

## **Public Disclosure**

November 22, 1999

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

First Fidelity Bank, National Association  
Charter Number: 17045

5101 N. Classen Boulevard  
Oklahoma City, Oklahoma 73118

Office of the Comptroller of the Currency

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**NOTE:** 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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## General Information

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the CRA performance of **First Fidelity Bank, National Association, Oklahoma City, Oklahoma** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **November 22, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

**Community Development (CD)** - Affordable 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.

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

**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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

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

**Low-Income** - Income levels that are less than 50% of the median family income.

**Median Family Income (MFI)** - The median income determined by the United States 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 Statistical Area (MSA)** - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** - Income levels that are at least 80% and less than 120% of the MFI.

**Moderate-Income** - Income levels that are at least 50% and less than 80% of the MFI.

**Small Business Loans** - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Farm Loans** - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

**Upper-Income** - Income levels that are 120% or more of the MFI.

## Overall CRA Rating

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

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

Performance Levels	First Fidelity Bank, National Association 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:

FFB's volume of small loans to businesses was excellent with its level of loans to businesses with revenues of \$1 million or less higher than the percentage of businesses of that size located in the assessment area. FFB's percentage of lending to businesses with revenues of \$1 million or less is also higher than the percentage of loans made by all other reporting lenders in the Oklahoma City MSA.

FFB has established a good record of home mortgage lending among geographies and an adequate record of lending to borrowers of various income levels.

Retail services provided by FFB are adequate and reasonably accessible to persons and entities of various income levels in its assessment area.

FFB has provided, during the evaluation period, an adequate level of community development loans, investments, and services throughout its assessment area.

## Description of Institution

First Fidelity Bank, National Association (FFB), headquartered in Oklahoma City, Oklahoma, is a wholly owned subsidiary of First Fidelity Bancorp, Inc., a one bank holding company, also located in Oklahoma City. FFB was founded in 1989 and currently employs 283 people. FFB has an operating subsidiary located in Reno, Nevada, FFB Investments, Inc. This is a shell corporation established for the primary purpose of holding direct and indirect consumer and commercial paper. The activities of the operating subsidiary do not adversely affect the capacity of FFB to meet the credit needs of its assessment area. FFB offers a full range of consumer and commercial related financial services, to include mortgage banking, trust services, and retail nondeposit investment products. In addition to the main office located at 5101 N. Classen, FFB has 14 full service branches and 21 automated teller machines (ATMs) to serve their customers. Six branches are located in Oklahoma City, three are located in Moore, three in Norman, one in Midwest City, and one in Edmond. The main headquarters, as well as four of the six Oklahoma City branches, are located in moderate-income census tracts. The bank has 21 ATMs located in the assessment area, which are accessible 24 hours a day. Eight of the ATMs are located in moderate-income census tracts. The bank also offers a variety of electronic services to its customers. *Direct Line 24 Telephone Banking* is a free 24-hour telephone banking service. Various online banking services are also available to consumer and commercial customers.

As of September 30, 1999, FFB reported total assets of \$510 million, total loans of \$322 million, and a loan-to-deposit ratio of 78%. Tier 1 capital totaled \$32 million. The bank's business strategy is to focus on consumer and light commercial lending. The bank offers a diverse choice of loan and deposit products. Loan products include commercial, real estate, and consumer loans, including SBA loans, residential real estate loans retained and sold to secondary market investors, and credit card loans. Loans to individuals represent 38% of the loan portfolio, real estate loans represent 35%, commercial loans comprise 25%, with agriculture loans and other loans totaling 2%. FFB Investments, Inc., the bank's operating subsidiary, houses \$145 million in indirect consumer loans originated in this market. These loans have been consolidated into the above numbers.

FFB is an intrastate bank with the Oklahoma City MSA designated as their assessment area. This assessment area consists of six counties and 324 census tracts. As of June 30, 1998, (latest available data) the Federal Deposit Insurance Corporation (FDIC) reported that FFB maintains 3.70% of the commercial bank deposits in its assessment area. For additional detailed information on the



assessment area, please refer to **Appendix B: Market Profiles for Areas Receiving Full-Scope Reviews**.

There are no significant financial barriers limiting FFB's ability to help meet the identified credit needs of its assessment area. The bank is adequately capitalized and operates profitably.

A CRA Performance Evaluation dated January 15, 1998 was previously prepared for FFB and a **Satisfactory** performance rating was assigned.

Refer to **Appendix B: Market Profile of Full Scope Areas**, to review the demographic data for the bank's assessment area.

## **Scope of the Evaluation**

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

The evaluation period for this review is December 5, 1997 through November 19, 1999 for the Investment and Service Tests, and January 2, 1998 to September 30, 1999 for the Lending Test. The previous Performance Evaluation, dated January 15, 1998 was performed using the Small Bank CRA standards. A rating of Satisfactory was given. This Performance Evaluation is the first one for FFB that has been performed under the Large Bank CRA tests.

### **Data Integrity**

The scope of this examination included a review of the accuracy of the bank data analyzed to develop our conclusions and ratings. Our review tested data provided for 1997, 1998, and year-to-date June 30, 1999. The data tested for accuracy includes data made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Public data includes home mortgage lending and small loans to businesses and farms. We also reviewed the accuracy of non-public data for qualified investments, community development services, and community development loans.

Significant errors were noted in both the HMDA and CRA data submitted for 1997 and 1998. Errors were also noted in CRA and HMDA data provided for 1999 through June 30, 1999. Management was able to correct the errors noted in the CRA and HMDA data for 1998 and 1999. Due to time constraints, 1997 data was not corrected, and was not analyzed for this evaluation for either CRA or HMDA. Internal testing was completed and corrections verified for CRA and HMDA through September 30, 1999. Due to the corrections made, the 1998 data analyzed in this evaluation will differ from the publicly reported information.

Errors were also noted in the information provided to examiners regarding qualified investments and community development loans and services. Management was able to correct the errors during the analysis portion of the examination, which allowed us to use the data for this evaluation.

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

FFB has designated the Oklahoma City MSA as their assessment area. We performed full-scope procedures to evaluate FFB's overall performance. This evaluation includes a detailed market profile of the Oklahoma City MSA. The

profile includes demographic and narrative information about the assessment area, its credit and community development needs, and the level and nature of community development opportunities. The analysis of FFB's performance in its assessment area considers the performance context information assembled as part of the profile. Additional analysis included the evaluation of the geographic distribution of lending and services provided in order to identify conspicuous gaps. The responsiveness of community development loans and investments to the community needs was also determined, as well as, the level of innovation and complexity involved in the loans and investments.

Refer to the table in **Appendix A** for more information.

### **Other**

Two community contacts were made in Norman for the purposes of determining if credit needs are being met, and what opportunities for community development lending, investments, and services may be available for banks to participate in. Additional copies of community contacts made by various government agencies during the evaluation period were obtained for Oklahoma City. The group of contacts reviewed included small business development and economic development agencies, realtors, public officials, one small neighborhood association, and a private not-for-profit developer. See the **Market Profile in Appendix B** for needs identified by these contacts.

## **Fair Lending Review**

Compliance with fair lending laws and regulations is satisfactory. Our review of fair lending laws and regulations did not reveal any evidence of illegal discriminatory treatment to borrowers from a prohibited basis group. Our review compared five home improvement loan denials from black applicants to twenty-five home improvement loan approvals from white applicants. The underwriting standards and levels of assistance were tested for differences in treatment. Our review for compliance with fair lending laws and regulations also included technical compliance with the Equal Credit Opportunity Act (ECOA). FFB has policies and procedures in place to prevent discriminatory or other illegal credit practices.

## 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 "**High Satisfactory**". Based on full-scope reviews, the bank's performance in the assessment area is reasonable.

#### Lending Activity

Refer to **Table 1 in Appendix C** for the facts and data used in this analysis.

The bank's volume of home mortgage lending was adequate. During the evaluation period, FFB ranked well below the market leaders for home purchase and refinance loans at 49<sup>th</sup> and 83<sup>rd</sup> place respectively. FFB was the eleventh highest lender for home improvement loans during the review period. Competition for mortgage loans is very high in the Oklahoma City MSA, with almost 300 lenders reporting home purchase loans, and over 320 lenders reporting refinance loans in 1998.

FFB's volume of small business loans was excellent. The market share ranking for both small business and small farm loans was higher than FFB's deposit market share ranking. The percentage of loans to small businesses was good. FFB had a higher percentage of its small business loans to businesses with revenues of \$1 million or less, than the percentage of small businesses in the Oklahoma City MSA, or the percentage of small business loans reported by all other lenders in the market.

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

We did not note any conspicuous gaps in the bank's lending patterns. We analyzed the distribution of home purchase, home improvement, refinance and small business loans in the low- and moderate-income census tracts of the assessment area to determine if there were any significant clusters of census tracts with low loan penetration. We used maps that displayed the income level of the census tracts and the level of lending for each product reviewed. If we found low penetration in one product, we looked to see whether another product compensated for the low penetration. We also considered the number of owner-occupied housing units and the number of businesses in each census tract to determine if a very low number in either demographic characteristic explained a perceived gap.

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

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

FFB's geographic distribution of mortgage loans by income level of census tract is good. The distribution of home purchase loans is excellent, and for home improvement and refinance is adequate.

### **Home Purchase**

The distribution of home purchase loans in low-income census tracts is slightly above the percentage of owner-occupied dwellings in those tracts. The distribution of home purchase loans in moderate-income census tracts is well above the percentage of owner-occupied dwellings in those tracts. Market share performance is also good, as the percentage share of home purchase loans in low- and moderate-income census tracts is higher than FFB's overall market share. Even though the distribution of loans in the low- and moderate-income geographies compares well to the percentage of owner-occupied units, the overall volume of loans is low, and did not carry as much weight in this evaluation as the small business lending.

### **Home Improvement**

Home improvement lending in low- and moderate-income census tracts was adequate. The percentage of bank loans in low-income geographies is slightly below the percentage of owner-occupied units in those areas. The percentage of

loans in moderate-income geographies was below the percentage of owner-occupied units in those areas. Market share in both low-income and moderate-income census tracts is considered adequate. The bank's market share of home improvement loans in low-income census tracts was somewhat lower than its overall market share for home improvement loans. The bank's market share for home improvement loans in moderate-income census tracts was slightly above its overall market share, but neither category had a significant number of loans when compared with the total made by all lenders in the assessment area.

### **Refinanced Loans**

The volume of refinance lending in the assessment area was adequate. Performance in low-income geographies was poor, as no refinance loans were made in these areas during the review period. The volume of refinance loans in moderate-income tracts was adequate. The percentage of loans in those areas was slightly below the percentage of owner-occupied units. Overall market share in refinance loans is low. The market share in moderate-income geographies slightly exceeded the overall market share in the assessment area.

### ***Small Business Loans***

Refer to **Table 5 in Appendix C** for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

FFB's geographic distribution of small loans to businesses in their assessment area was good. In 1998, the bank's market share of small loans to businesses was above the bank's deposit share in the market. The market share of loans to businesses in low-income geographies was below the overall market share, while the market share of small loans to businesses in moderate-income census tracts exceeded the overall market share. The percentage of loans the bank made in low- and moderate-income tracts slightly trailed percentages of businesses located in those areas.

### ***Small Farm Loans***

Refer to **Table 6 in Appendix C** for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations.

FFB's geographic distribution of small loans to farms was poor. No farm loans were made in low-income geographies, and the percentage of loans in moderate-income tracts was well below the percentage of farms located in moderate-income

tracts. In 1998, the bank's overall market share of small loans to farms was adequate. While the market share ranking is above the bank's market share of deposits, few small farm loans were originated during the review period. This type of lending is not a significant product, and carried little weight in the overall rating under the lending test.

### ***In/Out Ratio***

The bank's distribution of loans inside and outside of its assessment area is excellent. A very substantial majority, 97% of the number and 95% of the dollar volume of all loans reported by FFB, were made within its assessment area. By loan type, over 96% of home mortgage loans and 97% of small business loans were made in the assessment area. Approximately 91% of the dollar volume of HMDA loans and over 96% of the dollar volume of small loans to businesses and farms were originated in the assessment area.

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

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

Refer to **Tables 7, 8 and 9 in Appendix C** for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

The distribution of home mortgage loans by income level of the borrower is adequate. Distribution of all three categories of loans to low-income borrowers is poor, but is good to moderate-income borrowers.

### **Home Purchase**

Home purchase lending to low-income borrowers is well below the percentage of low-income families in the assessment area. The percentage of home purchase loans to moderate-income borrowers mirrors the percentage of moderate-income families in the area. The bank's market share of home purchase loans is very low, as previously discussed, and the distribution of home purchase loans to low- and moderate-income borrowers is slightly less than the overall market share in the assessment area.

### **Home Improvement**



Home improvement lending to low-income borrowers is well below the percentage of low-income families in the assessment area. The level of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the assessment area. The bank's market share of home improvement loans is adequate. The bank's market share to low- and moderate-income borrowers slightly exceeds their overall market share.

### **Refinanced**

Home refinance lending to low-income borrowers is significantly below the percentage of low-income families in the assessment area. The percentage of refinance loans to moderate-income borrowers slightly exceeds the percentage of moderate-income families in the area. The bank's market shares with low- and moderate-income borrowers were both higher than the overall market share, which is very low as previously discussed.

### ***Small Business Loans***

Refer to **Table 10 in Appendix C** for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

FFB's record of making small loans to businesses with gross annual revenues of \$1 million or less is excellent. The bank's percentage of small loans is higher than the percentage of businesses reporting revenues of \$1 million or less in the assessment area. Their percentage of small loans is also higher than all other lenders reporting loans to businesses with revenues of \$1 million or less. A substantial majority (88%) of the bank's small business loans, were less than \$100 thousand. The market share of loans to small businesses is also higher than the bank's overall market share of small loans to all businesses.

### ***Small Farm Loans***

Refer to **Table 11 in the Appendix C** for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

FFB's record of making small loans to farms is adequate. It is not a significant portion of their lending portfolio, and carried minimal weight in the overall lending test rating. The percentage of small loans to farms with revenues of \$1 million or less was higher than all other lenders reporting in the Oklahoma City MSA, but is lower than the percentage of farms reporting revenues of \$1 million or less. The bank's overall market share of small loans to farms is low. Its market share of

small loans to farms with revenues of \$1 million or less is higher than its overall market share.

## **Community Development Lending**

Refer to **Table 1 in Appendix C** for the facts and data used to evaluate FFB's level of community development lending.

The bank's level of community development lending, while not particularly innovative or complex, is adequate. Most of the bank's lending is in the category of providing affordable housing for low- and moderate-income individuals. Affordable housing is recognized as a need in the assessment area.

Details on the bank's community development loans are provided below;

Silvercrest Apartments: This is a \$2.5 million participation in a \$5 million rehabilitation and construction loan originated by FFB, for a 208-unit apartment complex located in Oklahoma City. The units will primarily be rented to individuals and families in the low- to moderate-income range. The project's budgeted rental rates are within the specified guidelines set by the Federal Tax Credit Program for projects utilizing Low Income Housing Tax Credits. The apartment complex is located in a moderate-income census tract.

City Rescue Mission, Inc.: FFB has a \$250 thousand participation in a \$1.5 million rehabilitation and construction loan to the City Rescue Mission, Inc., a nonprofit organization providing religious, charitable, and benevolent services to the homeless and needy of Oklahoma City.

Central Oklahoma Clearing House Association (COCHA): FFB participates in COCHA's low to moderate-income residential loan program. During the review period, the bank has committed approximately \$20 thousand to this program.

## **Product Innovation and Flexibility**

FFB recently developed new underwriting criteria for low-income home improvement, home purchase, and consumer auto purchase loans to provide

accessibility of credit to low-income families in the assessment area. No loans were originated under the more flexible underwriting guidelines during the lending review period.

The mortgage department offers flexible home purchase loan programs through their secondary market investors, but none of these loans are included in the figures in the Lending Volume tables in Appendix C, since all applications processed by the mortgage department are approved and funded by the secondary market investors.

The mortgage department became certified to offer FHA and VA home mortgage loans during this examination.

## **INVESTMENT TEST**

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

Refer to **Table 12 in Appendix C** for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test is rated "**Low Satisfactory.**"

Qualified investments are investments, deposits, membership shares, or grants that have as their primary purpose "community development" as defined in the CRA regulation. The level of investment opportunities in the OKC MSA is moderate. FFB's volume of investments is adequate in relation to the bank's capitalization. Responsiveness to the most pressing needs of the community is also adequate.

The majority of the dollar amount of investments is used to finance affordable housing projects. FFB has developed a program to purchase pools of affordable housing mortgages in its assessment area. The bank is able to identify and select the underlying mortgages by the reported income level of the borrower. Three such pools have been purchased to date, totaling \$751 thousand, with plans to purchase similar pools in the future. The bank also has an equity investment of \$12,500 in a local Community Development Corporation (CDC) that has as its primary purpose, the purchase and rehabilitation of affordable housing for low- and moderate-income people. The CDC has been inactive during the review period for this evaluation, but there are plans to reactivate the program.

The remaining items are grants and donations to agencies that provide community development services to low- and moderate-income people in the assessment area. Examples include: groups promoting affordable housing, battered women's shelters, and various other groups which provide health, economic, and general welfare assistance to low- and moderate-income individuals/families.

FFB was previously evaluated under small-bank guidelines, which do not require community development investments. FFB made donations and investments continuously throughout this evaluation period. Bank management continues to explore opportunities.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "**Low Satisfactory.**"

Refer to **Table 13 in Appendix C** for the facts and data used to evaluate the distribution of the bank's branch network and the opening and closing of branches.

### **Retail Banking Services**

The quantity, quality and accessibility of FFB's service-delivery systems within the assessment area are good. The bank provides a wide range of services at each of the 14 locations. Services provided at the various branches do not vary in a way that would inconvenience portions of the assessment area. Hours of operation are equitable bank wide.

Branch and ATM locations are considered to be reasonably accessible and equitably distributed between moderate-, middle-, and upper-income geographies. Four of the six Oklahoma City branches, in addition to the bank's headquarters, are located in moderate-income census tracts. Five branches are located in middle-income census tracts and five are located in upper-income census tracts. Eight of the bank's 21 ATMs are located in moderate-income census tracts. Since the last CRA examination dated January 15, 1998, the bank has opened three new branch offices and relocated the corporate office. One branch and the new corporate office are located in moderate-income census tracts and two branches were opened in upper-income census tracts. The former corporate office was located in a middle-income tract and was closed in November 1999. Openings and closings

of branches have not had an adverse impact on low- and moderate-income geographies or individuals. Refer to **Appendix C: - Tables of Performance Data - Table 13** for an illustration of the aggregate distribution of FFB's branch locations by income level within the assessment area.

FFB has several products that provide alternate delivery systems for easy access to bank services by all sections of their assessment area, as well as to low- and moderate-income individuals and geographies. In addition to branches and ATMs, the bank offers the following delivery services:

- **Direct Line 24 Telephone Banking** - is an automated telephone service that enables customers to obtain loan and deposit information 24 hours a day, 365 days a year, free of charge.

- **Customer Service Center** - is a full service telephone center that permits customers to open accounts, apply for consumer loans, and inquire about rates. The center is open Monday through Friday from 8:00 a.m. to 6:00 p.m. Sometime during the first quarter of 2000, FFB will expand Customer Service hours to 8:00 a.m. to 8:00 p.m. Monday through Friday and 8:00 a.m. to 1:00 p.m. on Saturday.
- **Bi-Lingual Services** - are offered at the Capital Hill Branch to better serve the high percentage of Hispanic customers that frequent this branch. The branch has a Personal Banking Representative and a teller who speak fluent Spanish. The Customer Service Center also has an employee who speaks fluent Spanish.

**FFB Online (personal and commercial)** - is a product that allows individual and commercial customers free Internet access to their accounts. Features include review of balances, bill paying, transfer of funds, check ordering, stop payments, and account reconciliation. No data was available to determine if low- and moderate-income individuals and geographies are positively affected by this alternative delivery system; therefore, we could not place significant weight when drawing our CRA performance conclusions for this product.

### **Community Development Services**

The current level of community development services is low. FFB has an officer who serves on the Board of Directors for the Cleveland County Habitat for Humanity and an officer who serves on the Loan Review Committee for the Central Oklahoma Clearing House Association (COCHA) Low-income Home Purchase Program. These organizations provide affordable housing for low- and moderate-income individuals.

The bank also accepts Access Oklahoma Cards. These are "money cards" issued by the State of Oklahoma to persons receiving certain types of public assistance. ATM access is required to obtain these funds. FFB has modified its ATMs to accept these cards and does not charge its usual terminal fee to users of these cards.

## Appendix A: Scope of Examination

The following table identifies the time periods covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "Full Scope" and those that received a less comprehensive review (designated by the term "Limited Scope").

<b>Time Period Reviewed</b>	Lending Test: January 2, 1998 to September 30, 1999 Investment Test: December 5, 1997 to November 19, 1999 Service Test: December 5, 1997 to November 19, 1999	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First Fidelity Bank, N.A. (FFB) Oklahoma City, Oklahoma	Home purchase and refinance mortgage loans, home improvement loans, small business loans, small farm loans, community development loans, community development investments, retail and community development services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>No affiliate activities were reviewed during this evaluation.</i>		
List of Assessment Areas and Type of Examination		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Oklahoma City MSA #5880	Full Scope	

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

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

MSA #5880 .....B-1

#### 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
Businesses by Geography	39,379	5.16	27.26	39.65	25.64	2.29
Farms by Geography	1,070	1.96	24.67	46.17	27.01	0.19
Family Distribution by Income Level	257,571	20.07	17.74	22.79	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 HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$32,406 = \$43,300 = 13.68%	Median Housing Value Unemployment Rate (As of August 31, 1999)				= \$55,280 = 2.4%*

Source: 1990 U.S. Census, and 199X HUD updated MFI. \*Oklahoma Department of Commerce Revised Rates.

FFB operates 15 full service branches and 21 ATMs in the Oklahoma City MSA. Five of the branch offices are located in moderate-income census tracts and eight of the ATMs are located in moderate-income tracts. This assessment area consists of six counties comprising Canadian, Cleveland, Logan, McClain, Oklahoma, and Pottawatomie counties. Oklahoma County is the most populous county in the MSA. Significant loan and deposit competitors in the Oklahoma City MSA include Bank One Oklahoma, Midfirst Bank, Bank of America (formerly NationsBank), Bank of Oklahoma, and Local Oklahoma Bank. Approximately 28% of the households in the MSA receive public assistance or social security. Households below the poverty level represent 13.68%. Slightly less than 87% of the total housing units are occupied and approximately 56% are owner occupied.



According to September 1999, employment information obtained by the Oklahoma Employment Security Commission and the U.S. Department of Labor, Bureau of Labor Statistics, the labor force in the Oklahoma City MSA is estimated to be 545,480, with an unemployment rate of 2.4%. The economy is good and generally diverse. State government, military, telecommunications, health care, education, and retail services are dominant industries.

Lender market share reports for 1998 show that FFB obtained the fifth highest market share in the MSA for small business lending (6.95%), and the sixth highest for farm loans (2.70%). The June 30, 1998, FDIC market share report indicates FFB maintains the seventh highest percentage of deposits in the MSA with 3.70%.

During the examination, two community contacts were performed. Sixteen other community contacts performed by the OCC, the FDIC, and the Federal Reserve were reviewed. The contacts indicated that affordable housing was a primary need. Emergency care shelter/services and transitional housing were noted as being a dire need in the Oklahoma City and Norman communities. Several opportunities for community development lending, investment, and services were disclosed during the community contacts. Lending products included participating with local banks in various programs to provide funds for affordable housing, rehabilitation, and assistance with down payments and closing costs. Many banks have mortgage products with flexible terms that target low- and moderate-income families, such as low down payments, closing costs, and below market interest rates. Investment opportunities include participating in projects with low-income tax credits and grants to local community development agencies. Service opportunities include providing technical assistance, such as credit counseling, landlord tenant training, and home buyer training. Overall, comments by community contacts have been positive with regard to the performance of local financial institutions in meeting the credit and community development service needs of the community.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the **Abank** 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; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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 MSA/assessment area. The following is a listing and brief description of the tables included in each set:

**Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.

**Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and 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 Refinance Loans** - See Table 2.

**Table 5. 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 rank and market share information based on the most recent aggregate market data available.

- Table 6. 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 rank and market share information based on the most recent aggregate market data available.
- Table 7. 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. 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 the population 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 MSA/assessment area.



**Table 1. Lending Volume**

LENDING VOLUME												
			State: Oklahoma				Evaluation Period: January 2, 1998 TO September 30, 1999					
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans(#) in MSA/AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:												
Oklahoma City MSA	100	623	26,708	1,178	69,460	25	599	5	2,756	1,831	99,523	100
Limited-Scope:												
N/A												

\* Deposit data as of September 30, 1999.

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

Geographic Distribution: HOME PURCHASE																
State: Oklahoma				Evaluation Period: January 2, 1998 TO September 30, 1999												
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% 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	#	% of Total**
Full-Scope:																
Oklahoma City MSA	2.35	2.50	21.40	28.75	46.55	38.75	29.70	30.00	49	0.36	1.28	0.72	0.41	0.18	160	100
Limited-Scope:																
N/A																

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 (\*\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

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

Geographic Distribution: HOME IMPROVEMENT      State: Oklahoma      Evaluation Period: January 2, 1998 TO September 30, 1999																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% 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	#	% of Total**
Full-Scope:																
Oklahoma City MSA	2.35	1.54	21.40	17.90	46.55	39.20	29.70	41.36	11	3.33	2.83	3.87	2.64	4.06	324	100
Limited-Scope:																
N/A																

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 (\*\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.



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

Geographic Distribution: HOME MORTGAGE REFINANCE      State: Oklahoma      Evaluation Period: January 2, 1998 TO September 30, 1999																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% 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	#	% of Total**
Full-Scope:																
Oklahoma City MSA	2.35	0.00	21.40	18.80	46.55	44.36	29.70	36.84	83	0.24	0.00	0.39	0.26	0.20	133	100
Limited-Scope:																
N/A																

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 (\*\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES      State: Oklahoma      Evaluation Period: January 2, 1998 TO September 30, 1999																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Oklahoma City MSA	5.16	4.75	27.26	24.28	39.65	39.30	25.64	31.24	5	6.95	5.38	7.42	7.26	7.39	1,178	100
Limited-Scope:																
N/A																

(\*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.  
 (\*\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

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

Geographic Distribution: SMALL LOANS TO FARMS State: Oklahoma Evaluation Period: January 2, 1998 TO September 30, 1999																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total*
Full-Scope:																
Oklahoma City MSA	1.96	0.00	24.67	4.00	46.17	76.00	27.01	20.00	6	2.70	0.00	0.00	4.26	4.08	25	100
Limited-Scope:																
N/A																

(\*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.  
 (\*\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE State: Oklahoma Evaluation Period: January 2, 1998 TO September 30, 1999																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Oklahoma City MSA	20.07	9.15	17.74	17.61	22.79	19.01	39.41	54.23	49	0.36	0.33	0.33	0.30	0.54	160	100
Limited-Scope:																
N/A																

(\*) As a percentage of loans with borrower income information available. No information was available for 11.25% of loans originated and purchased by the bank.  
 (\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Borrower Distribution: HOME IMPROVEMENT      State: Oklahoma      Evaluation Period: January 2, 1998 TO September 30, 1999																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Oklahoma City MSA	20.07	9.97	17.74	21.26	22.79	24.58	39.41	44.19	11	3.33	3.60	3.36	3.11	3.61	324	100
Limited-Scope:																

(\*) As a percentage of loans with borrower income information available. No information was available for 7.10% of loans originated and purchased by the bank.  
 (\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 (\*\*\*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE																
				State: Oklahoma				Evaluation Period: January 2, 1998 TO September 30, 1999								
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Oklahoma City MSA	20.07	6.50	17.74	18.70	22.79	21.95	39.41	52.85	72	0.24	0.26	0.34	0.20	0.30	133	100
Limited-Scope:																
N/A																

(\*) As a percentage of loans with borrower income information available. No information was available for 7.52% of loans originated and purchased by the bank.  
 (\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.  
 (\*\*\*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES State: Oklahoma Evaluation Period: January 2, 1998 TO September 30, 1999											
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size				Market Share****		Total Small Loans to Businesses	
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total****	
Full-Scope:											
Oklahoma City MSA	71.73	73.26	67.55	87.78	7.39	4.84	6.95	7.30	1,178	100	
Limited-Scope:											
N/A											

(\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.  
 (\*\*) 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 0.39% of small loans to businesses originated and purchased by the bank.  
 (\*\*\*) The market consists of all other Small Business reporters in the MSA/AA and is based on 1998 Aggregate Small Business Data only.  
 (\*\*\*\*) Based on 1998 Aggregate Small Business Data only.  
 (\*\*\*\*\*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.



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

Borrower Distribution: SMALL LOANS TO FARMS State: Oklahoma Evaluation Period: January 2, 1998 TO September 30, 1999										
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total****
Full-Scope:										
Oklahoma City MSA	94.02	92.00	87.50	96.00	4.00	0.00	2.70	3.08	25	100
Limited-Scope:										
N/A										

(\*) Farms with revenues of \$1 million or less as a percentage of all farms.  
 (\*\*) 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 8.00% of small loans to farms originated and purchased by the bank.  
 (\*\*\*) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1998 Aggregate Small Farm Data only.  
 (\*\*\*\*) Based on 1998 Aggregate Small Farm Data only.  
 (\*\*\*\*\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS State: Oklahoma Evaluation Period: December 5, 1997 TO November 19, 1999									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$-s	#	\$ (000's)
Full-Scope:									
Oklahoma City MSA	1	12,500	33	770,419	34	782,919	100	0	0
Limited-Scope:									
N/A									

(\*) 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 reported on the Report of Condition Schedule-L Off Balance Sheet Items.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: Oklahoma				Evaluation Period: December DAY, 1997 TO November 19, 1999									
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Oklahoma City MSA	100	15	100	0.00	33.3 3	33.3 3	33.3 3	1	4	0	+2	-1	+2	3.71	24.7 3	44.4 6	26.9 6
Limited-Scope:																	
N/A																	

**Table 14. Geographic and Borrower Distribution of Consumer Loans (Optional)**

Geographic and Borrower Distribution: CONSUMER LOANS																		State: Oklahoma		Evaluation Period: January 2, 1998 TO September 30, 1999	
MSA/Assessment Area:	Geographic Distribution								Borrower Distribution												
	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Total Consumer Loans				
	% of Pop*	% BANK Loans	% of Pop*	% BANK Loans	% of Pop*	% BANK Loans	% of Pop*	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	#	% of Total**			
Full-Scope:																					
N/A																					
Limited-Scope:																					
N/A																					

(\*) The percentage of the population in the MSA/assessment area that resides in these geographies.  
 (\*\*) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.