



# INTERMEDIATE SMALL BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## PUBLIC DISCLOSURE

July 23, 2012

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Vision Bank, National Association  
Charter Number: 12591

101 East Main Street  
Ada, Oklahoma 74820

Office of the Comptroller of the Currency

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**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, 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 ratio is reasonable and averaged 88 percent during the evaluation period.
- A majority of the bank's loans were originated within the Assessment Areas (AAs).
- Vision Bank's distribution of loans to businesses and individuals of different income (including low- and-moderate) levels is satisfactory.
- The geographic distribution of loans reflects an excellent dispersion throughout the AA, particularly in moderate-income geographies.
- Vision Bank's community development performance demonstrates satisfactory responsiveness to the community development needs of the AAs.

### **Scope of Examination**

A Data Integrity review commenced on May 12, 2012, 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).

A sample of HMDA loans originating in 2010 and 2011 were reviewed. The review indicated that the data the bank is required to collect and report to regulatory agencies under the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA) is materially accurate. Internal controls over the system to collect and report HMDA data are effective.

This Performance Evaluation is based on 2000 U.S. Census demographic information. Conclusions regarding the Lending Test are based on the origination of home mortgage and small business loans from January 1, 2000 through December 31, 2011. Conclusions regarding the Community Development Test are based on community development activities from June 17, 2008 through September 10, 2012.

### **Description of Institution**

Vision Bank, National Association (Vision Bank) is an intrastate bank headquartered in Ada, Oklahoma. As of June 30, 2012 Vision Bank's assets totaled \$525 million. Tier 1 capital totaled \$50 million and the loan-to-deposit ratio was 86 percent. Vision Bank is a wholly owned subsidiary of Vision Bancshares, Inc., a one-bank holding company.

Vision Bank operates in three different market areas of the state. It has seven full-service

banking offices and 20 automatic teller machines (ATMs) within its AAs. 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 12<sup>th</sup> & Rennie and the Arlington Branch located at 1901 Arlington, Ada, Oklahoma. The second marketing area includes the census tracts surrounding the Prague and Meeker branches in east-central Oklahoma located in Lincoln County, which is part of the Oklahoma City MSA. The Prague branch is located at 820 Jim Thorpe Boulevard, Prague, Oklahoma, and the Meeker branch is located at 409 South Dawson, Meeker, Oklahoma. This second assessment area also includes Pottawatomie, Seminole, and Okfuskee counties, which are all located outside the Oklahoma City MSA. The Shawnee branch at 4301 N. Harrison, Shawnee, Oklahoma is also located in Pottawatomie County. The third marketing area is in southern Oklahoma surrounding the Durant branch located at 2514 University Boulevard, Durant, Oklahoma.

Two branches were opened since the last CRA examination; each replaced a nearby branch or LPO that was closed. The Shawnee Branch at 4301 N. Harrison, Shawnee, OK was opened in September 2009 and replaced the Shawnee Branch at 3813 N. Harrison, Shawnee, OK that was closed September 2009. The Arlington-Ada Branch at 1901 Arlington, Ada, OK was opened in November 2011 and replaced the Arlington Center-Ada Branch at 1800 Arlington, Ada, OK that was closed November 2011. In addition, the Sherman LPO at 320 E. Peyton St., Sherman, TX was closed in May 2010. See the Retail Delivery Systems page of this report for additional branch and ATM location information.

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 nondeposit investment services. At June 30, 2012, the bank had total loans of \$339 million. The table below details Vision Bank’s loan portfolio composition as of June 30, 2012:

<b>Loan Portfolio Composition as of March 31, 2008</b>		
	<b>\$ (000)</b>	<b>%</b>
Residential Real Estate	130,816	39%
Commercial Real Estate	110,995	33%
Commercial and Industrial	41,041	12%
Farm Loans	26,135	8%
Individual Loans	15,511	4%
Other	14,796	4%
<b>Total</b>	<b>\$339,294</b>	<b>100%</b>

*Source: June 30, 2012 Report of Condition and Income*

The Office of the Comptroller of the Currency last evaluated Vision Bank’s CRA performance as of June 17, 2008. The bank received an overall rating of “Satisfactory”.

## Description of Assessment Area (AA)

Two AAs were considered 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. The second AA represents homogenous non-MSA areas located in east-central and southeast Oklahoma. The non-MSA AA includes the fifteen census tracts located in Pottawatomie County, ten census tracts in Pontotoc County, four census tracts in Seminole County, the 10 census tracts located in Bryan County, and one census tract in Okfuskee County.

According to the 2000 U.S. Census data, the bank's Oklahoma City MSA AA (Lincoln County portion) has a population of 11,770. The median family income for the MSA is \$44,898 and HUD's 2011-updated MSA median family income is \$60,600. The 2011 data is the income information used to determine the income level of families in the MSA. Households below the poverty level total 576 or thirteen percent and households that receive public assistance total 171 or four percent of the total number of households. Of the 4,923 total housing units available in the AA, 3,676 or seventy-five percent are owner occupied. Please refer to the table below for additional information relating to Vision Bank's MSA AA:

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE MSA AA	
Population	
Number of Families	3,380
Number of Households	4,405
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)	
2000 MFI for AA	\$44,898
2007 HUD-Adjusted MFI	\$60,600
Economic Indicators	
Unemployment Rate	2.82%
2000 Median Housing Value	\$56,345
% of Households Below Poverty Level	13.08%

*Source: 2000 Census data and 2011 HUD updated income data*

According to the 2000 U.S. Census data, Vision Bank's non-MSA areas have a population of 151,948. The median family income for the AA is \$35,517 and HUD's 2011-updated MSA median family income is \$48,800. Households below the poverty level total 10,003 or seventeen percent and households that receive public assistance total 3,816 or seven percent of the total number of households. Of the 65,720 total housing units available in the AA, 41,020 or sixty-two percent are owner occupied. Please refer to the table below for additional information relating to Vision Bank's non-MSA AA:

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE NON-MSA AA	
Population	
Number of Families	41,298
Number of Households	58,449
Geographies	
Number of Census Tracts	40
% Low-Income Census Tracts	0.00%
% Moderate-Income Census Tracts	17.50%
% Middle-Income Census Tracts	70.00%
% Upper-Income Census Tracts	12.50%
% N/A	0.00%
Median Family Income (MFI)	
2000 MFI for AA	\$35,517
2006 HUD-Adjusted MFI	\$48,800
Economic Indicators	
Unemployment Rate	3.83%
2000 Median Housing Value	\$56,075
% of Households Below Poverty Level	17.11%

*Source: 2000 Census data and 2011 HUD updated income data*

The major employers in the Lincoln 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 MSA county is 6.20 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. The average current unemployment rate for the non-MSA counties is 6.84 percent.

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, OK, 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, OK, there are four other banks, one credit union, and an LPO of a Texas bank operating in Durant. First United Bank and a branch of Landmark Bank have the most competitive presence. In Shawnee, OK, 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, OK 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, for that reason other smaller institutions are competitive in those areas.

A community contact was conducted during this review. This interview was conducted with a representative of Chickasaw Nation Division of Housing & Tribal Development. The contact 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

The Lending test is rated: **Satisfactory**

### LOAN-TO-DEPOSIT RATIO

Vision Bank's loan-to-deposit (LTD) ratio is more than reasonable and meets the standard for satisfactory performance. The bank's average quarterly loan-to-deposit ratio from June 30, 2008 through June 30, 2012, was approximately 88 percent. This average was compared to the average of five similarly situated intermediate small banks with total assets between \$401 million and \$528 million for the same time period. These comparable banks are listed in the following table:

Loan-To-Deposit Ratios		
Institution	Total Assets \$000's (As of 03/31/08)	Average Loan – to-Deposit Ratio
Great Plains National Bank, Elk City, Oklahoma	427, 469	93.97%
<b><i>Vision Bank, N.A., Ada, Oklahoma</i></b>	<b><i>525,201</i></b>	<b><i>88.12%</i></b>
First Bank & Trust Co., Duncan, Oklahoma	528,165	80.30%
The First National Bank and Trust Co., Chickasha, Oklahoma	400, 569	76.71%
The FNB and Trust Co. of Ardmore, Ardmore, Oklahoma	474,878	52.92%
First National Bank, Midwest City, Oklahoma	470,643	46.01%

*Source: Institution Reports of Condition from June 30, 2008 to June 30, 2012*

Vision Bank's loan-to-deposit ratio is more than reasonable when compared to five similarly situated intermediate small banks whose average LTD ratio during the same period was 70 percent. The bank's loan-to-deposit ratio does not include the home mortgage loans originated by the mortgage company and sold to secondary market investors. From 2010 through 2011, the mortgage company originated 143 loans, with service retained loans totaling \$8.3 million and service released loans totaling \$10.4 million.

### LENDING IN ASSESSMENT AREA

Vision Bank's lending in the AAs is satisfactory and meets the standard for satisfactory performance. A majority of the number and dollar amount of the home mortgage and small business loans were originated within the bank's AA. As depicted in the following table, 83 percent of the number and 81 percent of the dollar amount of total loans were originated in Vision Bank's AAs. More precisely, 84 percent of the HMDA reportable home mortgage loans made during the review period and 73 percent of the sampled small business loans made during the review period were made in the bank's AAs.

Table 1 – Lending in AAs										
Loan Type	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	323	77.46	94	22.54	417	31,829	76.42	9,823	23.58	41,652
Home Improvement	322	86.79	49	13.21	371	8,646	89.12	1,055	10.88	9,701
Refinance	432	86.75	66	13.25	498	47,975	85.33	8,245	14.67	56,220
Small Business	51	72.86	19	27.14	70	4,759	68.08	2,231	31.92	6,990
Totals	1,128	83.19	228	16.80	1,356	93,209	81.36	21,354	18.64	114,563

Source: Data reported for 2010 and 2011 HMDA Loans and 2010 and 2011 Small Business Loan Sample

### LENDING TO BORROWERS OF DIFFERENT INCOMES AND TO BUSINESSES OF DIFFERENT SIZES

The overall distribution of loans in the bank's AAs indicates reasonable penetration to borrowers of different incomes and to businesses of different sizes and meets the standard for satisfactory performance. Because the bank has a branch in Prague, Oklahoma whose AA includes two Lincoln County census tracts located in the Oklahoma City MSA, this analysis treats lending in the MSA AA separately from lending in the non-MSA AAs. More weight was given to performance in Vision Bank's non-MSA AA since it represents the majority of the bank's lending.

**Non-MSA AA Summary:** Vision Bank's borrower distribution of small business loans indicates excellent penetration and the borrower distribution of home mortgage loans indicates reasonable penetration within Vision Bank's non-MSA AA.

**MSA AA Summary:** Vision Bank's borrower distribution of small business loans indicates excellent penetration and the borrower distribution of home mortgage loans indicates reasonable penetration within Vision Bank's MSA AA.

## Vision Bank's non-MSA AA

The bank's borrower distribution of loans to small businesses indicates excellent penetration as 93 percent of the number of business loans sampled and 96 percent of the dollar volume of business loans sampled from the 2010 and 2011 evaluation period were to businesses with revenues of less than \$1 million. However, due to the significant level of businesses (31.72%) that did not report revenues to their industry, a truly meaningful comparison is not available.

<b>Table 2A - Borrower Distribution of Loans to Businesses in Non-MSA AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	66.02	2.27	31.72	100%
% of Bank Loans in AA by #	92.59	7.41	0.00	100%
% of Bank Loans in AA by \$	95.85	4.15	0.00	100%

*Source: 2010 and 2011 Small Business Loan Sample; Dunn and Bradstreet data.*

The bank's distribution of home mortgage loans indicates reasonable penetration. While the percentage of home purchase loans to low- and moderate income borrowers is less than the corresponding percentages of low- and moderate-income families in the AA, this performance is not unreasonable in light of the recent recession during the evaluation period, and the difficulty low-income families have qualifying for conventional home mortgage products. Borrowers in these income ranges were especially hesitant to purchase homes when unemployment was at all-time highs in the State and locally. The distribution of home mortgage products to moderate-income families is reasonable, and for home improvement loans, exceeds the percentage of moderate-income families in the Non-MSA AA. Rather than risk purchasing new homes, many of these families elected to maintain or improve their existing housing.

<b>Table 2 - Borrower Distribution of Residential Real Estate Loans in Non-MSA AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans						
Home Purchase	19.81	3.83	17.95	14.04	21.82	19.15	40.42	62.98
Home Improvement	19.81	9.86	17.95	23.47	21.82	19.25	40.42	47.42
Refinance	19.81	4.89	17.95	11.78	21.82	18.39	40.42	64.94

*Source: Data reported for 2010 and 2011 HMDA Loans; 2000 U.S. Census data*

## Vision Bank's MSA AA

The bank's borrower distribution lending to small businesses in Lincoln County, which is part of the Oklahoma City MSA, evidences excellent penetration. One hundred percent of the dollar volume of business loans sampled from the 2010 and 2011 evaluation period were to businesses with revenues of less than \$1 million. However, due to the significant level of businesses (29.86%) that did not report revenues to their industry, a truly meaningful comparison is not provided.

<b>Table 2A - Borrower Distribution of Loans to Businesses in MSA AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	68.21	1.93	29.86	100%
% of Bank Loans in AA by #	100.00	0.00	0.00	100%
% of Bank Loans in AA by \$	100.00	0.00	0.00	100%

*Source: 2010 and 2011 Small Business Loan Sample; Dunn and Bradstreet data.*

The bank's distribution of home mortgage loans indicates reasonable penetration. While the percentage of home purchase loans to low- and moderate income borrowers is less than the corresponding percentages of low- and moderate-income families in the AA, this performance is not unreasonable in light of the recent recession during the evaluation period, and the difficulty low-income families have qualifying for conventional home mortgage products. Borrowers in these income ranges were especially hesitant to purchase homes when unemployment was at all-time highs in the State and locally. The distribution of home improvement loans and refinanced home loans to low- and moderate-income families is reasonable, and for home improvement loans, exceeds the percentage of moderate-income families in the MSA AA. Rather than risk purchasing new homes, many of these families elected to maintain or improve their existing housing.

<b>Table 2 - Borrower Distribution of Residential Real Estate Loans in MSA AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans						
Home Purchase	24.50	9.68	21.95	9.68	26.45	35.48	27.10	45.16
Home Improvement	24.50	22.06	21.95	29.41	26.45	17.65	27.10	30.88
Refinance	24.50	18.60	21.95	13.95	26.45	20.93	27.10	46.51

*Source: Data reported for 2010 and 2011 HMDA Loans; 2000 U.S. Census data*

Vision Bank senior managers participate in several community development services directed toward providing affordable housing in the bank's AAs. These are discussed in the Community Development Section below and include board and committee leadership in *Habitat for Humanity*, *Hope for Homes*, and service as a director on the *Affordable Housing Committee* of the Federal Home Loan Bank of Topeka, which promotes affordable housing in Oklahoma, including the bank's AAs.

## GEOGRAPHIC DISTRIBUTION OF LOANS

The geographic distribution of loans to small businesses and home mortgage loans indicate excellent dispersion in Vision Bank's non-MSA AA and exceeds the standard for satisfactory performance. This dispersion significantly exceeded the demographic comparators in the bank's seven moderate-income non-MSA census tracts. The bank has no low-income census tracts in any of its 40 Non-MSA AA tracts. A geographic distribution analysis was not performed for Vision Bank's MSA AA since this AA has no low- or moderate-income census tracts.

### Vision Bank's non-MSA AA

The geographic distribution of small business loans displays excellent penetration as the percentage of small business loans made in moderate-income census tracts exceeds the percentage of small businesses located in those tracts.

Table 3A - Geographic Distribution of Loans to Businesses in Non-MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Small Business	0.00	0.00	15.51	34.62	58.33	53.85	26.16	11.54

Source: 2010 and 2011 Small Business Loan Sample; Dunn and Bradstreet data.

The geographic distribution of home mortgage loans in moderate-income census tracts also indicates excellent penetration as the percentage of home purchase, home improvement and refinance loans originated in moderate-income tracts exceeds the percentage owner occupied housing in those tracts.

Table 3 - Geographic Distribution of Residential Real Estate Loans in 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	0.00	0.00	8.21	14.78	69.77	67.70	22.02	17.53
Home Improvement	0.00	0.00	8.21	16.13	69.77	66.53	22.02	17.34
Refinance	0.00	0.00	8.21	11.75	69.77	63.71	22.02	24.54

Source: Data reported for 2010 and 2011 HMDA Loans; 2000 U.S. Census data.

## **Responses to Complaints**

There have been no consumer complaints relating to the bank's Community Reinvestment Act performance during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test is rated adequate.

Opportunities for qualified community development loans and investments are limited in the bank's assessment areas (AAs). A majority of the AAs are comprised of rural, low-density tracts. The largest cities in the AA are Shawnee with a population of 30,212, and Ada and Durant with populations of less than 17,000. Currently, there are no major community development projects underway in the bank's AAs.

Vision Bank is 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 low- and moderate-income individuals. The bank is also involved with, or lends to, organizations whose focus is on community or economic development and health care.

The bank's commitment to economic development is evidenced by investments and loans involving economic development activities. The bank has been very active in holding leadership positions and making significant donations to local Chambers of Commerce, which are primarily involved in economic development and small business creation. Vision Bank has made significant investments in the form of revenue bonds to construct the county jail and to renovate the local county courthouse. These types of investments have been important in retaining and creating jobs for low- and moderate-income workers at these and other facilities. In addition, the bank has made significant investments in school bond issues in districts where the majority of students are from low- and moderate-income families.

### **COMMUNITY DEVELOPMENT LOANS**

The level of community development loans is adequate. Qualifying community development loans are those that meet the definition of community development, as defined in the CRA regulation. At the review date, Vision Bank had originated \$9.1 million of qualified community development loans. The following is a summary of those loans.

In September 2009, Vision Bank originated a \$2.0 million loan to the City of Durant to fund the construction of a new airport terminal located in a middle-income nonmetropolitan distressed or underserved geography. The airport will revitalize and stabilize the community through attracting and retaining existing businesses and residents, in addition to creating several permanent jobs for low- and moderate-income workers. The model enhanced airport capabilities leading to expanded economic development in southern Oklahoma.

In January 2011 the bank financed a \$3 million Bryan County capital improvements project to purchase land near the courthouse and construct a new county jail. The jail is located in a middle-income nonmetropolitan distressed or underserved geography. It will contribute to the stabilization of the community as essential infrastructure contributing to public safety.

In October 2011, Vision Bank originated a \$2.5 million loan to construct and then operate affordable housing in Shawnee, Oklahoma. The project was to build very-low and low-income housing that produces tax credits for the investors over 10 years. A variety of apartment formats were built and are available to meet the needs of different low- and moderate-income family units, including units designed for the handicapped. In an unrelated project in September 2010, a development agency borrowed \$50 thousand to fund self-help housing for qualified low- and moderate-income families.

The bank also financed \$600 thousand of borrowings by Shawnee Public Schools and \$29 thousand of borrowing by Prague Public Schools for the purpose of purchasing and renovating buildings and purchasing equipment. Both schools serve primarily low- and moderate-income students based upon participation in the federal free or reduced price lunch program.

### **QUALIFIED INVESTMENTS**

Although opportunities for qualified community development investments are limited in the bank's assessment area, the level of community development investments, including community development donations, is adequate. Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation. During the evaluation period, exclusive of donations, Vision Bank invested in seven community development qualified municipal securities, totaling \$7 million that will finance construction and renovation of schools in the bank's AAs that will be or are attended primarily by students from low- and moderate-income families.

During the review period, Vision Bank also made over 48 qualified community development donations in its assessment area, totaling \$121,654. Donations are to local non-profit organizations that provide social services, youth programs, affordable housing, and health care services that target elderly and low- to moderate-income individuals.

Prior period community development investments still outstanding include \$3.3 million remaining of a \$4 million purchase of Sales Tax Revenue Notes issued by the Pontotoc County Facilities Authority to construct a new county jail and perform renovations to the county courthouse located in Ada, Oklahoma. This investment allowed for the construction and renovation of two critical infrastructure projects, in addition to retaining and creating low- to moderate-income jobs. The courthouse is located in a moderate-income census tract.

### **COMMUNITY DEVELOPMENT SERVICES**

The level of qualified community development services is excellent. Bank officers and staff have served in leadership positions on organizations that provide community services to low- and moderate-income families and provided technical expertise and financial assistance to these organizations. Bank officers also serve in leadership positions on organizations that are involved in economic and small business development activities. The following are examples of qualifying community

development services.

- **Financial Literacy** - Vision Bank is dedicated to promoting financial literacy in its communities. In 2011, the bank partnered with financial industry specialists to develop an interactive web-based e-learning curriculum, which took form as the “Vision Bank Financial Program.” Vision Bank embarked on a three-year commitment to fund the site licenses for eleven schools within the area. Vision Bank officers also presented classes on personal finance to students of all levels at East Central University. Several bank staff members spearheaded the implementation of a general education course on personal finance to the University’s required “core” curriculum. The class is now one option for every freshman enrolling in the University to meet their education requirement. Bank officers and staff spend considerable time providing other financial literacy courses to the community. A bank employee is in charge of the Financial Leadership Council Prague/Meeker, while another bank officer is a member of the Oklahoma Council on Economic Education. Both of these organizations provide financial education within the bank’s AAs.
- **Chambers of Commerce** - Bank officers are very active in taking leadership positions in local Chambers of Commerce. Bank officers currently serve as board members or officers on the Ada, Durant, Meeker, Prague, Shawnee, and Tecumseh Chambers and provide technical expertise through their involvement with planning, budgeting, and financing activities. These Chambers are all active with regard to economic development and to the retention and recruiting of new businesses within their respective communities.
- **Main Street Associations** - The focus of these organizations is to revitalize the downtown area and to retain and attract new business to the downtown Ada, Durant, and Prague areas to make the business district economically viable for independently owned businesses. Bank officers serve as board members of these Main Street Associations.
- **Ada Industrial Development Corp., Tri-County Indian Nations Development Corp., Lincoln County Economic Development Authority, Central Oklahoma Economic Development Authority, & Ada Jobs** - Bank officers serve as board members of these non-profit organizations whose primary objective is to create and retain quality jobs, recruit new firms, and encourage and support new start-up firms.
- **Habitat for Humanity** - A bank officer serves as a board member of this non-profit organization, which helps low- to moderate- income persons obtain homes.
- **Federal Home Loan Bank of Topeka** - A bank officer serves as a director and is on the Affordable Housing Committee. This committee provides affordable housing within Oklahoma and the bank’s AA.

- **McCalls Chapel** - This organization serves handicapped individuals, most of which are low- to moderate- income persons. McCalls Chapel helps those able to find jobs and assists in providing affordable housing. A bank officer serves as a board member of this non-profit organization.
- **Hope for Homes** - Hope for Homes is a non-profit organization that comes into communities and provides financial and manual labor assistance to repair homes for low- to moderate- income persons. During July 2012, this organization repaired homes in Durant, Oklahoma and a bank officer served on the committee that assisted this organization.
- **Ada Regional United Way** - The Ada Regional United Way raises funds that are provided to various agencies within the community and many of these agencies provide services to low- or moderate- income persons. Two bank officers serve as a board member of this non-profit organization.
- **Valley View Foundation** - Valley View Foundation raises funds for the Valley View Regional Hospital, which accepts patients on Medicaid and provides charity assistance. A bank officer serves on the finance committee of this organization.
- **Family Crisis Center** - Family Crisis Center provides assistance and temporary housing for abused spouses and their children. A bank officer serves as a board member of this non-profit organization.
- **Ada Youth Shelter** - This shelter provides temporary housing for youths within the court system when needed. A bank officer serves as a board member of this organization.
- **Court Appointed Special Advocates (CASA)** - Every year millions of children are abused, neglected, or abandoned in the United States. CASA provides court appointed advocacy for these children so they can thrive in safe, permanent homes. A bank officer serves as a board member of this non-profit organization.

## RETAIL DELIVERY SYSTEMS

The bank's branch and ATM delivery systems are accessible to geographies and individuals of different income levels in the AA. Lobby hours and extended drive-up hours are established to meet customer needs. The following table reflects the bank's banking and ATM locations in the AA:

<b>Distribution of Bank Offices and ATMs by Census Tract</b>						
<b>Census Tract Income Level</b>	<b>Tracts in AA</b>		<b>Full-Service Offices</b>		<b>Automated Teller Machines*</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	0	0.0%	0	0.0%	0	0.00%
Moderate	7	17.0%	2	28.5%	4	20.0%
Middle	30	71.0%	2	28.5%	9	45.0%
Upper	5	12.0%	3	43.0%	7	35.0%
<b>Total</b>	42	100.00%	7	100.00%	20	100.00%

Vision Bank has a well-staffed separate Call Center to allow customers to perform banking activities during banking hours. Vision Bank also offers 24-hour services via telephone banking (Vision Voice) or by Mobile/Internet banking. Internet banking services allow viewing account information, transfers between accounts, and for commercial customers wire transfers and cash management features. Traditional banking services are offered at the full-service offices. Although the bank has no low-income census tracts in its AAs, there are seven moderate-income census tracts and 7 of its 30 middle-income census tracts (23%) are identified as "distressed non-metropolitan middle-income census tracts."

### **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 (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.