



# LARGE BANK

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

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## Public Disclosure

January 3, 2005

### Community Reinvestment Act Performance Evaluation

**The First National Bank & Trust Company of Ada**  
Charter Number: 12591

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Ada, Oklahoma 74821

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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 **The First National Bank & Trust Company of Ada** with respect to the lending, investment, and service tests:

Performance Levels	The First National Bank & Trust of Ada Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending activity reflects good responsiveness to area credit needs.
- Good borrower distribution of loans by the income level. The distribution of home mortgage loans is good. The distribution of small business and small farm loans is excellent.
- Good geographic distribution of loans by income tract. The geographic distribution of home mortgage loans is good. The geographic distribution of small business and small farm loans is adequate.
- Good performance for Community Development Lending (CD) that had a positive effect on the lending test. The bank originated a notable number and dollar volume of CD loans that were responsive to assessment area credit needs.
- Good network of retail delivery systems that are readily accessible to geographies and individuals of different income levels.
- Good level of CD services, with the bank sometimes taking a leadership role in the provision of those services.
- Adequate levels of qualified investments extended in the bank's assessment areas.

## ***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 statistical 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 householder 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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of 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 statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan area (CMSA), 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***

The First National Bank & Trust Company of Ada (FNB&T) is an intrastate bank headquartered in Ada, Oklahoma. As of September 30, 2004, FNB&T's assets totaled \$355 million. Tier 1 capital totaled \$31 million, and the loan-to-deposit ratio equaled 77 percent. FNB&T is a wholly owned subsidiary of Vision Bancshares Inc., a one-bank holding company.

FNB&T's operations are located in two primary areas. The first area is located in south central Oklahoma and consists of Pontotoc County. This area surrounds the Ada branch locations. The second area is located in east central Oklahoma, in an area surrounding the Prague and Meeker branch locations. This area includes portions of Lincoln, Pottawatomie, Seminole, and Okfuskee counties. Lincoln County is located in the eastern portion of the Oklahoma City MSA. The bank's operating locations are located in non-metropolitan areas; however, demographics are wide-ranging and degrees of competition vary.

FNB&T's business strategy is focused on residential real estate and small business lending. The bank has a mortgage department that originates long-term mortgages for sale in the secondary market. No significant legal or financial impediments limit FNB&T's ability to meet the credit needs of its assessment areas. A diverse choice of commercial, residential, and consumer loan products are offered, as well as retail and commercial deposit products. The bank also offers trust and retail nondeposit investment services. As of September 30, 2004, of the bank's loan portfolio, 55 percent was composed of commercial loans, 37 percent in 1-4 family residential real estate loans, and 8 percent in consumer loans. FNB&T is also very active in the origination of residential real estate loans for sale in the secondary market. From January 1, 2002 through December 31, 2004, FNB&T originated 492 residential mortgages totaling approximately \$44 million that were sold in the secondary market. If these loans were retained in the loan portfolio, FNB&T's loan-to-deposit ratio would approximate 96 percent.

The Office of the Comptroller of the Currency last evaluated FNB&T's small bank CRA performance on March 23, 1998. The bank received an overall rating of **“Outstanding”**.



## ***Scope of the Evaluation***

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

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. Conclusions regarding the Lending Test are based on Home Mortgage Disclosure Act (HMDA) related residential mortgage loans originated from January 1, 2004 through December 31, 2004. Conclusions regarding small business and small farm lending were based on loans originated from January 1, 2002 through December 31, 2003. The community development (CD) lending performance analysis considered loans made from January 1, 2002 through December 31, 2004.

The evaluation period for the Service Test was from January 1, 2002 through December 31, 2004. The Service 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 evaluation period for the Investment Test was from January 1, 2002 through December 31, 2003. The Investment Test conclusions are based on an evaluation of qualified community development investments and grants.

### ***Data Integrity***

A Data Integrity examination was conducted on October 20, 2003 to determine the accuracy of FNB&T's small business, small farm, and community development loan data. A sample of loans the bank reported for 2002 and 2003 was reviewed, with data found to be reliable. The bank was not required to report HMDA data until 2004. The bank engaged a qualified, independent third party to test the accuracy of this data. A small number of errors were identified, but have since been corrected. Therefore, the HMDA data for 2004 used in this analysis is considered reliable.

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

FNB&T has two assessment areas (AA). The Ada AA and the Prague/Meeker AA each received full-scope reviews. The Ada AA accounts for a majority of the bank's branches, deposits and loans. A portion of the Prague/Meeker AA is located within the Oklahoma City Metropolitan Statistical Area (MSA) and as such, requires a full scope review. Performance in the Ada AA is given more weight in the overall evaluation, since the majority of the bank's business is derived from this AA. Please refer to the table in Appendix A for additional information.

The delineation of the AA's did not reflect any illegal discrimination and did not arbitrarily exclude low- or moderate-income geographies.

***Other***

Two community contact interviews were made in the Ada assessment area to discuss credit needs and community development opportunities. Organizations contacted included one non-profit organization that provides community housing and another non-profit organization whose primary focus is on housing. Both agencies focus on serving the needs of low- and moderate-income individuals/families. The contacts indicated that FNB&T is actively involved in the community and participates in community development programs and opportunities available. Additionally, the interviewees indicated that they were not aware of any unmet credit needs in the community.

## ***Fair Lending Review***

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

## ***Conclusions with Respect to Performance Tests***

### ***LENDING TEST***

#### ***CONCLUSIONS FOR AREAS RECEIVING FULL-SCOPE REVIEWS***

The bank's performance under the lending test is rated "**High Satisfactory**". Based on the full-scope review, the bank's performance in the full-scope AA is good.

#### ***Lending Activity***

Please refer to *Table 1 Lending Volume* section of *Appendix C* for the facts and data used to evaluate the bank's lending activity.

FNB&T's business strategy is focused on residential real estate and small business lending. The bank's overall lending volume and the distribution of these types of loans are good. This evaluation gives additional weight to the results of home mortgage related lending analysis. This is appropriate, as the combination of current mortgage related loans held by the bank and the significant volume of home mortgage related loans originated by the bank and sold in the secondary market would result in these types of loans representing the largest segment of the loan portfolio.

The FNB&T's lending activity reflects good responsiveness to the credit needs of its full-scope AA. Based on 2003 aggregate data, the bank's small farm and small business loans market shares in the Ada AA of 50.97 percent and 20.49 percent, respectively. For the Prague/Meeker AA, the bank's small farm and small business loan market shares were 13.77 percent and 4.01 percent, respectively. As of June 30, 2004, FNB&T's deposit market share in the Ada AA was approximately 33 percent, which ranks 1<sup>st</sup> in this AA. Deposit market share in the Prague/Meeker AA was approximately 5 percent, which ranks 6<sup>th</sup> in this AA. Of the five banks with a larger deposit market share in the Prague/Meeker AA, four have total assets exceeding \$1 billion, which contributes to the bank's smaller deposit market share in that AA. The market share for 2004 HMDA loans was not available.

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

FNB&T's overall distribution of loans by income level of geographies is good. Prior to 2003, the Ada AA contained one low-income geography and the Prague/Meeker AA contained no low-income geographies. Updated census data in 2003 reflects that Ada AA no longer contains any low-income geographies. Since the evaluation period covers 2002 and 2003 for the assessment of small businesses and small farms lending, these analyses are separated by year in this evaluation for comparative purposes. No market share information data is available for home mortgage related loans, as 2004 was the first year FNB&T was required to report HMDA data and the summary of that data has not yet been compiled.

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

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

#### ***Ada Assessment Area***

##### ***Home Purchase Loans***

FNB&T's distribution of home purchase loans in moderate-income areas is excellent. Of the total loans extended, 25.38 percent were made in moderate-income geographies, which exceeds the 14.09 percent of owner-occupied units in those areas.

##### ***Home Improvement Loans***

FNB&T's distribution of home improvement loans in moderate-income areas is excellent. Of the total loans extended, 18.67 percent were made in moderate-income geographies, which exceeds the 14.09 percent of owner-occupied units in those areas.

##### ***Home Refinance Loans***

FNB&T's distribution of home mortgage refinance in moderate-income areas is poor. Of the total loans extended, 4.95 percent were made in moderate-income geographies, which is lower than the 14.09 percent of owner-occupied units in those areas. The lower distribution can be attributed to the fact that individuals or families living in moderate-income geographies typically are less likely to refinance their home mortgages, due to the costs involved. Additionally, the current low interest rate environment has resulted in many individuals or families that were living in moderate-income geographies being able to upgrade and purchase homes in higher income geographies.

## *Prague/Meeker Assessment Area*

### *Home Purchase Loans*

FNB&T has not extended any home purchase loans in moderate-income areas. However, only 4.04 percent of the owner occupied units are located in the moderate-income geography. The low distribution of loans in moderate-income assessment areas in the AA results from the limited opportunity to extend these loans, since there is only one moderate-income census tract in the AA. That census tract is located in Seminole County, which is adjacent to the counties in which the Prague and Meeker branches are located. Seminole County has numerous financial institutions that are closer in proximity to this census tract.

### *Home Improvement Loans*

FNB&T has not extended any home improvement loans in moderate-income areas. However, only 4.04 percent of the owner occupied units are located in the moderate-income geography. The low distribution of loans in moderate-income assessment areas in the AA results from the limited opportunity to extend these loans, since there is only one moderate-income census tract in the AA. That census tract is located in Seminole County, which is adjacent to the counties in which the Prague and Meeker branches are located. Seminole County has numerous financial institutions that are closer in proximity to this census tract.

### *Home Refinance Loans*

FNB&T has not extended any home refinance loans in moderate-income areas. However, only 4.04 percent of the owner occupied units are located in the moderate-income geography. The low distribution of loans in moderate-income assessment areas in the AA results from the limited opportunity to extend these loans, since there is only one moderate-income census tract in the AA. That census tract is located in Seminole County, which is adjacent to the counties in which the Prague and Meeker branches are located. Seminole County has numerous financial institutions that are closer in proximity to this census tract.

### *Small Loans to Businesses*

Please refer to *Table 5* in *Appendix C* for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses. There are no low-income tracts in the Ada or Prague/Meeker AAs.

#### *Ada Assessment Area*

2002

FNB&T's distribution of loans to small businesses in low-income geographies is adequate. Of the total loans extended, 4.47 percent were made in low-income geographies, which is somewhat lower than the 8.28 percent of business in that geography. The distribution of loans to small businesses in moderate-income areas is adequate. Of the total loans extended, 22.36 percent were made in moderate-income geographies, which is somewhat lower than the 40.62 percent of businesses in those areas. The bank's 22.92 and 26.67 percent market share in low- and moderate-income geographies, respectively, compares to its overall market share of 24.31 percent.

2003

FNB&T's distribution of loans to small businesses in moderate-income areas is adequate. Of the total loans extended, 35.06 percent were made in moderate-income geographies, which is somewhat lower than the 60.78 percent of businesses in those areas. The bank's zero and 17.73 percent market share in low- and moderate-income geographies, respectively, compares to its overall market share of 20.49 percent.

#### *Prague/Meeker Assessment Area*

2002

FNB&T's distribution of loans to small businesses in moderate-income areas is adequate. Of the total loans extended, 4.63 percent were made in moderate-income geographies, which is somewhat lower than the 18.53 percent of businesses in those areas. The bank's zero and 2.87 percent market share in low- and moderate-income geographies, respectively, compares to its overall market share of 4.14 percent. The low distribution of loans in moderate-income assessment areas in the AA results from the fact that there is only one moderate-income census tract in the AA. That census tract is located in Seminole County, which is adjacent to the counties in which the Prague and Meeker branches are located. Seminole County has numerous financial institutions that are closer in proximity to this census tract.

2003

FNB&T's distribution of loans to small businesses in moderate-income areas is poor. Of the total loans extended, 1.10 percent were made in moderate-income geographies, which is lower than the 14.74 percent of businesses in those areas. The bank's 1.10 and 2.10 percent market share in low- and moderate-income geographies, respectively, compares to its overall market share of 4.01 percent. The low distribution of loans in moderate-income assessment areas in the AA results from the fact that there is only one moderate-income census tract in the AA. That census tract is located in Seminole County, which is adjacent to the counties in which the Prague and Meeker branches are located. Seminole County has numerous financial institutions that are closer in proximity to this census tract.



### *Small Loans to Farms*

Please refer to *Table 6* in *Appendix C* for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

#### *Ada Assessment Area*

2002

FNB&T's distribution of loans to small farms in low-income areas is adequate. Of total loans extended, 1.89 percent were made in low-income geographies, which is lower than the 10.61 percent of small farms in those areas. The bank's distribution of loans to small farms in moderate-income areas is poor. Of total loans extended, none were made in moderate-income areas, compared to the 21.31 percent of small farms in those areas. Analyses found that the lower penetration of loans in the moderate-income geographies results from the fact that the moderate-income census tract comprises mostly residential and commercial businesses. There are small farms located on the fringe of this census tract; however, although they are classified as small farms for data analysis, a substantial majority are residences located on small acreages with minimal farming activity. The bank's 14.29 and zero percent market share in low- and moderate-income geographies, respectively, is somewhat lower than its overall market share of 28.57 percent.

2003

FNB&T's distribution of loans to small farms in moderate-income areas is poor. Of total loans extended, no loans were made in moderate-income areas, which is significantly lower than the percentage of small farms in those areas (36.62%). The bank has no market share for small loans to farms in moderate-income census tracts. Analyses found that the lower penetration of loans in the moderate-income geographies in the AA results from the fact that the moderate-income census tract comprises mostly residential areas and commercial businesses. There are small farms located on the fringe of this census tract; however, although they are classified as small farms for data analysis, a substantial majority are residences located on small acreages with minimal farming activity.

**Prague/Meeker Assessment Area**

2002

FNB&T's distribution of loans to small farms in moderate-income areas is good. Of total loans extended, 0.93 percent were made in moderate-income areas, which compares favorably to the 3.49 percent of small farms in those areas. The bank has a 3.78 percent market share in moderate-income geographies, which is somewhat lower than its overall market share of 16.24 percent. However, the lower penetration level is mitigated by the fact there is only one moderate-income census tract in the AA. That census tract is located in Seminole County, which is adjacent to the counties in which the Prague and Meeker branches are located. Seminole County has numerous financial institutions that are closer in proximity to this census tract.

2003

FNB&T's distribution of loans to small farms in moderate-income areas is good. Of total loans extended, 1.00 percent were made in moderate-income areas, which compares favorably to the 2.27 percent of small farms in those areas. The bank has a 5.45 percent market share in moderate-income geographies, which is somewhat lower than its overall market share of 13.77 percent. However, the lower penetration level is mitigated by the fact there is only one moderate-income census tract in the AA. That census tract is located in Seminole County, which is adjacent to the counties in which the Prague and Meeker branches are located. Seminole County has numerous financial institutions that are closer in proximity to this census tract.

***Lending Gap Analysis***

An analysis of home mortgage, small business / small farm lending, and consumer loan activity revealed no unexplained conspicuous gaps in lending.

***Inside/Outside Ratio***

The bank's lending activity reflects excellent concentration within its assessment areas. A substantial majority of HMDA and Small Business and Small Farm loans analyzed during the evaluation period were made in the bank's two defined AA's. By type, approximately 70 percent of the number of home mortgage related loans, 76 percent of small business loans, and 81 percent of small farm loans were made in the AA's.

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

FNB&T's overall distribution of loans by income level of the borrower is good. Prior to 2003, the Ada AA contained one low-income geography and the Prague/Meeker AA contained no low-income geographies. Updated census data in 2003 reflects that Ada AA no longer contains any low-income geographies. Since the evaluation period covers 2002 and 2003 for the evaluation of small businesses and small farms, these analyses are separated by year for comparative purposes. No market share information data is available for home mortgage related loans, as 2004 was the first year FNB&T was required to report HMDA data and the summary of that data has not yet been compiled.

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

Please refer to Tables 7, 8, and 9 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### ***Ada Assessment Area***

##### ***Home Purchase Loans***

FNB&T's borrower distribution of home purchase loans to low-income individuals is adequate and the distribution of those loans to moderate-income individuals is good. Of the total of this type of loan extended, 10.48 percent of loans were made to low-income individuals, which is somewhat lower than the 20.36 percent of families in that income category. Additionally, 15.32 percent was made to moderate-income individuals, which compares to the percentage of families at that income level of 19.20 percent.

##### ***Home Improvement Loans***

FNB&T's borrower distribution of home improvement loans to low-income individuals is good and the distribution of those loans to moderate-income individuals is adequate. Of the total of this type of loan extended, 15.28 percent of loans were made to low-income individuals, which compares to the 20.36 percent of families in that income category. Additionally, 9.72 percent was made to moderate-income individuals, which is somewhat lower than the percentage of families in that income category of 19.20 percent.

##### ***Home Refinance Loans***

FNB&T's borrower distribution of home refinance loans to low-income individuals is adequate and the distribution to moderate-income individuals is good. Of the total of this type of loan extended, 5.62 percent of loans were made to low-income individuals, which is somewhat lower than the 20.36 percent of families in the income category. Additionally, 13.48 percent was made to moderate-income individuals, which compares to the percentage of families at that income level of 19.20 percent.

## *Prague/Meeker Assessment Area*

### *Home Purchase Loans*

FNB&T's borrower distribution of home purchase loans to low-income individuals is poor and the distribution of those loans to moderate-income individuals is excellent. Of the total of this type of loan extended, 3.45 percent of loans were made to low-income individuals, which is lower than the 20.17 percent of families in that income category. Additionally, 24.14 percent of home purchase loans were made to moderate-income individuals, which exceeds the percentage of families at that income level of 19.05 percent. The low penetration of home purchase loans to low-income individuals or families results from the fact that low-income individuals typically are unable to afford to purchase homes, due to downpayment and various other costs associated with a home purchase.

### *Home Improvement Loans*

FNB&T's borrower distribution of home improvement loans to low-income individuals is excellent and the distribution of those loans to moderate-income individuals is good. Of the total of this type of loan extended, 21.15 percent of loans were made to low-income individuals, which exceed the 20.17 percent of families in that income category. Additionally, 17.31 percent of home improvement loans were made to moderate-income individuals, which compares to the percentage of families in that income category of 19.05 percent.

### *Home Refinance Loans*

FNB&T's borrower distribution of home refinance loans to low-income individuals is adequate and the distribution to moderate-income individuals is excellent. Of the total of this type of loan extended, 10.81 percent of loans were made to low-income individuals, which is lower than the 20.17 percent of families in this income category. Additionally, 21.62 percent of home refinance loans were made to moderate-income individuals, which exceeds the percentage of families at that income level of 19.05 percent.

### *Small Loans to Businesses*

Please refer to *Table 10 of Appendix C* for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

#### ***Ada Assessment Area***

2002

The distribution of loans to small business with revenues of less than \$1 million is excellent and exceeds the distribution of small businesses with revenues of less than \$1 million. A substantial majority of the bank's small business loans were in amounts of less than \$100 thousand. Additionally, the bank's market share of loans to businesses with revenues less than \$1 million exceeds its overall market share of small business loans.

2003

The distribution of loans to small business with revenues of less than \$1 million is excellent and exceeds the distribution of small businesses with revenues of less than \$1 million. A substantial majority of the bank's small business loans were in amounts of less than \$100 thousand. Additionally, the bank's market share of loans to businesses with revenues less than \$1 million exceeds its overall market share of small business loans.

#### ***Prague/Meeker Assessment Area***

2002

The distribution of loans to small business with revenues of less than \$1 million is excellent and exceeds the distribution of small businesses with revenues of less than \$1 million. A substantial majority of the bank's small business loans were in amounts of less than \$100 thousand. Additionally, the bank's market share of loans to businesses with revenues less than \$1 million exceeds its overall market share of small business loans.

2003

The distribution of loans to small business with revenues of less than \$1 million is excellent and exceeds the distribution of small businesses with revenues of less than \$1 million. A substantial majority of the bank's small business loans were in amounts of less than \$100 thousand. Additionally, the bank's market share of loans to businesses with revenues less than \$1 million exceeds its overall market share of small business loans.

### *Small Loans to Farms*

Please refer to Table 11 of Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

#### *Ada Assessment Area*

2002

The distribution of loans to small farms with revenues of less than \$1 million is excellent and exceeds that of the distribution of small farms with revenues of less than \$1 million. Additionally, a substantial majority of the bank's small farm loans were in amounts of less than \$100 thousand. Additionally, the bank's market share of loans to small farms with revenues less than \$1 million exceeds its overall market share of small farm loans.

2003

The distribution of loans to small farms with revenues of less than \$1 million is excellent and exceeds the distribution of small farms with revenues of less than \$1 million. Additionally, a substantial majority of the bank's small farm loans were in amounts of less than \$100 thousand. Additionally, the bank's market share of loans to small farms with revenues less than \$1 million is equal to its overall market share of small business loans.

#### *Prague/Meeker Assessment Area*

2002

The distribution of loans to small farms with revenues of less than \$1 million is good and is equal to that of the distribution of small farms with revenues of less than \$1 million. Additionally, a substantial majority of the bank's small farm loans were in amounts of less than \$100 thousand. Additionally, the bank's market share of loans to small farms with revenues less than \$1 million is equal to its overall market share of small farm loans.

2003

The distribution of loans to small farms with revenues of less than \$1 million is excellent and exceeds the distribution of small farms with revenues of less than \$1 million. Additionally, a substantial majority of the bank's small farm loans were in amounts of less than \$100 thousand. Additionally, the bank's market share of loans to businesses with revenues less than \$1 million exceeds its overall market share of small business loans.

## *Community Development Lending*

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

The bank's community development positively impacts lending test conclusions. Given the size and financial strength of the institution, the bank's level of community development lending is good. During this evaluation period, FNB&T made four loans totaling approximately \$1.8 million. These loans were to provide funding for the development of affordable housing to fulfill an identified need. The housing units are specifically targeted to low- and moderate-income individuals and families. FNB&T extended these loans through the Federal Home Loan Bank's Affordable Housing Program. As a result of these loans, 42 housing units have been constructed in the Ada AA, with an additional 54 under construction in Shawnee, Oklahoma, just adjacent to the Prague/Meeker AA.

### *Product Innovation and Flexibility*

FNB&T has an adequate record of providing flexible lending products. One flexible lending program related to affordable housing is available. The *Rural First-Time Homebuyer Program* is designed to help first-time homebuyers in rural areas purchase a home. Funds can be used for down payment, closing costs and rehabilitation assistance on homes that is outside a MSA. To be eligible for this program, homebuyers must:

- Pay at least 15 percent of their monthly income toward their monthly housing cost;
- Have income that is 80 percent or less of the area median;
- Purchase a home located in a rural area;
- Complete a homebuyer education/counseling program prior to receiving the funds; and,
- Provide a minimum of \$500 as a down payment.

Through this program, the bank has extended 26 loans totaling \$104 thousand from March 2002 through September 2004. Of these loans, 24 totaling \$96 thousand were extended in the Ada AA, with 2 loans totaling \$8 thousand extended in the Prague/Meeker AA.

## **INVESTMENT TEST**

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

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

The bank's performance under the investment test is rated "**Low Satisfactory**". During the evaluation period, FNB&T's qualified investments were limited to grants. FNB&T donated \$17 thousand in the Ada AA and \$1 thousand in the Prague/Meeker AA, to various non-profit organizations that provide social services to low-and moderate-income individuals and families. Analysis of these grants found that while they do benefit low- and moderate-income individuals and geographies, they are not considered complex or innovative. Additionally, FNB&T has donated a significant amount of funds to other civic and charitable organizations; however, those organizations do not meet the criteria required for qualifying investments.



## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "**High Satisfactory**". Based on a full-scope review, the bank's performance is excellent. FNB&T has achieved good performance when providing banking products and services that are readily accessible to geographies and individuals of different incomes in each of their AAs. The primary delivery system is the bank's branch network, which is readily accessible to geographies and individuals of different income levels throughout each of the full-scope assessment area. The bank's ATM network offers an effective alternative delivery system for delivering retail banking services in low- and moderate-income geographies. Retail products and services meet a wide array of customer needs. The bank provides a good level of community development services.

### ***Retail Banking Services***

Please refer to *Table 13* 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.

Branch openings/closings have not affected the accessibility of delivery systems in the full-scope assessment areas. Since the prior evaluation, there have been 2 branch acquisitions, one in Prague, Oklahoma, and one in nearby Meeker, Oklahoma. As a result of these acquisitions, the Prague/Meeker AA was identified. Both are located in middle-income census tracts. There have been no branch closings since the prior evaluation.

Bank branches are the primary delivery system and are readily accessible to geographies and individuals of different income levels throughout the full-scope assessment areas. There are four banking offices including the main office. Drive-thru facilities are attached or adjacent to each banking office. Of these, two offices are located in the Ada AA, one of which is located in moderate-income census tract. Branch penetration in this AA is good, as 50 percent of the banking offices are located in moderate-income geographies, while only 24 percent of the population resides within those geographies. The Prague/Meeker AA contains 2 banking offices. Both are located in middle-income census tracts. Although there are no branch locations in moderate-income geographies in this AA, branch penetration is considered good, as only 6 percent of the population resides with moderate-income geographies and the moderate-income geography is located in a county adjacent to the Prague and Meeker branch locations.

Various banking services and products augment the branch system. These include ten ATMs located in various income tracts, telephone banking, banking by mail, Internet banking services, direct deposit, on-line bill pay, checkcards, and debit cards.

Services do not cause inconvenience to any portion of the AAs, particularly moderate-income geographies. All banking products and services are available at all offices. A free checking product has been developed for consumers and small businesses to assist in meeting the basic banking needs of the low- and moderate-income population, as well as small businesses in the bank's AAs. A variety of other deposit and loan products are available to all current and potential customers. Hours of operations are reasonable to ensure banking services are available to all segments of the population in FNB&T's AAs. Hours of operation at the main bank drive-thru facility and Arlington branch in the Ada AA were recently expanded to meet customer needs.

### *Community Development Services*

FNB&T has demonstrated a good level of community development service performance in the Ada and Prague/Meeker full-scope assessment areas. Such services include technical assistance, fundraising activities, and educational programs. Although the services provided are not considered innovative, they are responsive to an identified need in the AA, with the bank sometimes taking a leadership role. The bank demonstrates a willingness to provide community development services to low- and moderate-income neighborhoods and individuals. Bank officers and employees are encouraged to be involved in community projects, events, fund raising activities, civic organizations and economic development programs. Community development services conducted during the review period include the following:

#### *Ada Assessment Area*

**Quick Advantage Entrepreneurship Program:** This six-week program is designed to stimulate economic development by assisting any person wishing to expand an existing business or create a new business. The program provides assistance in various areas, including how to begin, planning, accounting, finance, marketing, leadership, and management. FNB&T partnered with East Central University to create this opportunity by requesting and obtaining a \$25 thousand grant through the Federal Home Loan Bank's Joint Opportunities for Building Success (JOBS) program. Bank personnel, as well as personnel from the East Central University, instructed the course. Twenty-seven people participated in program, which has resulted in the creation of approximately ten additional jobs in the local area.

**Ada Regional United Way:** Several FNB&T employees serve in leadership positions for Ada Regional United Way. Employees provide technical assistance through serving as board and/or committee members, and fundraising chairs. Members are active in evaluating budgets and initiating funding for member agencies. One of the primary goals of the United Way is to provide assistance and funding to several community service agencies that target low- and moderate-income families and individuals.

**Ada Jobs Foundation:** An FNB&T employee serves on the board for the Ada Jobs Foundation, whose primary purpose is to promote business growth with existing businesses and encourage new businesses to locate in the Ada area to provide permanent jobs. In that capacity, he provides financial consultation and makes decisions regarding budgets and projects. Ada Jobs Foundation has been successful in bringing countless jobs to the Ada Area and keeping existing jobs, many of which have been to low- and moderate-income individuals.

**Tri-County Indian Nation CDC (Coal, Pontotoc, Johnston Counties):** An FNB&T employee serves on the board of directors of the Tri-County Indian Nation CDC. In that capacity, he provides financial consultation and makes decisions regarding budgets and projects. Tri-county's primary purpose is to provide child care assistance, healthcare services, transportation, and affordable housing to low to moderate-income families and individuals. Tri-County was instrumental in bringing Linden Partners to Ada and constructing an affordable housing apartment complex.

**Ada Industrial Development Corp:** An FNB&T employee serves on the board of directors for the Ada Industrial Development Corp, whose primary purpose is to bring jobs to the Ada area, many of which have been to low- and moderate-income individuals. In that capacity, he makes decisions regarding budgets and projects and provides financial consultation.

**Ada Chamber of Commerce:** Several FNB&T employees serve on the community development committee of the Ada Chamber of Commerce, whose primary purpose is to maintain jobs in the community and encourage new businesses to move into the area creating jobs, many of which target for low- and moderate-income individuals. In that capacity, they make decisions regarding budgets and projects.

**Ada Main Street:** An FNB&T employee serves in a leadership role in the Ada Main Street Organization, whose purpose is to stabilize and revitalize the main street area by encouraging new businesses to fill vacant buildings and promoting existing businesses. This employee provides technical assistance through serving on the board of directors and as chair of the organizational committee. In that capacity, he reviews and makes decisions on budgets and projects. Ada Main Street is in a moderate geography with several low-income housing apartments in the vicinity.

**Ada Area Youth Shelter:** An FNB&T employee serves on the board of directors. In that capacity, she provides financial consultation and makes decisions regarding budgets and projects. The Ada Area Youth Shelter provides needs to economically deprived persons, persons with mental health issues. A majority of the individuals using this service are low- and moderate-income individuals.

**Success by 6:** An FNB&T employee serves on the advisory board for Success by 6. In that capacity, she provides financial consultation and makes decisions regarding budgets and projects. She is co-chair of the fundraising committee. Success by 6 is the center agency of all child agencies. The agency was created to provide families with materials, education, and needed necessities to help children in school readiness, of which many of these families come from low- and moderate-income geographies. Success by 6 assists low- and moderate-income individuals, through its Even Start program, with obtaining their GED and provides classes on educating your child, health awareness, cooking, etc. Ada is one of 13 communities selected by the First Lady of Oklahoma to take steps in creating this Agency.

**Big Brother/Big Sister:** An FNB&T employee serves on the board for Big Brother/Big Sister. In that capacity, he provides financial consultation and makes decisions regarding budgets and projects. Big Brother/Big Sister is new to the Ada area, of which many of their clients are from low- and moderate-income geographies. The agency provides positive role models to children from single parent families and children living with elderly grandparents.

**Ada Lions Club:** An FNB&T employee serves in a leadership position in the Ada Lion's Club. He provides technical assistance through serving as Secretary and Past President. He makes decisions on budgets and projects the club is involved in. One primary project the Lions Club is involved in is giving eye exams and eyewear to low and moderate-income individuals, primarily children.

**Ada Kiwanis:** Several FNB&T employees serve in leadership positions for Ada Kiwanis. Employees provide technical assistance through serving as officers, board members, and committee members. In that capacity, they provide financial consultation and make decisions regarding budgets and projects. The primary purpose is teaching leadership and sportsmanship to children through summer programs, many of which come from low and moderate-income families.

**Student Board of Directors:** FNB&T sponsors a program that provides financial education on all aspects of banking to area high school students. Students are selected by their counselors and teachers. Students learn the aspects of balancing a checkbook to management of a bank. Each student resides on FNB&T's Student Board of Directors for one semester and is given a fee for each meeting they attend. The Student Board of Directors has been recognized by the Oklahoma Bankers Association (OBA) for its success.

**McCall's Chapel School:** An FNB&T employee serves in a leadership position for McCall's Chapel School. In that capacity, she provides financial consultation and makes decisions regarding budget and projects. McCall's Chapel mission is to improve the quality of life for disadvantaged individuals through basic necessities, specialized programs, and independent living skills, many of whom are low and moderate individuals.

**Pontotoc County Industrial Development Corp:** An FNB&T employee serves on the board of directors for Pontotoc County Industrial Development Corp. In that capacity, he provides financial consultation and makes decisions regarding budget and projects. Pontotoc County Industrial Development Corp's primary purpose is to encourage new businesses to come to Pontotoc County creating new jobs, many of which are for low and moderate individuals.

**Bank at School:** FNB&T provides material to area schools for children through the OBA's Bank at School Program, many of which come from low and moderate-income families. The materials teach children how to manage their finances through balancing checking accounts, giving description of types of accounts, and provides an overview general banking.

### *Prague/Meeker Assessment Area*

**Meeker Chamber of Commerce:** Several FNB&T employees serve in leadership positions for the Meeker Chamber of Commerce. Employees provide technical assistance through serving as officers, directors, and/or committee members. In that capacity, they provide financial consultation and make decisions regarding budget and projects. The Meeker Chamber of Commerce is focused on bringing jobs to the area and promoting economic development in the region, many of which affect low and moderate-income families and individuals.

**Prague Chamber of Commerce:** Several FNB&T employees serve in leadership positions for the Prague Chamber of Commerce. Employees provide technical assistance through serving as officers, board of Directors, and committee members. In that capacity, they make decisions regarding budget and projects and provide financial consultation when needed. The Prague Chamber of Commerce is focused on bringing jobs to the area and promoting economic development in the region. One focus is replacing jobs lost by the closing of Wrangler, which impacted many low- and moderate-income individuals.

**Prague Main Street:** Several FNB&T employees serve in leadership positions for the Prague Main Street. Employees provide technical assistance through serving as officers, board and/or committee members and volunteers. In that capacity, they provide financial consultation and make decisions regarding budget and projects. Prague Main Street's mission is to stabilize and revitalize the main street area by promoting existing businesses and encouraging new business in the area. This brings jobs to the area, many of which are targeted to low- and moderate-income individuals.

**Central Oklahoma Economic Development Authority (COEDA):** An FNB&T employee serves in a leadership position for the COEDA. He provides financial consultation and makes decisions regarding budget and projects through the loan trust committee. The authority promotes economic development by bringing new business to Central Oklahoma, many of which bring jobs to low- and moderate-income individuals.

**Lincoln County Economic Development Authority:** An FNB&T employee serves on the Board of Directors for the Lincoln County Economic Development Authority. In his capacity, he provides financial consultation and makes decisions regarding budget and projects. The Authority encourages Economic Development by bringing new businesses to Lincoln County and expanding existing businesses to the area. As a result, jobs are created, many of which are targeted to low- and moderate-income individuals.

**Prague Student Board of Directors:** FNB&T sponsors a program that provides financial education on all aspects of banking to area high school students. Students are selected by their counselors and teachers. Students learn the aspects of balancing a checkbook to management of a bank. Each student resides on FNB&T's Student Board of Directors for one semester and is given a fee for each meeting they attend. The Student Board of Directors has been recognized by the Oklahoma Bankers Association for its success.

**Oklahoma Council of Economic Education:** An FNB&T employee serves on the Board of Directors for the Oklahoma Council of Economic Education. He provides financial consultation and makes decisions regarding budgets and projects. The Oklahoma Council of Economic Education promotes economic and personal financial literacy for all Oklahoma. They provide informational material and projects to area schools concerning economic concepts, free enterprise education and basic financial management skills in grades K-12.

**Bank at School:** FNB&T provides material to area schools for children through the OBA's Bank at School Program, many of which come from low and moderate income families. The materials teach children how to manage their finances through balancing checking accounts, giving description of types of accounts, and provides an overview general banking.

**Student Loan Seminars:** FNB&T is involved in educating students in the Prague and Meeker AA on how to apply for their student loans to meet their college financial needs. FNB employees are on hand to answer questions and give suggestions in the application process.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	<b>Lending Test:</b> January 1, 2002 to December 31, 2003 for Small Business/Small Farm January 1, 2004 to December 31, 2004 for Home Mortgage Products <b>Investment Test:</b> January 1, 2002 to December 31, 2003 <b>Service Test:</b> January 1, 2002 to December 31, 2004 <b>Community Development Lending:</b> January 1, 2002 to December 31, 2004	
<b>Financial Institution</b>		<b>Products Reviewed</b>
The First National Bank & Trust Company of Ada Ada, Oklahoma		Home Purchase, Home Improvement, Home Refinance, Small Business, Small Farm  Community Development Loans, Investments and Services
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Ada	Full-Scope	AA is comprised of Pontotoc County
Prague/Meeker	Full-Scope	AA is comprised of portions of four counties, which a portion of one county is located in the Oklahoma City MSA

# Appendix B: Market Profiles for Full-Scope Areas

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## Table of Contents

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

Ada Assessment Area.....B-2  
Prague/Meeker Assessment Area.....B-3



**Ada Assessment Area**

Demographic Information for Full-Scope Area: Ada AA 2003-2004						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	0.00	30.00	60.00	10.00	0.00
Population by Geography	35,143	0.00	23.67	57.00	19.33	0.00
Owner-Occupied Housing by Geography	9,363	0.00	14.09	63.56	22.35	0.00
Businesses by Geography	2,045	0.00	60.78	23.37	15.84	0.00
Farms by Geography	71	0.00	36.62	56.34	7.04	0.00
Family Distribution by Income Level	9,553	20.36	19.20	20.94	39.51	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,779	0.00	26.75	59.57	13.68	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below the Poverty Level	= \$35,517 = \$41,300 = 17.53%	Median Housing Value Unemployment Rate				= \$54,797 = 2.68%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2004 HUD updated MFI.

Demographic Information for Full-Scope Area: Ada AA 2002						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	10.00	10.00	60.00	20.00	0.00
Population by Geography	33,390	6.86	5.20	60.75	27.19	0.00
Owner-Occupied Housing by Geography	8,931	5.23	4.10	60.89	29.78	0.00
Businesses by Geography	1,957	8.28	40.62	30.61	20.49	0.00
Farms by Geography	66	10.61	21.21	53.03	15.15	0.00
Family Distribution by Income Level	9,174	23.63	17.72	18.67	39.97	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,794	12.26	6.54	60.54	20.66	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below the Poverty Level	= \$24,139 = \$34,200 = 21.67%	Median Housing Value Unemployment Rate				= \$36,864 = 3.23%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

### Prague/Meeker Assessment Area

Demographic Information for Full-Scope Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	0	0.00	11.11	66.67	22.22	0.00
Population by Geography	34,511	0.00	6.43	69.00	24.57	0.00
Owner-Occupied Housing by Geography	10,077	0.00	5.15	69.62	25.23	0.00
Businesses by Geography	1,646	0.00	18.53	65.19	16.28	0.00
Farms by Geography	86	0.00	3.49	77.91	18.60	0.00
Family Distribution by Income Level	9,866	19.62	17.09	21.55	41.74	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	3,622	0.00	9.44	69.99	20.57	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below the Poverty Level	= \$27,803 = \$39,430 = 18.24%	Median Housing Value Unemployment Rate		= \$44,613 = 3.26%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2004 HUD updated MFI.

The AAs for The FNB&T consists of two areas surrounding its operating locations. The Ada assessment area consists of all of Pontotoc County, containing 10 census tracts. The Prague/Meeker Assessment area consists of 9 census tracts in portions of Lincoln, Pottawatomie, Seminole, and Okfuskee counties. The 2 census tracts located in Lincoln County are located in the Oklahoma City MSA. There are no low-income census tracts in either of these AAs. However, prior to 2003, the Ada AA had one low income census tract. Therefore, small business and small farm data analysis for 2002 and 2003 was analyzed using 1990 census data for 2002 and 2000 census data for 2003.

Of FNB&T's 4 full-service branches, 2 are located in the Ada AA. Of these offices, none are located in low-income census tracts, 1 is located in moderate-income census tract (50 percent) and 1 is located in upper-income census tract (50 percent). The remaining 2 branches are located in the Prague/Meeker AA. These offices are located in middle income census tracts.

During the evaluation period, there were numerous financial service entities operating in the AAs. There is competition for loan and deposit business. Those competitors include, but are not limited to, Citizens Bank, BancFirst, Arvest Bank, and Landmark Bank, N.A. Several non-bank entities such as mortgage companies and brokerage firms also provide a notable level of competition.

Of FNB&T's total deposits, approximately 74 percent are from the Ada locations and 26 percent are from the Prague/Meeker locations. FNB&T holds approximately 33 percent of the \$483 million in deposits in the Ada AA, and approximately 5 percent of the \$1.2 billion in deposits in the Prague/Meeker AA.

The economy is considered stable. Ada is the center of an area well balanced between industry and agriculture, the heart of a strong retail trade area, and the center of higher education, medical care, and research. The largest employers in the area are the Chickasaw Nation and PrePaid Legal Services, Inc. Unemployment levels are at 3.01 percent.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/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 MSA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

- Table 6. 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 7. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 10. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

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

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings -** Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.



## Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: The First National Bank & Trust Company of Ada								Evaluation Period: January 1, 2004 to December 31, 2004					
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Over-all	Low	Mod	Mid	Upper
<b>Full Review:</b>															
Ada AA	130	81.25	0.00	.000	14.09	25.38	63.56	49.23	22.35	25.38	N/A	N/A	N/A	N/A	N/A
Prague/Meeker AA	30	18.75	0.00	0.00	4.04	0.00	78.42	96.67	17.53	3.33	N/A	N/A	N/A	N/A	N/A
<b>Limited Review:</b>															

\* Market share information for 2004 evaluation period not available as of examination.

\*\* 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 2000 Census information.



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

Geographic Distribution: HOME IMPROVEMENT      Geography: The First National Bank & Trust Company of Ada      Evaluation Period: January 1, 2004 to December 31, 2004															
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Over-all	Low	Mod	Mid	Upper
<b>Full Review:</b>															
Ada AA	75	58.59	0.00	0.00	14.09	18.67	63.56	65.33	22.35	16.00	N/A	N/A	N/A	N/A	N/A
Prague/Meeker AA	53	41.41	0.00	0.00	4.04	0.00	78.42	98.11	17.53	1.89	N/A	N/A	N/A	N/A	N/A
<b>Limited Review:</b>															

\* Market share information for 2004 evaluation period not available as of examination.

\*\* 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: The First National Bank & Trust Company of Ada Evaluation Period: January 1, 2004 to December 31, 2004

MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	% Owner Occupied Units***	% BANK Loans	Over-all	Low	Mod	Mid	Up-per
<b>Full Review:</b>															
Ada AA	101	73.19	0.00	0.00	14.09	4.95	63.56	75.25	22.35	19.80	N/A	N/A	N/A	N/A	N/A
Prague/Meeker AA	37	26.81	0.00	0.00	4.04	0.00	78.42	97.30	17.53	2.70	N/A	N/A	N/A	N/A	N/A
<b>Limited Review:</b>															

\* Market share information for 2004 evaluation period not available as of examination.  
 \*\* 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 Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES    Geography: The First National Bank & Trust Company of Ada    Evaluation Period: January 1, 2002 to December 31, 2003															
MSA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Up-per
<b>Full Review:</b>															
<b>2002</b>															
Ada AA	246	69.49	8.28	4.47	40.62	22.36	30.61	41.87	20.49	31.30	24.31	22.92	26.67	35.03	28.31
Prague/Meeker AA	108	30.51	0.00	0.00	18.53	4.63	65.19	68.52	16.28	26.85	4.14	0.00	2.87	5.52	7.33
<b>2003</b>															
Ada AA	174	65.66	0.00	0.00	60.78	35.06	23.37	39.66	15.84	25.29	20.49	0.00	17.73	31.36	26.04
Prague/Meeker AA	91	34.34	0.00	0.00	14.74	1.10	85.26	98.90	0.00	0.00	4.01	1.10	2.10	5.35	8.11
<b>Limited Review:</b>															

\* Based on 2002 & 2003 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet 2002 & 2003.

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

Geographic Distribution: SMALL LOANS TO FARMS    Geography: The First National Bank & Trust Company of Ada    Evaluation Period: January 1, 2002 to December 31, 2003															
MSA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upper
<b>Full Review:</b>															
<b>2002</b>															
Ada AA	53	33.13	10.61	1.89	21.21	0.00	53.03	83.02	15.15	15.09	28.57	14.29	0.00	35.16	16.67
Prague/Meeker AA	107	66.88	0.00	0.00	3.49	0.93	77.91	81.31	18.60	17.76	16.24	0.00	3.78	21.24	26.09
<b>2003</b>															
Ada AA	79	44.13	0.00	0.00	36.62	0.00	56.34	87.34	7.04	12.66	50.97	0.00	0.00	56.56	47.62
Prague/Meeker AA	100	55.87	0.00	0.00	2.27	1.00	97.73	99.00	0.00	0.00	13.77	0.00	5.45	17.36	0.00
<b>Limited Review:</b>															

<sup>\*</sup> Based on 2002 & 2003 Peer Small Business Data: US.

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

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet 2002 & 2003.

## Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: The First National Bank & Trust Company of Ada															Evaluation Period: January 1, 2004 to December 31, 2004														
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*																																	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over-all	Low	Mod	Mid	Up-per																											
<b>Full Review:</b>																																												
Ada AA	130	81.25	20.36	10.48	19.20	15.32	20.94	20.16	39.51	54.03	N/A	N/A	N/A	N/A	N/A																													
Prague/Meeker AA	30	18.75	20.17	3.45	19.05	24.14	22.64	27.59	38.14	44.83	N/A	N/A	N/A	N/A	N/A																													
<b>Limited Review:</b>																																												

\* The evaluation period for Optional Product Lines is from January 1, 2004 to December 31, 2004.  
 \*\* As a percentage of loans with borrower income information available. No information was available for 4.4 percent of loans originated and purchased by Bank.  
 \*\*\* Percentage of Families is based on the 2000 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 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2004		Geography: The First National Bank & Trust Company of Ada						Evaluation Period: January 1, 2004 to December 31, 2004								
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over-all	Low	Mod	Mid
<b>Full Review:</b>																
Ada AA	75	58.59	20.36	15.28	19.20	9.72	20.94	18.06	39.51	56.94	N/A	N/A	N/A	N/A	N/A	N/A
Prague/Meeker AA	53	41.41	20.17	21.15	19.05	17.31	22.64	34.62	38.14	26.92	N/A	N/A	N/A	N/A	N/A	N/A
<b>Limited Review:</b>																

\* The evaluation period for Optional Product Lines is from January 1, 2004 to December 31, 2004.  
 \*\* As a percentage of loans with borrower income information available. No information was available for 3.10 percent of loans originated and purchased by Bank.  
 \*\*\* Percentage of Families is based on the 2000 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 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: The First National Bank & Trust Company of Ada Evaluation Period: January 1, 2004 to December 31, 2004																
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share *					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Over-all	Low	Mod	Mid
<b>Full Review:</b>																
Ada AA	101	73.19	20.36	5.62	19.20	13.48	20.94	14.61	39.51	66.29	N/A	N/A	N/A	N/A	N/A	
Prague/Meeker AA	37	26.81	20.17	10.81	19.05	21.62	22.64	18.92	38.14	48.65	N/A	N/A	N/A	N/A	N/A	
<b>Limited Review:</b>																

\* The evaluation period for Optional Product Lines is from January 1, 2004 to December 31, 2004.

\*\* As a percentage of loans with borrower income information available. No information was available for 8.70 percent of loans originated and purchased by Bank.

\*\*\* Percentage of Families is based on the 2000 Census information.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES Geography: The First National Bank & Trust Company of Ada Evaluation Period: January 1, 2002 to December 31, 2003									
MSA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total **	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
<b>2002</b>									
Ada AA	246	69.49	76.34	99.19	90.24	7.72	2.03	24.31	49.69
Prague/Meeker AA	108	30.51	76.49	98.15	94.44	3.70	1.85	4.14	8.96
<b>2003</b>									
Ada AA	174	65.66	61.42	82.76	84.48	12.07	3.45	20.49	31.93
Prague/Meeker AA	91	34.34	61.18	93.41	94.51	3.30	2.20	4.01	6.52
<b>Limited Review:</b>									

\* Based on 2002 & 2003 Peer Small Business Data: US.

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B – 2002 & 2003).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00 percent of small loans to businesses originated and purchased by the Bank.



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

Borrower Distribution: SMALL LOANS TO FARMS      Geography: The First National Bank & Trust Company of Ada      Evaluation Period: January 1, 2002 to December 31, 2003									
MSA/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 \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
<b>2002</b>									
Ada AA	53	33.13	98.48	100.00	88.68	11.32	0.00	28.57	29.03
Prague/Meeker AA	107	66.88	100.00	100.00	98.13	0.93	0.93	16.24	16.45
<b>2003</b>									
Ada AA	79	44.13	95.77	100.00	89.87	6.33	3.80	50.97	50.97
Prague/Meeker AA	100	55.87	95.45	100.00	96.00	4.00	0.00	13.77	13.94
<b>Limited Review:</b>									

\* Based on 2002 & 2003 Peer Small Business Data: US.

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B –2002 & 2003).

\*\*\*\* 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 0.00 of small loans to farms originated and purchased by Bank.

## Table 12. Qualified Investments

QUALIFIED INVESTMENTS		Geography: The First National Bank & Trust Company of Ada				Evaluation Period: January 1, 2002 to December 31, 2004			
MSA/Assessment Area:	Prior Period Investments <sup>*</sup>		Current Period Investments		Total Investments			Unfunded Commitments <sup>**</sup>	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Ada AA	0	0	21	17	17	17	94.00	0	0
Prague/Meeker AA	0	0	7	1	1	1	6.00	0	0
<b>Limited Review:</b>									

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: The First National Bank & Trust Company of Ada Evaluation Period: January 11, 2002 to December 31, 2004																	
MSA Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Up-per			Low	Mod	Mid	Up-per	Low	Mod	Mid	Up-per
<b>Full Review:</b>																	
Ada AA	74.00	2	100.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	23.67	57.00	19.33
Prague/Meeker AA	26.00	2	100.00	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	6.43	69.00	24.57
<b>Limited Review:</b>																	

