



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

April 08, 2002

### **Community Reinvestment Act Performance Evaluation**

**Bank Of Oklahoma, National Association  
Charter Number: 13679**

**Bank Of Oklahoma Tower  
Tulsa, OK 74103**

**Office of the Comptroller of the Currency**

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

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## Overall CRA Rating

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

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

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

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflect an adequate responsiveness by BOK to the credit needs of the AA.
- An adequate distribution of BOK's loans among geographies and among borrowers of different income levels throughout its AAs.
- Community development lending reflects a good responsiveness to the affordable housing needs in the assessment areas. It is at a high level in two of the three full scope assessment areas and has an overall positive impact on the Lending Test conclusion.
- Investments reflect a good responsiveness by BOK to the needs of its AAs.
- Adequate accessibility of BOK's offices to geographies and individuals of different income levels and adequate responsiveness of BOK's services to the needs of its AAs.
- Adequate performance in providing Community Development Services.

## 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.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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

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

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

**Geography:** A census tract or a block numbering area 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 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).

**Home Mortgage Loans:** such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

**Limited 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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

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

## Description of Institution

Bank of Oklahoma, N.A. (BOK), headquartered in Tulsa, Oklahoma, is the largest locally owned bank in Oklahoma. As of December 31, 2001, BOK reported total assets of \$9.1 billion, Tier 1 Capital of \$536 million, and a loan-to-deposit ratio of approximately 99%. BOK is a wholly-owned subsidiary of BOK Financial Corporation (BOKF), a multi-bank holding company also headquartered in Tulsa. BOKF also owns banks in Arkansas (Bank of Arkansas, N.A.), Texas (Bank of Texas, N.A.), and New Mexico (Bank of Albuquerque, 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. BOK Mortgage contributed 7% of net income in 2001 compared to 3% in 2000. BOK Mortgage services approximately \$6.6 billion of mortgage loans. Approximately 60% of these loans are in BOK's primary market area.

BOK's operations are predominantly in the Tulsa and Oklahoma City metropolitan areas. BOK operates 67 branch offices and 294 automated teller machines (ATMs). Through the ownership of mortgage lending operating subsidiaries in four states, the bank also operates eight loan production offices (LPOs) for residential mortgage loan originations.

The bank's business strategy centers on residential real estate and commercial lending activities. Lending products include commercial, real estate, and consumer loan products, including credit cards and student loans, and retail and commercial deposit products. As of December 31, 2001, the loan portfolio represented approximately 53% of total assets, with commercial loans accounting for 44% of the portfolio. Consumer and residential real estate lending accounted for 7% and 32% of the portfolio, respectively. As is customary in the banking industry, the majority of the real estate mortgage loans originated by BOK are sold into the secondary market. Therefore, these loans do not make up a large portion of the bank's loan portfolio. There are no significant financial or legal barriers limiting BOK's ability to help meet the identified credit needs of its assessment areas. The bank is financially capable of meeting almost any request for credit, subject to certain legal restrictions applicable to all national banks.

BOK is an intrastate bank with seven assessment areas (AA) within the state of Oklahoma. These are the Tulsa MSA, which includes five counties (Tulsa, Creek, Osage, Rogers, and Wagoner), the Oklahoma City MSA with six counties (Canadian, Cleveland, Logan, McClain, Oklahoma and Pottawatomie), the Enid MSA (Garfield County), the Muskogee Region (Muskogee, McIntosh, and Pittsburg), the Bartlesville Region (Washington County), the Grove Region (Delaware County), and the Kay County Region (Kay County). These assessment areas include 18 of the 77 counties in Oklahoma (23%).

The bank offers a full range of banking products and related financial services through its branch network within the state of Oklahoma. In addition to the main office in Tulsa, BOK has 24 branches and 128 ATMs in the Tulsa MSA. BOK's distribution network outside the Tulsa MSA includes 27 branches and 141 ATMs in the Oklahoma City MSA, 6 branches and 6 ATMs in the Muskogee Region, 3 branches and 6 ATMs in the Bartlesville Region, 2 branches and 3 ATMs in the Enid MSA, 2 branches and 2 ATMs in the Grove Region, 2 branches and 1 ATM in the Kay County Region, and 7 ATMs outside the bank's AA.

As of March 31, 2002, the Tulsa MSA accounts for 66% of BOK's total deposit base, followed by the Oklahoma City MSA with 21%, the Muskogee Region with 8%, the Enid MSA with 1%, the Bartlesville Region with 2%, the Grove Region with 1% and the Kay County Region with 1%.

BOK's CRA performance was last evaluated as of April 5, 1999. At that time BOK's overall level of performance was rated "Satisfactory".



## **Scope of the Evaluation**

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

The evaluation period for the Lending Test at this examination was from January 1, 1999, through December 31, 2001. Lending products reviewed included small business loans, community development loans, home mortgage and refinance loans, and home improvement loans.

The evaluation period for the Community Development loans and Investment and Service Tests was from April 5, 1999 through April 15, 2002. The Investment Test included a review of investments, grants, and donations made in the bank's assessment areas that meet the definition of community development investments. The Service test included a review of retail and community development services provided in the bank's assessment areas.

### **Data Integrity**

Prior to this CRA examination, OCC personnel performed a review to determine the accuracy of lending-related data supplied by BOK. That review found the data to be reliable, as no significant inaccuracies were revealed. As a result, publicly reported lending data may also be considered accurate.

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

During this examination we performed full-scope reviews for three of the bank's AAs. The AAs selected for review were areas in which the bank has a substantial share of its business, 95% of deposits and approximately 92% of total reported loans. A full-scope review was conducted for the Muskogee Region, Oklahoma City MSA, and Tulsa MSA. A limited scope review was conducted in the remaining AAs, Bartesville Region AA, Enid MSA, Grove Region AA, and Kay County AA. Please refer to the table in Appendix A for more information.

### **Ratings**

The bank's overall rating is based primarily on those areas that received full-scope reviews. The overall rating is weighted more heavily on those areas that constitute the majority of the activities. However, the extent to which the bank is providing lending, investments, and services in all its assessment areas was given consideration in assigning the overall rating for the bank.

### **Other**

We reviewed four recent community contact interview summaries conducted in Oklahoma City MSA and the Tulsa MSA. Organizations contacted were involved in affordable housing and

providing services to small businesses. Opportunities for the bank to participate in community development activities in both assessment areas are good. The predominate needs identified by the contacts included affordable housing and small business lending.

## **Fair Lending Review**

An analysis of the 1999, 2000, 2001 public comments and consumer complaint information and HMDA, small business and small farm lending data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in April 1999.

# 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 Low Satisfactory. Based on full-scope reviews, the bank's performance in the Oklahoma City and Tulsa MSAs and the Muskogee Region is adequate. The level of community development loans in Oklahoma City and Tulsa MSAs is good. The level of community development lending in Muskogee Region is low. The community development lending has a positive impact on the bank's overall lending performance.

### Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in appendix C for the facts and data used to evaluate the bank's lending activity.

In each full scope AA, 52% or more of the loans originated during the examination period were small loans to businesses, with home mortgage loans comprising the majority of the remainder. At less than one percent, the volume of BOK's small farm loan originations/purchases is not material. Agricultural lending is not a primary business line of BOK.

Reviews of the full scope AA show that among home mortgage loan originations/purchases, approximately 39% were home purchase, 29% were home mortgage refinance, and 32% were for home improvement in Muskogee. OKC and Tulsa home mortgage loan originations are approximately 66% and 59%, 13% and 29% and 21% and 24%, respectively.

BOK's lending activity is adequate in the full scope AAs.

In the Muskogee Region AA, BOK ranks first in terms of deposit market share (26.1%). Based on 2000 HMDA aggregate data, BOK ranks first in overall market share for home purchase (9.33%) and home improvement loans (26.36%). In refinanced loans BOK ranked second with 8.42% overall market share. Based on 2000 CRA aggregate data, BOK ranks third (14.05%) in small loans to businesses in the MSA. BOK market share of home mortgage related loans and small loans to businesses are less than its deposit market share.

In the Oklahoma City MSA, BOK ranks first in deposit market share (11.9%). Based on 2000 HMDA aggregate data, BOK ranks second in overall market share (5.5%) in the origination of home purchase loans and seventh in home improvement loans (4.6%). In refinanced loans BOK ranks 22 (1.0%). The bank's market share of these loans is less than its deposit market share. Based on 2000 CRA aggregate data, BOK ranks ninth in small loans to businesses (2.6%) in the MSA. The top two lenders are larger credit card banks. BOK's market share of small loans to businesses is less than its deposit market share in the AA.

In the Tulsa MSA, BOK ranks first in terms of deposit market share (24.2%). Based on 2000 HMDA data, BOK ranks first in overall market share in the origination of home purchase loans (9.6%) and third in home improvement loans (5.6%). In refinanced home loans BOK is ranked sixth with an overall market share of 2.6%. The bank's market share of these loans is less than its deposit market share. Based on 2000 CRA aggregate data, BOK ranked ninth in small loans to businesses (4.4%) in the MSA. BOK's market share of small loans to businesses is less than its deposit market share in the MSA.

## **Distribution of Loans by Income Level of the Geography**

### ***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 and purchases.

The geographic distribution of home mortgage loans is poor.

### **Muskogee Region**

The overall geographic distribution of home mortgage loans is adequate.

Home purchase loans in low-income CTs are poor and good in moderate-income CTs. The percentage of loans in low-income is lower than the percentage of owner-occupied units. In moderate-income CTs it near to the percentage of owner-occupied units in those tracts. The 2000 market share data reflects that BOK's home purchase loan market share of loans in low-income is lower than its overall market share. BOK's home purchase loan market share in moderate-income CTs exceeds its overall market share.

Home improvement loans in low-income CTs are excellent and adequate in moderate-income CTs. The percentage of loans to low-income CTs exceeds the percentage of owner-occupied units. The percentage of loans in moderate-income CTs is lower than the percentage of owner-occupied units. BOK's market share of home improvement loans in low-income CTs exceeds its overall market share. Market share of loans in moderate-income CTs is lower than its overall market share.

Refinanced home mortgage loans in low-income CTs are poor and adequate in moderate-income CTs. The percentage of loans in low-income and moderate-income CTs is lower than the percentage of owner-occupied units. Market share of loans in low- and moderate-income tracts is lower than its overall market share.

### **Oklahoma City MSA**

The overall geographic distribution of home mortgage loans is poor.

Home purchase loans in low-income and moderate-income CTs are poor. The percentage of loans in low-income and moderate-income CTs is lower than the percentage of owner-

occupied units in those tracts. The 2000 market share data reflects that BOK's home purchase loan market share of loans in low-income and moderate-income CTs is lower than its overall market share.

Home improvement loans in low-income CTs are poor and adequate in moderate-income CTs. The percentage of loans to low-income CTs the percentage of loans in moderate-income CTs is lower than the percentage of owner-occupied units. BOK's market share of home improvement loans in low-income and moderate-income CTs are is lower than its overall market share.

Refinanced home mortgage loans in low- and moderate-income CTs are poor. The percentage of loans in low-income and moderate-income CTs is lower than the percentage of owner-occupied units. Market share of loans in low- and moderate-income tracts is lower than its overall market share.

### **Tulsa MSA**

The overall geographic distribution of home mortgage loans is poor.

Home purchase loans in low- income and moderate-income CTs are poor. The percentage of loans in low-income and moderate-income CTs is lower than the percentage of owner-occupied units in those tracts. The 2000 market share data reflects that BOK's home purchase loan market share of loans in low-income and moderate-income CTs is lower than its overall market share.

Home improvement loans in low-income CTs are poor and adequate in moderate-income CTs. The percentage of loans to low-income and moderate-income CTs is lower then the percentage of owner-occupied units. BOK' market share of home improvement loans in low-income and moderate-income CTs is lower than its overall market share.

Refinanced home mortgage loans in low- and moderate-income CTs are poor. The percentage of loans in low-income and moderate-income CTs is lower than the percentage of owner-occupied units. Market share of loans in low- and moderate-income tracts is lower than its overall market share.

### ***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.

### **Muskogee Region**

BOK's geographic distribution of small loans to businesses located in low- and moderate-income CTs is excellent.

The percentage of small loans to business in low-income CTs is excellent and exceeds the percentage of businesses located within these designated tracts. The percentage of small loans to businesses in moderate -income CTs is good. The percentage of loans originated is

lower than the percentage of businesses located within the CTs. The bank's market share in low-income and moderate-income CTs exceeds its overall market share.

### **Oklahoma City MSA**

BOK's geographic distribution of small loans to businesses located in low- and moderate-income CTs is good.

The percentage of small loans to business in low-income CTs is excellent and exceeds the percentage of businesses located within these designated tracts. The percentage of small loans to businesses in moderate -income CTs is adequate. The percentage of loans originated is lower than the percentage of businesses located within the CTs. The bank's market share in low-income CTs exceeds its overall market share. Frost's market share of loans to small businesses in moderate-income CTs is lower than the bank's overall market share.

### **Tulsa MSA**

BOK's geographic distribution of small loans to businesses located in low- and moderate-income CTs is excellent.

The percentage of small loans to business in low-income CTs is excellent and exceeds the percentage of businesses located within these designated tracts. The percentage of small loans to businesses in moderate -income CTs is good. The percentage of loans originated is lower than the percentage of businesses located within the CTs. The bank's market share in low-income and moderate-income CTs exceeds its overall market share.

### ***Small Loans to Farms [Not Applicable]***

### **Lending Gap Analysis**

Maps and reports 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 conspicuous gaps were identified.

### ***Inside/Outside Ratio***

A substantial majority of the home mortgage loans, small loans to businesses and farms, and community development loans originated/purchased by BOK over the evaluation period were within its AAs. Sixty six percent of the bank's home mortgage loans, 90% of the small loans to businesses and 100% of CD loans were within its AAs. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of geography.

### **Distribution of Loans by Income Level of the Borrower**

## **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.

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

### **Muskogee**

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

Home purchase loan borrower distribution is good. Home purchase loans to low-income borrowers are poor. Home purchase loans to moderate-income borrowers are excellent. The percentage of home purchase loans to low-income borrowers is substantially lower than the percentage of families. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the Muskogee Region AA. The 2000 market share of data for the Muskogee Region AA shows BOK's market share of home purchase loans to low-income borrowers is lower than its overall market share. Market share of home purchase loans to moderate-income borrowers exceeds its overall market share.

Home improvement loan borrower distribution is good. Home improvement loans to low-income borrowers are adequate. The percentage of loans made to low-income borrowers is lower than the percentage of low-income families in the AA. Home improvement loans to moderate-income borrowers are excellent. The percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families. BOK's market share of home improvement loans to low-income borrowers exceeds its overall market share. BOK's market share of home improvement loans to moderate-income borrowers is lower than its overall market share.

Refinanced loan borrower distribution is adequate. Refinanced loans to low-income borrowers are poor. The percentage of loans to low-income borrowers is substantially lower than the percentage of low-income families in this MSA. Refinanced loans to moderate-income borrowers are good. The percentage of refinanced loans to moderate-income borrowers is near to the percentage of moderate-income families. BOK's market share of refinanced loans to low-income and moderate-income borrowers is lower than its overall market share.

### **Oklahoma City MSA**

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

Home purchase loan borrower distribution is excellent. Home purchase loans to low-income borrowers are poor. Home purchase loans to moderate-income borrowers are excellent. The percentage of home purchase loans to low-income borrowers is lower than the percentage of families. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the Oklahoma City MSA. The 2000 market share of data for the Oklahoma City MSA shows BOK's market share of home purchase loans to low-income and moderate-income borrowers exceeds its overall market share.



Home improvement loan borrower distribution is good. Home improvement loans to low-income borrowers are poor. The percentage of loans made to low-income borrowers is lower than the percentage of low-income families in the AA. Home improvement loans to moderate-income borrowers are good. The percentage of home improvement loans to moderate-income borrowers is lower than the percentage of moderate-income families. BOK's market share of home improvement loans to low-income borrowers is lower than its overall market share. BOK's market share of home improvement loans to moderate-income borrowers is near to its overall market share.

Refinanced loan borrower distribution is poor. Refinanced loans to low-income borrowers are poor. The percentage of loans to low-income borrowers is substantially lower than the percentage of low-income families in this MSA. Refinanced loans to moderate-income borrowers are adequate. The percentage of refinanced loans to moderate-income borrowers is lower than the percentage of moderate-income families. BOK's market share of refinanced loans to low-income and moderate-income borrowers is lower than its overall market share.

## **Tulsa MSA**

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

Home purchase loan borrower distribution is adequate. Home purchase loans to low-income borrowers are poor. Home purchase loans to moderate-income borrowers are good. The percentage of home purchase loans to low-income and moderate-income borrowers is lower than the percentage of families. The 2000 market share of data for the Tulsa MSA shows BOK's market share of home purchase loans to low-income and moderate-income borrowers is lower than its overall market share.

Home improvement loan borrower distribution is adequate. Home improvement loans to low-income borrowers are poor. The percentage of loans made to low-income borrowers is lower than the percentage of low-income families in the AA. Home improvement loans to moderate-income borrowers are adequate. The percentage of home improvement loans to moderate-income borrowers is lower than the percentage of moderate-income families. BOK's market share of home improvement loans to low-income and moderate-income borrowers is lower than its overall market share.

Refinanced loan borrower distribution is poor. Refinanced loans to low-income borrowers are poor. The percentage of loans to low-income borrowers is substantially lower than the percentage of low-income families in this MSA. Refinanced loans to moderate-income borrowers are adequate. The percentage of refinanced loans to moderate-income borrowers is lower than the percentage of moderate-income families. BOK's market share of refinanced loans to low-income and moderate-income borrowers is lower than its overall market share.

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

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

The distribution of small loans to businesses is adequate.

### **Muskogee Region**

The distribution of small loans to small businesses is adequate in the Muskogee Region.

The percentage of BOK small loans to businesses with revenues of \$1 million or less is less than the percentage of businesses with revenues of \$1 million or less. The percentage of loans of \$100,000 or less in the Muskogee Region AA is less than the percentage of businesses with revenues of \$1 million or less. The bank's market share of small loans to small businesses exceeds its overall market share for small loans to all businesses in the MSA.

### **Oklahoma City MSA**

The distribution of small loans to small businesses is adequate in the Oklahoma City MSA.

The percentage of BOK small loans to businesses with revenues of \$1 million or less is less than the percentage of businesses with revenues of \$1 million or less. The percentage of loans of \$100,000 or less in the Oklahoma City MSA is less than the percentage of businesses with revenues of \$1 million or less. The bank's market share of small loans to small businesses exceeds its overall market share for small loans to all businesses in the MSA.

### **Tulsa MSA**

The distribution of small loans to small businesses is adequate in the Tulsa MSA.

The percentage of BOK small loans to businesses with revenues of \$1 million or less is less than the percentage of businesses with revenues of \$1 million or less. The percentage of loans of \$100,000 or less in the Tulsa MSA is less than the percentage of businesses with revenues of \$1 million or less. The bank's market share of small loans to small businesses exceeds its overall market share for small loans to all businesses in the MSA.

### ***Small Loans to Farms [Not Applicable]***

Refer to Table 12 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

### **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 lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development (CD) lending has a positive impact on the Lending Test conclusions in the Tulsa MSA and Oklahoma City MSA AAs. CD lending has a neutral impact in the Muskogee Region AA. The bank's CD loans primarily help meet needs in the bank's AAs for affordable housing and services targeted to LMI individuals. Although the opportunities for CD lending in the Tulsa MSA and OKC MSA AAs are high (refer to each areas Market Profile in Appendix B), the dollar amount of CD loans originated by BOK in these areas is still considered significant.

### **Tulsa MSA**

The bank originated a good level of CD loans within the Tulsa MSA AA during the evaluation period. BOK originated 72 CD loans totaling \$27.3 million. This includes 65 loans totaling \$16.0 million for affordable housing, and 7 loans totaling \$13.3 million for services targeted to LMI individuals.

### **Oklahoma City MSA**

The bank originated a good level of CD loans within the Oklahoma City MSA AA during the evaluation period. BOK originated 32 CD loans totaling \$15.9 million. This includes 19 loans totaling \$9.7 million for affordable housing, 10 loans totaling \$1.8 million for services targeted to LMI individuals, and 3 loans totaling \$4.3 million for revitalization and stabilization in an area targeted by the city for same.

### **Muskogee Region**

The bank originated an adequate level of CD loans within the Muskogee Region AA during the evaluation period. BOK originated 1 CD loans totaling \$50 thousand. The purpose of the loan was affordable housing.

## **Product Innovation and Flexibility**

Product Innovation and flexibility has a positive impact on the Lending Test conclusions for BOK. The bank uses innovative and flexible underwriting guidelines to meet the credit needs of low- and moderate-income individuals and small businesses. Examples of innovative and flexible loan products are:

**Zero Down Homeward Bound 2000 Mortgage Program** - This product was created in July of 2000 to provide financing in LMI geographies or to LMI families and individuals for purchasing or refinancing an 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% (includes closing costs and any prepaid insurance), and does not require private mortgage insurance. BOK set aside \$100 million for this particular program. However, secondary market participation has allowed the bank to originate 1,220 loans totaling approximately \$138 million as of April 15, 2002. A breakdown of dollars originated through the full-scope AAs is: Tulsa MSA AA \$54.2 million, OKC MSA AA \$38.6 million, and the Muskogee Region AA \$4.0 million.

**The Edge on Expansion Loans** - This product's primary purpose is to promote business growth and encourage investment in Muskogee, Oklahoma. The program offers discounted interest rates on loans used by businesses for start-up or expansion of their operations. As of April 15, 2002, the bank originated 4 small business loans totaling \$2.1 million in the Muskogee Region AA.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Bartlesville Region, Enid MSA, Grove Region, and Kay County is not inconsistent with the bank's overall Low Satisfactory rating performance under the lending test. The performance in the limited scope assessment areas has a neutral impact on the bank's overall performance. The combined assessment areas represent 6% of the reported loans and 5% of the bank's total deposits.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test is rated "High Satisfactory." Based on full scope reviews, the bank's investment performance in the Tulsa MSA and Oklahoma City MSAs is good. In the Muskogee Region AA, the bank's investment performance is adequate.

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

Qualified investments are investments, deposits, membership shares, or grants that have as their primary purpose "Community Development" as defined in the CRA regulation. BOK has made 383 qualified investments totaling \$23.1 million or 4.31% of Tier 1 Capital during the evaluation period of April 5, 1999 through April 15, 2002. The investments are distributed throughout the seven assessment areas with the vast majority (98 percent) in the Tulsa and Oklahoma City MSAs. This compares favorably with the fact that 87 percent of BOK's deposits come from those assessment areas.

The majority of the dollar amount of qualified investments represents mortgage-backed securities (MBS). BOK has developed a program to purchase pools of affordable housing mortgages originated in its assessment areas and the bank continues to be active in this program. The Investment Portfolio Manager has distributed the bank's assessment area 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 then 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 inputted to verify that each mortgage qualifies. BOK purchased \$16.5 million of these qualified mortgages during the evaluation period. Purchase of these MBS creates additional lending capacity for affordable

housing in the bank's affected AAs. This has been identified as a primary need in the bank's full scope AAs.

The majority of the number of investments consists of grants and donations extended in all assessment areas to organizations that promote community developed as defined by the regulation. Examples include groups promoting affordable housing and various other groups that provide health, economic, and general welfare assistance to low- and moderate-income individuals and families.

### **Muskogee Region**

The bank has an adequate level of qualified investments in the Muskogee Region AA. Two MBS were purchased totaling \$78 thousand in addition to 50 grants/donations totaling \$56 thousand. Grant and donations were to organizations that provide affordable housing, urban renewal, and other social services that target low- and moderate-income individuals or families.

### **Oklahoma City MSA**

BOK has a good level of qualified investments in the Oklahoma City MSA. The bank has 108 qualified investments totaling \$9.2 million. Mortgage backed securities that were originated during the evaluation period totaled \$4.0 million. Additionally, over 100 grants/donations totaling \$355 thousand 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 two affordable housing projects in the Oklahoma City MSA. These LIHTCS were purchased in 1998 with an original cost of \$5.8 million and now have an amortized book balance of \$4.8 million. Management states that opportunities to invest in LIHTCs have become very limited due to competition, limited availability of LIHTCs within the AAs, and restrictions associated with the closely held structure of the bank.

### **Tulsa MSA**

BOK has a good level of qualified investments in the Tulsa AA. The bank has 162 qualified investments/grants totaling \$13.4 million. Investments include 4 qualified MBS for affordable housing totaling \$12.1 million. The bank continues to be an active purchaser of pooled MBS that were originated in the bank's AA with borrowers who meet the low- to moderate-income criteria. One-hundred and fifty-eight donations/grants totaling \$1.3 million were made to organizations providing affordable housing, urban renewal, and other social services targeting low- and moderate-income individuals or families.

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

Based on limited scope reviews, the bank's performance under the Investment Test in the Enid MSA, Bartlesville Region AA, Kay County AA, and Grove AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Investment Test.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "Low Satisfactory." Based on full scope reviews, the bank's Service Test performance in the Tulsa-MSA, Oklahoma City-MSA, and Muskogee Region is adequate.

### **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.

BOK's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the full scope AAs. Accessibility is adequate in the Muskogee Region, the Oklahoma City MSA and the Tulsa MSA.

The distribution of branches in the Tulsa MSA Region and Oklahoma City MSA are poor and the distribution in the Muskogee Region is adequate.

In the Oklahoma City MSA the distribution of BOK branches in low-income areas is less than the distribution of the population living in those geographies. In the Tulsa MSA, the distribution of BOK branches is equal to the population living in low-income areas. In the Muskogee Region AA the distribution of branches in low-income area well exceeds the population living in low-income areas. In each of the areas that received full-scope reviews, the distribution of BOK branches in moderate -income geographies is poor. The distribution in the full-scope areas is less than each AA's respective population residing in such geographies.

Delivery systems are reasonably accessible to essentially all portions of the bank's seven assessment areas. BOK provides a wide range of services at each of its 67 branches. All of the bank's branches offer full-services. At the traditional stand-alone branches, drive-through banking and safe-deposit services are typically available. Services provided at the various branches are in no way dependent upon the income-geography of the branch, and do not vary in a way that would inconvenience portions of the assessment areas. In addition, the BOK offers a full-service telephone banking system titled "24-Hour ExpressBanking." This system enables customers to bank from anywhere, 24 hours a day, 365 days a year; and through language-line communications, is available in almost any language.

In the AAs receiving full-scope reviews operates 24 branches in supermarkets, primarily in Albertson's stores. These branches provide convenient banking and extended hours, including weekend hours and banking services on several holidays. Supermarket branches represent about 36 percent of the bank's branch locations. In addition BOK has 294 proprietary ATMs, 104 are full-service, which accept deposits, and 190 are cash-dispensing ATMs, which do not take deposits but do allow transfers between accounts and provide account balances.

Muskogee Region AA branch and ATM openings and closing, in net, have had no adverse impact on low and moderate income census tracts.

In the Oklahoma City MSA ATM openings and closings have had no adverse impact on low- and moderate-income areas. No branches in the Oklahoma City MSA have been closed during the evaluation period. Two full-service in-store supermarket branches and one traditional branch were opened during the period. All three of these new branches were located in upper-income census tracts.

No bank branches have been closed in the Tulsa MSA during the evaluation period; however, three new supermarket branches were opened in middle-income census tracts. Several ATMs in moderate-income census tracts were closed during the period while no new ATMs were opened in these areas.

In the full-scope AAs BOK has available several alternative delivery systems for certain of its products and services. These include the use of postal services, telephone, and Internet services for access. The Express Banking telephone system allows twenty-four hour access for both loan and deposit services. Through the use of a language-line interpretive service, the Express Bank can conduct banking with customers speaking almost any language. These services expand the opportunity for conducting business with BOK without traveling to a branch office or ATM. The services are readily available to and beneficial to individuals of income levels.

## **Community Development Services**

Overall, BOK provides an adequate level of services in their assessment areas related to the provision of financial services whose purpose is community development.

Community development services include providing technical assistance on financial matters to nonprofit organizations which serve low- and moderate-income individuals/families and to other groups or small businesses which promote community revitalization, community development, or affordable housing. BOK officers and employees provide financial planning and expertise to community organizations and provide homeownership counseling to individuals and groups, primarily focusing on those in low- and moderate-income categories. All of these services benefit the bank's assessment areas.

Services provided include an innovative IDA Matched Savings Program (in partnership with the Community Action Project of Tulsa County), Homebuyer Education Programs, Banking Basics financial education presentations, Small Business Seminars, Credit and Financial Counseling, Technical Assistance to Non-Profit Organizations through board or committee participation, the Community Spirit Program which tailors banking services to the needs of LMI customers, Access Oklahoma ATM Services, and extensive Bilingual Services. Finally, BOK also assists community-based organizations in obtaining FHLB grant monies designated for development of AHP (affordable housing projects). The bank assists in the application, monitoring, and funding process for the AHP grants. Examination of the level of community development services provided by the bank during the last three-year assessment period and on-going services indicate the following:

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Enid MSA, Kay County and Bartlesville and Grove Regions is not inconsistent with the bank's overall Low Satisfactory performance under the Service Test. Refer to Table 15 in appendix C for the facts and data that support these conclusions.



## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): (01/10/1999 to 12/31/2001) Investment and Service Tests and CD Loans: (04/05/1999 to 04/15/2002)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Bank of Oklahoma, N.A. (BOK) City, State)		
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>[Instructions: Provide only if affiliate products are reviewed.]</i>  (Not Applicable)		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Tulsa MSA #8560 Oklahoma MSA #5880 Enid MSA #23540 Muskogee Region (McIntosh, Muskogee, and Pittsburgh Counties) Kay County Region Bartlesville Region (Washington County) Grove Region (Delaware County)	Full-Scope Full-Scope Limited-Scope Full-Scope  Limited Scope Limited Scope Limited Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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## Table of Contents

### Market Profiles for Areas Receiving Full-Scope Reviews

<a href="#">(Name of MA or Non-metropolitan Area)</a> .....	B-Error! Bookmark not defined.
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## Tulsa MSA

Demographic Information for Full Scope Area: Tulsa MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	207	5.31	25.60	43.96	24.15	0.97
Population by Geography	708,954	4.00	22.44	50.05	23.52	0.00
Owner-Occupied Housing by Geography	181,730	2.38	21.10	51.27	25.25	0.00
Business by Geography	34,168	2.44	24.60	47.24	25.72	0.00
Farms by Geography	917	1.09	24.10	54.09	20.72	0.00
Family Distribution by Income Level	195,735	20.32	17.70	22.17	39.80	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	74,430	6.54	33.56	49.60	10.31	0.00
Median Family Income	32,578	Median Housing Value		61,222		
HUD Adjusted Median Family Income for 2001	46,800	Unemployment Rate (1990 US Census)		2.92%		
Households Below Poverty Level	13.26%					

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

Source: 1990 US Census and 2001 HUD updated MFI

BOK has defined the entire Tulsa MSA as its assessment area, which does not arbitrarily exclude any low- or moderate-income areas. BOK operates 25 full service branches and 128 ATMs and numerous non-proprietary ATMs in the MSA. The bank's branches are primarily located in the central and southern regions of Tulsa County. One of the branch offices is located in a low-income census tract and two are located in moderate-income tracts.

Deposits originating from the Tulsa MSA represent approximately 66% of BOK's total deposits. In terms of market share, a June 30, 2001 Summary of Deposits report from the FDIC shows that BOK ranks first in the assessment area with 28.80% of the deposit market share. Lender market share reports for 2000 show BOK ranks first in market share for the Tulsa MSA for residential real estate at 8.28% and ranks ninth in market shares for small business loans at 4.44% lending activities. Local banking competition is aggressive and includes affiliates of large national banking companies, regional banks, numerous community banks, credit unions and non-bank financial service providers.

The Tulsa MSA includes five counties, Tulsa, Creek, Osage, Rogers, and Wagoner, and includes 207 census tracts. Two of the census tracts, representing .97% of the total number of tracts, are not classified by income level and are not included in the above table. The total population of the Tulsa MSA is 708,954. This population is comprised of 195,735 families, of which 20.32%, 17.70%, 22.17%, and 39.80% have low, moderate, middle, and upper-income levels, respectively. Of the total population, 4.00%, 22.44%, 50.05%, and 23.15% are located in low, moderate, middle, and upper-income geographies, respectively. The table above provides basic demographic information based on the income level of the census tracts and families within the Tulsa MSA.

The Tulsa economy has been stable. High-tech manufacturing, particularly in the telecommunications and the IT industries, is making inroads into Tulsa. A growing presence of software developers and fiber optics construction companies is also evident.

Leading industries include eating and drinking establishments, personnel supply services, and air transportation. Major employers include American Airlines, Avis Rent-a-Car, Blue Cross and Blue Shield, and Boeing Corporation. According to the U.S. Bureau of Labor Statistics as of December 31, 2001, the unemployment rate was 4% at December 31, 2001, an increase from 2.3% from December 31, 2000.

A review of the community contacts conducted within the Tulsa MSA indicates that opportunities exist to participate in community development lending, investments, and services. A primary need is revitalization of the north Tulsa area, where most of the low and moderate-income tracts are located. Affordable housing, small business loans, and technical assistance for individuals attempting to start a small business were also mentioned as needs for the north Tulsa area. Contacts indicated that generally banks are interested and involved in community development opportunities.

## Oklahoma City MSA

Demographic Information for Full Scope Area: Oklahoma City MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	324	6.79	26.54	38.89	22.53	5.25
Population by Geography	958,839	3.71	24.73	44.46	26.96	0.13
Owner-Occupied Housing by Geography	236,478	2.35	21.40	46.55	29.70	0.00
Business by Geography	45,881	4.87	26.53	39.77	26.44	2.39
Farms by Geography	1,287	1.94	22.30	46.78	28.59	0.39
Family Distribution by Income Level	257,571	20.07	17.74	22.78	39.41	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	97,370	6.85	35.12	44.58	13.45	0.00
Median Family Income	32,406	Median Housing Value	55,280			
HUD Adjusted Median Family Income for 2001	45,400	Unemployment Rate (1990 US Census)	3.29%			
Households Below Poverty Level	13.68%					

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

Source: 1990 US Census and 2001 HUD updated MFI

BOK has defined the entire Oklahoma City MSA as its assessment area, which does not arbitrarily exclude any low- or moderate-income areas. BOK operates 27 full service branches and 141 ATMs and numerous non-proprietary ATMs in the MSA. The bank's branches are primarily located in Oklahoma County. There are no branches located in a low-income census tract and one branch is located in moderate-income tracts.

Deposits originating from the Oklahoma City MSA represent approximately 21% of BOK's total deposit base. A June 30, 2001 Summary of Deposits report from the FDIC shows that BOK ranks first in the assessment area with 13.36% of the deposit market share. Lender market share reports for 2000 show BOK ranks third in market share for the Oklahoma City MSA for residential real estate at 4.11% and ranks ninth in market shares for small business loans at 2.57%.

Local banking competition is aggressive and includes affiliates of large national banking companies, regional banks, numerous community banks, credit unions and non-bank financial service providers.

The Oklahoma City MSA includes six counties, Canadian, Cleveland, Logan, McClain, Oklahoma and Pottawatomie and includes 324 census tracts. Seventeen of the census tracts, representing 5.25% of the total number of tracts, are not classified by income level and are not included in the above table. The total population of the Oklahoma City MSA is 958,839. This population is comprised of 257,571 families, of which 20.07%, 17.74%, 22.78%, and 39.41% have low, moderate, middle, and upper-income levels, respectively. Of the total population, 3.71%, 24.73%, 44.46%, and 26.96% are located in low, moderate, middle, and upper-income geographies, respectively. The table above provides basic demographic information based on the income level of the census tracts and families within the Tulsa MSA.

The economic conditions in Oklahoma City are stable and the outlook remains good in the short run, as the rebound in the energy industry will continue to help the region by boosting employment and income growth. New industry growth is also anticipated with the recent right to work legislation. Major employers include the State of Oklahoma, Tinker Air Force Base, and the OU Health Sciences Center. American Airlines, Avis Rent-a-Car, Blue Cross and Blue Shield, and Boeing Corporation. According to the U.S. Bureau of Labor Statistics, unemployment was 4% as of December 31, 2001, an increase from 2.1% at December 31, 2000.

A review of community contacts conducted within the Oklahoma City MSA noted that there are several opportunities to participate in community service activities, but opportunities are more limited for community development lending and investments. Several contacts stated investment opportunities are limited in Oklahoma. Contacts indicated that affordable housing and rehabilitation of declining areas continue to be the primary needs of the AA.

## Muskogee Region

Demographic Information for Full Scope Area: Muskogee Region						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	42	2.38	21.43	47.62	14.29	14.29
Population by Geography	125,438	0.49	26.73	52.73	20.06	0.00
Owner-Occupied Housing by Geography	34,876	0.24	25.83	54.13	19.80	0.00
Business by Geography	5,198	8.96	27.99	48.36	14.68	0.00
Farms by Geography	293	0.34	30.72	59.04	9.90	0.00
Family Distribution by Income Level	34,834	23.21	17.31	19.60	39.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	14,115	0.39	33.91	53.76	11.94	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below Poverty Level		24,139 34,000 22.03%	Median Housing Value Unemployment Rate (1990 US Census)		38,460 3.27%	

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

Source: 1990 US Census and 2001 HUD updated MFI

The Muskogee Region AA is located in the western section of Oklahoma and includes Muskogee, McIntosh, and Pittsburg counties. This AA does not arbitrarily exclude any low- and moderate-income areas. BOK operates 6 full service branches and 6 ATMs in the AA. According to 1990 Census, there are 42 census tracts in the Muskogee Region consisting of only 1 low-income tract and 9 moderate-income tracts. Total population of the AA, according to the 1990 Census, is 125,438. This population is comprised of 34,834 families, of which 23.21%, 17.31%, 19.60%, and 39.88% have low, moderate, middle, and upper-income levels, respectively. Of the population, .49%, 26.73%, 52.73%, and 20.06% are located in low, moderate, middle, and upper-income geographies, respectively.

Deposits originating from the Muskogee Region AA represent about 8% of the bank's total deposits. BOK is number one in market share in the AA at 25.13%. Local banking competition is aggressive and includes affiliates of large national banking companies, regional banks, numerous community banks, credit unions and savings banks.

## Appendix C: Tables of Performance Data

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### 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: 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. 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. Refer to Interagency Q&As.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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/regional entities or made outside of the bank's assessment area. See Interagency Q&As 12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

- 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**

LENDING VOLUME												
Geography: OKLAHOMA												
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001												
MA/Assessment Area (2001):	% 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)	
<b>Full Review:</b>												
Muskogee Region	7.72	990	48,692	821	70,126	98	4,564	1	50	1,910	123,432	7.73
Oklahoma City MSA	33.65	6,573	562,493	1,723	271,551	29	3,167	32	15,885	8,357	853,097	21.07
Tulsa MSA	50.27	10,169	1,004,895	2,227	385,129	40	2,671	72	27,270	12,508	1,419,965	65.77
<b>Limited Review:</b>												
Bartlesville Region	1.33	169	10,282	148	17,470	11	177	0	0	328	27,929	2.28
Enid MSA	4.96	1,075	66,818	145	16,661	7	346	0	0	1,227	83,825	1.22
Grove Region	1.58	259	23,603	131	13,134	2	300	0	0	392	37,037	1.24
Kay County	0.49	79	4,036	40	5,463	2	44	0	0	121	9,543	.69

\* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is From January 01, 1999 to December 31, 2001.

\*\*\* Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE		Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Muskogee Region	384	3.28	0.24	0.00	25.83	25.52	54.13	45.83	19.80	28.65	9.33	0.00	11.88	8.16	9.44	
Oklahoma City MSA	4,349	37.18	2.35	0.69	21.40	10.30	46.55	45.71	29.70	43.30	5.46	3.52	4.37	6.34	5.11	
Tulsa MSA	5,943	50.81	2.38	0.57	21.10	7.72	51.27	45.80	25.25	45.90	9.64	6.12	6.36	8.94	12.03	
<b>Limited Review:</b>																
Bartlesville Region	75	0.64	0.00	0.00	5.09	0.00	32.21	17.33	62.69	82.67	2.61	0.00	0.00	1.23	3.09	
Enid MSA	794	6.79	0.00	0.00	23.96	23.55	53.12	44.08	22.92	32.37	24.95	0.00	26.14	24.08	25.31	
Grove Region	111	0.95	0.00	0.00	24.37	4.50	75.63	95.50	0.00	0.00	6.11	0.00	0.00	7.71	0.00	
Kay County	40	0.34	0.00	0.00	0.00	0.00	50.45	25.00	49.55	75.00	2.11	0.00	0.00	0.00	3.40	

\* Based on 2000 Peer Mortgage Data: Southwest Region.

\*\* 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME IMPROVEMENT															Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/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	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Muskogee Region	285	9.34	0.24	1.05	25.83	18.25	54.13	58.95	19.80	21.75	26.36	33.33	20.97	24.16	34.94									
Oklahoma City MSA	846	27.74	2.35	0.59	21.40	12.88	46.55	45.27	29.70	41.25	4.95	3.00	3.54	5.12	5.50									
Tulsa MSA	1,705	55.90	2.38	0.94	21.10	11.79	51.27	41.23	25.25	46.04	14.08	5.66	10.83	10.68	21.70									
<b>Limited Review:</b>																								
Bartlesville Region	48	1.57	0.00	0.00	5.09	8.33	32.21	20.83	62.69	70.83	22.35	0.00	20.00	23.53	22.22									
Enid MSA	88	2.89	0.00	0.00	23.96	15.91	53.12	43.18	22.92	40.91	11.79	0.00	9.68	9.84	17.74									
Grove Region	62	2.03	0.00	0.00	24.37	12.90	75.63	87.10	0.00	0.00	16.94	0.00	6.67	20.21	0.00									
Kay County	16	0.52	0.00	0.00	0.00	0.00	50.45	62.50	49.55	37.50	5.06	0.00	0.00	5.26	4.55									

\* Based on 2000 Peer Mortgage Data: Southwest Region.

\*\* 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: OKLAHOMA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	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						
<b>Full Review:</b>																
Muskogee Region	314	6.94	0.24	0.00	25.83	17.52	54.13	49.68	19.80	32.80	8.42	0.00	6.51	7.30	12.95	
Oklahoma City MSA	1,368	30.25	2.35	0.37	21.40	5.85	46.55	37.87	29.70	55.92	1.04	0.00	0.44	1.08	1.42	
Tulsa MSA	2,493	55.13	2.38	0.40	21.10	6.98	51.27	40.83	25.25	51.79	2.59	0.00	1.04	2.15	4.68	
<b>Limited Review:</b>																
Bartlesville Region	45	1.00	0.00	0.00	5.09	2.22	32.21	8.89	62.69	88.89	0.98	0.00	0.00	0.00	1.33	
Enid MSA	193	4.27	0.00	0.00	23.96	10.88	53.12	38.86	22.92	50.26	4.84	0.00	3.85	3.40	8.76	
Grove Region	86	1.90	0.00	0.00	24.37	6.98	75.63	93.02	0.00	0.00	3.50	0.00	0.00	4.66	0.00	
Kay County	23	0.51	0.00	0.00	0.00	0.00	50.45	34.78	49.55	65.22	0.40	0.00	0.00	0.00	0.83	

\* Based on 2000 Peer Mortgage Data: Southwest Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: MULTIFAMILY															Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/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	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Tulsa MSA	28	60.87	8.01	0.00	23.64	17.86	44.13	67.86	24.21	14.29	12.77	0.00	7.69	17.86	0.00									
Oklahoma City MSA	10	21.74	4.42	10.00	30.24	20.00	42.45	30.00	22.89	40.00	0.86	0.00	0.00	2.44	0.00									
Muskogee Region	7	15.22	3.59	0.00	37.14	28.57	30.58	42.86	28.70	28.57	40.00	0.00	0.00	33.33	100.00									
<b>Limited Review:</b>																								
Kay County	0	0.00	0.00	0.00	0.00	0.00	28.72	0.00	71.28	0.00	0.00	0.00	0.00	0.00	0.00									
Grove Region	0	0.00	0.00	0.00	17.50	0.00	82.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00									
Enid MSA	0	0.00	0.00	0.00	25.16	0.00	50.21	0.00	24.63	0.00	0.00	0.00	0.00	0.00	0.00									
Bartlesville Region	1	2.17	0.00	0.00	2.90	0.00	30.90	0.00	66.21	100.00	0.00	0.00	0.00	0.00	0.00									

\* Based on 2000 Peer Mortgage Data: Southwest Region.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/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 Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Muskogee Region	821	15.68	8.96	16.93	27.99	26.31	48.36	30.82	14.68	25.94	14.05	41.26	18.29	9.76	15.08									
Oklahoma City MSA	1,723	32.91	4.87	5.34	26.53	17.88	39.77	35.64	26.44	37.55	2.57	3.89	2.10	2.45	3.02									
Tulsa MSA	2,227	42.54	2.44	2.56	24.60	22.68	47.24	41.31	25.72	33.45	4.44	4.62	4.83	4.44	4.73									
<b>Limited Review:</b>																								
Bartlesville Region	148	2.83	0.00	0.00	7.10	12.16	54.51	45.27	38.39	42.57	4.86	0.00	15.63	4.90	4.30									
Enid MSA	145	2.77	0.00	0.00	37.37	28.28	44.83	46.90	17.81	24.83	4.97	0.00	3.97	5.90	5.12									
Grove Region	131	2.50	0.00	0.00	21.53	3.82	78.47	96.18	0.00	0.00	8.18	0.00	0.81	11.49	0.00									
Kay County	40	0.76	0.00	0.00	0.00	0.00	54.56	40.00	45.44	60.00	1.63	0.00	0.00	1.39	2.13									

\* Based on 2000 Peer Small Business Data: US.

\*\* 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 (2001).



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

Geographic Distribution: SMALL LOANS TO FARMS															Geography: OKLAHOMA		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/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						
<b>Full Review:</b>																					
Muskogee Region	98	51.85	0.34	0.00	30.72	17.35	59.04	59.18	9.90	23.47	9.71	0.00	4.46	9.59	18.84						
Oklahoma City MSA	29	15.34	1.94	0.00	22.30	13.79	46.78	24.14	28.59	51.72	1.56	0.00	0.73	0.61	6.93						
Tulsa MSA	40	21.16	1.09	0.00	24.10	42.50	54.09	42.50	20.72	15.00	4.00	0.00	8.49	1.87	8.00						
<b>Limited Review:</b>																					
Bartlesville Region	11	5.82	0.00	0.00	3.26	0.00	45.65	9.09	51.09	90.91	4.65	0.00	0.00	0.00	10.53						
Enid MSA	7	3.70	0.00	0.00	9.91	0.00	76.72	71.43	13.36	28.57	1.29	0.00	0.00	1.02	5.56						
Grove Region	2	1.06	0.00	0.00	32.18	50.00	67.82	50.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00						
Kay County	2	1.06	0.00	0.00	0.00	0.00	71.91	50.00	28.09	50.00	0.63	0.00	0.00	0.00	3.03						

\* Based on 2000 Peer Small Business Data: US.

\*\* 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 (2001).

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

Borrower Distribution: HOME PURCHASE															Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/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****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
Muskogee Region	384	3.28	23.21	5.08	17.31	18.72	19.60	21.12	39.88	55.08	10.56	8.20	12.50	8.33	11.07									
Oklahoma City MSA	4,349	37.18	20.07	9.72	17.74	25.20	22.78	26.31	39.41	38.77	6.42	6.80	7.83	5.93	5.84									
Tulsa MSA	5,943	50.81	20.32	4.79	17.70	16.77	22.17	24.68	39.80	53.76	11.90	7.21	9.39	11.19	14.27									
<b>Limited Review:</b>																								
Bartlesville Region	75	0.64	12.59	0.00	11.02	10.81	16.51	18.92	59.88	70.27	2.63	0.00	2.68	2.05	3.07									
Enid MSA	794	6.79	18.74	18.39	18.75	25.42	24.37	24.65	38.14	31.55	27.20	40.00	29.70	26.46	21.35									
Grove Region	111	0.95	21.28	3.67	22.54	5.50	22.20	13.76	33.98	77.06	7.17	7.41	1.49	5.26	9.09									
Kay County	40	0.34	14.06	2.50	14.19	12.50	19.48	30.00	52.26	55.00	2.65	0.00	1.67	2.22	3.45									

\* Based on 2000 Peer Mortgage Data: Southwest Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 0.78% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Muskogee Region	285	9.34	23.21	12.84	17.31	17.90	19.60	17.51	39.88	51.75	24.75	37.04	20.29	27.42	23.45	
Oklahoma City MSA	846	27.74	20.07	7.58	17.74	17.30	22.78	22.10	39.41	53.03	4.86	4.46	4.88	3.00	6.10	
Tulsa MSA	1,705	55.90	20.32	6.63	17.70	12.84	22.17	20.33	39.80	60.20	14.46	10.77	9.32	11.38	18.60	
<b>Limited Review:</b>																
Bartlesville Region	48	1.57	12.59	8.89	11.02	24.44	16.51	17.78	59.88	48.89	22.22	16.67	30.00	30.77	19.23	
Enid MSA	88	2.89	18.74	8.24	18.75	10.59	24.37	31.76	38.14	49.41	12.83	13.79	7.02	12.96	16.28	
Grove Region	62	2.03	21.28	6.78	22.54	8.47	22.20	18.64	33.98	66.10	16.52	18.18	6.25	8.33	21.88	
Kay County	16	0.52	14.06	0.00	14.19	13.33	19.48	20.00	52.26	66.67	4.05	0.00	8.33	0.00	5.88	

\* Based on 2000 Peer Mortgage Data: Southwest Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 5.54% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: OKLAHOMA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/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****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Muskogee Region	314	6.94	23.21	4.90	17.31	14.05	19.60	14.71	39.88	66.34	9.69	8.06	9.22	9.19	10.31									
Oklahoma City MSA	1,368	30.25	20.07	3.83	17.74	11.89	22.78	21.07	39.41	63.21	1.21	0.44	0.83	0.97	1.75									
Tulsa MSA	2,493	55.13	20.32	3.76	17.70	9.32	22.17	21.22	39.80	65.70	3.01	1.02	2.29	2.14	4.25									
<b>Limited Review:</b>																								
Bartlesville Region	45	1.00	12.59	2.44	11.02	7.32	16.51	21.95	59.88	68.29	1.12	0.00	2.56	1.79	0.61									
Enid MSA	193	4.27	18.74	6.25	18.75	7.39	24.37	19.32	38.14	67.05	5.27	2.60	2.17	2.19	10.16									
Grove Region	86	1.90	21.28	2.33	22.54	12.79	22.20	18.60	33.98	66.28	4.14	0.00	2.70	5.08	4.64									
Kay County	23	0.51	14.06	9.09	14.19	4.55	19.48	18.18	52.26	68.18	0.50	0.00	0.00	0.00	0.84									

\* Based on 2000 Peer Mortgage Data: Southwest Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 5.93% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: OKLAHOMA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Muskogee Region	821	15.68	87.57	67.48	78.20	14.01	7.80	14.05	18.77
Oklahoma City MSA	1,723	32.91	87.35	58.68	63.15	18.63	18.22	2.57	3.50
Tulsa MSA	2,227	42.54	84.04	55.99	60.93	17.78	21.28	4.44	5.29
<b>Limited Review:</b>									
Bartlesville Region	148	2.83	88.74	68.24	73.65	14.19	12.16	4.86	5.44
Enid MSA	145	2.77	89.40	68.28	72.41	11.72	15.86	4.97	7.28
Grove Region	131	2.50	86.55	64.89	70.23	20.61	9.16	8.18	8.60
Kay County	40	0.76	87.55	45.00	57.50	30.00	12.50	1.63	2.07

\* Based on 2000 Peer Small Business Data: US.

\*\* 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 - 2001).

\*\*\*\* 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 13.93% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: OKLAHOMA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Muskogee Region	98	51.85	97.61	79.59	89.80	7.14	3.06	9.71	7.92
Oklahoma City MSA	29	15.34	92.07	48.28	72.41	20.69	6.90	1.56	0.64
Tulsa MSA	40	21.16	92.91	82.50	80.00	17.50	2.50	4.00	4.39
<b>Limited Review:</b>									
Bartlesville Region	11	5.82	100.00	54.55	100.00	0.00	0.00	4.65	0.00
Enid MSA	7	3.70	95.69	42.86	71.43	28.57	0.00	1.29	0.49
Grove Region	2	1.06	94.25	100.00	50.00	50.00	0.00	0.00	0.00
Kay County	2	1.06	94.94	100.00	100.00	0.00	0.00	0.63	0.65

\* Based on 2000 Peer Small Business Data: US.

\*\* 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 - 2001).

\*\*\*\* 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 24.87% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
			Geography: OKLAHOMA		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Muskogee Region	0	0	50	111	50	111	.48	0	0
Oklahoma City MSA	0	0	108	9,187	108	9,187	39.75	0	0
Tulsa MSA	0	0	162	13,429	162	13,429	58.10	0	0
<b>Limited Review:</b>									
Bartlesville Region	0	0	23	264	23	264	1.14	0	0
Enid MSA	0	0	18	17	18	17	.07	0	0
Grove Region	0	0	16	51	16	51	.22	0	0
Kay County	0	0	6	55	6	55	.24	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: OKLAHOMA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001			
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							
<b>Full Review:</b>																								
Muskogee Region	7.73	6	8.96	17.00	17.00	33.00	33.00	3	1	+1	0	0	+1	0.49	26.73	52.73	20.06							
Oklahoma City MSA	21.07	27	40.30	0.00	4.00	42.00	54.00	3	0	0	0	0	+3	3.71	24.73	44.46	26.96							
Tulsa MSA	65.77	25	37.31	4.00	8.00	40.00	48.00	3	0	0	0	+3	0	4.00	22.44	50.05	23.52							
<b>Limited Review:</b>																								
Bartlesville Region	2.28	3	4.48	N/A	0.00	33.00	67.00	0	1	0	0	0	-1	0.00	4.41	33.37	62.22							
Enid MSA	1.22	2	2.99	N/A	0.00	0.00	100.00	0	0	0	0	0	0	0.00	26.38	52.72	20.90							
Grove Region	1.24	2	2.99	N/A	0.00	100.00	N/A	0	0	0	0	0	0	0.00	28.93	71.07	0.00							
Kay County	0.69	2	2.99	N/A	N/A	50.00	50.00	0	0	0	0	0	0	0.00	0.00	51.15	48.85							



