



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

September 21, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of Oklahoma, National Association
Charter Number: 13679

Bank of Oklahoma Tower
Tulsa, OK 74103-0000

Office of the Comptroller of the Currency

Midsized Bank Supervision
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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.

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION	9
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	12
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	13
LENDING TEST	13
INVESTMENT TEST	23
SERVICE TEST	25
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating

Institution’s CRA Rating: This institution is rated “Outstanding.”

The following table indicates the performance level of Bank of Oklahoma, National Association (BOK) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bank of Oklahoma, N.A Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- BOK originated a significant volume and dollar amount of community development loans during the evaluation period. This, combined with innovative and flexible products, had a positive impact on the Lending Test rating.
- The lending activity in the Tulsa AA is excellent. BOK is ranked 1st in market share for both home purchase and home improvement loans. The bank is ranked 3rd in market share for home refinance loans.
- BOK is ranked on the FDIC Market Share Report as the largest bank in the Tulsa AA with 24.93 percent of the deposit market share out of 274 institutions reporting as of June 30, 2008.
- The overall distribution of small business loans by the income levels of the geography is excellent.
- The overall distribution of home mortgage loans by the income levels of the geography is adequate. The bank’s market share for home purchase loans, which is the primary HMDA product, was near to its overall market share for low- and-moderate CTs in both full-scope assessment areas.
- The borrower distribution of home mortgage products to moderate-income borrowers is good in both full-scope AAs. The distribution of home mortgage loans among low-income borrowers is adequate.
- The bank has a good level of community development investments and has taken an active role in seeking out investment opportunities that exist within its full-scope AAs.
- A substantial majority of BOK’s home mortgage loans and small business loans were originated within the bank’s assessment areas.

- Delivery systems are readily accessible to individuals and businesses of different income levels throughout the bank's full-scope AAs. The distribution of branches in the Tulsa AA is excellent.
- BOK is a leader in providing community development services in its full-scope AAs.

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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 householder 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 additional 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: 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: 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: 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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Description of Institution

Bank of Oklahoma, N.A. (BOK) is an intrastate bank headquartered in Tulsa, Oklahoma. BOK has eighty-eight branches located in the state of Oklahoma. BOK is ranked on the FDIC Market Share Report as the largest bank in Tulsa with 24.93 percent of the market share out of 274 institutions reporting as of June 30, 2008. As of June 30, 2009, BOK reported total assets of \$15.9 billion, Tier One capital of \$1 billion, and a loan-to-deposit (LTD) ratio of approximately 98 percent. BOK is a wholly-owned subsidiary of BOK Financial Corporation (BOKF), a multi-bank holding company, headquartered in Tulsa, Oklahoma. BOKF also owns banks in Arizona (Bank of Arizona, N.A.), Arkansas (Bank of Arkansas, N.A.), Colorado (Colorado State Bank and Trust, N.A.), Kansas (Bank of Kansas, N.A.), New Mexico (Bank of Albuquerque, N.A.), and Texas (Bank of Texas, N.A.) BOKF engages in mortgage activities through the BOK mortgage division. These activities include the origination, marketing, and servicing of conventional and government-sponsored mortgage loans. The mortgage loans originated by BOK Mortgage that are located in the affiliated bank's primary market areas are credited to the individual banks for the evaluation of CRA performance. BOK also makes HMDA loans through its consumer division. The tables in Appendix C and all discussion in this Performance Evaluation are based on the combined HMDA loans originated by the mortgage and banking departments.

As part of this evaluation, consideration of lending and investment activities of other BOKF affiliates and subsidiaries were considered. This includes the following affiliates and subsidiaries:

- BOKF Community Development Fund (BOKFCDC) for alternative investments
- Pacesetters (BOKF subsidiary) – Pacesetters holds three low-income housing tax credit investments; two of which are in Oklahoma: Norman Senior Apartments \$1,378M and Savannah Point \$1,870M
- BOK Foundation for grants and contributions

BOK is a commercial middle market bank whose strategy centers on commercial and industrial lending and consumer and wealth management. Products include energy, commercial and industrial, real estate, health care and small business. As of June 30, 2009, net loans and leases represent approximately 51 percent of total assets with commercial and commercial real estate loans accounting for 55 percent of the loan portfolio. The high concentration of commercial loans is in line with the bank's business strategy. Residential Real Estate loans account for 20 percent of the loan portfolio. Construction and land development loans account for 15 percent of the loan portfolio followed by consumer loans representing 6 percent and Ag loans representing 2 percent of the loan portfolio. Other loans and loans to U.S. banks comprise the remaining 2 percent of the loan portfolio.

There are no significant financial or legal barriers limiting BOK's ability to help meet the identified credit needs of its AAs. The bank is financially capable of meeting almost any request for credit, subject to certain legal restrictions applicable to all national banks.

The Office of the Comptroller of the Currency last evaluated BOK's CRA performance on May 29, 2006. The bank received an overall rating of "Outstanding" at that evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses performance under the Lending, Investment, and Service tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and farms, and community development (CD) loans. With the exception of CD loans, the evaluation period for the Lending Test is January 1, 2006 through December 31, 2008. For CD loans and the Investment and Service Tests, the evaluation period is May 29, 2006, which was the date of the last Performance Evaluation, through September 21, 2009. The Investment Test includes a review of investments, grants, and donations made in the AAs that meet the definition of CD investments. The Service Test includes a review of retail and CD services in the AAs. Conclusions regarding the Lending Test are based on three entire years (2006, 2007, and 2008). This information is evaluated using the 2000 Census demographics for home loans and 2008 Dun and Bradstreet demographics for businesses. Appendix C contains tables reflecting the overall performance.

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, improvement, and multifamily loans; and small loans to businesses and farms. We also verified the bank's reporting of CD loans, investments, and services at the examination. Based on the results of our review, we considered the lending data and CD loans to be reliable.

Selection of Areas for Full-Scope Review

During the review period, BOK had two full-scope assessment areas. These were the Tulsa AA and Oklahoma City AA. The majority of the BOK deposits are in these two assessment areas. Per the FDIC June 30, 2008 institution deposit summary, Tulsa AA has 55 percent and Oklahoma City has 33 percent of the bank's deposits. These two full scope areas have 87 percent of total reported HMDA and CRA loans reported during the review period. Tulsa AA had 51 percent and Oklahoma City AA had 36 percent of the HMDA, CRA reportable loans and Community Development loans.

Limited-scope reviews were conducted for Bartlesville AA, Enid AA, Grove AA, Kay County AA, Muskogee AA and Stillwater AA.

Please refer to the table in Appendix A: Scope of the Examination, for additional information.

Ratings

The overall rating is based primarily on activity in the two full-scope assessment areas.

The Tulsa AA has 55 percent of the bank's deposit base and 51 percent of the bank's HMDA and CRA reportable loans. Therefore, more weight was given to performance in the Tulsa AA. As for loan products in the Tulsa AA, the bank had a greater amount of HMDA loans with 82 percent of the reported loans for 2006-2008. Small business lending was 17 percent of the reported loans during this time-period. Small farm lending was less than 1 percent of the reported loans. Therefore, HMDA lending performance was assigned more weight in the final ratings. Further analyzing the Tulsa AA HMDA products, over the three year period, purchase home loans were the greatest portion of home mortgage products at 68 percent of the reported loans. Home refinance was 19 percent and home improvement was 13 percent of total reported loans. No weight was assigned to small farm loans as the small farm loans represented less than one percent of the total reported loans.

The Oklahoma City AA has 33 percent of the bank's deposit base and 36 percent of the bank's HMDA and CRA reportable loans. Therefore, some weight was given to performance in the Oklahoma City AA. As for loan products in the Oklahoma City AA, the bank had a greater amount of HMDA loans with 79 percent of the reported loans for 2006-2008. Small business lending was 20 percent of the reported loans during this time-period. Small farm lending was less than 1 percent of the reported loans. Therefore, HMDA lending performance was assigned more weight in the final ratings. Further analyzing the Oklahoma City HMDA products, over the three year period, purchase home loans were the greatest portion of home mortgage products at 75 percent of the reported loans. Home refinance was 15 percent and home improvement was 10 percent of total reported loans. No weight was assigned to small farm loans as the small farm loans represented less than one percent of the total reported loans.

In summary, Tulsa AA will receive the greatest weight on the Lending Test of the two full-scope assessment areas. HMDA loan products will receive the greatest weight in the final ratings, in addition to the Community Development activities in the three full-scope areas.

Community Contacts

Oklahoma City AA:

During the examination, we reviewed several community contacts that were conducted in the Oklahoma City AA. The group of contacts included entities engaged in small business development, affordable housing and neighborhood associations. Community contacts most commonly cited the continuing need for small business and affordable housing loans, affordable housing, both rental and owner occupied, and financial education programs.

Tulsa AA:

During the examination, we conducted a community contact in the Tulsa AA. The contact entity is engaged in community development, affordable housing, and neighborhood associations. This community contact cited the continuing need for affordable housing. The

contact stated that the greatest need is for social, family and financial educational programs. The contact stated the community was in need of a program that promoted good fatherhood/parenting practices which would help promote intact birth families. Contact also stated a need for programs and jobs for persons in lower economic situations which would give them hope for a better future. Contact stated that many local area banks and their employees are active in the community by teaching sound financial practices. Contact was not aware of any discriminatory practices by local financial institutions.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "Outstanding." The overall distribution of loans by income levels of borrower is excellent. The overall distribution of loans by the income levels of the geography is adequate. CD lending had a positive effect on the final rating. The bank's performance rating also includes positive consideration for product innovativeness and flexibility.

Lending Activity

Refer to Table 1 lending volume in State of Oklahoma section of Appendix D for the facts and data used to evaluate the bank's lending activity.

The bank's lending levels reflect excellent responsiveness in relation to the bank's deposit market share and area credit needs.

BOK is a predominant lender for home mortgage products in the Oklahoma City AA. Based on 2008 Peer Mortgage Data, BOK is ranked 6th in market share with 4.66 percent of market share in the Oklahoma City AA for home purchase loans. There are 363 home purchase lenders in this AA. The bank is also ranked 5th in market share with 5.67 percent of market share in the Oklahoma City AA for home improvement loans. The bank is ranked 11th in market share for home refinance loans with a market share of 2.75 percent in the Oklahoma City AA. Based on 2008 Peer Small Business Data, BOK was ranked 15th out of 91 lenders in the Oklahoma City AA for small loans to businesses by number with 1.34 percent market share. BOK was 2nd by dollar with 12.35 percent market share for small loans to businesses. BOK is ranked 2nd in deposit market share for the Oklahoma City Region.

BOK is the most predominant lender for home mortgage products in the Tulsa AA. Based on 2008 Peer Mortgage Data, BOK is ranked 1st in market share with 9.18 percent of market share in the Tulsa AA for home purchase loans. There are 317 home purchase lenders in this AA. The bank is also ranked 1st in market share with 13.59 percent of market share in the Tulsa AA for home improvement loans. The bank is ranked 3rd in market share for home refinance loans with a market share of 6.61 percent in the Tulsa AA. Based on 2008 Peer Small Business Data, BOK was ranked 12th out of 68 lenders in the Tulsa AA for small loans to businesses by number with 1.99 percent market share. BOK was 2nd by dollar with 16.69 percent market share for small loans to businesses. BOK is ranked on the FDIC Market Share Report as the largest bank in Tulsa with 24.93 percent of the deposit market share out of 274 institutions reporting as of June 30, 2008.

Distribution of Loans by Income Level of the Geography

The geographic distribution of loans by income level of the geography is adequate.

Home Mortgage Loans

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

Oklahoma City AA

In evaluating the geographic distribution of home loans in the Oklahoma City AA, it is important to note the number of low-and-moderate income tracts and the population distribution in these tracts. The Oklahoma City AA contains 23 low-income tracts, and 90 moderate-income tracts. There are 13,105 households (3 percent of total households) living in low-income tracts, and 105,444 households (28 percent of total households) living in moderate-income tracts. It is also important to note the number of households that live below the poverty level in these tracts. The low-income tracts contain 11 percent of households living below the poverty level. The moderate-income tracts contain 44 percent of households living below the poverty level. The significant level of households living below the poverty level makes lending for home mortgages difficult in the low-and-moderate income tracts.

The number and percentage of owner-occupied housing units in low-income geographies is relatively low at 4,856 units representing 2.03 percent of total owner-occupied units in the Oklahoma City AA, indicating relatively fewer opportunities to originate home mortgage loans in low-income geographies.

Home Purchase

The geographic distribution of home purchase loans is poor. In 2006-2008, the percentage of home purchase loans in low-income geographies is lower than the percentage of owner-occupied housing units. The bank's market share for home purchase loans in low-income geographies substantially meets its overall market share. BOK percentage of home purchase loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units. The bank's market share for home purchase loans in moderate-income geographies is below its overall market share.

Home Improvement

The geographic distribution of home improvement loans is poor. In 2006-2008, the bank's distribution of home improvement loans in low-income geographies is lower than the percentage of owner-occupied housing units. The bank's market share in low-income geographies is lower than its overall market share for home improvement loans. The percentage of home improvement loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units. BOK's market share in moderate-income geographies is lower than the bank's overall market share.

Home Refinancing

The geographic distribution of home refinance loans is poor. In 2006-2008, the percentage of home refinance loans in low-income geographies is significantly below the percentage of owner-occupied housing units. The bank's market share in low-income geographies is lower

than its overall market share for home improvement loans. Loan originations in moderate-income CTs are somewhat lower than the percentage of owner-occupied housing units. The market share of loans in moderate-income CTs is somewhat lower than its overall market share for home refinance loans.

Multifamily

In 2006-2008, BOK originated 4 multifamily loans in the Oklahoma City AA. This product had too few loans for a meaningful analysis. Two of these or 50 percent were located in moderate-income geographies. This exceeded the number of multifamily units located in moderate-income tracts for the Oklahoma City AA. The bank's market share for multifamily loans in moderate income geographies is near to its overall market share. BOK did not make any multifamily loans in low-income geographies.

Tulsa AA

The number and percentage of owner-occupied housing units in low-income geographies is relatively low at 2,093 units representing 1.06 percent owner-occupied housing units, indicating relatively fewer opportunities to originate home mortgage loans in low-income geographies. This can partially explain lending performance below comparable demographics in low-income CTs. As only 1 percent of owner-occupied homes are in these tracts, any penetration would be notable.

Home Purchase

The geographic distribution of home purchase loans is poor. In 2006-2008, the percentage of home purchase loans in low-income geographies is significantly lower than the percentage of owner-occupied housing units. The bank's market share in low-income geographies is lower than its overall market share for home purchase loans. The percentage of home purchase loans in moderate-income geographies is lower than the percentage of owner-occupied housing units. The bank's market share in moderate-income geographies is near to its overall market share for home purchase loans.

Home Improvement

The geographic distribution of home improvement loans is adequate. In 2006-2008, the percentage of home improvement loans in low-income geographies is somewhat lower than the percentage of owner-occupied housing units. The bank's market share of home improvement loans in low-income geographies exceeds its overall market share for home improvement loans. The percentage of home improvement loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied housing units. The bank's market share in moderate-income geographies exceeds its overall market share for home improvement loans.

Home Refinancing

The geographic distribution of home refinance loans is adequate. In 2006-2008, the percentage of home refinance loans in low-income geographies is lower than the percentage of owner-occupied housing units. The bank's market share of refinance loans in low-income

geographies is lower than its overall market share for refinance loans. The percentage of loans in moderate-income CTs is somewhat lower than the percentage of owner-occupied housing units. BOK's market share in moderate-income geographies is near to its overall market share for home refinance loans.

Multifamily

The bank originated eight multifamily loans during the evaluation period. This product had too few loans for a meaningful analysis. Twenty five percent of these were located in moderate-income geographies. This exceeded the percentage of multifamily units in the Tulsa AA. The bank did not have a notable market share in moderate-income geographies for multifamily loans.

Small Loans to Businesses

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

Oklahoma City AA

BOK's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses located in low-income tracts. BOK's market share of small loans to businesses in low-income geographies significantly exceeds its overall market share. BOK's percentage of small loans to businesses in moderate-income geographies substantially meets to the percentage of businesses located in moderate-income CTs. The bank's market share of loans in moderate-income geographies exceeds to its overall market share for small loans to businesses.

Tulsa AA

BOK's geographic distribution of small loans to businesses is excellent. The percentage of small loans to businesses in low-income tracts exceeds the percentage of businesses located in low-income tracts. The bank's market share of business loans in low-income tracts significantly exceeds its overall market share for small loans to businesses. BOK's percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses located in moderate-income CTs. The bank's market share of loans in moderate-income geographies significantly exceeds its overall market share for small loans to businesses.

Small Loans to Farms

Refer to Table 7 in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Small loans to farms comprised approximately 0.08 percent of total loans reported in the Oklahoma City AA and 0.15 percent of total loans reported in the Tulsa AA. Therefore, an analysis was not conducted for this loan type due to the low volume of loans reported.

Lending Gap Analysis

Reports and maps detailing BOK's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained gaps were identified.

Inside/Outside Ratio

A substantial majority of BOK's home mortgage loans originated in the combined AA's. For the 2006-2008 evaluation period, approximately 87 percent of the number of loans originated in the bank's combined AA's. The percentage of loans by dollar amount originated in the AA was the same. A substantial majority of small loans to businesses, approximately 95 percent of the number of loans also originated in BOK's combined AA's. The percentage of loans by dollar amount originated in the AA was the same.

Distribution of Loans by Income Level of the Borrower

The distribution of loans by income level of the borrower is good.

Home Mortgage Loans

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

Overall, the distribution of home mortgage loans by income level of borrower is good in the Oklahoma City AA and Tulsa AA. 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 living below poverty level based on the 2000 census data is 13 percent for the Oklahoma City AA and 11 percent for the Tulsa AA.

Oklahoma City AA

Home Purchase

The borrower distribution of home purchase loans is good. The percentage of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on opportunities to lend to the low-income segment of the community. BOK's market share to low-income borrowers exceeds its overall share of the home purchase market. The bank's market share to moderate-income borrowers is near its overall market share of the home purchase market.

Home Improvement

The borrower distribution of home improvement loans is good. The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the percentage of home improvement loans to low-income

borrowers is somewhat lower than the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on opportunities to lend to the low-income segment of the community. BOK's market share to low-income borrowers is near to its overall share of the home improvement market. The bank's market share to moderate-income borrowers is near its overall market share of the home improvement market.

Home Refinance

The borrower distribution of home refinance loans is good. The percentage of home refinance loans to moderate-income borrowers is near the percentage of moderate-income families in the AA. While the percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on opportunities to lend to the low-income segment of the community. BOK's market share to low-income borrowers is near its overall share of the home refinance market. The bank's market share to moderate-income borrowers is near its overall market share of the home refinance market.

Tulsa AA

Home Purchase

The borrower distribution of home purchase loans is good. The percentage of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. While the percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on opportunities to lend to the low-income segment of the community. BOK's market share to low-income borrowers exceeds its overall share of the home purchase market. The bank's market share to moderate-income borrowers is near its overall market share of the home purchase market.

Home Improvement

The borrower distribution of home improvement loans is good. The percentage of home improvement loans to moderate-income borrowers is near the percentage of moderate-income families in the AA. While the percentage of home improvement loans to low-income borrowers is somewhat lower than the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on opportunities to lend to the low-income segment of the community. BOK's market share to low-income borrowers exceeds its overall share of the home improvement market. The bank's market share to moderate-income borrowers is near its overall market share of the home improvement market.

Home Refinance

The borrower distribution of home refinance loans is good. The percentage of home refinance loans to moderate-income borrowers is near the percentage of moderate-income families in the AA. While the percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families in the AA, consideration is given to the impact that the area's poverty level has on opportunities to lend to the low-income segment of the community.

BOK's market share to low-income borrowers is near its overall share of the home refinance market. The bank's market share to moderate-income borrowers is near its overall market share of the home refinance market.

Small Loans to Businesses

BOK had an adequate performance level of making small loans to businesses in both full-scope areas.

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

Oklahoma City AA

BOK's penetration of small loans to businesses with revenues of \$1 million or less is adequate. The percentage of small loans to businesses is somewhat lower than the percentage of businesses with revenues of \$1 million or less in the AA. The bank's market share to businesses with revenues of \$1 million or less exceeds its overall market share of small loans to businesses, regardless of revenue size.

Tulsa AA

BOK's penetration of small loans to businesses with revenues of \$1 million or less is adequate. The percentage of small loans to businesses is somewhat lower than the percentage of businesses with revenues of \$1 million or less in the AA. The bank's market share to businesses with revenues of \$1 million or less significantly exceeds its overall market share of small loans to businesses, regardless of revenue size.

Small Loans to Farms

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 businesses.

Small loans to farms comprised approximately 0.08 percent of total loans reported in the Oklahoma City AA and 0.15 percent of total loans reported in the Tulsa AA. Therefore, an analysis was not conducted for this loan type due to the low volume of loans reported

Community Development Lending

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 multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Full-Scope Areas

Community development lending has a very positive impact on the Lending Test conclusions, particularly in the Tulsa and Oklahoma City AAs. The bank's CD loans primarily help to revitalize and stabilize low- and moderate-income (LMI) geographies, particularly in areas

designated as either federal or state Enterprise Zones. Although the opportunities for CD lending in the Tulsa AA and Oklahoma City AA are relatively high, the number and dollar amount of CD loans originated by BOK in these areas is considered significant.

Oklahoma City AA

The bank originated an excellent level of CD loans within the Oklahoma City AA during the evaluation period. BOK originated 48 CD loans totaling \$141 million. This represents 41 percent of allocated Tier 1 capital. This includes 6 loans totaling \$7.5 million for affordable housing, 11 loans totaling \$9.4 million for services targeting LMI individuals, 9 loans totaling \$61.9 million for economic development, and 22 loans totaling \$62.9 million for revitalization and stabilization of LMI areas. A substantial portion of downtown Oklahoma City is located in a federally designated Empowerment Zone. The bank has a substantial amount of lending in this area, primarily related to revitalization and stabilization.

Examples of community development loans and commitments are highlighted below:

- BOK originated 8 loans totaling \$19.8 million to an entity that purchased and rehabilitated properties in midtown Oklahoma City. The purpose of the loans is to finance the acquisition and improvement of properties in the Midtown area. The Midtown District of Oklahoma City is a 387-acre area bounded by North 4th Street on the south, North 13th Street on the north, Broadway on the east, and Classen Boulevard on the west. The Midtown area was developed in the early 20th century and contains very old buildings and housing stock. This area is part of the OKC MAPS 2010 Downtown Plan to revitalize and stabilize low- and moderate-income communities. The area is Empowerment and Enterprise Zones.
- The bank originated a \$1.9 million loan to a company that rehabilitates multifamily housing to be leased to low- and moderate-income individuals and families. The funds were used to purchase a 96-unit apartment complex located in Oklahoma City. All units are available for Section 8 housing vouchers.
- BOK originated two loans totaling \$3.2 million to a 501c3 not-for-profit health-care facility. The entity has been designated to provide mental health services to patients. The entity's services or programs primarily benefits LMI individuals and families. The clinic provides medication to severely mentally ill patients sometimes without charge or through an assistance program based on need and limited income. The entity is a licensed Oklahoma DHS agency and is a United Way Partner agency.
- BOK originated 5 loans totaling \$54.5 million to a bottling company. The purpose of the loans was for working capital, financing fixed assets, and issuance of letters of credit. The facility is located in a low-income census tract and in a designated Empowerment and Enterprise Zone. The presence of the company in a low-income census tract has helped to revitalize and stabilize the area. Ancillary businesses have opened up near the bottling plant. The company employs over 1,000 employees at all of its Oklahoma facilities. The company provides permanent employment to low- and moderate-income individuals. More than 50% of employees make less than the Oklahoma City median family income.

Tulsa AA

The bank originated an excellent level of CD loans within the Tulsa AA during the evaluation period. BOK originated 59 CD loans totaling \$185 million. This represents 32 percent of Allocated Tier 1 capital. This includes 13 loans totaling \$12.9 million for affordable housing, 18 loans totaling \$7.3 million for services targeting LMI individuals, 19 loans totaling \$115.9 million for economic development, and 9 loans totaling \$49.1 million for revitalization and stabilization of LMI areas. Several CTs within Tulsa County have been designated as part of the Oklahoma Enterprise Zone. The bank has made loans in several of these tracts and has helped to revitalize and stabilize these areas.

Examples of community development loans and commitments are highlighted below:

- BOK originated two loans totaling \$6.2 million to a city of Tulsa housing agency that provides affordable mixed housing units to low- and moderate-income individuals and families. The entity purchased a mid-rise apartment building in southwest Tulsa and rehabilitated the units to house low- and moderate-income adults diagnosed with mental disabilities.
- The bank originated a \$5.4 million loan to a developer who used the funds to purchase and renovate a 348 unit apartment complex in Tulsa. The property is rated “C” class. The units are considered affordable housing. The rents for the apartments will be below market rate rents.
- BOK originated two loans totaling \$4 million to a nonprofit entity that provides outpatient behavioral health care and family services. The entity serves predominately low- and moderate-income and uninsured children, families, and adults of all ages.

Product Innovation and Flexibility

BOK has several innovative and flexible loan products. The use of these products has a positive impact on the bank’s overall lending rating. The products consist of the following:

Low Income Housing Tax Credit (LIHTC) Lending

The LIHTC is a tax credit created under the Tax Reform Act of 1986 that gives incentives for the utilization of private equity in the development of affordable housing aimed at low-income Americans. The LIHTC provides funding for the development costs of low-income housing by allowing a taxpayer to take a federal tax credit equal to a large percent of the cost incurred for development of the low-income units in a rental housing project.

During this evaluation period, BOK originated 7 LIHTC loans for a total of \$12 million in either construction loans and/or permanent debt utilizing this program; all targeting affordable housing throughout the State of Oklahoma. A total of 225 affordable units were created through these lending efforts.

New Market Tax Credit Program (NMTC)

During the examination period BOKFCDF was awarded \$35 million in tax credit allocation authority in round 6 of the New Market Tax Credit program with the Community Development Financial Institution (CDFI) fund in 2008 and close on the allocation authority in March 2009. No loans were reported under this program during this examination cycle.

HUD 184 Mortgage Loans

HUD section 184 is a specialized program to specifically help meet the needs of the Native American, Alaskan Native and New Mexican Pueblo Homebuyers, Indian Tribes, Tribally Designated Housing Entities and Indian Housing Authorities. The HUD Section 184 product can be used to originate mortgages for 1-4 unit dwellings located on both fee simple and restricted lands.

During this evaluation period, BOK originated 199 HUD 184 mortgage loans for a total of \$24 million benefiting the State of Oklahoma and supporting Native American initiatives.

Zero Down Homeward Bound (ZDHB) Home Mortgage Product – 103% Financing

This product provides financing in LMI geographies or to LMI families and individuals for purchasing or refinancing a home. The program offers 15 or 30 year fixed rate mortgages up to \$165,000 with no down payment requirements, a loan to value up to 103 percent (includes closing costs and any prepaid insurance), and does not require private mortgage insurance. BOKF (BOK's parent company) originally set aside \$100 million for this particular program.

This product was offered through Freddie Mac from 2006 through Summer 2008. The program ended in the summer of 2008, as financial markets started to decline and Freddie Mac would no longer purchase this product.

During the evaluation period, BOK originated 1,630 ZDHB mortgage loans for a total of \$137 million benefiting the State of Oklahoma. 365 of these loans were originated in LMI communities for a total of \$24 million. 1,472 of these loans were to families with income levels at or below 80% of state median income of \$44,000.

Mortgage Modification

During this examination period, BOK modified 142 mortgage loans for a total of \$11 million. \$10 million of these were in the bank's assessment areas. These loans are not reflected on the HMDA loan application register. Out of the 122 loans originated in the bank's assessment areas, 74 were to borrowers with household income lower than \$44,000 per year. This income level would be considered moderate income for both the Oklahoma City and Tulsa AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

The bank's community development lending performance in limited-scope assessment areas is weaker than the full-scope areas, with the exception of the Enid AA and Muskogee AA. Performance in the Enid AA and Muskogee AA is not inconsistent with performance in the full-scope areas. BOK originated 7 community development loans in Enid totaling \$61.6 million to a food distribution company. The business is located in an Enterprise Zone. Approximately 500 new jobs were created. BOK originated 5 community development loans in Muskogee totaling \$5.3 million.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "High Satisfactory." Investment levels are high, and the bank has taken a more active role in creating investment opportunities.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

BOK participates in a program to purchase pools of affordable housing mortgages originated in its AA's. The Investment Portfolio Manager has distributed the bank's AA information to various mortgage originators and securities dealers who, in turn, provide lists of new mortgages available for sale. The Manager then selects mortgages and the originator or broker pools them into a MBS, which is purchased by the bank. The security is split between BOK and affiliates based on the location of the mortgage origination. The bank has developed a model in which city, state, and income information is input to verify that each mortgage qualifies. Purchase of these MBS creates additional lending capacity for affordable housing in the bank's affected AA's. Affordable housing has been identified as a primary need in the bank's full scope AA's.

Investments also consist of grants and donations extended in all AA's to organizations that promote community development as defined by the regulation. The bank has created an innovative program that focuses on building strong partnerships with non-profit agencies in the communities it serves. The program is called the Adopt-An-Agency Program. The bank directs resources, both in dollars and volunteer hours, to these identified agencies in their AA's. These agencies serve in the areas of affordable housing, community services, financial education, and economic development. BOK has contributed \$371,730 in grants and donations to qualified programs during the evaluation period.

The bank recognized the need for innovative investments for the purpose of promoting economic and industrial development, promoting creation and retention of jobs, and engaging in other public welfare investments to meet the needs of the communities served. Therefore, BOK and BOKF formed a community development company (BOKF Community Development Corporation) to address these needs throughout the organization's AA's.

Oklahoma City AA

BOK has a good level of qualified investments in the Oklahoma City AA totaling \$38.1 million. This represents 11 percent of allocated Tier 1 capital. However, new mortgage backed securities purchased during the evaluation period totaled \$10 million, which represents 3 percent of allocated Tier 1 capital. Additionally, grants and donations of \$127,900 were made to organizations providing affordable housing, urban renewal, and other social services targeting low- and moderate-income individuals or families.

Prior period investments include the purchase of Low Income Housing Tax Credits (LIHTCs) in 2 affordable housing projects in the AA. These LIHTCS were purchased in 1998 with an original cost of \$5.8 million and now have an amortized book balance of \$3.2 million.

Tulsa AA

BOK has a good level of qualified investments in the Tulsa AA totaling \$18.7 million. This represents 3 percent of allocated Tier 1 capital. Mortgage backed securities purchased during the evaluation period totaled \$18.4 million. Approximately \$6 million of these were current period investments, which represents 1 percent of allocated Tier 1 capital. Additionally, grants and donations totaling \$234,630 were made to organizations providing affordable housing, urban renewal, and other social services targeting low- and moderate-income individuals or families.

Statewide Investments

In addition to the community development efforts of BOK, we also considered investments and commitments made by the Community Development Fund of the holding company. Funded statewide investments during this evaluation period total \$7 million, \$3.8 million of which were current period investments. These investments or commitments are further described as follows:

BOKF Community Development Fund (BOKFCDF)

The bank recognized the need for creative and innovative investments for the purpose of promoting constructive economic and industrial development, promoting creation and retention of jobs and tax base, and engaging in other public welfare investments to meet the needs of the communities served. As the bank determines needs in its assessment areas, the BOKFCDF will assume a role to best serve accomplishing the objective and completing a particular project. As an example this role may be lender, developer, or conduit for equity and debt.

During this evaluation period a total of \$61.8 million was committed and or invested by the BOKF Community Development Fund targeted specifically to Oklahoma and the bank's assessment areas. *Of this amount, \$3.2 million are prior period investments and \$3.8 million were invested during this evaluation period.* The bank has \$54.8 million in unfunded commitments. An example of the banks investments are below:

- During the evaluation period, \$3,000,000 was commitment to affordable housing in partnership with Community Capital Management through the CRA Qualified Investment Fund.

The funds were invested as part of a \$10 million community development investment Bank of Oklahoma made on behalf of itself and its bank affiliates with Community Capital Management. Community Capital Management's flagship product, the CRA Qualified Investment Fund (CRAIX), was established in August, 1999, and manages \$875 million in community and economic development investments.

- During the examination period BOKFCDF invested in one multi-investor fund (\$5 million) and developed the organizations first private label Low Income Housing Tax Credit (LIHTC) fund in the amount of \$25 million (\$15 million targeted specifically to Oklahoma markets). A total of \$20 million dollars is targeted for Oklahoma to construct new affordable housing units.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's investment performance in the Bartlesville AA, and Grove AA are not inconsistent with the bank's overall "High Satisfactory" performance in the full-scope areas. The bank's investment performance in Kay County, Muskogee and Stillwater AA is weaker than the bank's overall "High Satisfactory" performance under the Investment Test. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test is rated "Outstanding." Based on full-scope reviews, the bank's performance is good in the Oklahoma City AA and excellent in the Tulsa AA. More weight was given to the branch distribution in the Tulsa AA. The Tulsa AA has 51 percent of total reportable loans and 55 percent of deposits for the institution.

Retail Banking Services

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.

Oklahoma City AA

The distribution of branches in the Oklahoma City AA is good. There are 34 branches in this AA and 26 branches or 76.5% are located in or within a two-mile radius of low- or moderate-income census tract. There are 7 (21 percent) branches in moderate-income CTs. This distribution is somewhat lower than the percentage of population in low-income and moderate-income CTs in the AA (27.66 percent). A majority of the bank's branches are accessible to low-income and moderate-income geographies and individuals.

Three branches were closed in the AA since the previous performance evaluation, one in an upper-income CT, one in a middle-income CT, and one in a moderate-income CT. This did not affect accessibility as the bank replaced these three branches with eight new branches in the Oklahoma City AA. There were eight openings in the Oklahoma City AA since the last performance evaluation, three in an upper-income CT, four in a middle-income CT, and one in a moderate-income CT. Twenty-two branches in the Oklahoma City AA (65 percent) have a bus stop either in front of or within a one mile radius of a branch.

Tulsa AA

The distribution of branches in the Tulsa AA is excellent. BOK operates 40 branches in the Tulsa AA. There are two (5 percent) branches in low-income CTs. This distribution exceeds the percentage (2 percent) of population in low-income CTs. There are six (15 percent) branches in moderate-income CTs. This distribution is lower than the percentage (21 percent) of population in moderate-income CTs in the AA. However, a majority of the bank's branches are accessible to low-income and moderate-income geographies and individuals. Twenty-five

of the bank's 40 branches (63 percent) are located in or within two miles of a low-income or moderate-income CT.

Seven branches were closed in the AA since the previous performance evaluation, three in an upper-income CT, three in a middle-income CT, and one in a moderate-income CT. There were 13 openings in the Tulsa AA since the last performance evaluation, seven in upper-income CT, four in middle-income CT, and two in moderate-income CT. Accessibility in the Tulsa AA was improved with the opening of these 13 branches, which included two branches located in moderate-income tracts. Thirty branches in the Tulsa AA (75 percent) have a bus stop either in front of or within a one mile radius of a branch.

The bank's hours, services and products offered do not vary in a way that inconveniences any portion of the assessment areas, including low- and moderate-income persons and geographies, and banking hours are consistent throughout the assessment areas. Standard lobby hours of operation for traditional branches are 9 a.m. to 4 p.m. Monday through Thursday, and 9:00 a.m. to 6:00 p.m. on Friday, with drive-in hours from 9:00 a.m. to 6:00 p.m. during weekdays, and 9:00 a.m. to 1:00 p.m. on Saturday.

BOK has several alternative delivery systems for many of its products and services. These systems are designed to provide banking products and services in innovative ways to ensure BOK is able to reach low-and-moderate-income customers at their point of need. These alternative delivery systems include, 24-hour express banking, toll-free banking, free online banking and Bill Pay. The Express Banking telephone system allows 24 hour access for both loan and deposit services, and incorporates the use of a language-line service that is available in many languages. These services expand the opportunity for conducting business without traveling to a branch or ATM. Furthermore the services are readily available and beneficial to individuals of all income levels.

Loan and deposit services available throughout the AA's include mortgage products (including affordable housing mortgage products), small business banking products (including SBA guaranteed loans).

Community Development Services

BOK provides an excellent level of community development services in the Tulsa and Oklahoma City AA's. These services are concentrated in three types of qualifying services – fundraising, financial literacy, and technical financial assistance – for non profits and governmental groups whose primary purpose is community development. BOK volunteers have provided thousands of hours of technical assistance to public and private organizations or their activities whose primary purpose is community development. Many of the volunteers have served in leadership positions for fundraising efforts, to bring revitalization or stabilization projects primarily to the North Tulsa area, and to ensure financial literacy education is provided to low- and moderate-income persons and families.

The strategy of the Community Development Banking Group is to provide low- and moderate-income individuals and families with financial education products and services through various partnerships. Examples of BOK's involvement in community development service projects include the "Adopt-An-Agency Program." FDIC Money Smart financial education, Individual Development Account savings programs and the Earned Income Tax Credit program.

BOK continues its “Adopt-An-Agency Program,” which fosters partnerships between leading non profit agencies and the bank in each of the bank’s AA’s. The goal is to promote and provide community development services for low- and moderate-income individuals and families. The program is implemented through the retail branch locations using volunteer support to provide a wide variety of community development services related to affordable housing, and financial literacy, and revitalization/stabilization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance in the Muskogee and Stillwater AAs is not inconsistent with the overall “Outstanding” rating. The bank’s performance in the Bartlesville AA, Enid AA, Grove AA, and Kay County AAs is weaker than the bank’s overall “Outstanding” rating.

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 nonmetropolitan 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”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/2006 to 12/31/2008) Investment and Service Tests and CD Loans: (05/29/2006 to 09/21/2009)	
Financial Institution	Products Reviewed	
Bank of Oklahoma, National Association (BOK) (NA) Tulsa, Oklahoma	Home Mortgage Loans, Small Loans to Businesses and Farms, Community Development Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Bank of Arizona, NA Bank of Albuquerque, NA Bank of Arkansas, NA Bank of Kansas City, NA Bank of Texas, NA Colorado State Bank and Trust, NA	Affiliates	Home Mortgage Loans, Small Loans to Businesses and Farms
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Oklahoma City Tulsa Bartlesville Enid Grove Kay Muskogee Stillwater	Full-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope	Canadian, Cleveland and Oklahoma Counties Creek, Rogers, Tulsa and Wagoner Counties Washington County Garfield County Delaware County Kay County McIntosh, Muskogee, and Pittsburg Counties Payne County

Appendix B: Market Profiles for Full-Scope Areas

Oklahoma City AA

Demographic Information for Full-Scope Area: Oklahoma City AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	303	7.59	29.70	34.98	26.07	1.65
Population by Geography	956,161	4.02	27.66	36.55	31.67	0.09
Owner-Occupied Housing by Geography	239,042	2.03	21.31	38.38	38.29	0.00
Business by Geography	77,682	4.69	22.20	37.10	33.63	2.38
Farms by Geography	1,411	2.48	12.90	39.33	44.58	0.71
Family Distribution by Income Level	250,547	19.66	17.74	21.39	41.21	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	93,705	6.09	39.76	36.77	17.38	0.00
Median Family Income		44,898	Median Housing Value		80,276	
HUD Adjusted Median Family Income for 2008		55,300	Unemployment Rate (2000 US Census)		2.39%	
Households Below Poverty Level		13%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2008 HUD updated MFI

The Oklahoma City MSA consists of seven counties: Canadian, Cleveland, Grady, Lincoln, Logan, McClain, and Oklahoma. Of these counties, BOK has designated only Canadian, Cleveland, and Oklahoma counties as part of its assessment areas. The largest cities in this AA include Oklahoma City, Norman and Edmond. BOK has 34 full-service branches located in the Oklahoma City AA. BOK also operates 36 full-service ATMs and 129 cash-dispensing ATMs in the AA.

Based on 2000 U.S. Census data, total population of the AA is 956,161. The 2009 HUD median family income for the Oklahoma City MSA is \$55,300. In 2008, non-farm businesses represented 98.22 percent (77,682) of total businesses in the AA. The majority of these businesses (59.80 percent) are considered small with revenues of less than \$1 million, with 34.67 percent of businesses not reporting.

The economic conditions in the Oklahoma City AA are stable and the outlook is fair. As of 2008, unemployment was 4.0 percent in Oklahoma County, 3.5 percent in Cleveland County, and 3.5 percent in Canadian County. Government, health, education, retail 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, U.S. Postal Service, University of Oklahoma, INTEGRIS Health Center, Oklahoma City School District, City of Oklahoma City, W.H. Braum, Hertz Corporation, and University of Oklahoma Medical Center. Job growth is expected to be minimal to fair within the Oklahoma City AA. Various service sectors will continue to lead the growth, but some movement may also occur in the natural resources & mining, construction, and governmental sectors.

The local economy benefits from continued growth from Tinker Air Force Base. Retail sales continue to be good for local retailers; national retailers are struggling. There continues to be new industries and businesses locating to the Midwest City area and surrounding municipalities.

Mortgage lending competition is strong, with competitors including community and regional banks, mortgage companies, and anti-poverty organizations. Also affecting lending opportunities is the fact that 13 percent of the households are below the poverty level. The limitation of disposable income for families living below the poverty level negatively affects their ability to qualify for home ownership.

Tulsa AA

Demographic Information for Full-Scope Area: Tulsa AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	240	2.92	22.50	41.67	32.92	0.00
Population by Geography	758,798	2.02	21.24	45.09	31.65	0.00
Owner-Occupied Housing by Geography	197,739	1.06	17.00	46.49	35.45	0.00
Business by Geography	62,822	1.09	20.97	43.03	34.92	0.00
Farms by Geography	1,199	0.50	15.43	49.54	34.53	0.00
Family Distribution by Income Level	204,366	19.00	17.92	21.54	41.54	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	75,456	3.78	32.01	48.36	15.86	0.00
Median Family Income		45,678	Median Housing Value		88,186	
HUD Adjusted Median Family Income for 2008		54,700	Unemployment Rate (2000 US Census)		2.33%	
Households Below Poverty Level		11%				

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

Source: 2000 US Census and 2008 HUD updated MFI

The Tulsa MSA consists of seven counties: Creek, Okmulgee, Osage, Pawnee, Rogers, Tulsa, and Wagoner counties. Bank of Oklahoma has designated Creek, Rogers, and Tulsa and Wagoner counties as part of its Assessment Areas (Tulsa AA). The largest cities in this AA include Tulsa, Broken Arrow, and Sapulpa. BOK has 40 full-service branches located in the Tulsa AA. BOK also operates 49 full-service ATMs and 124 cash-dispensing ATMs in the AA.

Based on 2000 U.S. Census data, total population of the AA is 758,798. The 2008 HUD median family income for the Tulsa MSA is \$54,700. In 2008, non-farm businesses represent 98.13 percent (62,822) of total businesses in the AA. The majority of these businesses (60.21 percent) are considered small with revenues of less than \$1 million. A full 33.85 percent of businesses did not report income.

The economic conditions in the Tulsa AA are stable and the outlook is fair. As of 2008, unemployment was 3.7 percent in Tulsa County, 4.4 percent in Creek County, 3.6 in Rodgers, and 3.7 percent in Wagoner County. Government, health, financial and service sectors account for the majority of the employers in the AA. The leading employers include the State of Oklahoma, American Airlines, Tulsa Public Schools, St. Francis Hospital, City of Tulsa, St. John's Medical Center, ONEOK, and BOK. Job growth is expected to continue in most sectors within the Tulsa AA with the exception of manufacturing jobs. The largest sources of new jobs are expected to be in the health care, construction, accommodations and food service, and temporary employment sectors.

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 fact that 11 percent of the households are below the poverty

level. The limitation of disposable income for families living below the poverty level negatively affects their ability to qualify for home ownership.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated 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 % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- 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. See Interagency Q&As 12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- 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 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

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/AAal 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. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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.

Table 1. Lending Volume

Institution ID: BANK OF OKLAHOMA, NA (13679)

LENDING VOLUME 31, 2008		Geography: STATE OF OKLAHOMA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER				
Assessment Area (2006):	% 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***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Oklahoma City	36.24	6,154	685,969	1,575	400,085	6	470	48	140,672	7,782	1,227,196	33.11
Tulsa	50.82	8,927	995,159	1,912	501,342	16	4,519	59	185,223	10,914	1,686,243	55.39
Limited Review:												
Bartlesville	1.10	183	13,322	50	8,439	3	275	0	0	236	22,036	1.63
Enid	4.32	789	68,662	130	25,935	1	182	7	61,632	927	156,411	1.24
Grove	1.34	240	30,795	47	10,433	1	250	0	0	288	41,478	1.23
Kay County	0.29	54	2,790	9	2,992	0	0	0	0	63	5,782	0.52
Muskogee	5.58	717	50,382	425	77,481	52	5,024	5	5,358	1,199	138,245	6.87
Stillwater	0.31	47	4,415	20	6,599	0	0	0	0	67	11,014	0.01

* Loan Data as of December 31, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from May 29, 2006 to September 21, 2009.

*** Deposit Data as of June 01, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Institution ID: BANK OF OKLAHOMA, NA (13679)

Geographic Distribution: HOME PURCHASE DECEMBER 31, 2008		Geography: STATE OF OKLAHOMA						Evaluation Period: JANUARY 1, 2006 TO					Market Share (%) by Geography				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp		
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans							
Full Review:																	
Oklahoma City	4,604	38.53	2.03	0.78	21.31	11.92	38.38	38.21	38.29	49.09	5.46	5.17	4.41	5.72	5.55		
Tulsa	6,091	50.97	1.06	0.28	17.00	8.18	46.49	41.60	35.45	49.94	10.63	4.60	9.21	11.17	10.53		
Limited Review:																	
Bartlesville	86	0.72	0.00	0.00	10.41	6.98	37.70	45.35	51.88	47.67	2.93	0.00	7.14	4.37	1.50		
Enid	615	5.15	0.00	0.00	8.52	6.18	61.85	50.89	29.62	42.93	18.26	0.00	26.83	20.58	14.74		
Grove	127	1.06	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	7.49	0.00	0.00	7.49	0.00		
Kay County	23	0.19	0.00	0.00	4.49	0.00	64.32	82.61	31.19	17.39	1.12	0.00	0.00	1.61	0.49		
Muskogee	367	3.07	0.00	0.00	15.78	14.71	66.59	66.21	17.63	19.07	3.84	0.00	2.29	4.40	3.61		
Stillwater	37	0.31	1.05	0.00	3.15	5.41	56.75	24.32	39.06	70.27	0.70	0.00	0.00	0.53	0.93		

* Based on 2008 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.

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

Table 3. Geographic Distribution of Home Improvement Loans Institution ID: BANK OF OKLAHOMA, NA (13679)

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2008		Geography: STATE OF OKLAHOMA								Evaluation Period: JANUARY 1, 2006 TO					
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Oklahoma City	625	29.89	2.03	0.80	21.31	13.44	38.38	34.40	38.29	51.36	4.03	1.72	1.83	4.30	4.78
Tulsa	1,118	53.47	1.06	0.63	17.00	12.08	46.49	36.23	35.45	51.07	13.05	25.00	13.61	11.36	14.65
Limited Review:															
Bartlesville	48	2.30	0.00	0.00	10.41	8.33	37.70	31.25	51.88	60.42	10.26	0.00	0.00	9.09	12.26
Enid	68	3.25	0.00	0.00	8.52	2.94	61.85	63.24	29.62	33.82	6.82	0.00	0.00	5.60	10.26
Grove	42	2.01	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.20	0.00	0.00	10.20	0.00
Kay County	16	0.77	0.00	0.00	4.49	0.00	64.32	75.00	31.19	25.00	9.90	0.00	0.00	12.00	4.55
Muskogee	173	8.27	0.00	0.00	15.78	16.18	66.59	64.74	17.63	19.08	11.57	0.00	8.62	13.79	6.85
Stillwater	1	0.05	1.05	0.00	3.15	0.00	56.75	100.00	39.06	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 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 **Institution ID: BANK OF OKLAHOMA, NA (13679)**

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2008		Geography: STATE OF OKLAHOMA								Evaluation Period: JANUARY 1, 2006 TO					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ*** Units	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
Oklahoma City	921	30.13	2.03	0.33	21.31	10.86	38.38	36.16	38.29	52.66	2.71	1.99	2.12	2.81	2.83
Tulsa	1,710	55.94	1.06	0.47	17.00	10.12	46.49	36.14	35.45	53.27	6.91	2.08	6.30	5.78	8.08
Limited Review:															
Bartlesville	49	1.60	0.00	0.00	10.41	2.04	37.70	44.90	51.88	53.06	3.00	0.00	0.00	2.86	3.40
Enid	105	3.43	0.00	0.00	8.52	4.76	61.85	52.38	29.62	42.86	9.51	0.00	4.76	7.72	12.79
Grove	71	2.32	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	5.32	0.00	0.00	5.32	0.00
Kay County	15	0.49	0.00	0.00	4.49	6.67	64.32	73.33	31.19	20.00	2.17	0.00	11.11	2.53	0.81
Muskogee	177	5.79	0.00	0.00	15.78	14.69	66.59	71.75	17.63	13.56	6.06	0.00	6.13	7.39	2.90
Stillwater	9	0.29	1.05	22.22	3.15	11.11	56.75	22.22	39.06	44.44	0.26	7.14	0.00	0.26	0.00

* Based on 2008 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

Institution ID: BANK OF OKLAHOMA, NA (13679)

Geographic Distribution: MULTIFAMILY 2008		Geography: STATE OF OKLAHOMA								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31,					
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
Oklahoma City	4	30.77	4.66	0.00	37.37	50.00	35.37	50.00	22.60	0.00	2.75	0.00	2.50	5.56	0.00
Tulsa	8	61.54	3.54	0.00	24.66	25.00	41.21	25.00	30.59	50.00	1.79	0.00	0.00	0.00	6.25
Limited Review:															
Bartlesville	0	0.00	0.00	0.00	27.43	0.00	5.16	0.00	67.41	0.00	0.00	0.00	0.00	0.00	0.00
Enid	1	7.69	0.00	0.00	10.91	100.00	58.52	0.00	30.58	0.00	0.00	0.00	0.00	0.00	0.00
Grove	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kay County	0	0.00	0.00	0.00	3.53	0.00	58.97	0.00	37.50	0.00	0.00	0.00	0.00	0.00	0.00
Muskogee	0	0.00	0.00	0.00	32.68	0.00	44.49	0.00	22.84	0.00	0.00	0.00	0.00	0.00	0.00
Stillwater	0	0.00	18.09	0.00	11.45	0.00	10.00	0.00	60.46	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 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

Institution ID: BANK OF OKLAHOMA, NA (13679)

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2008		Geography: STATE OF OKLAHOMA								Evaluation Period: JANUARY 1, 2006 TO					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Oklahoma City	1,524	37.02	4.69	7.22	22.20	21.65	37.10	33.92	33.63	37.20	1.35	2.65	1.51	1.31	1.23
Tulsa	1,912	46.44	1.09	1.36	20.97	24.63	43.03	29.97	34.92	44.04	1.99	2.36	2.82	1.84	1.95
Limited Review:															
Bartlesville	50	1.21	0.00	0.00	24.22	22.00	39.75	36.00	36.03	42.00	0.75	0.00	0.33	0.91	0.89
Enid	130	3.16	0.00	0.00	6.95	3.85	71.70	72.31	21.35	23.85	1.90	0.00	5.13	1.86	1.87
Grove	47	1.14	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.54	0.00	0.00	1.65	0.00
Kay County	9	0.22	0.00	0.00	13.07	44.44	58.67	33.33	28.26	22.22	0.27	0.00	0.60	0.33	0.00
Muskogee	425	10.32	0.00	0.00	17.61	21.18	68.99	63.53	13.40	15.29	3.02	0.00	6.12	2.97	2.67
Stillwater	20	0.49	8.08	25.00	14.20	5.00	50.11	35.00	27.60	35.00	0.09	0.00	0.00	0.00	0.27

* Based on 2008 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 (2008).

Table 7. Geographic Distribution of Small Loans to Farms

Institution ID: BANK OF OKLAHOMA, NA (13679)

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2008		Geography: STATE OF OKLAHOMA								Evaluation Period: JANUARY 1, 2006 TO					
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Oklahoma City	6	7.59	2.48	0.00	12.90	0.00	39.33	66.67	44.58	33.33	0.37	0.00	0.00	0.83	0.00
Tulsa	16	20.25	0.50	0.00	15.43	0.00	49.54	56.25	34.53	43.75	2.03	0.00	0.00	1.64	3.16
Limited Review:															
Bartlesville	3	3.80	0.00	0.00	12.20	0.00	55.28	33.33	32.52	66.67	0.00	0.00	0.00	0.00	0.00
Enid	1	1.27	0.00	0.00	2.54	0.00	83.47	100.00	13.98	0.00	0.00	0.00	0.00	0.00	0.00
Grove	1	1.27	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Kay County	0	0.00	0.00	0.00	3.38	0.00	73.43	0.00	23.19	0.00	0.00	0.00	0.00	0.00	0.00
Muskogee	52	65.82	0.00	0.00	14.04	9.62	73.33	65.38	12.63	25.00	5.24	0.00	6.67	3.47	14.63
Stillwater	0	0.00	0.00	0.00	9.42	0.00	54.97	0.00	35.60	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 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 (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Institution ID: BANK OF OKLAHOMA, NA (13679)

Borrower Distribution: HOME PURCHASE 31, 2008		Geography: STATE OF OKLAHOMA								Evaluation Period: JANUARY 1, 2006 TO DECEMBER					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Oklahoma City	4,604	38.53	19.66	8.79	17.74	26.33	21.39	24.62	41.21	40.25	6.04	6.69	5.96	5.87	6.09
Tulsa	6,091	50.97	19.00	6.86	17.92	22.68	21.54	26.61	41.54	43.85	11.46	9.36	11.04	11.31	12.07
Limited Review:															
Bartlesville	86	0.72	14.22	8.43	14.41	26.51	19.86	27.71	51.52	37.35	3.13	5.45	5.24	4.50	1.52
Enid	615	5.15	15.45	13.36	15.10	25.08	23.69	22.80	45.76	38.76	21.43	41.67	34.93	18.67	15.37
Grove	127	1.06	21.33	1.68	19.98	12.61	21.85	8.40	36.84	77.31	7.98	0.00	14.04	3.57	8.36
Kay County	23	0.19	18.73	0.00	17.06	52.17	19.93	17.39	44.27	30.43	1.20	0.00	2.61	0.00	1.28
Muskogee	367	3.07	21.73	8.03	18.55	21.33	20.91	23.27	38.81	47.37	4.38	4.17	3.47	4.15	4.91
Stillwater	37	0.31	16.93	0.00	15.02	2.70	20.29	24.32	47.76	72.97	0.78	0.00	0.00	1.14	0.85

* Based on 2008 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by bank.

Table 9. Borrower Distribution of Home Improvement Loans

Institution ID: BANK OF OKLAHOMA, NA (13679)

Borrower Distribution: HOME IMPROVEMENT 31, 2008		Geography: STATE OF OKLAHOMA								Evaluation Period: JANUARY 1, 2006 TO DECEMBER					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Oklahoma City	625	29.89	19.66	10.03	17.74	18.12	21.39	24.92	41.21	46.93	4.21	3.60	3.63	4.73	4.32
Tulsa	1,118	53.47	19.00	9.69	17.92	17.84	21.54	23.55	41.54	48.91	14.29	14.49	12.81	15.26	14.33
Limited Review:															
Bartlesville	48	2.30	14.22	8.33	14.41	20.83	19.86	25.00	51.52	45.83	11.49	0.00	10.34	19.44	10.10
Enid	68	3.25	15.45	8.82	15.10	13.24	23.69	16.18	45.76	61.76	7.14	14.29	5.41	6.00	7.34
Grove	42	2.01	21.33	16.67	19.98	16.67	21.85	28.57	36.84	38.10	11.63	28.57	0.00	21.74	6.67
Kay County	16	0.77	18.73	0.00	17.06	12.50	19.93	25.00	44.27	62.50	10.31	0.00	6.67	17.39	9.43
Muskogee	173	8.27	21.73	9.36	18.55	24.56	20.91	21.05	38.81	45.03	12.17	14.71	21.15	7.53	11.45
Stillwater	1	0.05	16.93	0.00	15.02	0.00	20.29	0.00	47.76	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans **Institution ID: BANK OF OKLAHOMA, NA (13679)**

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2008		Geography: STATE OF OKLAHOMA								Evaluation Period: JANUARY 1, 2006 TO					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans***	Overa II	Low	Mod	Mid	Upp
Full Review:															
Oklahoma City	921	30.13	19.66	7.80	17.74	16.04	21.39	24.16	41.21	52.00	2.98	2.74	2.64	2.89	3.18
Tulsa	1,710	55.94	19.00	6.48	17.92	16.74	21.54	24.13	41.54	52.66	7.60	6.96	6.73	6.73	8.34
Limited Review:															
Bartlesville	49	1.60	14.22	8.16	14.41	24.49	19.86	24.49	51.52	42.86	3.36	0.00	6.82	4.81	2.27
Enid	105	3.43	15.45	3.06	15.10	15.31	23.69	17.35	45.76	64.29	9.90	4.35	5.17	10.67	11.29
Grove	71	2.32	21.33	1.45	19.98	11.59	21.85	18.84	36.84	68.12	5.59	3.33	3.66	3.85	6.93
Kay County	15	0.49	18.73	13.33	17.06	26.67	19.93	13.33	44.27	46.67	2.37	8.70	3.23	1.54	1.60
Muskogee	177	5.79	21.73	6.32	18.55	20.69	20.91	20.69	38.81	52.30	6.61	7.14	7.23	6.49	6.45
Stillwater	9	0.29	16.93	0.00	15.02	11.11	20.29	11.11	47.76	77.78	0.28	0.00	0.00	0.00	0.43

* Based on 2008 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 Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated and purchased by bank.

Table 11. Borrower Distribution of Small Loans to Businesses

Institution ID: BANK OF OKLAHOMA, NA (13679)

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2008		Geography: STATE OF OKLAHOMA				Evaluation Period: JANUARY 1, 2006 TO			
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	
	#	% 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
Full Review:									
Oklahoma City	1,575	37.79	59.80	45.46	42.41	24.25	33.33	1.35	1.97
Tulsa	1,912	45.87	60.21	46.86	39.54	24.48	35.98	1.99	2.78
Limited Review:									
Bartlesville	50	1.20	55.35	54.00	46.00	30.00	24.00	0.75	0.47
Enid	130	3.12	55.79	56.92	50.77	22.31	26.92	1.90	4.30
Grove	47	1.13	42.59	53.19	42.55	25.53	31.91	1.54	1.69
Kay County	9	0.22	52.89	11.11	22.22	22.22	55.56	0.27	0.00
Muskogee	425	10.20	46.03	62.35	51.76	24.71	23.53	3.02	4.51
Stillwater	20	0.48	51.80	55.00	35.00	25.00	40.00	0.09	0.12

* Based on 2008 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 - 2008).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.73% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Institution ID: BANK OF OKLAHOMA, NA (13679)

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2008		Geography: STATE OF OKLAHOMA				Evaluation Period: JANUARY 1, 2006 TO			
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	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
Oklahoma City	6	7.59	95.11	33.33	66.67	33.33	0.00	0.37	0.00
Tulsa	16	20.25	95.91	37.50	31.25	18.75	50.00	2.03	0.00
Limited Review:									
Bartlesville	3	3.80	98.37	33.33	66.67	33.33	0.00	0.00	0.00
Enid	1	1.27	97.46	100.00	0.00	100.00	0.00	0.00	0.00
Grove	1	1.27	96.46	100.00	0.00	100.00	0.00	0.00	0.00
Kay County	0	0.00	98.07	0.00	0.00	0.00	0.00	0.00	0.00
Muskogee	52	65.82	97.19	84.62	69.23	25.00	5.77	5.24	5.56
Stillwater	0	0.00	96.86	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2008 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 - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 24.05% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

Institution ID: BANK OF OKLAHOMA, NA (13679)

QUALIFIED INVESTMENTS 31, 2008		Geography: STATE OF OKLAHOMA				Evaluation Period: JANUARY 1, 2006 TO DECEMBER			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Oklahoma City AA	350	27,643	127	10,477	477	38,120	58.45	0	0
Tulsa AA	152	12,718	83	5,946	235	18,664	28.62	0	0
Statewide Investments	2	3,249	4	3,775	6	7,024	10.77	4	54,800
Limited Review:									
Bartlesville AA	1	30	4	211	5	241	0.37	0	0
Enid AA	1	67	2	85	3	153	0.23	0	0
Grove AA	4	332	3	182	7	514	0.79	0	0
Kay County	0	0	0	0	0	0	0.00	0	0
Muskogee AA	6	299	4	204	10	503	0.77	0	0
Stillwater AA	0	0	0	0	0	0	0.00	0	0

* '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

Institution ID: BANK OF OKLAHOMA, NA (13679)

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: STATE OF OKLAHOMA				Evaluation Period:			
JANUARY 1, 2006 TO DECEMBER 31, 2008																								
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
*Oklahoma City AA	33.11	34	38.64	0	20.59	32.35	44.12	8	3	0	0	+3	+2	4.02	27.66	36.55	31.67							
Tulsa AA	55.39	40	45.45	5.00	15.00	37.50	42.50	13	7	0	+1	+1	+4	2.02	21.24	45.09	31.65							
Limited Review:																								
Bartlesville AA	1.63	2	2.27	0	0	0	100	0	1	0	-1	0	0	0.00	14.48	36.54	48.98							
Enid AA	1.24	1	1.14	0	0	0	100	0	0	0	0	0	0	0.00	10.27	63.73	26.00							
Grove AA	1.23	2	2.27	0	0	100	0	0	0	0	0	0	0	0.00	0.00	100.00	0.00							
Kay County	.52	2	2.27	0	0	50.00	50.00	0	0	0	0	0	0	0.00	5.42	66.22	28.36							
Muskogee AA	6.87	6	6.82	0	16.67	50.00	33.33	0	0	0	0	0	0	0.00	19.45	64.20	16.35							
Stillwater AA	.01	1	1.14	100	0	0	0	1	0	+1	0	0	0	5.17	11.20	44.88	38.75							

* 2.94% of the branches in the OKC AA are located in census tracks with unknown income data.