



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

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Community Reinvestment Act Performance Evaluation

**Simmons First National Bank
Charter Number: 6680**

**501 Main Street
Pine Bluff, AR 71611**

Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

The following table indicates the performance level of **Simmons First National Bank (SFNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Simmons First National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Geographic distribution is good with no unexplained gaps in lending.
- Overall borrower distribution is excellent. SFNB has a good record of lending to borrowers of different income levels and to small businesses and farms.
- SFNB has a high level of qualified investments that support affordable housing and small business financing, primarily in the Pine Bluff MA.
- SFNB’s delivery system is accessible to services and products throughout the assessment area, including low- and moderate-income areas. The bank has a good level of community development services that are responsive to identified needs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

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

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

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

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

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

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

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

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

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

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

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

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

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

Description of Institution

Simmons First National Bank (SFNB), headquartered in Pine Bluff, Arkansas is a wholly owned subsidiary of Simmons First National Corporation, a \$2.1 billion multi-bank holding company, and is the lead bank in the company. The holding company provides a full range of consumer and commercial financial products and services, and operates one nationally chartered financial institution in El Dorado and state banks in Dumas, Jonesboro, Lake Village, Rogers, Russellville, and Searcy, Arkansas.

SFNB is an intrastate bank and the largest commercial bank headquartered in Arkansas with total assets of \$1.1 billion as of December 31, 2001. The bank's deposit market share in Arkansas is 2.4 percent as of June 30, 2001. Net loans are reported at \$630 million, loan-to-deposit ratio at 71.4 percent and Tier One Capital at \$80 million.

During the evaluation period, SFNB's strategic plan has been to provide a wide array of financial services to consumers and small businesses, and excellent customer service within the market areas. The bank offers a variety of loan products, including the following types of loans: commercial loans and commercial real estate loans, consumer loans, credit card loans, and single-family real estate loans. SFNB operates 27 branch offices and 28 automated teller machines (ATM) throughout Arkansas. Banking offices are located in the metropolitan areas (MAs) of Fort Smith, Little Rock, and Pine Bluff, Arkansas. There are also branches in the non-MA counties of Franklin and Lincoln. During 1998, SFNB opened one new full-service branch location in Little Rock, AR. In 1999, SFNB acquired three branches of American State Bank in Charleston, Arkansas. Two branches were acquired from First Financial Banc Corporation in Conway, Arkansas in 2000. In 2001, SFNB opened two additional new full service branches in Little Rock, Arkansas.

SFNB has a large credit card operation with accounts throughout the United States. Credit card loans represent 31 percent of gross loans as of December 31, 2001. Net loans represent 59 percent of total assets. The loan portfolio is comprised of 55 percent loans to individuals (including credit cards), 29 percent loans secured by real estate, 9 percent commercial and industrial loans, 5 percent agricultural loans, and 2 percent all other loans.

No significant financial barriers limit SFNB's ability to meet the identified credit needs within its AA.

The prior CRA examination is dated May 4, 1998 and the assigned rating was "**Satisfactory**".

Scope of the Evaluation

Evaluation Period/Products Evaluated

Conclusions regarding the Lending Test are based on small business, small farm and home mortgage loans from July 1, 1998 through December 31, 2001. The community development lending performance analysis includes loans made from May 4, 1998 through February 25, 2002.

The evaluation period for the Services Test and Investment Test was also from May 4, 1998 through February 25, 2002. The Services Test was evaluated based on branch distribution, hours of operation, branch openings and closings, alternative delivery systems, retail and commercial deposit and loan products and services, and community development services. The Investment Test conclusions are based on an evaluation of qualified community development investments and donations.

No affiliate information was submitted for inclusion in this evaluation.

Data Integrity

We reviewed the accuracy of HMDA, small business, small farm, and community development loan data collected by the bank for 1999, 2000 and 2001. Small business and farm data had some inaccuracies during the data integrity review. Corrections were made to the data and the processes for collecting data were changed to prevent further inaccuracies. All the data reported for the above categories were used in this evaluation. Community development services and investments were also reviewed during data integrity and additional information was required to determine qualifying investments and services during the examination.

Selection of Areas for Full-Scope Review

Simmons First National Bank (SFNB) has six AAs. Three are in metropolitan statistical areas and three are not. The Pine Bluff MA #6240 and Fort Smith MA #2720 were reviewed using full-scope procedures. The Little Rock CT MA #4400, Faulkner County, Franklin County and Lincoln County were reviewed using limited-scope procedures.

Pine Bluff is the headquarters for SFNB and accounts for major portions of the loan and deposit portfolios. Fort Smith was selected for a full-scope review since SFNB has its second highest concentration of branches in Fort Smith and has a long history serving that market.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. More weight was placed on performance in the Pine Bluff MA AA. SFNB has 61 percent of the deposit market share in Jefferson County. A significant volume of loans and deposits are made in the Pine Bluff MA AA, with 61 percent of total bank deposits, 54 percent of HMDA loans and 57 percent of CRA reported loans from the Pine Bluff MA AA. Small loans to businesses were given more weight in the Lending Test.

Other

We conducted one interview with a community organization in Pine Bluff and reviewed several recent interview summaries conducted in Pine Bluff and Fort Smith. Organizations contacted were involved in affordable housing and providing basic services to low- and moderate-income individuals. Opportunities for banks to participate in community development activities in both assessment areas are adequate. The predominant needs identified by these contacts included: affordable housing, home improvement loans for existing housing stock, debt management seminars and home buyer education programs, start-up funding for small businesses, and loans to rehabilitate existing commercial buildings.

Fair Lending Review

In January 2002, OCC conducted a fair lending examination to test for compliance with anti-discrimination laws including Equal Credit Opportunity Act, Fair Housing Act and Home Mortgage Disclosure Act. The review focused on home improvement lending and included a comparative file analysis for home improvement loans. Denials to Black applicants were compared with approvals to White applicants. In February 2000, the OCC conducted a fair lending review centered on small business lending in the Pine Bluff area. A comparative file analysis was conducted that focused on denials to Black applicants compared to approvals to White applicants.

The reviews also included evaluating policies, procedures, training programs and internal review practices used by the bank to prevent discriminatory or other illegal credit practices. No violations of the substantive provisions of the anti-discrimination laws and regulations were identified.

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**". Overall lending performance is good in both the Pine Bluff MA and Fort Smith AA, based on the bank's performance context and the full-scope review of the specific metropolitan areas (MAs) and assessment areas (AAs). Lending performance in the Pine Bluff MA was weighted most given the high loan volume.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

Lending activity is good. SFNB is the dominant lender in the Pine Bluff MA. Approximately 58 percent of the bank's loans evaluated for CRA are in this market. During the evaluation period, from July 1, 1998 to December 31, 2001, the bank has originated a good volume of loans to small businesses, including those secured by real estate, home mortgage loans, and loans to small farms, which impacts CRA lending performance assessments. Also, the bank has facilitated the origination of conventional home mortgage loans by referring qualified borrowers to other lenders. Due to the low volume of multi-family loans, these loans were not considered for geographical distribution. Since the last evaluation, the bank has experienced considerable growth in which SFNB's loans have increased by 54 percent and deposits have grown by 49 percent. During this period, the loan-to-deposit ratio has remained relatively stable, averaging 79.8 percent.

Fort Smith AA:

Loan volume in this assessment area is adequate. The Fort Smith AA, consists of nineteen CT's that comprise the city limits of Fort Smith. The bank has 7 percent of the deposit market share in Sebastian County and ranks fifth in this market. SFNB ranks 15th in the AA for home purchase loans and has a 1.78% market share. For home improvement loans, SFNB ranks 10th with a 1.59% market share. The bank ranks 33rd for refinance loans with a 0.62% market share. SFNB is ranked 11th with a 1.9% market share for small loans to businesses, and is ranked 5th with a market share of 6.38% for small loans to farms. Numerous nondeposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders compete for market share of loans in this market.

Pine Bluff MA:

Loan volume in this assessment area is excellent. Overall, the Pine Bluff MA accounts for approximately 58 percent of the bank's loans. SFNB ranks first in deposit market share at 61 percent. The bank is the dominant lender in Jefferson County and ranks first in home purchase and home improvement loans with a 16.14% and 21.43% market share, respectively. SFNB is ranked 2nd for home refinance loans with a 7.25% market share. For small loans to businesses and farms, SFNB is ranked 1st with a 33.16% and 88.51% market share, respectively. Loans in this market are centered in small business and home mortgage loans. Only five financial institutions compete for deposits in the Pine Bluff MA while numerous non-deposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders compete for market share of loans.

Distribution of Loans by Income Level of the Geography

SFNB's overall distribution of loans by income level of the geography is good. Geographic distribution for home mortgage products is good in both the Fort Smith AA and Pine Bluff MA. Geographic distribution is good for small loans to businesses in both the Fort Smith AA and Pine Bluff MA. The geographic distribution of small loans to farms is excellent in the Pine Bluff MA. The Fort Smith AA was not analyzed for loans to small farms as the percentage of farms in low- and moderate-income geographies is low and SFNB did not originate any loans in these geographies. No unexplained gaps exist. A majority of loans were originated in the bank's AAs. More weight was given to the Pine Bluff MA due to the relative loan volume in these two markets.

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 origination and purchases of home mortgage loans. The bank's distribution of home mortgage loans by income level of the geography is adequate in both the Pine Bluff MA and Fort Smith AA.

Home Purchase Loans:Fort Smith Area:

The geographic distribution of home purchase loans is good. The distribution of loans in moderate-income CT's is near to the percentage of owner-occupied housing units. No loans were originated in low-income geographies; however, there are fewer opportunities to make home purchase loans in these geographies due to the low percentage of owner-occupied housing units. The banks' market share among low- and moderate-income borrowers is below its overall market share. The bank has no loans in low-income CT's.

Pine Bluff MA:

The geographic distribution of home purchase loans is adequate. More weight is given to performance in the moderate income CT's since there are significantly more owner-occupied housing units and opportunities for lending. Although the distribution of loans in moderate-income CT's is well below the percentage of owner-occupied housing units, the bank's market

share is near to its overall market share. The distribution of loans in low-income CT's is near to the percentage of owner-occupied housing units and the market share in low-income CT's exceeds its overall market share.

Home Improvement Loans:

Fort Smith AA:

The geographic distribution of home improvement loans is adequate. The percentage of home improvement loans in moderate-income CT's is below the percentage of owner-occupied housing units. The bank has no loans in low-income geographies; however, there are fewer opportunities due to the low percentage of owner-occupied housing units. SFNB did not originate any home improvement loans in low- or moderate-income CT's in 2000; therefore, the bank has no market share for this product in these tracts.

Pine Bluff MA:

The geographic distribution of home improvement loans is adequate. More weight is given to performance in the moderate-income CT's since there are significantly more owner-occupied housing units and opportunities for lending. The percentage of home improvement loans in moderate-income CT's is below the percentage of owner-occupied housing units. The market share in moderate-income CT's is well below its overall market share. The percentage of home improvement loans in low-income CT's is near to the percentage of owner-occupied housing units. SFNB did not originate any home improvement loans in low-income CT's in 2000; therefore, the bank has no market share for low-income CT's.

Home Refinance Loans:

Fort Smith AA:

The geographic distribution of home mortgage refinance loans is good. The percentage of loans in low-income CT's exceeds the percentage of owner-occupied units. The percentage of home refinance loans in moderate-income CT's is near to the percentage of owner-occupied housing units. SFNB did not originate any home refinance loans in low- and moderate-income geographies in 2000. The bank's overall market share for home refinance loans is very low; therefore, the fact that no loans originated in low- and moderate-income CT's in 2000 is not given much weight.

Pine Bluff MA:

The geographic distribution of home refinance loans is adequate. More weight is given to performance in the moderate-income CT's since there are significantly more owner-occupied housing units and opportunities for lending. Although the distribution of home refinance loans in moderate-income CT's is well below the percentage of owner-occupied housing units, the bank's market share substantially meets its overall market share. The percentage of home refinance loans in low-income CT's exceeds the percentage of owner-occupied housing units. The market share of loans in low-income CT's exceeds the overall market share. SFNB was the only lender that originated home refinance loans (consisting of one loan) in a low-income geography in 2000.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's lending to small businesses. The distribution of loans by the income level of the geography is adequate in the Fort Smith AA and excellent in the Pine Bluff MA.

Fort Smith AA:

The geographic distribution of small business loans is adequate. The percentage of loans in low-income CT's is below the percentage of small businesses located in low-income CT's and is near to the percentage of small businesses located in moderate-income CT's. SFNB did not originate any small business loans in low-income geographies in 2000; therefore, the bank has no market share for this product in low-income CT's. The bank's market share in moderate-income CT's is near to its overall market share.

Pine Bluff MA:

The geographic distribution of small business loans is excellent. Performance in both low- and moderate-income geographies was considered. The percentage of loans in low-income CT's exceeds the percentage of small businesses located in low-income CT's and is near to the percentage of small businesses located in moderate-income CT's. Also, the market share in low-and moderate-income CT's exceeds the overall market share in these CT's.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms. The bank's distribution of loans by the income level of the geography is excellent in the Pine Bluff MA. Due to the low volume of loans in the Fort Smith AA, an analysis is not meaningful.

Fort Smith AA:

No analysis was conducted for small loans to farms in the Fort Smith AA. Only seven loans were made in the Fort Smith AA. Based on 2001 Dun and Bradstreet data, there are no farms located in low- income geographies and the bank did not originate any loans in these tracts. SFNB also did not originate any loans in moderate-income CT's of which a small percentage of farms are located in moderate-income tracts.

Pine Bluff MA:

The geographic distribution of small farm loans is excellent. Most weight is given to performance in the moderate-income CT's due to the higher number of small farms and lending opportunities in these CT's. The percentage of loans to small farms in moderate-income CT's exceeds the percentage of small farms located in moderate-income CT's. Also, the bank's market share in moderate-income CT's exceeds its overall market share. The percentage of loans to small farms in low-income CT's exceeds the percentage of small farms located in low-income CT's. Also, the bank's market share in low-income CT's exceeds its overall market share.

Lending Gap Analysis

Maps and reports were reviewed to identify any gaps in the geographic distribution home mortgage loans, small loans to businesses, and small loans to farms. No unexplained or conspicuous gaps were identified.

Inside/Outside Ratio

During the evaluation period, approximately 55 percent of loans reviewed were within the combined AAs. Approximately 42 percent of the bank's home mortgage loans, 78 percent of the small business loans, 63 percent of the small farm loans, and 69 percent of small business loans secured by real estate were within its combined AAs. This performance was a positive factor in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

SFNB's overall distribution of loans by income level of the borrower is excellent. More weight is given to the Pine Bluff MA due to the loan volume in this market. Loan distribution by income level of the borrower is excellent in both Pine Bluff MA and Fort Smith AA due mostly to small business lending.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan origination and purchases. The distribution of loans by income level of the borrower is good in both the Pine Bluff MA and Fort Smith AA.

Home Purchase Loans:

Fort Smith Area:

The distribution of home purchase loans by borrower income level is good. The percentage of loans to low-income borrowers is below the percentage of low-income families in the AA. It is more difficult for low-income families to obtain financing for home purchases. In addition, 13 percent of households are below the poverty level. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. The bank's market share for both low- and moderate-income borrowers exceeds its overall market share.

Pine Bluff MA:

The distribution of home purchase loans by borrower income level is good. The percentage of loans to low-income borrowers is below the percentage of low-income families in the MA. It is more difficult for low-income families to obtain financing for home purchases. In addition, approximately 24 percent of households are below the poverty level. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. The

bank's market share for both low- and moderate-income borrowers exceeds its overall market share.

Home Improvement Loans:

Fort Smith Area:

The distribution of home improvement loans by borrower income level is good. SFNB does not have any home improvement loans to low-income borrowers. It is difficult for low-income families to obtain financing for home purchase products, and home improvement loans are not possible without home ownership. The distribution to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the AA. SFNB did not originate any home improvement loans to low- and moderate-income individuals in 2000; therefore, the bank has no market share in these categories.

Pine Bluff MA:

The distribution of home improvement loans by borrower income levels is excellent. The percentage of home improvement loans to low-income borrowers is below the percentage of low-income families in the MA; however, it is more difficult for low-income families to obtain financing for home mortgage products. SFNB was able to originate loans to low-income borrowers given the high percentage of low-income families and the high percentage of households below the poverty level. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the MA. The bank's market share to low-income borrowers exceeds its overall market share. The market share of loans to moderate-income borrowers is near to its overall market share.

Home Refinance Loans:

Fort Smith Area:

The distribution of home mortgage refinance loans by borrower income level is good. The distribution to low-income borrowers is below the percentage of low-income families. It is difficult for low-income families to obtain financing for home purchase loans making it impossible to obtain a home refinance loan without home ownership. The percentage of moderate-income borrowers exceeds the percentage of moderate-income families. The bank's market share to low-income borrowers exceeds its overall market share. In 2000, SFNB did not originate any home refinance loans to moderate-income borrowers; therefore, the bank has no market share for loans in moderate-income borrowers.

Pine Bluff MA:

The distribution of home refinance loans by borrower income levels is adequate. The percentage of home refinance loans to low-income borrowers is well below the percentage of low-income families in the MA. It is difficult for low-income families to obtain financing for home purchases; therefore, a home refinance loan is not possible without home ownership. Given the high percentage of low-income families and households below the poverty level, any penetration to low-income families is considered positive. The market share of loans to low-income borrowers exceeds the overall market share. The percentage of home refinance loans

to moderate-income borrowers is below the percentage of moderate-income families in the MA and the market share of loans to moderate-income borrowers is below the overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distributions of the bank's origination/purchase of small loans to businesses. The distribution of loans by income level of the borrower is excellent in both the Pine Bluff MA and Fort Smith AA.

Fort Smith Area:

The borrower distribution of small loans to businesses is excellent. The percentage of loans to businesses with revenues of \$1 million or less exceeds the percentage of businesses with revenues of \$1 million or less in the AA. Also, the market share to businesses with revenues of \$1 million or less exceeds its overall market share.

Pine Bluff MA:

The bank's loan distribution to small business is excellent. The percentage of loans to businesses with revenues of \$1 million or less is near to the percentage of businesses with revenues of \$1 million or less in the MA. Also, the market share of loans to these businesses significantly exceeds the overall market share.

Small Loans to Farms

Refer to Table 12 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses. The distribution of loans by income level of the borrower is excellent in both the Pine Bluff MA and Fort Smith AA.

Fort Smith Area:

The distribution of small loans to farms is excellent. The percentage of loans to farms with revenues of \$1 million or less exceeds the percentage of farms with revenues of \$1 million or less in the MA and the market share of small loans to farms exceeds its overall market share.

Pine Bluff MA:

The distribution of small loans to farms is excellent. The percentage of small loans to farms with revenues less than \$1 million exceeds the percentage of farms with revenues less than \$1 million in the MA. Also, the market share of small loans to farms substantially meets the overall market share.

Community Development Lending

SFNB has an adequate level of community development (CD) loans in the Pine Bluff MA. During the evaluation period the bank made a total of 2 CD loans totaling \$72,000. These loans provide affordable housing for low- and moderate-income residents in the Pine Bluff MA.

None of the CD loans are considered complex or innovative. CD lending had a neutral effect on the Lending Test Conclusions in the Jefferson County MA and Fort Smith AA.

Product Innovation and Flexibility

SFNB did not have any products that are considered innovative and flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Refer to Tables 1 through 12 in Appendix C for the facts and data that support these conclusions.

Based on limited-scope reviews, the performance is consistent with the bank's overall "**High Satisfactory**" performance under the Lending Test in the Franklin and Lincoln County AAs, and the Little Rock AA.

Based on limited-scope reviews, the bank's performance in the Faulkner County AA is inconsistent with (weaker) the bank's overall "**High Satisfactory**" performance under the Lending Test. The bank's performance is considered "**Low Satisfactory**" in this AA. This rating is due to the bank's weaker performance in HMDA lending in low- and moderate-income CTS and to low- and moderate-income borrowers.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "**High Satisfactory**". Based on full-scope reviews, the bank's performance in the Fort Smith AA is poor. The bank's performance in the Pine Bluff MA is good.

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

Qualifying investments are investments, deposits, membership shares or grants that have as their primary purpose community development, as defined in the CRA regulation. SFNB's qualifying investments are centered in investments and grants/donations with the primary purpose of community development. Investment activity in the Pine Bluff MA carries the most weight.

Fort Smith AA:

SFNB has a poor level of investments in the Fort Smith AA given the investment opportunities noted in Appendix B. Qualified investments consist of 13 grants/donations totaling \$12,000 and a portion of an equity investment in a small business investment corporation (SBIC) totaling \$16,000. These donations benefit organizations in the Fort Smith AA that provide a

variety of services to low- and moderate-income individuals such as constructing affordable housing, eradicating illiteracy, and promoting youth programs.

Pine Bluff MA:

SFNB has a good level of qualified investments in the Pine Bluff MA based on the opportunities described in Appendix B. These investments are very responsive to the identified needs in the AA, such as, affordable housing and small business financing. During the evaluation period, SFNB had 45 qualified investments totaling \$2.2 million. Of this amount, thirty-nine are grants/donations totaling \$193,340 and six are equity or debt instruments totaling \$2.1 million.

Investments consist of equity shares and purchases of bond issues that promote small business development and affordable housing targeted to low- and moderate-income families.

The bank's largest investment is a \$1.8 million municipal bond used to provide mortgage loans to low- and moderate-income individuals in Jefferson County. Affordable housing is identified as a major need in the Pine Bluff MA.

Small business financing is an identified need in the Pine Bluff MA. SFNB's investment in the debt instruments below meets that need.

The bank has a \$200,000 equity investment in a community development corporation (CDC) that provides venture capital to businesses in the Delta region of Arkansas, Mississippi, and Louisiana. The CDC provides loans, equity financing, and technical assistance to low- and moderate-income persons and small and minority-owned businesses. This investment is a prior period investment.

SFNB has committed \$500,000 to a SBIC that promotes economic development by financing small businesses in a regional area that includes the state of Arkansas. The bank's funded portion is \$100,000 of which \$61,000 is allocated to this full scope area. The SBIC provides equity investments in small businesses that have difficulty obtaining venture capital. The SBIC is based in Arkansas, but invests in companies outside of Arkansas with strong potential to credit markets or supplier relationships in Arkansas.

Donations are to organizations that promote affordable housing, youth programs that benefit low- and moderate-income children, programs that assist low- and moderate-income families and elderly, and business/economic development in low- and moderate-income geographies.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Faulkner County, Franklin County, Lincoln County, and the Little Rock AA is inconsistent with the bank's overall "**High Satisfactory**" performance under the Investment Test. Investment opportunities in Franklin and Lincoln Counties are limited. Investment opportunities are adequate in Faulkner County and the Little Rock AA; however, numerous competitors and SFNB's recent entry into these markets have limited the bank's investment activities. Refer to Table 14 of Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service test is rated "**High Satisfactory**". Based on full-scope reviews, the bank's performance in the Fort Smith AA is adequate. SFNB's performance in the Pine Bluff MA is good. More weight was given to the Pine Bluff MA.

The primary delivery system is the bank's branch network. In total, SFNB has 27 branches. The bank offers a wide variety of loan and deposit products, most of which are available at all banking offices. Commercial and agricultural loan products are limited to a few locations in the branch network, but this does not negatively impact the availability of services to low- and moderate-income areas or individuals. Alternative delivery systems include ATMs, telephone banking, and Internet banking services. We could not place significant weight on the alternative delivery systems when drawing our conclusions because no data was available to judge the accessibility and effectiveness of such systems to low- and moderate-income geographies and low- and moderate-income individuals. No branches closed since the last evaluation and ten full service branches opened. In addition to SFNB's branch network, customers have access to 35 branches of affiliate banks in different markets throughout Arkansas. SFNB customers can conduct loan and deposit transactions at any affiliate bank. Banking hours are reasonable throughout the assessment areas, including low- and moderate-income tracts. High volume branches have extended hours on Fridays and half of the bank's branches are open on Saturdays. The bank provides a high level of community development services, primarily in the Pine Bluff MA.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Fort Smith AA:

The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the AA. The Fort Smith AA has five full service branches. No branches are located in low- and moderate-income tracts in which 17 percent of the population resides. However, branches located in middle- and upper-income geographies are adjacent to low- and moderate-income geographies. Four of the five banking offices are located within four miles or less to low- and moderate-income geographies and can be easily reached by automobile. Two branches opened in the Fort Smith AA during the evaluation period.

Pine Bluff MA:

The bank's service delivery systems are accessible to geographies and individuals of different income levels in the AA. The Pine Bluff MA has ten full service branches. The percentage of branches in low- and moderate-income tracts is near to the percentage of population that resides in the same tracts. No branches were opened in the Pine Bluff MA during the evaluation period.

Community Development Services

Fort Smith AA:

SFNB has limited involvement in community development activities in the Fort Smith AA. The bank sponsored a credit and budgeting class at Ragon Homes. Ragon Homes is an apartment complex for low- and moderate-income individuals. The classes were coordinated by a Certified Housing Counselor of the Crawford-Sebastian Community Development Council and taught by a bank officer.

Pine Bluff MA:

SFNB has demonstrated good performance in providing community development services in the Pine Bluff MA. The bank actively seeks opportunities and provides services to a large number of groups. During the evaluation period, SFNB provided education or technical assistance to the following types of organizations:

- **Affordable housing:** SFNB provided educational information or technical assistance to twelve organizations that promote affordable housing. The bank's participation included speaking to low- and moderate-income individuals or groups on affordable housing financing and serving as board members for organizations that promote or provide affordable housing.

The bank was successful in helping two organizations obtain Federal Home Loan Bank (FHLB) grants totaling \$312,000 to be used for down payment assistance or to purchase homes for low- and moderate-income individuals. ACORN obtained a \$180,000 grant. Funds from this grant were used for down payment assistance. The Southeast Arkansas Community Development Corporation received a \$132,000 grant. Funds from the grant were used to purchase 32 affordable housing units in the Pine Bluff area.

- **Small Business financing:** The bank provided information on small business financing and/or technical assistance in developing business plans to seven entities. Bank officers participated in several seminars that provided information on small business financing, specifically developing business plans and Small Business Administration (SBA) loans. One notable activity is the bank's involvement with the Enterprise Corporation of the Delta. Bank personnel serve on the Investment Management Committee of this entity. The corporation specifically provides loans, equity financing, and technical assistance to low- and moderate-income persons and minority-owned businesses in the Delta region of Arkansas, Mississippi, and Louisiana. The Investment Management Committee defines investment policies, asset allocation, approves loan policies, and evaluates outside investment managers and broker dealers. From 1998 through 2001, Enterprise Corporation of the Delta originated 12 loans totaling \$1.1 million that benefited small businesses in the Pine Bluff area.
- **Consumer Financial Information:** SFNB provided technical assistance or information to six organizations that educate clientele on general financial information such as budgeting and maintaining good credit. One of the most successful programs in which the bank is involved in is the Rapid Assets Individual Development Account (IDA) Program. SFNB

bank officers provide technical assistance by serving on the board of the Good Faith Fund, which oversees the IDA Program. The Rapid Assets IDA program is a rapid asset-building strategy for low-income, low-asset individuals or families offered by the Good Faith Fund. It is designed to provide both adults and children with an opportunity to save their own money to begin accumulating assets, and to have their savings matched by state funds. Every dollar that an individual places into an IDA will be matched by three dollars of state funds. IDAs can be used to buy a first home or make repairs to a house owned by the participant, start a small business, or to pay for post-secondary education for the individual saver or an immediate family member, including children. To qualify, the participant's household income must be less than 185 percent of the Federal poverty level and their household net worth must be less than \$10,000, excluding their primary residence and one car. SFNB offers special no-fee savings accounts for IDA participants. To date, SFNB opened 215 accounts totaling \$36,612.

- **Economic Development:** Bank officers provided technical assistance to two entities that promote economic development through financing small businesses, revitalizing and stabilizing low- and moderate-income geographies, and job creation and retention. Several members of senior management helped to form the Economic Development Alliance of Jefferson County. The purpose of the Alliance is to create more and better jobs for low- and moderate-income citizens of Jefferson County. The Alliance hopes to achieve this goal through job training, attraction of new businesses, and overall economic revitalization of the area. An executive officer of SFNB serves as a member of the Pine Bluff Downtown Development Board which was established to develop and redevelop downtown Pine Bluff. The downtown Pine Bluff area is located in a low-income CT. The officer was instrumental in raising \$80,000 from various businesses in Pine Bluff. The funds were used to hire a consultant that will develop a master plan for developing and redeveloping downtown Pine Bluff.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in Faulkner, Franklin, and Lincoln Counties, is consistent with the bank's overall "**High Satisfactory**" under the Service Test. The bank's performance in the Little Rock AA is not consistent with the overall "**High Satisfactory**" under the Service Test.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 07/01/1998 to 12/31/2001 Investment and Service Tests and CD Loans: 05/04/1998 to 02/25/2002	
Financial Institution		Products Reviewed
Simmons First National Bank (SFNB) Pine Bluff, Arkansas		HMDA Loans Small Business Loans, Small Farm Loans, Community development loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable.		Simmons has several bank affiliates; however, no affiliate products were reviewed.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Pine Bluff MA AA #6240 Fort Smith MA AA #2720 Little Rock CT AA #4400 Faulkner County Franklin County Lincoln County	Full-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope	Entire MA Not entire MA, includes city of Ft. Smith Only portion of Little Rock Entire county Entire county Entire county

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Fort Smith AA	2
Pine Bluff MA	3

Fort Smith AA

Demographic Information for Full Scope Area: Fort Smith AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	10.53	15.79	26.32	47.37	0.00
Population by Geography	65,267	2.84	14.23	31.95	50.98	0.00
Owner-Occupied Housing by Geography	15,824	2.55	9.81	32.89	54.75	0.00
Business by Geography	4,186	10.01	22.55	20.47	46.97	0.00
Farms by Geography	55	0.00	7.27	29.09	63.64	0.00
Family Distribution by Income Level	17,756	14.74	14.46	22.32	48.47	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,186	6.31	23.22	38.22	32.26	0.00
Median Family Income		26,404	Median Housing Value		54,598	
HUD Adjusted Median Family Income for 2001		39,100	Unemployment Rate (1990 US Census)		2.72%	
Households Below Poverty Level		13.45%				

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

Source: 1990 US Census and 2001 HUD updated MFI

The Fort Smith AA is located in the northwest Arkansas region. The northern portion of this region consists of the Ozark Mountains. The southern portion of this region consists of the Arkansas River Valley, an area of broad valleys and ridges that separate the Ouachita and Ozark Mountains. The AA is comprised of 19 census tracts in Sebastian County, of which 2 are low-income, 3 are moderate-income, 5 are middle-income, and 9 are upper-income. Fort Smith is the largest city in Sebastian County. The 1990 population of this geographical area is 65,267. There are 17,756 families in the Fort Smith AA. The U.S. Census 1990 median family income for the AA is \$26,404. The updated 2001 HUD MFI used to determine individual income classifications is \$39,100.

The economy is stable. Sebastian County has a civilian labor force of 55,600 in 2000, compared to 52,475 in 1990. Unemployment is 3.3 percent compared to 4.4 percent for the state of Arkansas. Dun and Bradstreet reported that in 2001, there were 4,186 businesses and 55 farms situated in the Fort Smith AA. Approximately 85.9 percent of the businesses and 87.3 percent of the farms reported gross annual revenues less than \$1 million. Retail trade and services comprise 61.7 percent of the industry within the Fort Smith AA. Manufacturing represents 6.1 percent of the industry followed by agriculture at 1.3 percent. The most significant employers include Arkansas Best Corporation, Baldor Electric, Fort Smith Public Schools, OK Industries, Rheem Manufacturing Corporation, Riverside Furniture Corporation, Sparks Health System, St. Edward Mercy Medical Center, The Trane Company, and Whirlpool Corporation.

Competition for loan and deposit customers is very active in the AA. Simmons operates five full-service branches and six deposit-taking ATMs in the Fort Smith AA. The larger competitors are branch facilities of mid-sized and large regional banks and credit unions. The

major competitors for both loans and deposits are BancorpSouth (formerly City National Bank), Farmers Bank, First National Bank of Fort Smith, Regions Bank, and Superior Federal Bank, FSB. In terms of deposit market share, Simmons ranks sixth in the AA with a 7.2 percent market share. First National Bank of Fort Smith ranks first with a 27.7 percent market share.

Approximately 154 financial institutions originated or purchased a home mortgage loan in the Fort Smith AA in 2000, the most recent year aggregate information is available. Simmons ranked 18th, with a 1 percent market share. The top five lenders in the AA were BancorpSouth (10.7 percent), Superior Federal Bank (8.9 percent), Regions Financial Corporation (6.8 percent), Farmers Bank (5.4 percent), and Fleet National Bank (5 percent).

During 2001 and 2002, four community contacts were conducted in the Fort Smith AA by three different regulatory agencies (FDIC, FRB, and OCC) to discuss community credit and community development needs. These organizations serve communities within the bank's AA by developing affordable housing, helping LMI individuals qualify for home mortgages, and providing services to LMI individuals. Opportunities for banks to participate in community development activities has historically been limited in the AA, but has increased in recent years with the designation of downtown Fort Smith as an improvement zone and the availability of low-income housing tax credits. The predominant needs identified by these contacts included: affordable housing, home improvement loans for existing housing stock, debt management seminars and homebuyer education programs, start-up funding for small businesses, and loans to rehabilitate existing commercial buildings.

Pine Bluff MA

Demographic Information for Full Scope Area: Pine Bluff MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	6.45	19.35	48.39	19.35	6.45
Population by Geography	85,487	0.67	26.75	43.84	28.74	0.01
Owner-Occupied Housing by Geography	20,121	0.50	21.68	44.12	33.71	0.00
Business by Geography	3,273	9.10	25.05	34.68	31.16	0.00
Farms by Geography	205	0.49	21.95	55.12	22.44	0.00
Family Distribution by Income Level	22,091	25.20	14.36	19.36	41.07	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	8,741	1.08	37.04	43.67	18.21	0.00
Median Family Income		26,361	Median Housing Value	43,766		
HUD Adjusted Median Family Income for 2001		38,700	Unemployment Rate (1990 US Census)	4.28%		
Households Below Poverty Level		23.52%				

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

Source: 1990 US Census and 2001 HUD updated MFI

The Pine Bluff MA is located in the southeastern Arkansas region. The geography of the region consists of the Mississippi Delta. The Arkansas, Ouachita, and White Rivers traverse this region. Crowley's Ridge is also a prominent geological feature of the region. The cities and towns of Altheimer, Dudley, Pine Bluff, Plum Bayou, Redfield, Richland, Spring,

Washington, and White Hall comprise the geographical area known as Jefferson County. The 1990 population for the area is 85,487. The estimated 2000 census data reflects a decrease in the population to 84,278. Jefferson County represents 14.4 percent of the population within the eastern region and 3.2 percent of the population for the State of Arkansas. Approximately 65.4 percent of the population in Jefferson County resides in Pine Bluff where the estimated 2000 population is 55,085.

There are 31 census tracts in the Pine Bluff MA, of which 2 are low-income, 6 are moderate-income, 15 are middle-income, 6 are upper-income, and 2 that are not designated because they are industrial tracts. There are 22,091 families in the Pine Bluff MAs. The U.S. Census 1990 median family income for the assessment area is \$26,361. The updated 2001 HUD MFI used to determine individual income classifications is \$38,700.

The area's economy is weak. Jefferson County has a civilian labor force of 36,150 in 2000, down 5.1 percent from 1990. The unemployment rate for the county as a whole was 7.1 percent in 2000, compared to 4.4 percent for the state of Arkansas. Dun and Bradstreet reported that in 2001, there were 3,273 businesses and 205 farms situated in Jefferson County. Approximately 89.9 percent of the businesses and 92.7 percent of the farms reported gross annual revenues less than \$1 million. Retail trade and services comprise 64.4 percent of the industry in Jefferson County. Agriculture represents 5.9 percent of the industry followed by manufacturing at 4 percent. The most significant employers include Tyson Foods, Inc., Jefferson Regional Medical Center, International Paper, Department of the Army - Pine Bluff Arsenal, Arkansas Department of Corrections, Pine Bluff Public Schools, Union Pacific Railroad, University of Arkansas - Pine Bluff, Central Moloney, Inc. and the National Center for Toxicological Research.

Competition for loan and deposit customers is very active in the AA. SFNB operates ten full-service branches and twelve deposit-taking ATMs in Jefferson County. The larger competitors are branch facilities of mid-sized and large regional banks and credit unions. The major competitors for both loans and deposits include Bank of America, NA and Pine Bluff National Bank. In terms of deposit market share, SFNB ranks first in the assessment area with a 60.9% market share as of June 30, 2001.

Approximately 137 financial institutions originated or purchased a home mortgage loan in Jefferson County in 2000, the most recent year aggregate data is available. SFNB ranked first with a 13.9 percent market share. Other significant lenders include Wells Fargo Home Mortgage (7.1 percent), Conseco Finance Servicing (5.8 percent), CitiMortgage, Inc. (4.5 percent), and Bank of America NA (4.5 percent).

During 2001 and 2002, two community contacts were conducted in the Pine Bluff MA by three different regulatory agencies (FDIC, FRB, and OCC) to discuss community credit and community development needs. These organizations serve communities within the bank's AA by developing affordable housing, helping LMI individuals qualify for home mortgages, and providing services to LMI individuals. Opportunities for banks to participate in community development activities in the AA are adequate. Recent opportunities include municipal bond issues for affordable housing in Jefferson County and a SBIC that provides venture capital for start-up businesses statewide. The predominant needs identified by these contacts included: affordable housing, home improvement loans for existing housing stock, debt management

seminars and homebuyer education programs, start-up funding for small businesses, and loans to rehabilitate existing commercial buildings.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												Geography: ARKANSAS	
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001													
MA/Assessment Area (2001):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)		
Full Review:													
Fort Smith AA	8.05	203	13,301	190	6,303	7	178	0	0	400	19,782	16.39	
Pine Bluff MA	58.41	1,135	68,087	1,246	65,692	519	41,811	2	72	2,902	175,662	60.79	
Limited Review:													
Faulkner County	9.28	395	37,786	62	2,993	4	634	0	0	461	41,413	5.07	
Franklin County	8.05	139	4,697	115	2,541	146	2,226	0	0	400	9,464	7.19	
Lincoln County	6.00	36	1,757	124	2,446	138	10,958	0	0	298	15,161	2.79	
Little Rock CT's	10.21	350	36,248	149	10,672	8	734	0	0	507	47,654	7.77	

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

** The evaluation period for Community Development Loans is From May 04, 1998 to February 25, 2002.

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

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE															Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001																			
MA/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 Occ Units***	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp				
Full Review:																			
Fort Smith AA	98	8.30	2.55	0.00	9.81	8.16	32.89	37.76	54.75	54.08	1.78	0.00	1.05	2.16	1.65				
Pine Bluff MA	615	52.07	0.50	0.33	21.68	8.78	44.12	34.47	33.71	56.42	16.14	40.00	13.39	11.16	20.69				
Limited Review:																			
Faulkner County	212	17.95	0.00	0.00	32.89	13.21	58.25	73.11	8.86	13.68	2.03	0.00	1.48	2.14	3.65				
Franklin County	31	2.62	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	4.55	0.00	0.00	4.55	0.00				
Lincoln County	16	1.35	0.00	0.00	22.78	0.00	46.72	87.50	30.50	12.50	2.86	0.00	0.00	3.49	0.00				
Little Rock CT's	209	17.70	1.04	0.00	25.67	7.66	22.31	15.79	50.98	76.56	1.48	0.00	1.20	0.80	1.78				

* Based on 2000 Peer Mortgage Data: Southwest Region.

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001												Geography: ARKANSAS				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp	
Full Review:																
Fort Smith AA	34	9.55	2.55	0.00	9.81	5.88	32.89	35.29	54.75	58.82	1.59	0.00	0.00	2.36	1.48	
Pine Bluff MA	215	60.39	0.50	0.47	21.68	15.81	44.12	43.72	33.71	40.00	21.43	0.00	9.76	24.39	25.00	
Limited Review:																
Faulkner County	33	9.27	0.00	0.00	32.89	9.09	58.25	78.79	8.86	12.12	1.48	0.00	0.00	2.01	4.35	
Franklin County	51	14.33	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	23.96	0.00	0.00	23.96	0.00	
Lincoln County	7	1.97	0.00	0.00	22.78	0.00	46.72	85.71	30.50	14.29	20.00	0.00	0.00	22.22	0.00	
Little Rock CT's	16	4.49	1.04	6.25	25.67	18.75	22.31	12.50	50.98	62.50	0.16	0.00	0.00	0.00	0.28	

* Based on 2000 Peer Mortgage Data: Southwest Region.

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE											Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total	% Owner Occ Units***	% BANK Loans	% Owner Occ Units** *	% BANK Loans	% Owner Occ Units** *	% BANK Loans	% Owner Occ Units** *	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Fort Smith AA	70	9.75	2.55	2.86	9.81	7.14	32.89	22.86	54.75	67.14	0.62	0.00	0.00	0.49	0.93
Pine Bluff MA	304	42.34	0.50	1.32	21.68	8.55	44.12	28.95	33.71	61.18	7.25	100.00	7.14	3.73	10.88
Limited Review:															
Faulkner County	150	20.89	0.00	0.00	32.89	7.33	58.25	75.33	8.86	17.33	1.44	0.00	0.78	1.19	9.80
Franklin County	56	7.80	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	2.21	0.00	0.00	2.21	0.00
Lincoln County	13	1.81	0.00	0.00	22.78	23.08	46.72	53.85	30.50	23.08	5.88	0.00	0.00	3.57	50.00
Little Rock CT's	125	17.41	1.04	0.00	25.67	8.80	22.31	12.80	50.98	78.40	0.29	0.00	0.20	0.30	0.34

* Based on 2000 Peer Mortgage Data: Southwest Region.

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY											Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total	% of MF Units***	% BANK Loans	% MF Units** *	% BANK Loans	% MF Units** *	% BANK Loans	% MF Units** *	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Fort Smith AA	1	33.33	1.80	0.00	17.40	0.00	27.67	100.00	53.12	0.00	14.29	0.00	0.00	33.33	0.00
Pine Bluff MA	1	33.33	0.69	0.00	27.98	0.00	23.16	0.00	48.17	100.00	50.00	0.00	0.00	0.00	100.00
Limited Review:															
Faulkner County	0	0.00	0.00	0.00	51.50	0.00	48.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Franklin County	1	33.33	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	25.00	0.00	0.00	25.00	0.00
Lincoln County	0	0.00	0.00	0.00	32.50	0.00	67.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Little Rock CT's	0	0.00	0.07	0.00	19.41	0.00	20.71	0.00	59.81	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Southwest Region.

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001																
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total	% of Busines ^{***}	% BANK Loans	% of Busines ^{**}	% BANK Loans	% of Busines ^{**}	% BANK Loans	% of Busines ^{**}	% BANK Loans	Overa ^l	Low	Mod	Mid	Upp	
Full Review:																
Fort Smith AA	190	10.07	10.01	3.16	22.55	17.89	20.47	17.37	46.97	61.58	1.90	0.00	1.13	1.90	2.67	
Pine Bluff MA	1,246	66.07	9.10	14.85	25.05	20.39	34.68	23.92	31.16	40.85	33.16	51.19	38.67	22.65	38.46	
Limited Review:																
Faulkner County	62	3.29	0.00	0.00	47.09	22.58	49.15	72.58	3.75	4.84	1.60	0.00	0.64	2.41	1.11	
Franklin County	115	6.10	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.53	0.00	0.00	10.65	0.00	
Lincoln County	124	6.57	0.00	0.00	0.00	32.26	84.56	58.87	15.44	8.87	35.77	0.00	68.18	27.27	33.33	
Little Rock CT's	149	7.90	1.88	2.68	20.84	17.45	32.68	26.85	44.61	53.02	0.74	0.56	0.45	0.57	1.04	

* Based on 2000 Peer Small Business Data: US&PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2001).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS											Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total	% of Farms***	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	% of Farms* **	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Fort Smith AA	7	0.85	0.00	0.00	7.27	0.00	29.09	14.29	63.64	85.71	6.38	0.00	0.00	7.25	4.17
Pine Bluff MA	519	63.14	0.49	0.58	21.95	36.03	55.12	50.67	22.44	12.72	88.51	100.00	94.83	84.95	86.36
Limited Review:															
Faulkner County	4	0.49	0.00	0.00	52.27	75.00	46.97	25.00	0.76	0.00	2.24	0.00	3.45	0.00	0.00
Franklin County	146	17.76	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	30.19	0.00	0.00	29.30	0.00
Lincoln County	138	16.79	0.00	0.00	0.00	65.94	42.50	28.26	57.50	5.80	93.24	0.00	100.00	88.89	0.00
Little Rock CT's	8	0.97	0.00	0.00	15.15	12.50	24.24	12.50	60.61	75.00	15.00	0.00	25.00	7.14	20.00

* Based on 2000 Peer Small Business Data: US&PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2001).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE												Geography: ARKANSAS					
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001																	
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]						
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{**}	Over all	Low	Mod	Mid	Upp
Full Review:																	
Fort Smith AA	98	8.30	14.74	6.12	14.46	18.37	22.32	23.47	48.47	52.04	2.57	2.78	2.79	3.31	2.11		
Pine Bluff MA	615	52.07	25.20	9.52	14.36	20.85	19.36	22.99	41.07	46.63	20.07	23.68	21.39	13.94	22.00		
Limited Review:																	
Faulkner County	212	17.95	21.87	5.66	21.33	15.57	25.10	29.25	31.70	49.53	2.53	2.04	1.26	3.28	2.93		
Franklin County	31	2.62	19.74	16.13	18.93	22.58	22.95	6.45	38.39	54.84	5.98	25.00	6.25	1.92	5.68		
Lincoln County	16	1.35	23.52	6.25	14.85	18.75	19.03	43.75	42.61	31.25	3.61	0.00	0.00	5.56	5.71		
Little Rock CT's	209	17.70	19.44	3.37	15.10	23.08	19.40	23.56	46.06	50.00	1.95	0.74	1.66	1.98	2.25		

* Based on 2000 Peer Mortgage Data: Southwest Region.

** As a percentage of loans with borrower income information available. No information was available for 0.59% of loans originated and purchased by BANK.

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT											Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Over all	Low	Mod	Mid	Upp
Full Review:															
Fort Smith AA	34	9.55	14.74	0.00	14.46	24.24	22.32	21.21	48.47	54.55	1.71	0.00	0.00	2.30	2.24
Pine Bluff MA	215	60.39	25.20	12.25	14.36	16.18	19.36	25.98	41.07	45.59	22.29	41.18	19.05	11.90	25.68
Limited Review:															
Faulkner County	33	9.27	21.87	6.25	21.33	12.50	25.10	25.00	31.70	56.25	1.58	0.00	0.00	1.16	3.01
Franklin County	51	14.33	19.74	7.84	18.93	29.41	22.95	23.53	38.39	39.22	25.00	28.57	23.53	25.00	25.00
Lincoln County	7	1.97	23.52	16.67	14.85	16.67	19.03	33.33	42.61	33.33	25.00	0.00	50.00	0.00	33.33
Little Rock CT's	16	4.49	19.44	7.14	15.10	14.29	19.40	21.43	46.06	57.14	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Southwest Region.

** As a percentage of loans with borrower income information available. No information was available for 4.49% of loans originated and purchased by BANK.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001																
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share					
	#	% of Total	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{**}	% Families ^{***}	% BANK Loans ^{**}	Over all	Low	Mod	Mid	Upp	
Full Review:																
Fort Smith AA	70	9.75	14.74	6.06	14.46	16.67	22.32	22.73	48.47	54.55	0.89	3.13	0.00	1.11	0.83	
Pine Bluff MA	304	42.34	25.20	4.41	14.36	6.10	19.36	19.32	41.07	70.17	9.87	12.20	5.06	5.47	14.14	
Limited Review:																
Faulkner County	150	20.89	21.87	2.70	21.33	17.57	25.10	26.35	31.70	53.38	1.82	0.00	1.81	1.52	2.33	
Franklin County	56	7.80	19.74	1.85	18.93	11.11	22.95	29.63	38.39	57.41	2.60	0.00	0.00	5.08	2.63	
Lincoln County	13	1.81	23.52	0.00	14.85	0.00	19.03	23.08	42.61	76.92	10.00	0.00	0.00	0.00	15.38	
Little Rock CT's	125	17.41	19.44	5.15	15.10	14.43	19.40	20.62	46.06	59.79	0.33	0.64	0.45	0.41	0.17	

* Based on 2000 Peer Mortgage Data: Southwest Region.

** As a percentage of loans with borrower income information available. No information was available for 6.27% of loans originated and purchased by BANK.

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

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total	% of Business es	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Fort Smith AA	190	10.07	85.88	92.63	95.79	2.63	1.58	1.90	3.16
Pine Bluff MA	1,246	66.07	89.86	84.35	87.64	9.71	2.65	33.16	61.26
Limited Review:									
Faulkner County	62	3.29	88.69	96.77	87.10	12.90	0.00	1.60	3.14
Franklin County	115	6.10	90.43	98.26	97.39	2.61	0.00	10.53	14.59
Lincoln County	124	6.57	88.60	97.58	98.39	0.81	0.81	35.77	53.16
Little Rock CT's	149	7.90	84.71	71.81	78.52	17.45	4.03	0.74	1.55

* Based on 2000 Peer Small Business Data: US&PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2001).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.98% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS					Geography: ARKANSAS				
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Fort Smith AA	7	0.85	87.27	100.00	100.00	0.00	0.00	6.38	8.45
Pine Bluff MA	519	63.14	92.68	94.99	75.72	14.45	9.83	88.51	87.95
Limited Review:									
Faulkner County	4	0.49	96.21	100.00	50.00	25.00	25.00	2.24	2.46
Franklin County	146	17.76	93.48	98.63	97.26	2.74	0.00	30.19	31.17
Lincoln County	138	16.79	95.00	92.03	73.19	18.84	7.97	93.24	95.77
Little Rock CT's	8	0.97	90.91	100.00	75.00	12.50	12.50	15.00	17.31

* Based on 2000 Peer Small Business Data: US&PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2001).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.12% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: ARKANSAS									
Evaluation Period: MAY 4, 1998 TO FEBRUARY 25, 2002									
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Fort Smith AA	0	0	14	28	14	28	1.24	1	66
Pine Bluff MA	1	200	44	2,000	45	2,200	97.56	1	243
Limited Review:									
Faulkner County	0	0	1	5	1	5	0.22	1	20
Franklin County	0	0	1	7	1	7	0.31	1	29
Lincoln County	0	0	1	3	1	3	0.13	1	11
Little Rock CT's	0	0	4	12	4	12	0.53	1	31

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.
 ** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: ARKANSAS			
Evaluation Period: JULY 1, 1998 TO DECEMBER 31, 2001																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Fort Smith AA	16.39	5	19	0.00	0.00	20.0 0	80.0 0	2	0	0	0	0	2	2.84	14.2 3	31.9 5	50.9 8
Pine Bluff MA	60.79	10	37	10.0 0	20.0 0	40.0 0	30.0 0	0	0	0	0	0	0	0.67	26.7 5	43.8 4	28.7 4
Limited Review:																	
Faulkner County	5.07	2	7	0.00	50.0 0	50.0 0	0.00	2	0	0	1	1	0	0.00	35.3 8	57.2 1	7.41
Franklin County	7.19	3	11	0.00	0.00	100. 00	0.00	3	0	0	0	3	0	0.00	0.00	100. 00	0.00
Lincoln County	2.79	3	11	0.00	66.6 7	33.3 3	0.00	0	0	0	0	0	0	0.00	28.0 6	35.0 0	36.9 5
Little Rock CT's	7.77	4	15	0.00	0.00	25.0 0	75.0 0	3	0	0	0	1	2	1.49	31.3 0	21.4 3	45.7 8