is poor.
- The distribution of small loans to businesses by borrower income is excellent.
- CD lending has a slightly positive impact on the bank's performance.
- SNB provided a good amount of CD investments.
- The bank's retail delivery systems are not adequately accessible to geographies and individuals of different income levels.

## **Description of Institution's Operations in Texas**

SNB's AAs in the State of Texas consists of the Dallas Region, Travis County and Bexar County. The Dallas Region is comprised of Dallas and Collin County, two counties in the Dallas-Plano-Irving, TX MD. Travis County is in the Austin-Round Rock, TX MSA, and Bexar County is in the San Antonio, TX MSA. The largest cities included in SNB's Texas AAs are Dallas, Plano, Austin, and San Antonio.

The bank operates four offices within the state. The Texas offices report 2 percent of SNB's total deposits and 9 percent of the total number of SNB's loans. Competition in these AAs is heavy and includes numerous national, regional and community banks, as well as other non-bank financial institutions. The branches are all relatively new to the organization and opened during the evaluation period. The Collin and Dallas County branches opened January 23, 2003 and December 1, 2004, respectively. The Travis County branch opened February 14, 2005. The Bexar County branch opened December 6, 2005.

Please refer to the market profiles for the State of Texas in Appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## **Scope of Evaluation in Texas**

Our analysis included full-scope examination procedures for the Dallas Region AA. Performance was only evaluated for the years 2004-2005, since the branches were not open prior to that time. Travis County and Bexar County received limited scope reviews. Little weight was given to the performance of the limited scope branches as they were opened during the very latter stages of the evaluation period. Additionally, there were simply not enough home mortgage loans in any category or small loans to farms to provide any meaningful analysis. Therefore, the bank's rating will be concentrated on performance regarding small loans to businesses. Please refer to the table in Appendix A for additional information on the scope of our review.

We conducted one community contact interview in Dallas Region for this examination. The contact was involved primarily in community services related to affordable housing and cited affordable housing as a need in the AA.



## ***LENDING TEST***

SNB's performance under the lending test in Texas is rated "Low Satisfactory".

### **Lending Activity**

Please refer to Table 1 in Appendix D for the facts and data used to evaluate the bank's lending activity.

#### **DALLAS REGION**

SNB's lending activity in the Dallas Region is adequate given the bank's performance context. In the Dallas Region AA, 15 loans or 8 percent of the loans originated/purchased were home mortgage loans and 164 loans or 92 percent of the loans originated/purchased were small loans to businesses. SNB ranks near the bottom in terms of deposits among FDIC-insured institutions in the Dallas Region with a 0.01 percent market share.

### **DISTRIBUTION OF LOANS BY INCOME LEVEL OF THE GEOGRAPHY**

The geographic distribution of SNB's small loans to businesses is poor. The number of home mortgage loans and small loans to farms originated/purchased in Texas is not significant enough to perform a meaningful analysis.

#### ***Small Loans to Businesses***

Please refer to Table 6 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

#### **DALLAS REGION**

The geographic distribution of small loans to businesses is poor. In 2004-2005, small loans to businesses in low-income geographies approximate the percentage of businesses within this geography. Small loans to businesses in moderate-income geographies are lower than the percentage of businesses within those geographies. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

### **Lending Gap Analysis**

We reviewed reports detailing SNB's lending activity for small loans to businesses to identify gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps in lending.

## **Inside/Outside Ratio**

A substantial majority, 82 percent, of home mortgage loans originated/purchased by SNB during the evaluation period was within the bank's AAs in Oklahoma and Texas. SNB also originated/purchased 75 percent of small loans to businesses and farms within its AAs.

## **DISTRIBUTION OF LOANS BY INCOME LEVEL OF THE BORROWER**

The borrower distribution of SNB's small loans to businesses reflects excellent dispersion among borrowers of different income. The number of home mortgage loans and small loans to farms originated/ purchased in Texas is not significant enough to perform a meaningful analysis.

### ***Small Loans to Businesses***

Please refer to Table 11 in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

#### **DALLAS REGION**

The borrower distribution of small loans to businesses is excellent. In 2004-2005, the percentage of SNB's loans extended to businesses with revenues of \$1 million or less significantly exceeds the percentage of area businesses that have revenue levels of \$1 million or less. Overall market share is low for this product in this AA and does not provide meaningful data for analysis.

### ***Community Development Lending***

Please refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

#### **DALLAS REGION**

CD lending has a positive impact on the Lending Test conclusions for the Dallas Region. The bank's CD loans help provide affordable housing and revitalize and stabilize LMI areas, particularly in areas designated as either federal or state Enterprise Zones.

SNB originated one loan totaling \$9.2 million for the revitalization and stabilization of a LMI area, one loan totaling \$2.0 million for affordable housing, and two loans totaling \$25 thousand to a non-profit organization that provides services to LMI families. The following examples are provided.

SNB originated a \$9.2 million loan to acquire land and construct a medical center located in a moderate-income tract within an Enterprise Zone and HUB Zone. This project is part of the McKinney Economic Development Corporation's plan to revitalize and create jobs in this LMI area.

SNB originated a \$2.0 million loan to fund the purchase and rehab of a 76 unit affordable housing apartment complex in Dallas, Texas.

### ***Product Innovation and Flexibility***

SNB does not currently offer any loan products which would be considered innovative and flexible.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Travis County AA and Bexar County AA is consistent with the bank's overall "Low Satisfactory" rating performance in Texas under the Lending Test. There were no CD loans originated in the Travis County and Bexar County AAs. These limited scope AAs combined represent approximately 2 percent of the reported loans and less than 1 percent of total deposits.

## ***INVESTMENT TEST***

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Investment Test in the State of Texas is rated "High Satisfactory". Based on full scope reviews, the bank's investment performance in the Dallas Region is good. No consideration was given to the fact there are no investments in the limited scope areas given these particular branches very short time in operation as part of SNB.

Please refer to Table 14 in the State of Texas section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments.

#### **DALLAS REGION**

SNB purchased a qualified FNMA mortgage backed securities totaling \$656 thousand. These affordable FNMA mortgages are located in the Dallas Region. Additionally, SNB made a \$450 thousand equity investment in an SBIC, which in turn used the money to provide a SBA loan to a start-up business in Collin County.

## ***SERVICE TEST***

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "Needs Improvement". Based on full-scope reviews, the bank's performance in the Dallas Region is poor.

#### ***Retail Banking Services***

Under the Service Test, we focused on branch locations, the availability and effectiveness of alternative delivery systems; reasonableness of business hours and services in meeting the needs of the assessment areas; and level of CD services. Please refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

##### **DALLAS REGION**

SNB has two branches in the Dallas Region AA. One branch is located in Dallas and the other is located in Frisco, Texas. The Texas markets are relatively new with the Frisco branch opening January 2003 and the Dallas branch opening December 2004. SNB's overall branch distribution in this AA is poor considering both branches are located and surrounded entirely by upper-income tracts.

Banking hours and services offered are reasonable and provide accessibility to banking products and services. Lobby hours for Monday through Friday are the same for both branches. Neither branch has drive through facilities. No branch closings occurred during this evaluation period.

SNB's alternative delivery systems somewhat increases the accessibility of bank products and services. The bank's network of 12 ATM locations, owned either by the bank or the bank's subsidiary, Cash Source, Inc., improve overall accessibility of bank products and services throughout the AAs. Eight of the ATMs are located in the full scope Dallas Region AA. There are no ATMs located in lower-income tracts and one ATM located in a moderate-income tract.

Other alternative delivery systems include ExpressLine 24, an automated 24-hour telephone banking product, the Sale and Service Center, a toll-free full-service telephone center which has extended business hours Monday-Friday and on Saturday, and *SNB DirectBanker®*, an internet banking product available to consumers and small business subscribers.

## ***Community Development Services***

### **DALLAS REGION**

SNB reported one CD service activity in this AA assisting a non-profit involved in affordable housing.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Travis County AA and Bexar County AA is consistent with the bank's overall "Needs Improvement" rating performance in Texas under the Service Test.

Please refer to Table 15 in Appendix C for the facts and data that support these conclusions.

## 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 metropolitan and non-metropolitan areas 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (1/01/02 to 12/31/05) Investment and Service Tests and CD Loans: (5/07/02 to 7/04/06)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Stillwater National Bank & Trust Company; Stillwater, OK	Home Mortgage Loans, Small Loans to Businesses and Farms, Community Development Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
OKLAHOMA Payne County Oklahoma City Region Tulsa County TEXAS Dallas Region Travis County Bexar County	Full Scope Full Scope Full Scope  Full Scope Limited Scope Limited Scope	Oklahoma County & Grady County    Dallas County & Collin County

## Appendix B: Summary of State Ratings

<b>RATINGS      Stillwater National Bank &amp; Trust Company</b>				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Rating
Stillwater National Bank & Trust Co.	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
<b>Individual State Ratings</b>				
OKLAHOMA	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
TEXAS	Low Satisfactory	High Satisfactory	Needs Improvement	Satisfactory

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.



## Appendix C: Market Profiles for Full-Scope Areas

### State of Oklahoma

#### Payne County

Demographic Information for Full Scope Area: <b>Payne County OK AA</b>						
Demographic Characteristics	Number	Low % of Number	Moderate % of Number	Middle % of Number	Upper % of Number	NA* % of Number
Geographies (Census Tracts/BNAs)	14	7.14	14.29	42.86	35.71	0.00
Population by Geography	68,190	5.17	11.20	44.88	38.75	0.00
Owner-Occupied Housing by Geography	14,912	1.05	3.15	56.75	39.06	0.00
Business by Geography	4,200	9.48	17.12	47.79	25.62	0.00
Farms by Geography	162	0.00	9.88	61.11	29.01	0.00
Family Distribution by Income Level	15,513	16.70	14.85	20.16	48.29	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,893	4.62	11.04	57.14	27.20	0.00
Median Family Income		35,235	Median Housing Value	54,357		
HUD Adjusted Median Family Income for 2002		34,200	Unemployment Rate	2.68%		
Households Below Poverty Level		23%	(2000 US Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2002 HUD updated MFI

Payne County (Stillwater) is located between the Oklahoma City and Tulsa MSAs. Payne County is the home of Oklahoma State University (OSU), the state's second largest public university. SNB has three full-service centers, which include the main office and a "Convenience Banking Center", both of which are located in the heart of the city. The Hall of Fame branch is located next to the Oklahoma State University campus. The main office and Hall of Fame branches are located in moderate-income census tracts while the Convenience Banking Center is located in a low-income census tract. SNB also operates a business development office on the campus of OSU. This location is an information and business development center. It does not solicit deposits or provide full-service banking. Alternative delivery systems include 17 automated teller machine (ATM) locations throughout the city of Stillwater, Oklahoma.

The only low-income census tract located in the AA surrounds the OSU campus to the north and east. This is primarily student housing. The two moderate-income census tracts in the AA are located in the middle of the city and are comprised largely of commercial buildings and residential housing.

Based on 2000 U.S. Census data, total population of the AA is 68,190. The median family income for the AA is \$41,400.

The unemployment rate of Payne County reported as of March 31, 2006 is 3.6 percent. Areas of economic strength for Payne County include new and expanded job growth in technology-based businesses. Meridian Technology Center has taken a leadership role in economic development by providing a business innovation facility (an incubation program) to encourage the development of new companies. Major employers include OSU, Mercury Marine, Stillwater Public Schools, and Stillwater Medical Center. The credit needs of the Stillwater area include financing for start-up businesses, small business loans, affordable housing and home improvement loans. Due to the predominately middle- and upper-income residents and college students, those needing affordable housing are in a fairly limited market. The level of households below the poverty level in Payne County total 23 percent.

Non-farm businesses represent 96 percent (4,200) of total businesses in the AA. The majority of these businesses are small reporting sales of less than \$1 million.

Community contacts, as well as a review of peer bank CRA Public Evaluations and community contacts conducted by other regulators, indicate that community development opportunities are limited in this assessment area. Contacts noted that identified needs exist for affordable housing, especially in southeast Stillwater. The contacts indicated the involvement of area banks has been excellent.

## Oklahoma City Region (Oklahoma County and Grady County)

Demographic Information for Full Scope Area: <b>Oklahoma City Region OK AA</b>						
Demographic Characteristics	Number	Low % of Number	Moderate % of Number	Middle % of Number	Upper % of Number	NA* % of Number
Geographies (Census Tracts/BNAs)	238	8.82	36.13	31.09	22.27	1.68
Population by Geography	705,964	4.46	34.49	33.56	27.40	0.09
Owner-Occupied Housing by Geography	174,281	2.69	26.98	36.77	33.56	0.00
Business by Geography	46,556	6.00	30.32	33.68	26.50	3.49
Farms by Geography	926	2.38	19.22	41.58	35.85	0.97
Family Distribution by Income Level	184,660	21.97	18.43	20.82	38.77	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	74,607	7.19	46.66	32.37	13.79	0.00
Median Family Income		45,753	Median Housing Value		64,773	
HUD Adj Median Family Income for 2005		52,350	Unemployment Rate		4.4%	
Households Below Poverty Level		14%				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2005 HUD updated MFI

The Oklahoma City Region AA contains the Oklahoma and Grady Counties. These counties are only two of the counties that make up the Oklahoma City, OK MSA. SNB has one full-service branch in Oklahoma City and one in Chickasha. Alternative delivery systems include 30 ATMs.

Based on 2000 U.S. Census data, total population of the AA is 705,964. The HUD 2005 updated annual median family income for the Oklahoma City, OK MSA is \$52,350.

This AA accounts for a large percentage of the deposits and loans. This AA maintains approximately 23 percent of SNB's total deposits and 33 percent of total reported loans. In terms of market share, SNB holds approximately 3.01 percent of total bank deposits in the AA. At March 31, 2006, the majority of the loans from this AA were real estate related.

The economic conditions in Oklahoma County are robust and the outlook remains good in the short run, as the rebound in the energy industry will continue to help the region by boosting employment and income growth. As of March 31, 2006, unemployment was 4.4 percent. The retail, government, and service sectors account for the majority of the employers in the AA. The leading employers include the State of Oklahoma, Tinker Air Force Base, Oklahoma Health Center, INTEGRIS Health Center, and Oklahoma City Public Schools. With the recent increase in oil and gas production, the energy sector is strong, which will feed through to the service and retail industries, to help not only the local businesses, but the public as well.

Non-farm businesses represent 98 percent (46,556) of total businesses in the AA. The majority of these businesses are small, with a high percent reporting revenues of less than \$1 million.

Mortgage lending competition continues to be fierce, with competitors including community and regional banks, mortgage companies, and anti-poverty organizations. Also affecting lending opportunities is the level of households below the poverty level totaling 14 percent. The limitation of disposable income for families living below the poverty level negatively affects their ability to qualify for home ownership.

We reviewed three community contacts for the Oklahoma City Region AA. Contacts included business development and affordable housing organizations. These contacts noted that there are several opportunities to participate in community service activities, but opportunities are more limited for community development lending and investments. Contacts indicated that local banks are interested and active in seeking community development opportunities. Several contacts indicated affordable housing and rehabilitation of declining areas continue to be the primary needs of the AA.

## Tulsa County

Demographic Information for Full Scope Area: <b>Tulsa County OK AA</b>						
Demographic Characteristics	Number	Low % of Number	Moderate % of Number	Middle % of Number	Upper % of Number	NA* % of Number
Geographies (Census Tracts/BNAs)	172	4.65	27.33	34.30	33.72	0.00
Population by Geography	563,299	3.31	25.85	38.35	32.48	0.00
Owner-Occupied Housing by Geography	140,131	1.94	20.76	39.52	37.78	0.00
Business by Geography	38,119	1.73	27.30	35.46	35.50	0.00
Farms by Geography	666	1.35	22.22	37.99	38.44	0.00
Family Distribution by Income Level	148,189	19.42	17.78	21.09	41.71	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	55,125	6.33	39.00	39.01	15.66	0.00
Median Family Income		51,562	Median Housing Value		86,532	
HUD Adj Median Family Income for 2005		53,150	Unemployment Rate		4.0%	
Households Below Poverty Level		11%				

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2005 HUD updated MFI

The Tulsa County AA is part of the Tulsa, OK MSA. SNB has two full-service branches located in the city of Tulsa. Both branches are located in upper-income census tracts. Alternative delivery systems include 21 ATMs located throughout the Tulsa city limits.

Based on 2000 U.S. Census data, total population of the assessment area is 563,299. The 2005 updated median family income for the MSA of \$53,150.

The AA accounts for approximately 18 percent of SNB's total deposits and 19 percent of total reported loans during this evaluation period. SNB holds approximately 2.62 percent of the deposit market share in Tulsa County. At March 31, 2006, the majority of the loans from this AA were real estate related.

The Tulsa economy has been stable. As of March 31, 2006 Tulsa County reported an unemployment rate of 4.0 percent. Job growth has been accelerating in the recent months driven by strong performance in the service-producing industries and construction. Major employers include American Airlines, Tulsa Public Schools, St. John Medical Center, St. Francis Hospital, and Hillcrest Medical Center.

Non-farm businesses represent 98 percent (38,119) of total businesses in the AA. The majority of these businesses are small reporting sales of less than \$1 million.

Competition is very strong in the AA especially for mortgage related products. Mortgage lending competition consists of community and regional banks, mortgage companies, credit unions, and anti-poverty organizations. Also affecting lending opportunities is the level of households below the poverty level 11 percent. New

housing construction and residential home sales are up from 2000. Tulsa has historically experienced an abundance of housing at all price ranges, including affordable housing. However, there has been a trend the last few years of increasing housing costs and decreasing affordable housing inventory.

We reviewed three community contacts for the Tulsa County AA. Contacts included urban and community development organizations. The primary need identified was for revitalization of the north Tulsa area, where most of the low and moderate-income tracts are located. Affordable housing, small business loans, and technical assistance for individuals attempting to start a small business were also mentioned as needs for the north Tulsa area. A review of peer bank CRA Public Evaluations and community contacts by other regulators in the assessment area indicates there are a number of opportunities to participate in community development lending, investment and service activities. Contacts reviewed indicated participation from area financial institutions has been good.

## State of Texas

### Dallas Region (Dallas County and Collin County)

Demographic Information for Limited Scope Area: <b>Dallas Region TX AA</b>						
Demographic Characteristics	Number	Low % of Number	Moderate % of Number	Middle % of Number	Upper % of Number	NA* % of Number
Geographies (Census Tracts/BNAs)	572	10.49	30.59	27.80	30.42	0.70
Population by Geography	2,710,574	9.25	30.43	29.76	30.56	0.00
Owner-Occupied Housing by Geography	549,723	3.27	22.72	32.17	41.83	0.00
Business by Geography	239,832	4.85	26.21	29.59	38.14	1.22
Farms by Geography	3,828	3.71	22.86	32.31	40.67	0.44
Family Distribution by Income Level	671,309	22.35	18.12	19.58	39.95	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	271,677	15.86	42.57	28.59	12.98	0.00
Median Family Income HUD Adj Median Family Income for 2005 Households Below Poverty Level		60,978 65,000 10%	Median Housing Value Unemployment Rate	118,844 2.53%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2005 HUD updated MFI

The Dallas Region AA is part of the Dallas-Plano-Irving, TX MD. SNB has two full-service branches located in Dallas and Frisco, Texas. Both branches are located in upper-income census tracts. Alternative delivery systems include eight ATMs located throughout the North Dallas city limits.

Based on 2000 U.S. Census data, total population of the AA is 2,710,574. The 2005 updated median family income for the MD is \$65,000.

The AA accounts for approximately 2 percent of SNB's total deposits and 7 percent of total reported loans during this evaluation period. At March 31, 2006, the majority of the loans from this AA were real estate related.

The Dallas region remains strong. Energy activity remains extremely strong. Manufacturing, construction, and service sectors have also strengthened. The labor market continues to be firm with hiring reported at both manufacturing and service companies. The housing market continues to be strong. At this point, there is little evidence that slowing in the housing market has spread to this region. Major employers in the Dallas region include AMR, Corporation, Lockheed Martin Aeronautics, Texas Instruments, Wal-Mart Stores, Inc., and the Dallas Independent School District.

Non-farm businesses represent 98 percent (239,832) of total businesses in the AA. The majority of these businesses are small reporting sales of less than \$1 million.

We conducted one community contact interview in Dallas Region for this examination. The contact was involved primarily in community services related to affordable housing and cited affordable housing as a need in the AA.



## Appendix D: Tables of Performance Data

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### ***Content of Standardized Tables***

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “*BANK*” include activities of any affiliates that Stillwater National 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 as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and percent Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> 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 1 Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- Table 2 Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3 Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4 Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5 Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6 Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7 Geographic Distribution of Small Loans to Farms** - 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. The table also presents market share information based on the most recent aggregate market data available. Because 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 assessment area.
- Table 8 Borrower Distribution of Home Purchase Loans** - 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 MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9 Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10 Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11 Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12 Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 14 Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

**Table 15 Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

***Tables of Performance Data***

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***State of Oklahoma***  
***State of Texas***

**Table 1 - Lending Volume**

Geography: OKLAHOMA /TEXAS													Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***													
		Number	\$ (000's)	Number	\$ (000's)	Number	\$ (000's)	Number	\$ (000's)	Number	\$(000's)														
<b>State of Oklahoma:</b>																									
OKC Region (FS)	32.62	284	43,897	603	114,176	2	850	8	28,449	897	187,372	22.63													
Payne County (FS)	39.53	610	76,509	462	59,383	12	1,085	3	1,835	1,087	138,812	57.41													
Tulsa County (FS)	18.80	189	33,909	323	59,866	0	0	5	9,301	517	103,076	17.57													
Statewide Region	0.18	0	0	0	0	0	0	5	25,020	5	25,020	N/A													
<b>State of Texas:</b>																									
Dallas Region (FS)	6.65	15	4,515	164	35,347	0	0	4	11,210	183	51,072	2.36													
Bexar County (LS)	1.09	2	294	28	6,676	0	0	0	0	30	6,970	0.00													
Travis County (LS)	1.13	0	0	31	6,510	0	0	0	0	31	6,510	0.02													

FS = Full Scope  
 LS = Limited Scope

\* Loan Data as of December 31, 2005. Rated area refers to either state or multi-state MA rating area.  
 \*\* The evaluation period for Community Development Loans is from May 6, 2002 to July 4, 2006.  
 \*\*\* Deposit Data as of June 30, 2005. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2 - Geographic Distribution of Home Purchase Loans**

Geography: OKLAHOMA /TEXAS																Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	Number	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper					
<b>State of Oklahoma:</b>																				
OKC Region (FS)	164	22.53	2.69	0.00	26.98	7.93	36.77	29.27	33.56	62.80	0.47	0.0	0.13	0.36	0.73					
Payne County (FS)	426	58.52	1.05	1.88	3.15	4.69	56.75	20.19	39.06	73.24	13.13	10.0	12.2	7.08	18.41					
Tulsa County (FS)	124	17.03	1.94	0.00	20.76	4.03	39.52	20.16	37.78	75.81	0.37	0.0	0.15	0.14	0.61					
<b>State of Texas:</b>																				
Dallas Region (FS)	12	1.65	3.27	0.00	22.72	0.00	32.17	16.67	41.83	83.33	0.00	0.00	0.00	0.00	0.01					
Bexar County (LS)	2	0.27	1.94	0.00	34.52	0.00	26.83	0.00	36.71	100.00	0.00	0.00	0.00	0.00	0.00					
Travis County (LS)	0	0.00	4.16	0.00	21.43	0.00	36.00	0.00	38.41	0.00	0.00	0.00	0.00	0.00	0.00					

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Mortgage Data (Western)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**Table 3 - Geographic Distribution of Home Improvement Loans**

Geography: OKLAHOMA /TEXAS												Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	Number	% of Total **	% Owner Occupied Units***	% Owner Occupied Units****	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper	
<b>State of Oklahoma:</b>																
OKC Region (FS)	29	34.12	2.69	0.00	26.98	3.45	36.77	31.03	33.56	65.52	0.43	0.00	0.20	0.23	0.89	
Payne County (FS)	40	47.06	1.05	5.00	3.15	0.00	56.75	27.50	39.06	67.50	13.89	66.67	0.00	6.60	25.00	
Tulsa County (FS)	16	18.82	1.94	0.00	20.76	0.00	39.52	6.25	37.78	93.75	0.44	0.00	0.00	0.12	0.94	
<b>State of Texas:</b>																
Dallas Region (FS)	0	0.00	3.27	0.00	22.72	0.00	32.17	0.00	41.83	0.00	0.00	0.00	0.00	0.00	0.00	
Bexar County (LS)	0	0.00	1.94	0.00	34.52	0.00	26.83	0.00	36.71	0.00	0.00	0.00	0.00	0.00	0.00	
Travis County (LS)	0	0.00	4.16	0.00	21.43	0.00	36.00	0.00	38.41	0.00	0.00	0.00	0.00	0.00	0.00	

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Mortgage Data (Western)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4 - Geographic Distribution of Home Mortgage Refinance Loans**

Geography OKLAHOMA /TEXAS											Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	Number	% of Total**	% Owner Occupied Units***	% Owner Occupied Units****	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper
<b>State of Oklahoma:</b>															
OKC Region (FS)	91	32.50	2.69	0.00	26.98	6.59	36.77	19.78	33.56	73.63	0.32	0.00	0.18	0.15	0.57
Payne County (FS)	141	50.36	1.05	4.26	3.15	7.09	56.75	22.70	39.06	65.96	7.11	15.79	6.00	3.36	10.98
Tulsa County (FS)	46	16.43	1.94	2.17	20.76	4.35	39.52	15.22	37.78	78.26	0.17	0.67	0.09	0.08	0.27
<b>State of Texas:</b>															
Dallas Region (FS)	2	0.71	3.27	0.00	22.72	0.00	32.17	0.00	41.83	100.00	0.00	0.00	0.00	0.00	0.01
Bexar County (LS)	0	0.00	1.94	0.00	34.52	0.00	26.83	0.00	36.71	0.00	0.00	0.00	0.00	0.00	0.00
Travis County (LS)	0	0.00	4.16	0.00	21.43	0.00	36.00	0.00	38.41	0.00	0.00	0.00	0.00	0.00	0.00

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Mortgage Data (Western)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 5 - Geographic Distribution of Multifamily Loans**

Geography: OKLAHOMA /TEXAS												Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	Number	% of Total **	% of Multi Units***	% of Multi Units****	% Multi Units***	% BANK Loans	% Multi Units***	% BANK Loans	% Multi Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper	
<b>State of Oklahoma:</b>																
OKC Region (FS)	0	0.00	4.94	0.00	44.08	0.00	29.86	0.00	21.13	0.00	0.00	0.00	0.00	0.00	0.00	
Payne County (FS)	3	42.8	18.09	33.33	11.45	0.00	10.00	0.00	60.46	66.67	10.00	16.67	0.00	0.00	0.00	
Tulsa County (FS)	3	42.8	3.76	0.00	28.37	0.00	38.01	0.00	29.86	100.00	2.38	0.00	0.00	0.00	11.76	
<b>State of Texas:</b>																
Dallas Region (FS)	1	14.3	15.56	100.00	31.93	0.00	29.39	0.00	23.12	0.00	0.00	0.00	0.00	0.00	0.00	
Bexar County (LS)	0	0.00	1.89	0.00	36.43	0.00	38.94	0.00	22.74	0.00	0.00	0.00	0.00	0.00	0.00	
Travis County (LS)	0	0.00	19.50	0.00	33.11	0.00	32.54	0.00	14.85	0.00	0.00	0.00	0.00	0.00	0.00	

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Mortgage Data (Western)

\*\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6 - Geographic Distribution of Small Loans to Businesses**

Geography: OKLAHOMA /TEXAS												Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	Number	% of Total **	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upper	
<b>State of Oklahoma:</b>																
OKC Region (FS)	581	36.56	6.00	6.54	30.32	19.79	33.68	39.24	26.50	34.42	1.73	2.25	1.10	2.02	2.07	
Payne County (FS)	462	29.07	9.48	18.18	17.12	14.94	47.79	27.49	25.62	39.39	13.15	32.98	17.32	7.27	14.56	
Tulsa County (FS)	323	20.33	1.73	0.62	27.30	25.70	35.46	15.79	35.50	57.89	1.10	0.54	1.19	0.53	1.58	
<b>State of Texas:</b>																
Dallas Region (FS)	164	10.32	4.85	1.22	26.21	14.02	29.59	24.39	38.14	60.37	0.10	0.03	0.06	0.09	0.15	
Bexar County (LS)	28	1.76	2.37	0.00	31.94	7.14	29.91	53.57	35.47	39.29	0.04	0.00	0.00	0.13	0.00	
Travis County (LS)	31	1.95	6.34	6.45	19.85	19.35	31.50	25.81	42.17	48.39	0.02	0.00	0.00	0.02	0.03	

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2005).

**Table 7 - Geographic Distribution of Small Loans to Farms**

Geography: OKLAHOMA /TEXAS											Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	Number	% of Total**	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	% of Farms ***	% BANK Loans	Overall	Low	Mod	Mid	Upper
<b>State of Oklahoma:</b>															
OKC Region (FS)	2	14.29	2.38	0.00	19.22	0.00	41.58	0.00	35.85	100.00	0.00	0.00	0.00	0.00	0.00
Payne County (FS)	12	85.71	0.00	0.00	9.88	0.00	61.11	50.00	29.01	50.00	4.71	0.00	0.00	4.65	5.17
Tulsa County (FS)	0	0.00	1.35	0.00	22.22	0.00	37.99	0.00	38.44	0.00	0.00	0.00	0.00	0.00	0.00
<b>State of Texas:</b>															
Dallas Region (FS)	0	0.00	3.71	0.00	22.86	0.00	32.31	0.00	40.67	0.00	0.00	0.00	0.00	0.00	0.00
Bexar County (LS)	0	0.00	1.14	0.00	25.68	0.00	27.71	0.00	45.28	0.00	0.00	0.00	0.00	0.00	0.00
Travis County (LS)	0	0.00	3.90	0.00	19.02	0.00	39.65	0.00	37.43	0.00	0.00	0.00	0.00	0.00	0.00

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2005).

**Table 8 - Borrower Distribution of Home Purchase Loans**

Geography: OKLAHOMA /TEXAS												Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	Number	% of Total**	% Families ***	% BANK Loans ****	% BANK Loans <sup>1</sup>	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upper	
<b>State of Oklahoma:</b>																
OKC Region (FS)	160	22.96	21.97	5.00	18.43	15.00	20.82	16.25	38.77	63.75	0.54	0.14	0.23	0.34	0.97	
Payne County (FS)	407	58.39	16.70	1.47	14.85	9.83	20.16	13.27	48.29	75.43	16.11	1.72	16.07	8.45	20.49	
Tulsa County (FS)	117	16.79	19.42	2.56	17.78	17.09	21.09	17.09	41.71	63.25	0.39	0.15	0.18	0.24	0.66	
<b>State of Texas:</b>																
Dallas Region (FS)	11	1.58	22.35	0.00	18.12	18.18	19.58	0.00	39.95	81.82	0.00	0.00	0.00	0.00	0.00	
Bexar County (LS)	2	0.29	22.08	0.00	18.16	50.00	20.24	0.00	39.52	50.00	0.00	0.00	0.00	0.00	0.00	
Travis County (LS)	0	0.00	21.52	0.00	17.95	0.00	21.02	0.00	39.51	0.00	0.00	0.00	0.00	0.00	0.00	

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Mortgage Data (Western)  
 \*\* As a percentage of loans with borrower income information available. No information was available for 5.4% of loans originated and purchased by bank.  
 \*\*\* Percentage of Families is based on the 2000 Census information.  
 \*\*\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.  
 1 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9 - Borrower Distribution of Home Improvement Loans**

Geography: OKLAHOMA /TEXAS												Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	Number	% of Total **	% Families ***	% BANK Loans ****	% BANK Loans <sup>2</sup>	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upper	
<b>State of Oklahoma:</b>																
OKC Region (FS)	29	35.37	21.97	6.90	18.43	3.45	20.82	6.90	38.77	82.76	0.47	0.00	0.00	0.00	1.27	
Payne County (FS)	37	45.12	16.70	8.11	14.85	0.00	20.16	18.92	48.29	72.97	13.41	14.29	0.00	10.81	17.98	
Tulsa County (FS)	16	19.51	19.42	6.25	17.78	6.25	21.09	12.50	41.71	75.00	0.48	0.43	0.24	0.23	0.77	
<b>State of Texas:</b>																
Dallas Region (FS)	0	0.00	22.35	0.00	18.12	0.00	19.58	0.00	39.95	0.00	0.00	0.00	0.00	0.00	0.00	
Bexar County (LS)	0	0.00	22.08	0.00	18.16	0.00	20.24	0.00	39.52	0.00	0.00	0.00	0.00	0.00	0.00	
Travis County (LS)	0	0.00	21.52	0.00	17.95	0.00	21.02	0.00	39.51	0.00	0.00	0.00	0.00	0.00	0.00	

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 5.4% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

2 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10 - Borrower Distribution of Home Mortgage Refinance Loans**

Geography: OKLAHOMA /TEXAS												Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	Number	% of Total**	% Families ***	% BANK Loans ****	% BANK Loans <sup>3</sup>	% BANK Loans ****	% Families ***	% BANK Loans ****	% Families ***	% BANK Loans ****	Overall	Low	Mod	Mid	Upper	
<b>State of Oklahoma:</b>																
OKC Region (FS)	89	33.97	21.97	5.62	18.43	5.62	20.82	15.73	38.77	73.03	0.39	0.12	0.03	0.22	0.73	
Payne County (FS)	127	48.47	16.70	3.94	14.85	7.87	20.16	11.81	48.29	76.38	8.35	7.14	3.76	4.17	10.83	
Tulsa County (FS)	44	16.79	19.42	4.55	17.78	11.36	21.09	11.36	41.71	72.73	0.19	0.10	0.13	0.07	0.31	
<b>State of Texas:</b>																
Dallas Region (FS)	2	0.76	22.35	0.00	18.12	0.00	19.58	50.00	39.95	50.00	0.00	0.00	0.00	0.01	0.00	
Bexar County (LS)	0	0.00	22.08	0.00	18.16	0.00	20.24	0.00	39.52	0.00	0.00	0.00	0.00	0.00	0.00	
Travis County (LS)	0	0.00	21.52	0.00	17.95	0.00	21.02	0.00	39.51	0.00	0.00	0.00	0.00	0.00	0.00	

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Mortgage Data (Western)

\*\* As a percentage of loans with borrower income information available. No information was available for 5.4% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

\*\*\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>3</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table11 - Borrower Distribution of Small Loans to Businesses**

Geography: OKLAHOMA /TEXAS					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	Number	% of Total **	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>State of Oklahoma:</b>									
OKC Region (FS)	603	37.43	61.18	78.77	50.25	23.71	26.04	1.73	3.72
Payne County (FS)	462	28.68	57.76	75.54	65.15	23.81	11.04	13.15	16.82
Tulsa County (FS)	323	20.05	63.17	61.61	54.18	21.67	24.15	1.10	1.59
<b>State of Texas:</b>									
Dallas Region (FS)	164	10.18	63.19	83.54	43.29	29.88	26.83	0.10	0.24
Bexar County (LS)	28	1.74	63.79	78.57	46.43	21.43	32.14	0.04	0.04
Travis County (LS)	31	1.92	64.41	96.77	51.61	19.35	29.03	0.02	0.06

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2005).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

**Table12 - Borrower Distribution of Small Loans to Farms**

Geography: OKLAHOMA /TEXAS					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	Number	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>State of Oklahoma:</b>									
OKC Region (FS)	2	14.29	88.12	50.00	0.00	0.00	100.00	0.00	0.00
Payne County (FS)	12	85.71	89.51	66.67	83.33	8.33	8.33	4.71	1.12
Tulsa County (FS)	0	0.00	87.39	0.00	0.00	0.00	0.00	0.00	0.00
<b>State of Texas:</b>									
Dallas Region (FS)	0	0.00	84.98	0.00	0.00	0.00	0.00	0.00	0.00
Bexar County (LS)	0	0.00	86.05	0.00	0.00	0.00	0.00	0.00	0.00
Travis County (LS)	0	0.00	85.71	0.00	0.00	0.00	0.00	0.00	0.00

FS = Full Scope  
 LS = Limited Scope

\* Based on 2004 Peer Small Business Data -- US and PR

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2005).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.



**Table 14 - Qualified Investments**

Geography: OKLAHOMA /TEXAS				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005					
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	Number	\$(000's)	Number	\$(000's)	Number	\$(000's)	% of Total	Number	\$(000's)
<b>State of Oklahoma:</b>									
OKC Region (FS)	1	232	12	797	13	1,029	17.08	0	0
Payne County (FS)	1	588	36	131	37	719	11.94	0	0
Tulsa County (FS)	1	180	14	37	15	217	3.60	0	0
Statewide Region	0	0	2	4,059	2	4,059	67.38	0	0
<b>State of Texas:</b>									
Dallas Region (FS)	0	0	2	1,106	2	1,106	100.00	0	0
Bexar County (LS)	0	0	0	0	0	0	0.00	0	0
Travis County (LS)	0	0	0	0	0	0	0.00	0	0

FS = Full Scope  
 LS = Limited Scope

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

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

**Table 15 - Distribution of Branch Delivery System and Branch Openings/Closings**

Geography: OKLAHOMA /TEXAS																Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2005			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposit in AA	Number of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				Number of Branch Openings	Number of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography					
				Low	Mod	Mid	Upper			Low	Mod	Mid	Upper	Low	Mod	Mid	Upper		
<b>State of Oklahoma:</b>																			
OKC Region (FS)	22.63	2	18.18	0.0	50.0	50.0	0.0	0	0	0	0	0	0	4.5	34.5	33.6	27.4		
Payne County (FS)	57.41	3	27.27	33.3	66.7	0.0	0.0	0	0	0	0	0	0	5.2	11.2	44.9	38.7		
Tulsa County (FS)	17.57	2	18.18	0.0	0.0	0.0	100	0	0	0	0	0	0	3.3	25.8	38.3	32.5		
<b>State of Texas:</b>																			
Dallas Region (FS)	2.36	2	18.18	0.0	0.00	0.0	100	2	0	0	0	0	+2	9.2	30.4	29.8	30.6		
Bexar County (LS)	0.00	1	9.09	0.0	0.00	100	0.0	1	0	0	0	+1	0	3.0	40.9	27.7	28.3		
Travis County (LS)	0.02	1	9.09	0.0	0.00	0.0	100	1	0	0	0	0	+1	11.5	29.3	32.4	26.4		

FS = Full Scope  
 LS = Limited Scope