



PUBLIC DISCLOSURE

March 21, 2016

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Vision Bank, National Association
Charter Number 12591

101 East Main Street
Ada, OK 74820

Office of the Comptroller of the Currency

The Harvey Parkway Building
301 NW 63rd Street, Suite 490
Oklahoma City, OK 73116-7908

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.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

Assigned ratings are based on the following conclusions:

- The bank's loan-to-deposit (LTD) ratio is reasonable and averaged 79 percent during the evaluation period.
- A substantial majority of the bank's loans were originated within their designated assessment areas (AAs).
- Vision Bank's distribution of loans to businesses and individuals of different income levels (including low- and moderate-income) is satisfactory.
- The geographic distribution of loans reflects a reasonable dispersion throughout the AA.
- Vision Bank's community development (CD) performance demonstrates adequate responsiveness to the CD needs of its AAs.

Scope of Examination

A Data Integrity review commenced on February 1, 2016, to evaluate the bank's system of internal controls for collecting, verifying, and submitting data reported on the Home Mortgage Disclosure Act Loan Application Register (HMDA LAR).

Two AAs were designated for full-scope reviews. There were no areas designated as limited-scope AAs. Full-scope reviews were performed for the Oklahoma City MSA Partial and the Ada Non-MSA AAs. Full-scope reviews are conducted in AAs where the bank has a substantial share of its deposit and loan business. The Ada Non-MSA AA contains 76 percent of the bank's loans and 86 percent of the bank's deposits. More weight was given to the performance in the Ada Non-MSA AA since it contains a majority of the bank's loans and deposits.

The full-scope review of the Oklahoma City MSA Partial and the Ada Non-MSA included a review of small business loans and HMDA loans (home purchase, home refinance, and home improvement) originated in 2013, 2014 and 2015. These are the major loan products for the bank.

This Performance Evaluation is based on 2010 US Census demographic information. Conclusions regarding the Lending Test are based on the origination of home mortgage and small business loans from January 1, 2013 through December 31, 2015. Conclusions regarding the Community Development Test are based on CD activities from July 23, 2012 through March 21, 2016.

Description of Institution

Vision Bank, National Association (Vision Bank) is an intrastate bank headquartered in Ada, Oklahoma. As of December 31, 2015 Vision Bank's assets totaled \$636 million. Tier 1 capital totaled \$62 million and the loan-to-deposit ratio was 83 percent. Vision Bank is a wholly owned subsidiary of Vision Bancshares, Inc., a one-bank holding company.

Vision Bank operates in two different market areas of the state. It has eight full-service banking offices and 19 automatic teller machines (ATMs) within its AAs. Since the last CRA review, Vision Bank acquired branches in Sulphur and Davis in December 2012. No branch closings occurred during this evaluation period.

The main bank is located in east-central Oklahoma in Pontotoc County at 101 East Main in Ada, Oklahoma, along with a Motor Bank located at 12th & Rennie and the Arlington Branch located at 1901 Arlington, Ada, Oklahoma. The Sulphur branch is located at 100 W. Broadway, Sulphur, Oklahoma and the Davis branch is located at 1200 E. Main, Davis, Oklahoma. The Durant, Oklahoma branch is located at 2514 University Blvd. The Shawnee, Oklahoma branch is located at 4301 N. Harrison. These branches are located in the bank's Ada Non-MSA AA. The branch in Prague, Oklahoma is located at 802 Jim Thorp Blvd and the branch in Meeker, Oklahoma is located at 409 S. Dawson. The Prague and Meeker branches are located in the bank's Oklahoma City MSA Partial AA.

Vision Bank's business strategy is focused on residential real estate and small business lending. The bank has a mortgage department that originates long-term residential mortgages for sale in the secondary market. No legal or financial impediments limit Vision Bank's ability to meet the credit needs of the AAs. 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 non-deposit investment services.

At December 31, 2015, the bank had total loans of \$398 million. The following table details Vision Bank's loan portfolio composition as of December 31, 2015:

Loan Portfolio Composition as of December 31, 2015		
	\$ (000)	%
Residential Real Estate	164,690	42%
Commercial Real Estate	116,011	29%
Commercial and Industrial	41,105	10%
Farm Loans	35,608	9%
Individual Loans	31,380	8%
Other	9,027	2%
Total	\$397,821	100%

Source: December 31, 2015 Report of Condition and Income

The Office of the Comptroller of the Currency last evaluated Vision Bank's CRA performance as of July 23, 2012. The bank received an overall rating of "Satisfactory".

Description of Assessment Area(s)

Two AAs were designated in evaluating Vision Bank's CRA performance. The first AA is comprised of a portion of Oklahoma City's MSA. It consists of two census tracts in southern Lincoln County. The bank's Prague and Meeker branches are located in these census tracts. Both census tracts are middle-income tracts. The second AA represents homogenous non-MSA areas located in east-central and southeast Oklahoma. The Non-MSA AA includes 46 census tracts with 11 census tracts located in Bryan County, one census tract in Johnston County, three census tracts in Murray County, one census tract in Okfuskee County, 10 census tracts in Pontotoc County, 16 census tracts in Pottawatomie County and four census tracts in Seminole County. The main branch and motor bank located in downtown Ada are in low-income census tracts. The branch in Durant is also located in a low-income census tract. Six branches are located in middle-income census tracts and one is located in an upper-income census tract.

According to the 2010 US Census data, the bank’s Oklahoma City MSA Partial AA has a population of 12,843. The median family income for the MSA is \$58,775 and HUD’s 2015-updated MSA median family income is \$64,500. The 2015 data is the income information used to determine the income level of families in the MSA. Households below the poverty level total 727 or 15 percent and households that receive public assistance total 125 or 2.59 percent of the total number of households. Of the 5,497 total housing units available in the AA, 4,056 or 73.79 percent are owner occupied. Please refer to the following table for additional information relating to Vision Bank’s Oklahoma City MSA Partial AA:

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE OKLAHOMA CITY MSA PARTIAL AA	
Population	
Number of Families	3,677
Number of Households	4,828
Geographies	
Number of Census Tracts	2
% Low-Income Census Tracts	0.00%
% Moderate-Income Census Tracts	0.00%
% Middle-Income Census Tracts	100.00%
% Upper-Income Census Tracts	0.00%
% N/A	0.00%
Median Family Income (MFI)	
2010 MFI for AA	\$58,775
2015 HUD-Adjusted MFI	\$64,500
Economic Indicators	
Unemployment Rate	3.90%
2010 Median Housing Value	\$89,328
% of Households Below Poverty Level	15.06%

Source: 2010 Census data and 2015 HUD updated income data

According to the 2010 US Census data, Vision Bank’s Non-MSA areas have a population of 181,244. The median family income for the AA is \$47,864 and HUD’s 2015 updated MSA median family income is \$52,700. Households below the poverty level total 12,415 or 18.28 percent and households that receive public assistance total 2,541 or 3.74 percent of the total number of households. Of the 79,351 total housing units available in the AA, 47,768 or 60.20 percent are owner occupied. Please refer to the following table for additional information relating to Vision Bank’s Non-MSA AA:

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE ADA NON-MSA AA	
Population	
Number of Families	46,216
Number of Households	67,923
Geographies	
Number of Census Tracts	46
% Low-Income Census Tracts	8.70%
% Moderate-Income Census Tracts	6.52%
% Middle-Income Census Tracts	71.74%
% Upper-Income Census Tracts	13.04%
% N/A	0.00%
Median Family Income (MFI)	
2010 MFI for AA	\$47,864
2015 HUD-Adjusted MFI	\$52,700
Economic Indicators	
Unemployment Rate	3.38%
2010 Median Housing Value	\$86,567
% of Households Below Poverty Level	18.28%

Source: 2010 Census data and 2015 HUD updated income data

The major employers in the Pottawatomie County area are primarily located in the city of Shawnee and include the Citizens Pottawatomie Nation, Unity Health Center, Exxon-Mobil Film Division, Wolverine Tube, and Shawnee Public Schools. The current unemployment rate in this Non-MSA county is 3.38 percent. Major employers in Ada (Pontotoc County) include the Chickasaw Nation, Prepaid Legal, Valley View Hospital, and East Central University. Major employers in Durant (Bryan County) include the Choctaw Nation of Oklahoma, Southeastern Oklahoma State University, and Medical Center of Southeastern Oklahoma.

Local banking across Vision Bank’s AAs is very competitive and includes several national and state chartered banks, branches of other larger banks, and credit unions. In Ada, Oklahoma, there are five other banks and three credit unions. Citizens Bank, First United Bank, and a branch of

Landmark Bank have the most competitive presence. In Durant, Oklahoma, there are four other banks, one credit union, and a loan production office of a Texas bank operating in Durant. First United Bank and a branch of Landmark Bank have the most competitive presence. In Shawnee, Oklahoma, there are six other banks and three credit unions. BancFirst, Arvest Bank, and First United Bank have the most competitive presence. In Prague and Meeker, Oklahoma the only other bank in each town is the BancFirst branch. The bank's AAs contain many rural areas and towns where they do not have a branch and therefore other smaller institutions are competitive in those areas.

Community contacts conducted with non-profits and local economic development entities within Vision Bank's AAs were reviewed as part of the CRA assessment. Contacts indicated that small business loans, particularly for startup businesses, are a credit need. Affordable rural housing mortgage products were also mentioned by one of the community contacts as a credit need. Overall, the contacts indicated that area financial institutions are perceived as taking an active role in the community and strive to meet the financial needs of the area.

Conclusions with Respect to Performance Tests

LENDING TEST

Vision Bank's performance under the Lending Test is rated satisfactory. The LTD ratio is reasonable when compared to similarly situated institutions. A substantial majority of the bank's loans were originated in the bank's AAs. Vision Bank's distribution of loans to businesses and individuals of different income levels is satisfactory. The geographic distribution of loans reflects a reasonable dispersion of loans to LMI geographies in the Non-MSA AA.

Loan-to-Deposit Ratio

Vision Bank's LTD ratio is reasonable and meets the standard for satisfactory performance. The bank's LTD ratio at December 31, 2015 was 83 percent. The bank's average quarterly LTD ratio from September 30, 2012 through December 31, 2015 was 79 percent. This average was compared to the average of four similar banks located in Vision Bank's AA or the surrounding counties, with total assets between \$250 million and \$750 million, for the same time period. Vision Bank's average LTD ratio of 79 percent is slightly higher than the average of the four comparable banks of 74 percent. These average LTD ratios are detailed in the following table.

Loan-To-Deposit Ratios		
Institution	Total Assets \$000's (As of 12/31/15)	Average Loan -to-Deposit Ratio
<i>Vision Bank, National Association, Ada, OK</i>	\$635,803	79.20%
First National Bank and Trust of Ardmore, OK	\$505,128	48.90%
Great Plains National Bank, Elk City, OK	\$554,698	100.48%
The First National Bank and Trust, Chickasha, OK	\$530,104	74.16%
First Bank and Trust Company, Duncan, OK	\$586,172	71.32%

Source: Institution Reports of Condition from September 30, 2012 to December 31, 2015

Lending in Assessment Area

Vision Bank's lending in its AAs exceeds the standard for satisfactory performance. A substantial majority of the number and dollar amount of home mortgage and small business loans originated within the bank's AAs. As depicted in the following table, 84.31 percent of the number and 84.71 percent of the dollar amount of loans originated in Vision Bank's AA.

Table 1 – Lending in AAs										
Loan Type	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	655	80.67	157	19.33	812	\$82,484	82.65	\$17,310	17.35	\$99,794
Home Improvement	590	88.46	77	11.54	667	\$18,939	85.18	\$3,295	14.82	\$22,234
Refinance	448	84.21	84	15.79	532	\$59,919	87.14	\$8,840	12.86	\$68,759
Small Business	54	88.52	7	11.48	61	\$7,254	88.07	\$983	11.93	\$8,237
Totals	1,747	84.31	325	15.69	2,072	\$168,596	84.71	\$30,428	15.29	\$199,024

Source: Data reported for 2013, 2014 and 2015 HMDA and Small Business Loans.

Non-MSA AA

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

Overall, the distribution of loans reflects a reasonable penetration among individuals of different income levels and businesses of different sizes and meets the standard for satisfactory performance.

The borrower distribution of home mortgage loans to low-income families reflects poor penetration for all loan products. However, the distribution of mortgage products to moderate-income families reflects reasonable penetration for an overall satisfactory performance. Slightly more weight was given to the distribution to moderate-income families as they can more easily qualify for conventional home mortgage products. The Chickasaw Nation, headquartered in Ada, Oklahoma, offers affordable housing mortgages, in addition to home counseling and service

programs to tribal members and tribal employees regardless of origin. Mortgage products have flexible terms, to include low closing costs, no private mortgage insurance, and low rates. Grant money from the tribe is also available to qualified applicants. The Chickasaw Nation’s affordable housing programs meet a significant need among low-income families and contribute to the low distribution levels by banks offering conventional mortgage products.

Borrower Distribution of Residential Real Estate Loans in Vision Bank’s Non-MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	21.40%	2.14%	17.86%	15.76%	20.73%	12.65%	40.01%	69.46%
Home Improvement	21.40%	12.14%	17.86%	16.56%	20.73%	21.19%	40.01%	50.11%
Home Refinance	21.40%	2.91%	17.86%	11.33%	20.73%	17.15%	40.01%	68.61%

Source: Data reported under HMDA for 2013, 2014 and 2015; U.S. Census data.

Vision Bank’s borrower distribution of loans to small businesses indicates a reasonable penetration, as 71.43 percent of the business loans sampled were to businesses with revenues of less than \$1.0 million. However, note that 19.72 percent of the businesses did not report their revenues.

Borrower Distribution of Loans to Businesses in Vision Bank’s Non-MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	75.71%	4.57%	19.72%	100%
% of Bank Loans in AA by #	71.43%	28.57%	0.00%	100%
% of Bank Loans in AA by \$	77.51%	22.49%	0.00%	100%

Source: Loan sample 2013, 2014 and 2015 sample; Dunn and Bradstreet data.

Geographic Distribution of Loans

Vision Bank’s overall geographic distribution of loans reflects a reasonable dispersion among LMI geographies and meets the standard for satisfactory performance.

Vision Bank’s geographic distribution of home mortgage loans is satisfactory. The bank’s geographic distribution of home loans to low-income geographies reflects an excellent dispersion for home purchase and home refinance and a reasonable dispersion for home improvement. The geographic distribution to moderate-income geographies reflects a poor dispersion for home improvement and home refinance loans and a reasonable dispersion for home purchase loans for an overall reasonable dispersion. Note that owner occupancy is only 2.94 percent in low-income

tracts and 4.25 percent in moderate-income tracts making opportunities to provide home mortgage loans in these areas limited.

Geographic Distribution of Residential Real Estate Loans in Vision Bank’s Non-MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	2.94%	6.71%	4.25%	3.36%	78.19%	64.60%	14.62%	25.34%
Home Improvement	2.94%	1.96%	4.25%	0.98%	78.19%	70.98%	14.62%	26.08%
Home Refinance	2.94%	9.31%	4.25%	0.53%	78.19%	65.16%	14.62%	25.00%

Source: Data reported under HMDA LAR 2013, 2014 and 2015; U.S. Census data.

Vision Bank’s geographic distribution of small business loans reflects an excellent dispersion to low-income census tracts and a very poor dispersion to moderate-income census tracts for an overall reasonable dispersion. Note that the percentage of AA businesses located in moderate-income census tracts is low at 4.26 percent making it more difficult to lend to these businesses.

Geographic Distribution of Loans to Businesses in Vision Bank’s Non-MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Business	% of Number of Loans	% of AA Business	% of Number of Loans	% of AA Business	% of Number of Loans	% of AA Business	% of Number of Loans
Small Business	10.67%	17.86%	4.26%	0.00%	70.45%	53.57%	14.62%	28.57%

Source: Loan sample 2013, 2014 and 2015; Dunn and Bradstreet data.

Oklahoma City MSA Partial**Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

The overall distribution of loans reflects a reasonable penetration among individuals and businesses of different income levels.

The borrower distribution of home mortgage loans to low-income families is poor for home purchase loans, good for home improvement loans, and adequate for refinance loans for an overall reasonable performance. The distribution of home mortgage loans to moderate-income families is poor for home purchase loans, excellent for home improvement loans, and good for home refinance loans for overall reasonable performance. Slightly more weight was given to the distribution to moderate-income families as they can more easily qualify for conventional home mortgage products.

Borrower Distribution of Residential Real Estate Loans in Vision Bank's Oklahoma City MSA Partial AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans						
Home Purchase	23.99%	11.11%	20.81%	8.89%	22.93%	28.89%	32.28%	51.11%
Home Improvement	23.99%	23.29%	20.81%	24.66%	22.93%	23.29%	32.28%	28.77%
Home Refinance	23.99%	16.67%	20.81%	19.70%	22.93%	24.24%	32.28%	39.39%

Source: Data reported under HMDA for 2013, 2014 and 2015; U.S. Census data.

Vision Bank's borrower distribution of loans to small businesses indicates a reasonable penetration as 65.38 percent of the business loans sampled were to businesses with revenues of less than \$1.0 million. However, note that 14.17 percent of the businesses did not report their revenues.

Borrower Distribution of Loans to Businesses in Vision Bank's Oklahoma City MSA Partial AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	80.63%	5.21%	14.17%	100%
% of Bank Loans in AA by #	65.38%	34.62%	0.00%	100%
% of Bank Loans in AA by \$	78.50%	21.50%	0.00%	100%

Source: Loan sample 2013, 2014 and 2015 sample; Dunn and Bradstreet data.

Geographic Distribution of Loans

A geographic analysis was not performed for the Oklahoma City MSA Partial as this AA does not contain any low- or moderate-income census tracts and therefore a geographic analysis would not be meaningful.

Responses to Complaints

There have been no consumer complaints regarding Vision Bank's Community Reinvestment Act during the evaluation period.

COMMUNITY DEVELOPMENT TEST

CD Loans, Qualified Investments and CD Services Test

The bank's performance under the Community Development Test is rated "*Satisfactory*". Vision Bank's CD performance demonstrates adequate responsiveness to the CD needs of its AAs.

Opportunities for qualified CD loans and investments are limited in the bank's AA. A majority of the AA is comprised of rural, low-density areas. The largest cities in the AA are Shawnee, which has a population of only 30,000, and Ada and Durant with populations of less than 17,000. Currently, there are no major CD projects underway in the bank's AAs.

Vision Bank's officers are very active in the communities they serve. This is evidenced by their leadership roles on various civic and non-profit organizations that provide services to LMI persons. The bank is also involved with, invests in, or lends to organizations whose focus is on community or economic development.

During the performance evaluation period, the bank extended \$13.6 million in qualified CD loans. It currently holds \$5.8 million in qualified CD bond investments; and during the evaluation period made \$204,000 in qualified donations to community organizations primarily serving LMI persons and families.

Community Development Loans

Qualifying CD loans are those that meet the definition of CD, as defined in the CRA regulation. This includes activities that promote affordable housing, community services, economic development, revitalization, and stabilization that benefits LMI individuals and geographies. Activities are considered to promote economic development if they support permanent job creation, retention and/or improvement for LMI persons. Qualified CD activities that help revitalize or stabilize a community are activities that attract new businesses or persons to a community, or are activities that help retain existing businesses or persons in a community. Qualified activities may include, for example, providing financing to help retain businesses in an area that employ LMI persons or providing financing to attract a new employer that will create permanent job opportunities for LMI persons.

Number and Amount of Community Development Loans

Non-MSA AA

The level of qualified CD loans in the Non-MSA full-scope AA reflects adequate responsiveness. During the evaluation period, Vision Bank originated or renewed 54 CD loans totaling \$12.4 million in the Non-MSA AA.

Vision Bank extended 16 loans to eight borrowers totaling \$5 million that provided funding to various nonprofit agencies that focus on providing community services for LMI individuals and geographies. Seven of the 16 loans were extended to a local nonprofit school that assists special needs individuals. The school provides employment opportunities in the community through a work program with local businesses. The nonprofit owns and operates a thrift store in the AA that provides jobs for the students. The residents are also provided housing in the 12 cottages on the grounds, as well as two additional facilities that provide 24-hour care for individuals.

Twenty loans to 11 different borrowers totaling almost \$3.5 million provided funding for economic development through creating and retaining permanent LMI jobs in the bank's AA.

Nine loans totaling \$3.5 million were extended to purchase, refinance, or construct affordable housing in the AA. The majority of the units in the multi-family complexes financed by the bank rent for rates that are below the median market rents in the area, thus providing housing for LMI individuals. The majority of the complexes are also located in LMI areas or middle-income distressed or underserved areas. Five loans totaling \$400,000 were made to five different borrowers that helped revitalize and stabilize parts of the bank's AA.

Oklahoma City MSA Partial AA

The level of qualified CD loans in the Oklahoma City MSA Partial full-scope AA reflects adequate responsiveness. During the evaluation period, Vision Bank originated or renewed three CD loans totaling \$1.2 million in the Oklahoma City MSA Partial AA. All three loans were economic development loans that retained LMI jobs in the retail and service industries.

Community Development Investments

Overall, Vision Bank's CD investment activity reflects adequate responsiveness. The bank provided adequate responsiveness in the full-scope Non-MSA AA and in the full-scope Oklahoma City MSA Partial AA.

Number and Amount of Qualified Investments

Non-MSA AA

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose CD, as defined in the CRA regulations.

The level of qualified CD investments in the Non-MSA full-scope AA reflects adequate responsiveness. During the evaluation period, the bank invested in 16 CD qualified municipal securities, totaling \$3.4 million that will finance construction and renovation of school buildings, new transportation for students and technology upgrades in the classrooms. More than 50 percent of the student populations in the area schools qualify for the federal free or reduced-price lunch program.

The bank also donated \$191,000 to qualified organizations in the Non-MSA AA during the review period. More than \$50,000 of the total donations is attributed to the bank's donation of financial literacy teaching supplies to local high schools. The financial literacy class/program is required of all high school students in Oklahoma in order to graduate. The majority of the high schools that receive the course material are schools where a majority of the students are LMI individuals or the school is in a LMI area.

Oklahoma City MSA Partial AA

The level of qualified CD investments in the Oklahoma City MSA Partial full-scope AA reflects adequate responsiveness. During the evaluation period, the bank invested in seven CD qualified municipal securities, totaling \$2.4 million that will finance construction and renovation of schools in the bank's AAs. More than 50 percent of the student populations in the school districts qualify for the federal free or reduced-price lunch program.

The bank also donated \$13,000 to qualified organizations in the Oklahoma City MSA Partial AA during the review period.

Community Development Services

Overall, Vision Bank's CD service activity reflects adequate responsiveness in the full-scope AAs. The bank provided excellent responsiveness in the full-scope Non-MSA AA and adequate responsiveness in the full-scope Oklahoma City MSA Partial AA.

Extent to Which the Bank Provides Community Development Services

Non-MSA AA

The level of qualified CD services in Vision Bank's Non-MSA full-scope AA is excellent. Vision Bank's employees are active in organizations that promote economic development, non-profit and civic organizations that provide social services to LMI families, and organizations that provide affordable housing. These employees provided technical and financial expertise to assist each organization.

Seven bank officers serve in leadership positions with local Chambers of Commerce, whose primary mission is small business and economic development. Two bank officers serve on the Ada Chamber, one as a board member and the other as Treasurer. Two officers serve on the Davis Chamber, both as board members and, one officer serves on each of the Shawnee, Sulphur and Durant Chambers.

Bank officers serve in leadership positions on various non-profit organizations that provide social services to LMI persons. Examples of organizations served include the Ada Regional United Way, Ada Youth Shelter, a local addiction and behavioral health center, CASA, Family Crisis Center, Family Promise of Shawnee, and Relay for Life. Organizations that promote affordable housing that bank officers serve on included Habitat for Humanity and the Ada Housing Authority.

Oklahoma City MSA Partial AA

The level of qualified CD services in Vision Bank's Oklahoma City MSA Partial full-scope AA is satisfactory. Vision Bank employees are active in organizations that promote economic development and non-profit and civic organizations that provide social services to LMI families. These employees provided technical and financial expertise to assist each organization.

Five bank officers serve in leadership positions with local Chambers of Commerce, whose primary mission is small business and economic development. Two bank officers serve on the Meeker Chamber, one serves as a board members and the other as Secretary. Three officers serve as board members on the Prague Chamber.

Bank officers serve in leadership positions on non-profit organizations that provide social services to LMI persons. One organization provides reading programs to LMI school children. An officer serves as Treasurer for an organization that promotes health and wellness through education and prevention with a primary focus on youth.

Responsiveness to Community Development Needs

Overall, Vision Bank has demonstrated adequate responsiveness to the identified needs and opportunities throughout their AAs. The level of CD activities is adequate with \$13.6 million in CD loans and \$5.8 million in qualified investments. Bank officers have taken leadership roles in the community with their involvement in organizations that provide services to LMI persons, promote economic development and provide affordable housing.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's CRA rating the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.