



SMALL BANK

Comptroller of the Currency
Administrator of National Banks

PUBLIC DISCLOSURE

April 10, 2003

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Bridgeview Bank, National Association
Charter Number 17076**

**2225 West Hefner Road
Oklahoma City, OK 73120**

**Comptroller of the Currency
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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, 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.

TABLE OF CONTENTS

INSTITUTION'S CRA RATING..... 2
DESCRIPTION OF INSTITUTION..... 3
DESCRIPTION OF BRIDGEVIEW BANK, N. A. ASSESSMENT AREA 5
CONCLUSIONS ABOUT PERFORMANCE CRITERIA..... 7

INSTITUTION'S CRA RATING

This institution is rated Satisfactory.

The major factors that support this rating include:

- A majority of the bank's loans are made within the Assessment Area (AA).
- The bank's loan-to-deposit ratio is reasonable and meets the standards for satisfactory performance.
- The bank meets the standard for satisfactory performance for lending to borrowers of different incomes and businesses of different sizes.
- The bank meets the standard for satisfactory performance for the distribution of loans in the various income tract levels.
- The bank has not received any consumer complaints regarding Community Reinvestment Act (CRA) performance.

Bridgeview Bank, N.A. Oklahoma City is committed to serving the community. This is demonstrated by satisfactory lending performance as described in this Public Disclosure.

DESCRIPTION OF INSTITUTION

Bridgeview Bank, N.A., (Bridgeview) is headquartered in Oklahoma City, Oklahoma. The main bank and drive-through facility are located at 2225 West Hefner Road. An automated teller machine (ATM) is also available at this location. Since the last evaluation, the bank has closed an ATM at 7040 NW 122nd Street in 2002, due to the low volume of transactions.

The bank's primary focus is to serve commercial, real estate and consumer customers in Oklahoma County. Bridgeview meets these needs by providing various types of loan and deposit products and services.

As of December 31, 2002, Bridgeview's total assets equaled \$34 million, of which \$24.9 million, or 73 percent, were composed of various types of loans to individuals and businesses. Specifically, the bank's loan portfolio consists of the following:

Loan Category	\$ (000)	%
Commercial Real Estate Loans	12,358	49.66
Commercial Loans	6,645	26.71
Residential Real Estate Loans	2,740	11.01
Consumer Loans	2,228	8.95
Agricultural loans	912	3.67
Total	24,883	100.00

There are no legal or financial impediments to prevent the bank from meeting the credit needs of the AA. The bank received an overall rating of Satisfactory at the last CRA examination dated June 21, 1999.

DESCRIPTION OF BRIDGEVIEW'S ASSESSMENT AREA

The assessment area adopted by Bridgeview consists of whole geographies, does not reflect illegal discrimination and does not arbitrarily exclude low- or moderate-income geographies. It meets the requirements of the CRA regulation.

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF AA	
<i>Population</i>	
Number of Families	161,080
Number of Households	238,447
<i>Geographies</i>	
Number of Census Tracts/BNA*	221
% Low-Income Census Tracts/BNA	9.50%
% Moderate-Income Census Tracts/BNA	26.70%
% Middle-Income Census Tracts/BNA	39.82%
% Upper-Income Census Tracts/BNA	22.17%
<i>Median Family Income (MFI)</i>	
1990 MFI for AA	32,406
2002 HUD- Adjusted MFI	46,000
<i>Economic Indicators</i>	
Unemployment Rate	3.51%
1990 Median Housing Value	55,156
% of Households Below Poverty Level	13.89%

* 4 census tracts or 1.81% have not been categorized by income

The AA is defined as Oklahoma County. The AA encompasses 221 contiguous census tracts in central Oklahoma. Of these, 21 tracts are considered low income, 59 tracts are considered moderate income, 88 tracts are considered middle income and 49 tracts are considered upper income tracts. There are 4 tracts representing 1.81 percent that have not been categorized by income. The main bank, drive-through and ATM are located in an upper income census tract.

Based on the 1990 census data, the total population of the assessment area is 599,611. Of the 279,340 total housing units, 145,847 or 52 percent are owner occupied. Households below the poverty level total 33,127 or 14 percent and households that receive public assistance total 14,935 or 6 percent of the total number of households.

The local economy is stable but exhibits some signs of weakening. The local community has been negatively affected by the recent work force reductions or plant closures at Celestica (formerly Lucent Technologies), Xerox, and Gulfstream. Current concerns exist with the budget shortfall in the Oklahoma City Public School system. In the immediate area of the bank, the Wal-Mart store relocated in March 2001, and the building remains vacant.

Local banking competition is aggressive and includes several other national and state chartered banks or branches of financial institutions located outside of the assessment area.

A community contact was conducted during this review to help ascertain the credit needs of the assessment area. The contact reported that the economy is doing well, with the real estate market showing good growth. According to the contact, the immediate credit need of the community is the need for single-family low income housing (\$30,000 – \$70,000) and long-term financing for low-income houses. Additionally, the contact feels there is a need for small business loans for new businesses. The bank is considered to be involved in the various community development activities and projects in the area.

CONCLUSIONS ABOUT PERFORMANCE CRITERIA

The Performance Evaluation (PE) assesses the bank's performance focusing primarily on five performance criteria: the loan-to-deposit ratio, lending in the assessment area, lending to borrowers of different incomes and to businesses/farms of different sizes, geographic distribution of loans, and responses to complaints.

In evaluating the bank's lending performance, home purchase, home improvement, and home refinance loans extended in 2001 and 2002 as recorded on Bridgeview's Home Mortgage Disclosure Application – Loan Application Register (HMDA-LAR) were assessed (34 loans). We also randomly sampled 21 consumer loans, and 21 loans to businesses that were extended in 2002 and 2003.

Based on the analysis and consistent with available resources and capabilities, the bank is meeting the credit needs of its assessment area in a satisfactory manner.

Loan-to-Deposit Ratio

The loan-to-deposit ratio is satisfactory, given the institution's size, financial condition, and assessment area credit needs. This determination is based on the bank's quarterly average loan-to-deposit ratio from June 30, 1999, through December 31, 2002, of 76.99 percent. The low ratio for the period was 66.11 percent at September 30, 2002. The high ratio for the period was 87.14 percent at December 31, 1999.

The average loan-to-deposit ratio for the 29 banks headquartered in the AA at December 31, 2002 was 75.18 percent. The ratios of the group ranged from 30.26 percent to 115.34 percent. As the table below illustrates, the bank's ratio is slightly higher than most other similarly situated banks in the area and compares similarly to the other 29 banks in the AA.

Institution	Assets as of 12/31/02 (000s)	Average LTD Ratio
Edmond Bank & Trust, Edmond	50,994	96.92%
Bank 2, Oklahoma City	28,213	70.10%
Peoples Bank, Oklahoma City	25,976	61.91%
First Security Bank & Trust Company, Oklahoma City	39,154	61.85%
<i>Bridgeview Bank, N.A., Oklahoma City</i>	33,938	76.99%

Lending in Assessment Area

Bridgeview Bank's lending in their assessment area meets the standards for satisfactory performance. The table below showing the HMDA loans and sampled loans indicates that a majority of credit is extended within the assessment area.

TOTAL LOANS REVIEWED								
LOAN TYPE	IN ASSESSMENT AREA				OUT OF ASSESSMENT AREA			
	#	%	\$ (000s)	%	#	%	\$ (000s)	%
2001 Residential Real Estate	14	70.00	1,056	69.66	6	30.00	460	30.34
2002 Residential Real Estate	14	100.00	824	100.00	0	0	0	0
Consumer	17	80.95	227	87.76	4	19.05	32	12.24
Business	14	66.67	1,025	76.84	7	33.33	309	23.16
Total Reviewed	59	77.63	3,132	79.63	17	22.37	801	20.37

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

Bridgeview meets the standard for satisfactory performance for lending to borrowers of different incomes and businesses of different sizes.

The following tables represent a reasonable distribution of lending based on the 28 HMDA loans and the random sample of 17 consumer loans and 14 business loans extended within the AA.

RESIDENTIAL REAL ESTATE								
Borrower Income Level	LOW		MODERATE		MIDDLE		UPPER	
% of AA Families	21.00		18.30		22.10		38.60	
LOANS BY YEAR	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount
2001	0	0	21.43	4.07	21.43	29.45	57.14	66.48
2002	0	0	7.14	.49	28.57	23.42	64.29	76.09
Total	0	0	14.29	2.50	25.00	26.81	60.71	70.69

The number and amount of real estate loans extended to moderate-income families compares reasonably to the percentages of those families represented in the AA. The lack of residential real estate loans extended to low-income borrowers can be attributed to the fact that the bank extends few residential real estate purchase, home improvement and refinance loans. The lack of lending to low-income families can also be attributed to the fact that the bank is located in an upper income census tract, with a majority of the surrounding tracts being middle- and upper-income tracts. The closest moderate-income census tract to the bank consists primarily of commercial properties and apartment complexes. There are no low-income tracts located within several miles of the bank.

CONSUMER								
Borrower Income Level	LOW		MODERATE		MIDDLE		UPPER	
% of AA Households	23.80		17.20		20.10		38.90	
	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount
	17.65	5.91	23.53	23.29	17.65	6.58	41.17	64.22

The number and amount of consumer loans extended to low- and moderate-income households compares favorably to the percentages of those households represented in the AA.

BORROWER DISTRIBUTION OF SMALL LOANS TO BUSINESSES		
Business Revenues	≤\$1,000,000	>\$1,000,000
% of AA Businesses*	79.62	7.77
% of Bank Loans in AA #	71.43	28.57
% of Bank Loans in AA \$	41.86	58.14

* 12.61 percent of the businesses did not report revenues

The level of business loans revealed that a majority of loans were extended to small businesses in the AA with annual gross revenues of less than \$1 million per year.

Geographic Distribution of Loans

The geographic distribution of loans meets the standard for satisfactory performance. The dollar volume and number of loans extended in the various income tracts is representative of the percentage of the population that those tracts represent. This conclusion is based on the analysis of the 28 HMDA loans extended in 2001 and 2002. Also considered in the analysis were the 16 consumer and 12 business loans for which that census tract information was available.

RESIDENTIAL REAL ESTATE								
Census Tract Income Level	LOW		MODERATE		MIDDLE		UPPER	
% of AA Owner Occupied	3.60		22.20		44.80		29.40	
LOANS BY YEAR	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount
2001	0	0	14.29	11.46	28.57	14.11	57.14	74.43
2002	0	0	28.57	18.08	35.71	36.65	35.72	45.27
Totals	0	0	21.43	14.36	32.14	23.99	46.43	61.65

CONSUMER								
Census Tract Income Level	LOW		MODERATE		MIDDLE		UPPER	
% of AA Households	5.30		26.60		42.70		25.30	
	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount
	0	0	6.25	7.93	43.75	49.94	50.00	42.13

The lack of loans in the low-income tracts can be explained by the fact that only 21 of the 221 (9.50 percent) census tracts in the AA are considered low-income tracts. Additionally, there are no low-income tracts located within several miles of the bank. The above table also reflects that only 3.60 percent of the residences in the low-income tracts are owner occupied and that only 5.30 percent of the households are in the low-income tracts.

BUSINESS LOANS								
Census Tract Income Level	LOW		MODERATE		MIDDLE		UPPER	
% of AA Businesses	6.13		24.73		38.24		27.63	
	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount	% of Number	% of Amount
	8.33	.87	16.67	17.26	58.33	74.13	16.67	7.74

The number and amount of business loans extended to low- and moderate-income tracts compares reasonably to the percentages of those businesses represented in each census tract income level.

Responses to Complaints

There have been no consumer complaints regarding the bank's CRA performance during the evaluation period.

Fair Lending Review

An analysis of 1999-2002 public comments and consumer complaint information was performed according to the OCC's risk based fair lending approach. The bank has a good history of complying with anti-discrimination laws. Based on analysis of the information, the OCC decided a comprehensive fair lending examination did not need to be conducted in connection with the CRA evaluation this year.