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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

December 20, 2002

**Community Development Investment Letter #2002-8**

**June 2004**

**12 CFR 24**

W. A. Moore  
President  
First National Bank  
P. O. Box 750  
Davis, OK 73030

Dear Mr. Moore:

This responds to your request for prior approval of an equity investment by the First National Bank (the "Bank"). The Bank is seeking OCC permission to invest \$300,000 for the purchase of stock in the Arbuckle Financial Services, Inc., a community development corporation subsidiary (the "CDC"), under 12 U.S.C. § 24 (Eleventh) (the "statute") and 12 C.F.R. 24 (the "regulation") concerning national bank community development corporations, community development projects, and other public welfare investments.

According to the Bank's proposal, the primary beneficiaries of the CDC will be low- and moderate-income individuals, low- and moderate-income areas, or other areas targeted for redevelopment by the local, state, or federal government. The CDC's purpose is to provide financial support and services that address local, county, state and federal economic development opportunities directed toward low- and moderate-income populations and communities, including those on, or with Native American nations. Specific activities of the CDC will include providing financial literacy services; buying, selling, and leasing real estate, for example, in partnership with local housing authorities; and, to a lesser extent, providing, servicing, and maintaining ATMs, ATM cards, and debit cards. The investment demonstrates nonbank community involvement because of the CDC's contractual agreements with government and community partners and its joint ventures with local small businesses. The CDC will focus its activities in Oklahoma and Texas.

The Bank's investment in the CDC and its aggregate amount of outstanding investments under the regulation will be [ ] percent of its capital and surplus. The OCC's decision to approve the Bank's investment up to 10 percent of its capital and surplus is based on our determination that the Bank is [ ] and that the amount of the Bank's aggregate investments do not pose risk to the deposit insurance fund. In no event shall the Bank's aggregate investments under the regulation exceed 10 percent of its capital and surplus.

Based on the foregoing, the OCC finds that the Bank's proposed investment in the CDC is consistent with the statute and the regulation, and is hereby approved.

If requested by the OCC, the Bank will provide reports concerning its investment in the CDC and the CDC's financial status, activities, and accomplishments. Copies of all reports submitted to the OCC are to be forwarded to the Deputy Comptroller, Southern District.

The opinions set forth in this letter are based on information and representations provided to us in connection with the proposal. Any change in the nature, amount, or purpose of the Bank's investment, or in the purposes and activities of the CDC, could result in a different opinion being rendered concerning the conformance of the Bank's investment with the statute and the regulation. Future investments by the Bank in the CDC must be consistent with the requirements of the statute and regulation.

This opinion regarding the Bank's Part 24 investment, and the activities and communications by OCC employees in connection with the filing, do not constitute a contract, express or implied, or any other obligation binding upon the OCC, the U.S., any agency or entity of the U.S., or an officer or employee of the U.S. This opinion does not affect the ability of the OCC to exercise its supervisory, regulatory, and examination authorities under applicable law and regulations. The foregoing may not be waived or modified by any employee or agent of the OCC or the U.S.

If you have questions regarding this letter, please contact Karen Bellesi, Manager, Community Development Investments, at (202) 874-4930.

Sincerely,

*/s/ Barry R. Wides*

Barry R. Wides  
Director  
Community Development Division