



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks  
Washington, DC 20219

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## **PUBLIC DISCLOSURE**

**April 25, 2005**

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

#### **First National Bank**

**Charter Number 14986**

**2911 South Air Depot  
Midwest City, Oklahoma 73110**

**Comptroller of the Currency  
Kyle M. Jones,  
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Oklahoma City Field Office  
The Harvey Parkway Building, Suite 490  
301 NW 63<sup>rd</sup> Street,  
Oklahoma City, Oklahoma 73116**

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, nor should it 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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## ***Description of Institution***

The First National Bank (FNB) is an intrastate bank headquartered in Midwest City, Oklahoma. All of its branch locations are located within the Oklahoma City metropolitan area. FNB is a \$297 million institution and is wholly owned by First Midwest Bancorp, Incorporated, a one-bank holding company also located in Midwest City, Oklahoma. The main bank, ATM, and drive-up facility are located at 2911 South Air Depot, Midwest City, Oklahoma.

***Full-service branches and ATMs are located at the following locations:***

Douglas*	1213 South Douglas Boulevard
Del City*	4330 S.E. 29 <sup>th</sup> Street
Tinker A.F.B.	Building 685, Tinker Air Force Base
Choctaw*	15801 N.E. 23 <sup>rd</sup> Street
Harrah	Country Boy Grocery, 20941 S.E. 29 <sup>th</sup> Street

***ATM facilities are located at the following locations:***

Midwest Regional Medical Center	2825 Parklawn Drive, MWC <sup>1</sup>
BestYet Foods	19655 N.E. 23 <sup>rd</sup> Street, Harrah
Big Bud's Phillips 66	5002 South Douglas Boulevard, MWC
Country Boy #9	18450 East Highway 9, Little Axe
Crest Discount Foods #1	7212 East Reno, MWC
Crest Discount Foods #2	249 North Douglas Boulevard, MWC
Country Boy Grocery	20941 S.E. 29 <sup>th</sup> Street, Harrah
Del City Drive-In	Del Crest Center, S.E. 15 <sup>th</sup> Street, Del City
Quad Graphics	6801 S. Sunnyslane, OKC
Tinker Air Force Base	Building 3001, Area "C"
Tinker Air Force Base	Service Station
Tinker Air Force Base	Indian Hills Inn
Tinker Air Force Base	Vanaway Dining Hall, Building 5905
Tinker Air Force Base	Mini Mart

As of December 31, 2004, FNB reported total assets of \$298 million, Tier 1 capital of \$29 million, and a loan-to-deposit ratio of 56 percent. Gross loans were reported to be \$142 million, or 48 percent of total assets. These loans consisted of \$99 million in real estate loans, (70 percent), \$15 million in consumer loans, (11 percent), \$27 million in commercial loans, (19 percent), and \$146 thousand (0.10 percent) in miscellaneous loan types. There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its assessment area (AA). A "***Satisfactory***" rating was assigned at the last Community Reinvestment Act review, which was performed as of January 10, 2000.

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<sup>1</sup> MWC: Midwest City

OKC: Oklahoma City

Tinker Air Force Base is located adjacent to Midwest City

\* Also has Drive-In Facility

The bank's primary focus is to serve commercial and consumer customers in its AA. FNB meets these needs by providing various types of loan and deposit products and services. The ability to lend in its AA continues to be impacted by very strong competition from a substantial number of other banks and financial institutions, or branches of those institutions.

### ***Evaluation Period***

FNB's mortgage and small business lending was evaluated using data for the period between January 1, 2003 through December 31, 2004. However, the tables in Appendix B do not include 2003 mortgage originations. Home mortgage lending performance for 2003 is consistent with 2004 performance. For community development loans, investments and services, the evaluation period was January 10, 1999 through April 25, 2005.

## Overall CRA Rating

**INSTITUTION'S CRA RATING:** This institution is rated **“Satisfactory”**

The following table indicates the performance level of **First National Bank** with respect to the lending, investment, and service tests:

Performance Levels	First National Bank, Midwest City Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		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 a good responsiveness by FNB to the credit needs of the AA.
- A good distribution of FNB’s loans among geographies and among borrowers of different income levels throughout the AA.
- Good accessibility of FNB’s offices to geographies and individuals of different income levels.
- Investments that reflect an adequate responsiveness by FNB to the needs of its AA in light of the limited investment opportunities.
- Excellent performance in providing community development services.

## *Lending*

Please refer to *Tables 1 through 9* in *Appendix B* for facts and data used to evaluate the bank's lending.

Performance under the lending test is rated “**High Satisfactory**”

FNB's lending performance is good in the Partial Oklahoma County AA. The volume of both small business and home mortgage lending activity is good. At December 31, 2004, FNB reported a loan-to-deposit ratio of 56 percent. This is comparable to local peer banks and indicates FNB's willingness to meet the credit needs of its community.

FNB's AA has no low-income census tracts (CTs). FNB's distribution of small business loans in moderate-income areas is good. Thirty-seven percent of small business loans were made in moderate-income geographies, which is near the percentage of businesses in those areas of 39 percent. FNB's distribution of home mortgage loans in moderate-income areas is good. Thirty-seven percent of home purchase loans were made in moderate-income geographies, which exceeds the percentage of owner-occupied units in those areas of 29 percent. Twenty-nine percent of home improvement loans were made in moderate-income geographies, which is equal to the percentage of owner occupied units in those areas. Thirteen percent of home refinance loans were made in moderate-income geographies, which is less than the percentage of owner occupied units in those areas.

Fifty-two percent of FNB's reportable loans were made inside its AA, which represents an adequate percentage.

FNB's distribution of small loans to businesses is excellent. Loans to businesses with revenues of \$1 million or less represented 86 percent of the bank's reportable loans, which was greater than the 64 percent of area businesses that had revenues of less than \$1 million. FNB's distribution of home mortgage loans to low- and or moderate-income individuals is good. Eleven percent of home purchase, 14 percent of home improvement, and 10 percent of home refinance loans were made to low-income individuals, which is lower than the percentage of families of those income levels at 20 percent. Thirty-two percent of home purchase and 25 percent of home improvement loans were made to moderate-income individuals, which exceeds the percentage of families of those income levels at 20 percent. Fourteen percent of home refinance loans were made to moderate-income families, which is slightly lower than the percentage of families of those income levels.

FNB's community development lending had a positive affect on its rating. FNB made three qualified loans totaling \$2.9 million. These loans were extended to nonprofit organizations that provide economic development and services to low- and moderate-income individuals. We also noted FNB has made numerous small business and affordable housing loans to meet the economic development needs of the community. Many of these loans were to rebuild areas that were devastated during the May 3, 1999 tornado.

## *Investments*

Please refer to *Table 10* in *Appendix B* for facts and data used to evaluate the bank's level of qualified investments.

Performance is rated “**Low Satisfactory**”

In evaluating the bank's qualified investments, community development investment opportunities in the AA were considered. Opportunities for qualified investments are very limited in the Partial Oklahoma County AA due to local economic conditions and limited local infrastructure to create qualified investments. In addition, FNB lacks the expertise to create these opportunities.

In the Partial Oklahoma County AA, performance is adequate. During the evaluation period FNB made over 60 donations totaling \$108 thousand. Donations targeted local nonprofit organizations that provide services to low- and moderate-income individuals or provide affordable housing. FNB also made a \$500 thousand equity investment in the Oklahoma MetaFund Community Development Corporation (CDC). The CDC was established to invest in or finance venture capital enterprises, primarily targeting low-income areas and small business ventures throughout Oklahoma.

## *Services*

Please refer to *Table 11* in *Appendix B* for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Performance under the service test is rated “**High Satisfactory**”

FNB's offices and retail services are readily accessible to geographies and individuals of different income levels throughout the AA. There are no low-income geographies within FNB's AA. However, thirty-three percent of FNB's offices are located in moderate-income areas. This meets the percentage of moderate-income population that resides in these areas. Two of the bank's branches are located in moderate-income CTs, including the main office. Two branches located in middle-income CTs are adjacent to moderate-income CTs. In effect, four of the bank's six locations are in or readily accessible to moderate-income areas. Other retail delivery systems include ATMs, Internet banking, banking by mail and telephone banking. Extended banking hours are offered at all branch and drive-up locations. No branch openings or closings have occurred during the evaluation period.

FNB's community development services are excellent. These services include significant hours spent providing banking/financial awareness programs to new, low-income recruits at Tinker AFB, who typically have limited banking knowledge. A bank officer is a board member of an organization that provides affordable housing. Another bank officer serves on the Chamber of Commerce's Economic Development Committee and an officer serves on the Business Development Committee. Numerous bank employees are involved with fund raising activities for organizations that provide services or goods to low- and moderate-income families. Bank employees are actively involved in local civic organizations. Most of these organizations sponsor fund raising events or offer goods and services that benefit low- and moderate-income families or areas within the community.

### ***Fair Lending or Other Illegal Credit Practices Review***

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



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

Demographic Information for Full Scope Area: Partial Oklahoma County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	43	0.00	44.19	37.21	18.60	0.00
Population by Geography	138,315	0.00	37.28	44.58	18.14	0.00
Owner-Occupied Housing by Geography	36,455	0.00	29.33	48.07	22.60	0.00
Business by Geography	5,367	0.00	39.13	41.46	19.41	0.00
Farms by Geography	104	0.00	31.73	47.12	21.15	0.00
Family Distribution by Income Level	38,649	20.44	20.64	23.16	35.76	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,878	0.00	47.82	41.51	10.67	0.00
Median Family Income		45,059				
HUD Adjusted Median Family Income for 2003		51,100				78,586
Households Below Poverty Level		13.07%				2.40%
			Median Housing Value			
			Unemployment Rate (1990 US Census)			

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

Source: 2000 US Census and 2003 HUD updated MFI

## Appendix B: 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. 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 Metropolitan Statistical Area/Assessment Area (MSA/AA). 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 MSA/AA. 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 MSA/AA column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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 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 6. 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/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of Home Improvement Loans** - See Table 6.
- Table 8. Borrower Distribution of Refinance Loans** - See Table 6.
- Table 9. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (equal to \$1 million or less) 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 10. 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 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 MSA/AA column and record the corresponding numbers and amounts in the "Qualified Investments" column.
- Table 11. 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.

Institution ID: FIRST NATIONAL BANK, Midwest City (14986)

Table 1. Lending Volume

LENDING VOLUME		STATE: OKLAHOMA						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2004				
MSA/Assessment Area (2003):	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Partial Oklahoma County	100.00	187	7,156	208	24,714	0	0	4	5,976	399	37,846	100.00

\* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MSA rating area.

\*\* The evaluation period for Community Development Loans is from January 10, 2004 to December 31, 2004.

\*\*\* Deposit Data as of April 25, 2005. Rated Area refers to either the state, multi-state MSA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		STATE: OKLAHOMA						Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004							
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper
<b>Full Review:</b>															
Partial Oklahoma County	19	100.00	0.00	0.00	29.33	36.84	48.07	52.63	22.60	10.53	0.62	0.00	0.66	0.66	0.46

\* Based on 2003 Peer Mortgage Data (Southwest)

\*\* 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.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												STATE: OKLAHOMA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MSA/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 Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper					
<b>Full Review:</b>																				
Partial Oklahoma County	91	100.00	0.00	0.00	29.33	28.57	48.07	49.45	22.60	21.98	10.76	0.00	8.44	13.75	8.07					

\* Based on 2003 Peer Mortgage Data (Southwest)

\*\* 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.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												STATE: OKLAHOMA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Overall	Low	Mod	Mid	Upper					
<b>Full Review:</b>																				
Partial Oklahoma County	77	100.00	0.00	0.00	29.33	12.99	48.07	55.84	22.60	31.17	1.77	0.00	2.21	1.73	1.51					

\* Based on 2003 Peer Mortgage Data (Southwest)

\*\* 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.

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

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												STATE: OKLAHOMA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2004				
MSA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>									
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upper					
<b>Full Review:</b>																				
Partial Oklahoma County	208	100.00	0.00	0.00	39.13	37.02	41.46	41.83	19.41	21.15	0.73	2.51	0.59	1.08	0.31					

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

Table 6. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE										STATE: OKLAHOMA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>							
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upper			
<b>Full Review:</b>																		
Partial Oklahoma County	19	100.00	20.44	10.53	20.64	31.58	23.16	36.84	35.76	21.05	0.76	0.26	0.64	0.89	0.97			

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Southwest)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>\*\*\*</sup> Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> 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 7. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			STATE: OKLAHOMA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004								
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upper
<b>Full Review:</b>															
Partial Oklahoma County	91	100.00	20.44	14.29	20.64	25.27	23.16	37.36	35.76	23.08	11.24	10.91	12.74	12.75	8.78

<sup>\*</sup> Based on 2003 Peer Mortgage Data (Southwest)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>\*\*\*</sup> Percentage of Families is based on the 2000 Census information.

<sup>\*\*\*\*</sup> 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 8. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			STATE: OKLAHOMA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004								
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upper
<b>Full Review:</b>															
Partial Oklahoma County	77	100.00	20.44	10.39	20.64	14.29	23.16	27.27	35.76	48.05	2.31	4.03	1.88	2.32	2.17

<sup>\*</sup>Based on 2003 Peer Mortgage Data (Southwest)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>\*\*\*</sup> Percentage of Families is based on the 2000 Census information.

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

Table 9. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			STATE: OKLAHOMA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2004				
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MSA/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>									
Partial Oklahoma County	208	100.00	63.65	86.06	65.38	24.52	10.10	0.73	1.28

\* Based on 2003 Peer Small Business Data -- US and PR

\*\* 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.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

\*\*\*\* 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 1.44% of small loans to businesses originated and purchased by the bank.

Table 10. Qualified Investments

QUALIFIED INVESTMENTS									
STATE: OKLAHOMA									
Evaluation Period: JANUARY 10, 1999 TO APRIL 25, 2005									
MSA/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>									
Partial Oklahoma County	0	0	60	608	60	608	100.00	0	0

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

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

Table 11. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS									
Geography: OKLAHOMA									
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2004									



MSA/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	Upper			Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
<b>Full Review:</b>																	
Partial Oklahoma County	100.00	6	100.00	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	37.28	44.58	18.14

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