



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **PUBLIC DISCLOSURE**

**March 7, 2005**

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**ANB Financial, National Association  
Charter Number 22721**

**3605 Southern Hills Boulevard  
Rogers, Arkansas 72758**

**Comptroller of the Currency  
Kansas City South Field Office  
1710 East 32nd Street  
Suite H  
Joplin, Missouri 64804**

**NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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## **Description of Institution**

ANB Financial National Association (ANB) is a \$631 million intrastate financial institution headquartered in Rogers, Arkansas. ANB is a wholly owned subsidiary of ANB Bancshares, Inc., a one-bank holding company also headquartered in Rogers, Arkansas.

ANB is a full-service banking institution, which offers a variety of retail and commercial services. The bank's primary lending focus is on commercial real estate activity. As of December 31, 2004, Tier 1 Capital is \$47 million, which represents 7.70 percent of total assets. For additional information on the products and services offered by ANB, please refer to the bank's Community Reinvestment Act (CRA) Public File.

ANB has designated Benton and Washington Counties in Arkansas as its assessment area (AA). The AA is part of the Fayetteville-Springdale-Rogers, AR-MO metropolitan area. The AA meets regulation requirements and does not arbitrarily exclude low- or moderate-income areas. Additional information on ANB's assessment area is included in the Market Profile in Appendix B.

ANB's performance was rated "Outstanding" at the bank's last CRA examination in December 2000. This is the bank's first evaluation under the Large Bank CRA examination procedures.

## **Evaluation Period**

We evaluated ANB's home mortgage lending, small business lending, and community development (CD) loans; investments; and services using data for the period beginning January 1, 2001 through December 31, 2004. An evaluation of small farm loan data is not meaningful since only 15 loans were originated during the evaluation period. Year-to-date 2005 CD data was not included in our review.

Due to changes in census data, we separately evaluated loan data for 2001-2002, 2003, and 2004. We used 1990 census data to evaluate performance in 2001-2002. For 2003 and 2004, we used 2000 census data. Also for 2004, we used the revised Metropolitan Statistical Area (MSA) boundaries and definitions established by the Office of Management and Budget.

The Standardized Tables are shown in Appendix C for the 2004 period. Market share data for 2004 was not available. Even though we did not include Tables for 2001-2003 in this Public Evaluation, performance for these periods is discussed in the narrative for each test.

## Overall CRA Rating

**INSTITUTION’S CRA RATING:** This bank is rated “Satisfactory”.

The following table indicates the performance level of ANB Financial National Association with respect to the lending, investment, and service tests:

Performance Levels	ANB Financial National Association 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.

Home mortgage loans (68 percent of total loans) are the bank’s primary product followed by small business loans (32 percent of total loans). Regarding home mortgage loans, primary consideration was given to refinance loans (54 percent) followed by home purchase loans (43 percent). We did not analyze performance for multifamily loans since ANB originated only 14 loans during the evaluation period, which represents less than 1 percent of total reported loans.

Identified credit needs in the AA include venture capital financing to help start-up businesses.

The major factors that support this overall rating are:

- Adequate penetration to borrowers of different income levels,
- Excellent penetration to businesses of different sizes,
- Strong levels of community development lending,
- Adequate levels of qualified donations, and
- Accessible branch locations to low- and moderate-income individuals.

Conclusions with respect to performance tests are:

### Lending

Refer to Table 1 through 11 in Appendix C for facts and data used to evaluate the bank’s lending.

Performance under the lending test is rated high satisfactory. Performance in the Benton/Washington Counties AA is good.

ANB's lending activity is adequate in the Benton/Washington Counties AA. The bank's deposit market share is 6.59 percent and exceeds its HMDA and small business loan market share. Seventy-nine percent of ANB's reportable loans were made inside its AA, which represents an adequate percentage.

- **The overall geographic distribution of loans is poor.**

- ANB's geographic distribution of home mortgage loans is poor.
  - The distribution of home refinance loans in moderate-income areas is poor. In 2001-2002 and 2003, the percentage of loans made in moderate-income geographies was 50 percent and 48 percent of demographics, respectively. In 2004, home refinance loans were 66 percent of demographics in moderate-income areas.
  - The distribution of home purchase loans in moderate-income geographies is adequate. In 2001-2002 and 2003, the percentage of home purchase loans was 75 percent and 73 percent of demographics, respectively. In 2004, penetration of these loans was 35 percent of demographics.
  - The distribution of home improvement loans in moderate-income geographies is adequate. The bank did not originate any home improvement loans in 2001-2002 in these areas. The distribution of these loans in 2003-2004 exceeded demographics.
- ANB's geographic distribution of small business loans is poor.
  - In 2001-2002, the distribution of loans in moderate-income geographies was 19 percent of demographics. In 2003 and 2004, small business loans were 43 percent and 69 percent of demographics, respectively.

Note: No analysis was made on low-income geographies, as the bank's performance in low-income areas is not meaningful. There were no low-income tracts in the AA in 2001-2002. In 2003, only 0.26 percent of owner-occupied units were in low-income tracts and only 1 percent of businesses were in low-income geographies.

- **The overall borrower distribution of loans is adequate.**

- ANB's borrower distribution of home mortgage loans is adequate. The assessment included consideration of the percentage of families below the poverty level, which during the evaluation period was 8 percent.
  - The distribution of home refinance loans is adequate. In 2001-2002 and 2003, the distribution of loans to low-income individuals was adequate at 36 percent and 29 percent of demographics, respectively. In 2004, performance was good as penetration was 53 percent of demographics. The distribution of home refinance loans to moderate-income individuals was adequate with penetration at 71 percent of demographics in 2001-2002, 70 percent in 2003, and 86 percent in 2004.
  - The distribution of home purchase loans is good. In 2001-2002 and 2004, the distribution of loans to low-income individuals was adequate at 38 percent and 43 percent of demographics, respectively. In 2003, performance was excellent as penetration was 62 percent of demographics. The distribution of home purchase loans to moderate-income individuals exceeded demographics in 2001-2003. In 2004, penetration was adequate at 86 percent of demographics.

- The distribution of home improvement loans is good. In 2001-2002 and 2003, performance was adequate as the distribution of loans to low-income individuals was 33 percent and 17 percent of demographics, respectively. In 2004, performance was excellent and exceeded demographics. The distribution of these loans to moderate-income individuals exceeded demographics in 2001-2003. In 2004, performance was poor at 41 percent of demographics.
- ➔ ANB's distribution of small loans to businesses is excellent.
  - The percentage of loans to businesses with revenues of \$1 million or less exceeded demographics in 2001-2004. In addition, the market share of these loans exceeded the overall market share in 2001-2003.
- **The volume of community development lending is excellent.**
  - ➔ ANB's community development lending (CD) positively affected its rating. ANB made \$24 million of qualified loans. This activity is favorable because of the significant volume of loans, which represents 51 percent of tier 1 capital. All CD loans helped provide affordable housing in the AA.

## Investments

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

Performance under the investment test is rated low satisfactory. In the Benton/Washington Counties AA, performance is adequate.

Qualified donations totaled \$239 thousand, which were all during the current period. ANB donated \$119 thousand to organizations that provide services targeted to low- and moderate-income (LMI) individuals. Donations to help provide affordable housing and promote economic development for small businesses totaled \$100 thousand and \$20 thousand, respectively.

ANB also donated \$500 to a research hospital to assist LMI families. The hospital is not located in Arkansas. However, we gave positive consideration to this activity since the bank has adequately addressed community development needs in its AA.

## Services

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

Performance under the service test is rated high satisfactory. In the Benton/Washington Counties AA, performance is good.

ANB's offices and retail services are accessible to geographies and individuals of all income levels. No branches are located in low-income areas. However, only 3 percent of the population resides in these areas. Ten percent of ANB's offices are located in moderate-income areas. This exceeds the percentage of population that resides in these tracts.

ANB's community development services are considered adequate. Bank personnel provided their financial expertise to an organization that provides education to the community on starting a small business. Financial expertise was also provided to two organizations that help LMI individuals with home repairs and provide scholarships to LMI single mothers. In addition, bank employees conducted a financial workshop for LMI individuals and assisted an affordable housing organization with bond issues.

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

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

## Appendix B: Market Profile for ANB Financial National Association

Demographic Information for Full Scope Area: Benton and Washington County, Arkansas AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	60	3.33	11.67	70.00	15.00	0.00
Population by Geography	311,121	3.13	9.10	70.81	16.96	0.00
Owner-Occupied Housing by Geography	77,776	0.26	5.82	75.61	18.31	0.00
Business by Geography	18,399	1.17	18.10	62.75	17.97	0.00
Farms by Geography	718	0.42	6.69	80.36	12.53	0.00
Family Distribution by Income Level	83,439	18.27	18.78	24.42	38.54	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	30,910	2.27	11.41	74.45	11.86	0.00
Median Family Income		42,578	Median Housing Value		95,364	
HUD Adjusted Median Family Income for 2004		49,800	Unemployment Rate (2004)		3.6%	
Households Below Poverty Level		12.10%				

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

Source: 1990 US Census and 2003 HUD updated MFI

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of 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. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by 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, if applicable, 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.

**TABLES 5, 7, and 12 ARE NOT APPLICABLE. THEREFORE, THEY ARE NOT INCLUDED IN THIS SECTION.**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: WASHINGTON & BENTON				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004						
MA/Assessment Area (2003):	% 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)	
<b>Full Review:</b>												
Benton and Washington Counties	100.00	667	85,062	558	159,121	0	0	4	10,700	1,229	254,883	100.00

\* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2001 to December 31, 2004. However, only 2004 data is presented in this table.

\*\*\* Deposit Data as of March 23, 2005. 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: WASHINGTON & BENTON				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
<b>Benton and Washington Counties</b>	341	100.00	0.26	0.29	5.82	2.05	75.61	74.34	18.31	23.31	N/A	N/A	N/A	N/A	N/A

\* Market share data for 2004 is not available.

\*\* 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 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: WASHINGTON & BENTON				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
<b>Benton and Washington Counties</b>	16	100.00	0.26	0.00	5.82	12.50	75.61	68.75	18.31	18.75	N/A	N/A	N/A	N/A	N/A

\* Market share data for 2004 is not available.

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: WASHINGTON & BENTON					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
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	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
<b>Benton and Washington Counties</b>	310	100.00	0.26	0.32	5.82	3.87	75.61	74.52	18.31	21.29	N/A	N/A	N/A	N/A	N/A									

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\* Market share data for 2004 is not available.

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

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

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

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: WASHINGTON & BENTON					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
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 Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
<b>Benton and Washington Counties</b>	525	100.00	1.17	0.38	18.10	12.57	62.75	65.14	17.97	21.90	N/A	N/A	N/A	N/A	N/A									

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\* Market share data for 2004 is not available..

\*\* 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 (2003).

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

Borrower Distribution: HOME PURCHASE		Geography: WASHINGTON & BENTON					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
<b>Benton and Washington Counties</b>	341	100.00	18.27	7.79	18.78	16.20	24.42	22.12	38.54	53.89	N/A	N/A	N/A	N/A	N/A	

\* Market share data for 2004 is not available.

\*\* As a percentage of loans with borrower income information available. No information was available for 5.9% 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 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: WASHINGTON & BENTON					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
<b>Benton and Washington Counties</b>	16	100.00	18.27	23.08	18.78	7.69	24.42	23.08	38.54	46.15	N/A	N/A	N/A	N/A	N/A	

\* Market share data for 2004 is not available..

\*\* As a percentage of loans with borrower income information available. No information was available for 18.8% 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 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: WASHINGTON & BENTON					Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
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****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
<b>Benton and Washington Counties</b>	310	100.00	18.27	9.60	18.78	16.06	24.42	23.73	38.54	50.61	N/A	N/A	N/A	N/A	N/A									

\* Market share data for 2004 is not available.

\*\* As a percentage of loans with borrower income information available. No information was available for 7.6% of loans originated and purchased by bank.

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

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: WASHINGTON & BENTON			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
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 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>Benton and Washington Counties</b>	525	100.00	63.43	87.62	70.10	15.24	14.67	N/A	N/A

\* Market share data for 2004 is not available.

\*\* 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 - 2003).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: WASHINGTON & BENTON									
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2004									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
<b>Benton and Washington Counties</b>	0	0	24	239	24	239	100.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: WASHINGTON & BENTON																	
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2004																	
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
<b>Full Review:</b>																	
<b>Benton and Washington Counties</b>	100.00	10	100.00	0.00	10.00	50.00	40.00	1	0	0	0	0	1	3.13	9.10	70.81	16.96