



Public Disclosure

April 5, 1999

Community Reinvestment Act Performance Evaluation

Bank of Arkansas, N.A.
Charter Number: 23034

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Fayetteville, Arkansas 72703

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NOTE: This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the

federal financial supervisory agency concerning the safety and soundness of this financial institution.

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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

*This document is an evaluation of the CRA performance of the **Bank of Arkansas, N.A.** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **April 5, 1999**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

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

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

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

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

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

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

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

Low-Income - Income levels that are less than 50% of the median family income.

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

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

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

The following table indicates the performance level of the **Bank of Arkansas, N.A.** (BARK) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Bank of Arkansas, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	T		
Low Satisfactory		T	T
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- < Overall, geographic distribution of residential mortgages, small business, small farm loans, and consumer loans is good. There is good penetration of all loan products throughout the assessment area.
- < Borrower distribution is also good for home purchase, home improvement, and consumer loans. BARK has a good record of extending credit to small businesses and small farms.
- < BARK has an adequate level of community development loans given its size and opportunities in the MSA.
- < The bank has an adequate level of qualified investments and/or donations that directly benefit low- and moderate-income persons and areas.
- < BARK provides an adequate level of services to its assessment area.

Description of Institution

Bank of Arkansas, N.A., (BARK) is a community bank based in Fayetteville, Arkansas. As of December 31, 1998, BARK reported total assets of \$118 million. BARK is a wholly owned subsidiary of Bank of Oklahoma Financial Corporation (BOKF), a multi-bank, multi-billion dollar holding company based in Tulsa, Oklahoma. The lead bank for BOKF is Bank of Oklahoma, N.A. (BOK). In addition to BARK and BOK, BOKF subsidiaries include two other banks operating in Texas and New Mexico.

In addition to the main office, BARK has two branch offices within the assessment area. The main office and one branch office are located within the city limits of Fayetteville. The other branch is located in Rogers. Automated Teller Machine (ATM) access is provided through the Transfund Network. Through this network, customers have access to over 430,000 ATMs worldwide and can make deposits to, withdrawals from, and transfers between accounts in many of these locations. The bank also has **24-Hour ExpressBanking**, a system whereby customers can perform certain banking tasks by telephone 24 hours a day 365 days a year. BARK offers a **Visa Check Card** that can be used for the purchase of goods at any one of Visa's 14 million merchants worldwide.

Loans to provide permanent financing (including refinancing) for the purchase of a home are available through Bank of Arkansas Mortgage Group doing business as Bank of Oklahoma Mortgage. Bank of Oklahoma Mortgage is a department within the Bank of Oklahoma, N.A. All loans are closed in the name of Bank of Oklahoma, N.A. BARK offers home purchase, refinanced, and home improvement loans. Bank of Arkansas Mortgage Group has four loan production offices, three of which are in the bank's assessment area, that offer conventional, FHA, and VA loans, both fixed rate and adjustable rate, as well as 203K rehabilitation loans. Bank of Arkansas Mortgage Group also participates in bond loan programs issued by state and local authorities specifically designed to assist low- and moderate-income purchasers and first time home buyers. Bank of Arkansas Mortgage Group assists eligible individuals to obtain funds for down payment assistance from local non-profit organizations.

BARK's primary line of business is small business lending, including both commercial real estate and operating lines of credit. As of December 31, 1997 and 1998, BARK's loan portfolio composition is as follows:

Loan Type	12/31/97 \$(000's)	%	12/31/98 \$(000's)	%
Commercial RE	31,069	50%	48,233	59%
Residential RE	11,425	19%	15,376	19%
Commercial	15,242	25%	13,801	17%
Consumer	3,240	5%	3,005	4%
Farm	784	1%	631	1%
Gross Loans	61,760	100%	81,046	100%

Source: Call Report Data.

There are no financial impediments which would hamper BARK's ability to help meet the credit needs of its assessment area. The Arkansas Usury Law, however, could impede BARK's ability to receive an adequate return on loans to the highest risk borrowers. The law limits the interest rate that financial institutions can charge on consumer loans to 5% above the Federal Discount Rate.

BARK's CRA performance was last evaluated October 22, 1997, by the Office of the Comptroller of the Currency. The bank received an overall performance rating of "**Satisfactory**". This will be the second evaluation of BARK's CRA performance since it became a nationally chartered institution on December 15, 1995.

Refer to Appendix B: Market Profiles for Full-Scope Areas to review the demographic information for the Fayetteville-Springdale-Rogers MSA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Lending Test

The evaluation period for the Lending Test covers calendar years 1997 and 1998. The products reviewed for the Lending Test include residential real estate (home purchase, home improvement, and refinancings), small business loans, small farm loans and consumer loans. BARK elected to have consumer loans considered in the bank's CRA performance. Consumer loans are not a major product line for the bank. At December 31, 1998, consumer loans comprised about 4% of the bank's gross loans. Community development loans originated in 1997, 1998, were also considered in assessing the bank's performance under the Lending Test. BARK also elected to have residential loans from its affiliate, Bank of Oklahoma, N.A. considered in the evaluation of lending activities.

Service Test

BARK's products and services were evaluated from the October 22, 1997 (date of the last CRA Performance Evaluation) through April 5, 1999 (date of the current Performance Evaluation). The bank's deposit and loan products, delivery system (branch and ATMs), and community development services were considered under the Service Test.

Investment Test

Qualified investments and grants were reviewed from October 22, 1997 to April 5, 1999. Any qualified investments purchased prior to the October 1997 evaluation with an outstanding balance as of April 5, 1999 are also included in this Performance Evaluation.

Data Integrity

We reviewed 7 residential real estate loans, 17 small business loans, and 3 small farm loans to verify the accuracy of reported data. The bank's audit department also verifies the accuracy of data before it is submitted. Our review preceded the audit department's review. Based on the sample taken, we determined the bank's data to be reliable.

Selection of Areas for Full-Scope Review

BARK has one assessment area which is the Fayetteville-Springdale-Rogers MSA. The assessment area received a full scope review.

Ratings

The bank's overall rating is based on activity in the Fayetteville-Springdale-Rogers MSA 2580.

Other

Two community contacts in BARK's assessment area were made during this evaluation. Both contacts were by telephone interview. Information on credit needs for affordable housing and general consumer loans was obtained from a non-profit organization that makes available small loans to low- and moderate-income individuals to assist in utilities, child care, groceries, or assistance during a layoff or brief unemployment. Additional comments on affordable housing needs were also obtained from a non-profit organization that constructs houses in partnership with low-income families who are 30-50% of the median income for the community. Both organizations stated affordable housing is in great demand in the area. High land costs make affordable housing cost prohibitive. Both contacts stressed that more flexible underwriting for consumer and mortgage loans is needed. There were no negative comments regarding BARK's lending performance.

Based on information obtained from the OCC's Community Reinvestment and Development Specialist, investment opportunities are limited in Arkansas. It was discovered that many financial institutions in the state form a CDC because of limited opportunities in the state. Many non-profit organizations in the state are unaware of funding sources available from governmental authorities and financial institutions. Also, financial institutions are not often aware of organizations or developers that need funding. Information provided by the Arkansas Development Finance Authority (ADFA) shows a few low-income housing tax credit (LIHTC) projects in the assessment area. In 1998, there were three (LIHTC) projects in the MSA. BARK did not bid on any of these projects. For 1999, there are three LIHTC projects in the MSA awaiting approval for LIHTC status. BARK management is reviewing documentation on one of these projects and anticipates bidding on the project if it receives LIHTC status. According to bank management, community development investment opportunities are usually revealed through word of mouth from the developer who is trying to qualify for LIHTC status. ADFA does not have

a formal process of informing financial institutions of the community development investment opportunities available in the MSA and the state.

Fair Lending Review

A fair lending examination was performed by evaluating sixteen (16) denied unsecured loan requests, four (4) denied home equity loan requests, and four (4) denied automobile loan requests. These denials were from January 1999 to April 1999. Our evaluation was performed to ensure compliance with the Equal Credit Opportunity Act (ECOA) and to evaluate the adequacy of the bank's internal audit coverage and internal controls for data integrity. No evidence of discriminatory or other illegal credit practices were noted during this examination. As a result, the fair lending examination did not impact the CRA rating. The bank's record of complying with the antidiscrimination laws (ECOA, FHA, or HMDA) is adequate.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "*High Satisfactory*". Based on a full-scope review, the bank's performance in the Fayetteville-Springdale-Rogers MSA is good.

Lending Activity

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

BARK has a good responsiveness to credit needs in the assessment area, based on its size and market presence. For the two calendar years 1997 and 1998, BARK originated 1,854 loans totaling \$175 million. These volumes consisted of 1,383 home mortgage products totaling \$115 million, 430 small business loans totaling \$54 million, 32 small farm loans totaling \$1.2 million, and 3 community development loans totaling \$2 million. Based on June 30, 1998 deposit market share information, BARK had 2.37% of total bank deposits in the assessment area. In terms of lending market share presence, BARK is ranked second (2nd) in the assessment area for home purchase loan originations, twenty-fourth (24th) for home improvement loan originations, and sixth (6th) for refinanced loan originations. BARK is ranked eighth (8th) in the market for small business and small farm originations.

A substantial majority, 96%, of all loan products reviewed in this evaluation were made in the assessment area. Census tract penetration of all loan products is good. Geographic distribution for home purchase, refinanced, small business loans, and consumer loans is good. Distribution by borrower income is also good for home purchase, home improvement, small business, small farm loans, and consumer loans. BARK has an adequate level of community development loans given its size and opportunities in the MSA. The bank offers home mortgage products with flexible underwriting to assist low- and moderate-income families in purchasing a home.

Distribution of Loans by Income Level of the Geography

There is good penetration of all residential mortgage products, small business loans, and consumer loans throughout the assessment area. Geographic distribution for small farm loans is adequate, but this product is not a significant business line for the bank.

Home Mortgage Loans

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

Home Purchase

Overall, BARK'S geographic distribution of home purchase originations reflects good penetration throughout the assessment area. For the two year period, BARK originated 942 of the 943 home purchase loans it made in its assessment area, or 99.9%. Table 2 in Appendix C shows that BARK originated the second highest volume of home purchase loans in the MSA. Home purchase loan originations to moderate-income geographies is good when compared to the percent of owner occupied units in moderate-income geographies. The percent of bank loans in moderate-income geographies slightly exceeds the demographics for owner-occupied units in the MSA. In terms of market share by geography, BARK has approximately 11% of home purchase originations made in moderate-income tracts. BARK'S home purchase originations for middle- and upper-income geographies is in line with the percent of owner-occupied units for those geographies.

There are no conspicuous gaps or under served census tracts in the assessment area for home purchase loans. Of 54 census tracts reporting data, only one census tract had no activity. This tract is a middle-income tract.

Home Improvement

For the two year evaluation period, BARK originated 19 of the 21 home improvement loans it made in its assessment area, or 90%. This volume represents approximately 1% of reported home mortgage products. The low percentage of owner-occupied units in moderate-income geographies supports why there are no home improvement loan originations in moderate-income tracts. There is little demand for home improvement loans overall in the MSA due to a high inventory of new homes. A study of lending patterns in the MSA revealed that most consumers find it more economical to refinance their homes and use the funds from the equity in their homes for home improvements, while taking

advantage of lower interest rates. Home improvement loans typically have higher interest rates.

Because BARK makes very few home improvement loans, penetration to all census tracts was low. None of the moderate-income census tracts were penetrated. Thirteen or 29% of the middle-income, and three or 40% of the upper-income census tracts were penetrated.

Refinanced

BARK's refinanced home mortgages show good distribution throughout the MSA as shown by Table 4 in Appendix C. Again, BARK originated a substantial majority of refinanced loans in its assessment. For the two years under review, 422 of 423 or 99.8% of refinanced mortgage loans were made in the assessment area. In moderate-income geographies, BARK's percentage of refinanced mortgages is slightly higher than the percentage of owner-occupied units. There is more penetration of refinanced mortgages in middle- and upper-income geographies because the percentage of owner-occupied units is much higher than moderate-income geographies.

Refinanced loans show excellent penetration in all census tracts, particularly moderate-income census tracts. All moderate-income census tracts had activity.

Small Business Loans

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

The geographic distribution of small business loan originations reflects good penetration throughout the assessment area, particularly in moderate-income geographies. A substantial majority, 430 of 493 or 87%, of small business loans originated in the assessment area. BARK originated approximately 13% of its small business loans in moderate-income geographies. Demographic data shows that 14% of small businesses are located in moderate-income geographies. Based on market share data, BARK ranks eighth (8th) in lending to small businesses and originated approximately 7% of small business loans in moderate-income geographies.

All moderate-income census tracts had loans made to small businesses. Only 6 of 45 middle-income tracts had no small business loan activity.

Small Farm Loans

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small farm loan originations.

Geographic distribution of small farm loans in moderate-income geographies is adequate. For the two-year evaluation period, BARK originated 32 of 36 or 89% of small farm loans in the assessment area. Small farm loans comprise less than 2% of the total reported loans. Demographic data shows a small percentage of farms in moderate-income geographies. The percent of small farm loans originated by the bank is about half of the percent of farms in moderate-income geographies. The majority of small farm loans were originated in middle-income geographies.

Farm loans are not a significant product line for BARK. This product accounted for 1% or less of gross loans for 1997 and 1998. Three of four moderate-income census tracts had no small farm lending activity. Thirty-two of forty-five middle-income tracts had no activity, and three of five upper-income census tracts had no activity.

Consumer Loans

Refer to Table 14 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations.

Geographic distribution of consumer loans is good. BARK originated 789 consumer loans of which 746 or 95% were made in the MSA. The percentage of bank loans in moderate-income geographies exceeds the percentage of the population that resides in moderate-income geographies, as is shown in Table 14.

Consumer loans penetrated all census tracts. There were no gaps in lending for this product.

Distribution of Loans by Income Level of the Borrower

Distribution of home purchase, home improvement, and consumer loans by income level of the borrower is good, particularly to low- and moderate-income borrowers. Penetration of refinanced loans to low- and moderate-income borrowers is adequate. BARK has a good record of extending credit to small businesses and small farms.

Home Mortgage Loans

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

Home Purchase

Borrower distribution by income level reflects good dispersion for home purchase originations. The percent of bank loans to low-income borrowers is considered good, despite the level being much lower than the percent of low-income families in the MSA. Home ownership is not easily affordable for low-income borrowers. The penetration of bank loans to moderate-income borrowers is excellent. The percent of home purchase originations to moderate-income borrowers materially exceeds the percent of moderate-income families in the MSA. Based on 1997 Aggregate HMDA data, BARK is ranked second in home purchase loan originations with an overall market share in the MSA of 7.34%. BARK's market share by borrower income exceeds the overall market share, particularly in the low- and moderate-income categories. BARK is ranked second in the market for originations to low-income borrowers and third for originations to moderate-income borrowers.

Home Improvement

The distribution of home improvement loan originations to low- and moderate-income borrowers is good. Over a two-year period, BARK originated only 19 home improvement loans. Three loans or 17% were made to low-income borrowers and two loans or 11% were made to moderate-income borrowers. The percent of home improvement loans to low-income borrowers nearly matches the percent of low-income families (17%) in the assessment area. Loans to moderate-income borrowers is below the percent of moderate-income families (20%) but is still considered good.

BARK'S overall market share for home improvement originations is low. There is not a big demand for home improvement loans in the MSA due to a high volume of new construction. Also, most of the borrowers in need of funds for home

improvement typically refinance their homes because the interest rate is lower for refinanced loans than home improvement loans.

Refinanced

The penetration to low- and moderate-income borrowers for refinanced loans is adequate. Mortgage industry studies show that many low- and moderate-income borrowers cannot afford the closing costs associated with refinancing a mortgage. Low interest loans through bond money and similar programs are available for low- and moderate-income borrowers, eliminating the need to refinance for lower interest rates.

Small Business Loans

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

BARK has a good record of making loans to small businesses. The percent of loans to businesses with revenues of \$1 million or less exceeds the percent of small business loans made by other lenders in the assessment area. BARK's percent of loans to businesses (82%) with revenues of \$1 million or less is below the percent of businesses (90%) in the assessment area with revenues of \$1 million or less. The bank is ranked eighth (8th) in the market for loans to small businesses with an overall 5.5% share of the market. BARK's market share for loans with revenues of \$1 million or less is 6.5%.

BARK also has a good record of making small loans to small businesses. Approximately 82% of the bank's small business loans were less than \$250,000 in loan size.

Small Farm Loans

Refer to Table 11 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

BARK has a good record of making loans to small farms. BARK's lending activity to small farms with revenues of \$1 million or less matches the percent of farms of the same revenue size in the MSA. BARK's small farm loans compare favorably

to the percent of small farm loans made by other lenders in the market. A substantial majority of small farm loans originated were \$100,000 or less in size. BARK originated 2.5% of small farm loans in the market.

Consumer Loans

Refer to Table 14 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations.

Penetration among borrowers of different income levels is good. The percent of bank loans made to low-income borrowers matches the percent of households that are low-income. Bank loans to moderate-income borrowers exceed the percent of moderate-income households.

Community Development Lending

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

The bank has an adequate level of community development loans considering its size and opportunities. BARK competes with branches of large banking organizations, such as Nations Bank/Bank of America and Regions Bank. Many of the community development loans available in the assessment area are funded by the larger banks because BARK's legal lending limit (\$1.7 million as of December 31, 1998) prohibits BARK from making loans to an entity in excess of \$1.7 million. The availability of qualified community development projects is somewhat dependent on the developers and the potential government assistance on tax credits. Not all developers who apply for LIHTC status receive this designation. BARK originated three loans in 1998 totaling \$2 million for which the primary purpose meets the definition of community development. Two of the loans are construction loans for affordable single family homes. One of the loans is to a local nonprofit organization which provides services primarily to low- and moderate-income families with troubled and at-risk youths.

Product Innovation and Flexibility

BARK has a few flexible loan products to assist low- and moderate-income applicants to purchase homes. As previously mentioned, customers have access to mortgage services through BARK's mortgage company with four loan production offices, three of which are in the assessment area. The mortgage company offers two mortgage products with flexible underwriting. The Advantage Plus Zero Down program was introduced March 1999. To date, no loans have closed under this program. This product requires only a three percent down payment. The down payment can be a gift or a loan from the bank. The FNMA 97 program also has flexible terms. This program has been available for over a year. In 1998, BARK originated two loans under this program totaling \$237,650.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

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

The bank's performance under the Investment Test is rated *"Low Satisfactory"*. Based on full-scope reviews, the bank's performance in the Fayetteville-Springdale-Rogers MSA is adequate.

Management submitted for our review ten investments/grants that qualify for community development investments totaling \$82,000. Some of the larger donations are to a child development program for economically disadvantaged children of families who meet the poverty income guidelines. The bank also contributes to an agency that assists in preparing grant requests and other funding applications to low- and moderate-income individuals and families to facilitate the building of homes. The bank has invested in a micro-loan fund program which makes available small loans for the purpose of paying utilities, child care, groceries, and assistance in the event of layoff. Other contributions include a non-profit organization that assists low-income and the homeless, a non-profit organization that helps low-income single parents obtain scholarships, and an organization that assists small businesses in obtaining capital.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated *"Low Satisfactory"*. Based on full scope reviews, the bank's performance in the Fayetteville-Springdale-Rogers MSA is adequate. BARK's delivery system is accessible to geographies and individuals of different income levels in its assessment area. Opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services offered at BARK offices do not vary in a way that would inconvenience any portion of the assessment area. BARK provides an adequate level of community development services.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

The quantity, quality, and accessibility of BARK's service delivery system within its assessment area is adequate. Besides the main bank, BARK has two branches within its assessment area. The main office and one branch are located in the Fayetteville city limits. The other branch is located in Rogers. Drive-in facilities

and ATM services are provided at all three locations. BARK also provides investment and trust services at each location by appointment. Residential loans are available through the Bank of Arkansas Mortgage Group with four loan production offices. Loan production offices are located in Bentonville, Little Rock, and two offices are located in Fayetteville.

A branch located in a moderate-income census tract in Springdale, which was opened May 27, 1997, closed March 1, 1999. This branch was closed due to its inability to generate profits. The bank continues to have a branch located in one of the four moderate-income census tracts in the MSA.

The bank's business hours are convenient for servicing the assessment area. The lobby at the main bank and Rogers branch is open from 8:30 until 5:30 Monday through Friday, while drive-ins at all three locations are open 7:30 until 6:00 Monday through Friday and 9:00 until 12:00 on Saturday. BARK customers can also use any of the ATMs in the TransFund Network, or can bank by telephone with the 24-Hour ExpressBank System.

Community Development Services

BARK has participated in various activities to provide community development services. In 1997, BARK conducted two affordable housing seminars with local real estate offices. The seminars were opened to first-time home buyers. BARK also held four affordable housing seminars in conjunction with ADFA. These seminars were also opened to first-time home-buyers. BARK co-sponsored a small business forum workshops with the University of Arkansas for small business owners and entrepreneurs. During the seminar, small business owners had the opportunity to consult with bankers, lawyers, accountants, and insurance experts on the basics of business ownership. As a result of the small business forum workshops, at least one new business was started. The business owner provided feedback stating she found the information presented to be very informative and helpful. About twenty business owners attended the small business forum workshop.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term "Full-Scope") and those that received a less comprehensive review (designated by the term "Limited-Scope").

Time Period Reviewed	Lending Test: January 2, 1997 to December 31, 1998 Investment Test: October 22, 1997 to April 12, 1999 Service Test: October 22, 1997 to April 12, 1999	
Financial Institution	Products Reviewed	
Bank of Arkansas, N.A. Fayetteville, Arkansas	Home mortgage products including home purchases, home improvement, and refinancings. Small business, small farm, consumer loans, community development loans and community development investments..	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>Bank of Oklahoma, N.A.</i>	sister bank	Home purchase, refinanced loans.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Fayetteville-Springdale-Rogers MSA #2850	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Fayetteville-Springdale-Rogers MSA #2580	B-2
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Fayetteville-Springdale-Rogers MSA #2580

Demographic Information for Full-Scope Area: Fayetteville-Springdale-Rogers MSA #2580						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	56	NA	7.14	80.36	8.93	3.57
Population by Geography	210,908	NA	7.14	79.82	13.04	0.00
Owner-Occupied Housing by Geography	88,793	NA	3.10	81.88	15.02	0.00
Businesses by Geography	9,045	NA	13.74	74.02	12.24	0.00
Farms by Geography	316	NA	6.33	80.38	13.29	0.00
Family Distribution by Income Level	59,575	17.03	19.93	25.13	37.91	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	22,016	NA	8.42%	83.00	8.58	0.00
Median Family Income	= \$29,073	Median Housing Value		= \$55,434		
HUD Adjusted Median Family Income for 1998	= \$40,300	Unemployment Rate (1990 Census)		= 1.87%		
Households Below the Poverty Level	= 13.21%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

BARK has identified the Fayetteville-Springdale-Rogers MSA 2580 as its assessment area. This MSA includes the entire counties of Washington and Benton, Arkansas. According to 1990 U.S. Census Data, the MSA has a total population of 210,908. The MSA contains 56 census tracts, of which none are low-income, four are moderate-income, forty-five are middle-income, five are upper-income, and two do not report data and are shown as NA. All of the moderate-income tracts are located in Washington County.

According to 1990 U.S. Census data, the median family income for the MSA was \$29,073. HUD's 1998 updated estimate of the median family income for the MSA is \$40,300. This is the income used to determine the income level of families in the MSA. Approximately 81% of the low-income families reside in a middle-income census tract. Of the available housing units in the MSA, about 91% are occupied, with 61% being owner occupied. The median housing value is \$55,434, and the median year built is 1972.

In 1996, Arkansas had 57,808 businesses with employees; 97.3% of the businesses were small businesses (percent based on 1994 data for independent businesses with fewer than 500 workers). In addition to the number of employer businesses, the state also had 77,000 self-employed persons in 1996, for an estimated total of 134,808 businesses. The income of sole proprietors and

partners rose 6.3% to \$3.7 billion in 1996, while wage-and-salary income rose 5.1%. Total personal income rose 5.3 percent to \$28.8 billion. The state also exported \$2.0 billion of goods in 1996. Small businesses created all of the net new jobs from 1992 to 1996. Very small businesses (less than 20 employees) represented 74.5% of the small business growth with 60,011 new jobs. These numbers clearly reflect the importance of small businesses as job creators. The composition of small business in Arkansas is very diverse. The Health Services industry is the largest small business employer in Arkansas, followed by Eating & Drinking Places. The fastest growing industry for small businesses is Textile Mill Products (represents industries that were at least 0.25% of the 1994 total). Major employers in the MSA include education, poultry, trucking, and retail.

Competition among financial institutions is strong. The FDIC's *Market Share Report* indicates that there are 19 nationally chartered banks and 15 state charter banks with 117 offices in the two county MSA. BARK's total market share of reported deposits in the MSA is 2.37%.

During this examination we conducted two community contacts and reviewed three other contacts performed by the FDIC and the Federal Reserve. These contacts indicated that due to the growth in the area, credit needs are strong. While the contacts indicated that, overall, the local financial institutions are meeting the credit needs of the community, there continues to be a need for affordable single and multi-family housing.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. 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; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. 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 by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (< \$1 million) to businesses originated 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 rank and market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (< \$500,000) to farms originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (< \$1 million) originated 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. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (< \$500 thousand) originated 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. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

Table 13. Distribution of Branch and ATM Delivery System - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (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 the population 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 MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME													State: ARKANSAS		Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full-Scope:																
Fayetteville-Springdale-Rogers	2.37%	1,383	\$114,588	430	\$54,038	32	\$1,243	3	\$2,044	1,854	\$174,827	100.00%				
Limited-Scope:																

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE				State: ARKANSAS				Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% 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	#	% of Total
Full-Scope:																
Fayetteville-Springdale-Rogers	NA	NA	3.10%	3.20%	81.88%	84.20%	15.02%	12.60%	2	7.34	NA	11.32	7.47	6.00	942	100%
Limited-Scope:																

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT				State: ARKANSAS				Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998								
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% 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	#	% of Total
Full-Scope:																
Fayetteville-Springdale-Rogers	NA	NA	3.10%	0.00%	81.88%	68.40%	15.02%	31.60%	24	0.65	NA	0.00	0.47	2.10	19	100%
Limited-Scope:																

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE																State: ARKANSAS		Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans				
	% 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	#	% of Total			
Full-Scope:																			
Fayetteville-Springdale-Rogers	NA	NA	3.10%	3.30%	81.88%	79.90%	15.02%	16.80%	6	3.21	NA	5.13	2.95	4.58	422	100%			
Limited-Scope:																			

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS																	State: ARKANSAS		Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans					
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Fayetteville-Springdale-Rogers	NA	NA	13.89%	13.02%	74.13%	69.77%	11.98%	17.21%	8	5.51	NA	7.09	4.83	9.26	430	100%				
Limited-Scope:																				

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM																	State: ARKANSAS		Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans					
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Fayetteville-Springdale-Roger	NA	NA	6.44%	3.13%	81.70%	90.63%	11.86%	6.25%	8	2.50	NA	0.00	2.63	0.00	32	100%				
Limited-Scope:																				

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE																
State: ARKANSAS																
Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Fayetteville-Springdale-Rogers	17.03%	9.06%	19.93%	29.21%	25.13%	28.14%	37.91%	33.58%	2	7.34	9.71	9.47	7.29	5.89	942	100%
Limited-Scope:																

(*) As a percentage of loans with borrower income information available. No information was available for 0.42% of loans originated by BARK.
 (**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT					State: ARKANSAS		Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998					Total Home Improvement Loans				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**						
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Fayetteville-Springdale-Rogers	17.03%	16.67%	19.93%	11.11%	25.13%	16.67%	37.91%	55.56%	24	0.65	0.78	0.00	0.96	0.58	19	100%
Limited-Scope:																

(*) As a percentage of loans with borrower income information available. No information was available for 5.26% of loans originated by BARK.
 (**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE																State: ARKANSAS		Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans				
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Fayetteville-Springdale-Rogers	17.03%	3.45%	19.93%	12.20%	25.13%	27.06%	37.91%	57.29%	6	3.21	1.98	1.49	2.72	4.05	422	100%			
Limited-Scope:																			

(*) As a percentage of loans with borrower income information available. No information was available for 10.66% of loans originated by BARK.

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS			State: ARKANSAS			Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998					
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Fayetteville-Springdale-Rogers	90.29%	81.75%	74.87%	61.07%	21.17%	11.68%	5.51%	6.51%	411	100%	\$122
Limited-Scope:											

(*) As a percentage of businesses with known revenues.
 (**) As a percentage of loans with revenue information available. No information was available for 4.42% of loans originated by BARK.
 (***) The market consists of all other Small Business reporters in BARK's assessment area and is based on 1997 Aggregate Small Business Data only.
 (****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM State: ARKANSAS Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998											
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Fayetteville-Springdale-Rogers	96.61%	96.88%	98.21%	87.50%	9.38%	3.12%	2.50%	2.54%	32	100%	\$39
Limited-Scope:											

(*) As a percentage of farms with known revenues.
 (**) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by BANK.
 (***) The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1997 Aggregate Small Farm Data only.
 (****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
			State: ARKANSAS			Evaluation Period: OCTOBER 22, 1997 TO APRIL 12, 1999			
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Fayetteville-Springdale-Rogers	2	\$1	100%	8	\$81	100%	10	\$82	100%
Limited-Scope:									

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in the Fayetteville-Springdale-Rogers MSA that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: ARKANSAS				Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998									
MSA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Fayetteville-Springdale-Rogers	100%	3	100%	NA	33%	67%	0%	3	100%	NA	33%	66%	0%	NA	7%	80%	13%
Limited-Scope:																	

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations (Optional)

Geographic and Borrower Distribution: CONSUMER LOANS																		State: ARKANSAS		Evaluation Period: JANUARY 2, 1997 TO DECEMBER 31, 1998	
MSA/Assessment Area:	Geographic Distribution								Borrower Distribution								Total Consumer Loans				
	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		#	% of Total			
	% of Pop*	% BANK Loans	% of Pop*	% BANK Loans	% of Pop*	% BANK Loans	% of Pop*	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans	% of Hshlds	% BANK Loans					
Full-Scope:																					
Fayetteville-Springdale-Rogers	NA	NA	7%	9%	80%	74%	13%	17%	22%	22%	17%	23%	21%	20%	40%	34%	746	100%			
Limited-Scope:																					

(*) The percentage of the population in the Fayetteville-Springdale-Rogers MSA that resides in these geographies.