



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

**May 6, 2002**

### **Community Reinvestment Act Performance Evaluation**

**Stillwater National Bank And Trust Company**  
**Charter Number: 5347**

**608 South Main Street**  
**Stillwater, OK 74074**

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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, 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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## *Overall CRA Rating*

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

The following table indicates the performance level of **Stillwater National Bank And Trust Company (SNB)** with respect to the Lending, Investment, and Service Tests:

<b>Performance Levels</b>	Stillwater National Bank and Trust Performance Tests		
	<b>Lending Test*</b>	<b>Investment Test</b>	<b>Service Test</b>
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
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:

- Lending levels reflect a good responsiveness by SNB to the credit needs of the assessment areas (AA’s).
- SNB’s distribution of loans among geographies is good and the distribution to borrowers of different income levels is adequate throughout its AA’s.
- Community development lending has a positive effect on the overall lending test rating, based on the significant level of CD loans.
- Investments reflect a good responsiveness by SNB to the needs of its AA’s considering available opportunities.
- Accessibility of SNB’s offices to geographies and individuals of different income levels and the responsiveness of SNB’s services to the needs of its AA’s are good.
- SNB maintains good performance in providing community development services.

## *Definitions and Common Abbreviations*

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. 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 with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental 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.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**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 area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited 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, and branch distribution).

**Low-Income:** Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. 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 Area (MA):** Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rated Area:** A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## *Description of Institution*

Stillwater National Bank and Trust Company (SNB) is an intrastate bank and was chartered June 16, 1894 to meet the deposit and credit needs of the individuals and businesses located in Stillwater, Oklahoma. Since that time, SNB has expanded into the Tulsa, Oklahoma City, and Chickasha, Oklahoma markets. As of December 31, 2001, total assets were reported at \$1.126 billion. Southwest Bancorp, Inc., a one-bank holding company headquartered in Stillwater, wholly owns SNB. The bank's subsidiary, Cash Source, Inc., operates proprietary ATMs.

SNB has six full-service branches, two each in Stillwater and Tulsa, and one each in Oklahoma City and Chickasha, Oklahoma. SNB pursues a centralized community banking strategy through three regional divisions. These divisions include the Stillwater Division, the Central Oklahoma Division (which includes Oklahoma City and Chickasha) and the Eastern Oklahoma Division (which includes Tulsa). A senior officer manages each division with substantial flexibility over credit and pricing decisions. The divisions offer commercial, consumer and real estate lending services and retail and commercial deposit products in their market areas. Student Loans and Mortgage Lending Services are offered throughout Oklahoma.

There are no legal, financial or other factors impeding SNB's ability to help meet the credit needs of its communities. The bank is adequately capitalized and operates profitably. As of year-end December 31, 2001, the bank reported a net loan to deposit ratio of 101 percent with net loans representing 76 percent of the bank's total assets. Tier One Capital was at \$94.3 million on this date. We noted over the evaluation period, that SNB has increased gross loans by 15 percent. Management's lending philosophy and strategy has focused on small business and commercial lending over this timeframe. However, the bank also continues to originate home mortgage products both for sale into the secondary market and portfolio retention.

The following table shows the portfolio composition and changes over the evaluation period.

<b>Loan Portfolio Composition (in 000s)</b>					
<b>Loan Type</b>	<b>12/31/1998</b>		<b>12/31/2001</b>		<b>% Change During Period</b>
	<b>\$ Amount</b>	<b>% of Portfolio</b>	<b>\$ Amount</b>	<b>% of Portfolio</b>	
Real Estate	\$435,930	54.95	\$499,681	53.67	14.62
Commercial	\$237,743	29.97	\$290,944	31.25	22.37
Individuals	\$103,530	13.05	\$118,213	12.70	14.18
Agricultural	\$1,824	0.23	\$6,713	0.72	368.00
Other	\$14,292	1.80	\$15,495	1.66	8.41
<b>Total Gross Loans</b>	<b>\$793,319</b>	<b>100.00</b>	<b>\$931,046</b>	<b>100.00</b>	<b>17.36</b>

The increase in commercial real estate and commercial loans is a result of management's growth philosophy and strategic planning. SNB considers itself more of a small business lender and their expertise and knowledge is primarily within the commercial/commercial real estate lending sector. Non-residential/commercial real estate loans comprise roughly 52 percent of the real estate loan portfolio as of December 31, 2001.

SNB's last CRA examination was dated March 8, 1999. The bank was rated "**Satisfactory**".

## ***Scope of the Evaluation***

### ***Evaluation Period/Products Evaluated***

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed their residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small business and small farm loans, and community development (CD) loans. With the exception of CD loans, the evaluation period for the Lending Test is January 1, 1999 through December 31, 2001. For CD loans and the Investment and Service Tests, the evaluation period is March 8, 1999 through May 6, 2002. The Investment Test included a review of investments, grants, and donations made in the bank's AA's that meet the definition of community development investments. The Service Test included a review of retail and community development services provided in the bank's AA's.

### ***Data Integrity***

Prior to this CRA examination, we verified the accuracy of lending and CRA performance data supplied by the bank. In addition, CD loans, services, and investments were reviewed to ensure they qualified as community development. Based on verification work performed, publicly reported lending data is considered materially accurate.

### ***Selection of Areas for Full-Scope Review***

During this examination, we performed full-scope reviews for three of the bank's AA's. The bank maintains a substantial share of its business in these AA's; 95 percent of deposits and approximately 99 percent of total reported HMDA and CRA loans. The areas reviewed are the Payne County AA, Oklahoma County AA and the Tulsa County AA. The Oklahoma County AA and Tulsa County AA are partial areas of larger MSA's. The bank does not designate these entire MSA's as its AA as it only has small offices in these locations with limited resources. The scope of their operations does not penetrate the geographies of these entire MSA's. A limited scope review was conducted in the Grady County AA. Please refer to the table in Appendix A for more information.

### ***Ratings***

The bank's overall rating is based primarily on those areas receiving full-scope reviews. Overall conclusions were weighted slightly heavier in the Payne County AA as it represents the largest share of bank deposits at 46 percent of total deposits and is where the bank is headquartered. Lending products are fairly equally distributed throughout the three AA's. As for loan product analysis, small business loans were weighted slightly heavier than HMDA products as they make up the largest share of total reportable loans and represent the bank's primary lending strategy. As for HMDA products, home purchase and refinance loans were weighted considerably heavier than home improvement loans since they represent approximately 93 percent of the total number of HMDA reportable loans. We gave little weight to small farm loans since the number of small farm originations was less than 1 percent of the total number of HMDA and CRA reportable loans.

*Other*

Numerous community contacts were made during the assessment period by the OCC and other regulatory agencies to better understand the public's perception of SNB's and other bank's performance in the noted AA's. The community contacts were also made to determine credit needs and opportunities in the AA's. A total of 6 community contacts were made during the review period in the AA's that received a full-scope review. The group of contacts included small business development, affordable housing and neighborhood associations. Community contacts most commonly cited the continuing need for small business and affordable housing loans, and financial and credit education programs. Several commentators noted that investment opportunities in Oklahoma were limited. One commentator stated that all the larger banks in the state were "engaged" in identifying potential investment needs and quickly absorbed any opportunities. In aggregate, the comments received were positive concerning the manner in which SNB and other bank's provided needed credit, investment, and services.

## *Fair Lending Review*

An analysis of the most recent public comments, consumer complaint information, HMDA and small loans to businesses and farms data was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed on March 8, 1999 in connection with the CRA examination performed at that time. The bank's recent record of complying with anti-discrimination laws (ECOA, FHA, and HMDA) was rated good.

## ***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 the bank's performance context and the full scope review of certain AA's, the bank's overall lending performance is good in the Payne County AA, adequate in the Oklahoma County AA, and adequate in the Tulsa County AA. CD lending had a positive impact on the overall rating, based on the significant level of CD loans. In particular, the Oklahoma County AA CD activity is excellent.

#### ***Lending Activity***

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

Lending levels reflect a good responsiveness to the credit needs within SNB's AA's. SNB's loan-to-deposit ratio as of December 31, 2001 was 101 percent and has averaged 98 percent over the evaluation period. This ranks as one of the highest loan-to-deposit ratios in the bank's peer group. Based on loans and deposits generated by branch locations, the loan-to-deposit ratio attributable to each of the three full scope AA's are: 179 percent in the Oklahoma County AA, 119 percent in the Tulsa County AA, and 63 percent in the Payne County AA. Additionally, SNB's lending within their combined AA's for home mortgage loans, small business and small farm loans, and community development loans continues to be high with 85 percent of the number of loans originating within the bank's combined AA's.

Commercial lending, including loans to small businesses, continues to be the bank's primary strategic focus. Approximately 60 percent of the dollar amount of gross loans are commercial in nature compared to approximately 12 percent for 1-4 family residential. The bank has concentrated most of their lending resources to the commercial area. Also, since the volume of small farm originations and purchases is not material and not a primary business line, no detailed assessment of small farm lending was performed in this performance evaluation.

#### ***Payne County AA:***

The bank's loan volume in this AA is excellent. At 46.29 percent, SNB ranks 1<sup>st</sup> in deposit market share. SNB's main office is located in Payne County and their lending performance is reflective of their leadership position within this market. SNB is a dominant lender regarding HMDA and small business loan products. The following market rank figures include only FDIC-insured financial institutions. Non-bank financial institutions (e.g. mortgage companies) are excluded. The market share data reflects all lenders.

Loan Type	Number of Loans		Dollar Amount of Loans	
	Market Rank	Market Share	Market Rank	Market Share
Home Purchase	1 <sup>st</sup>	15.47%	1 <sup>st</sup>	18.13%
Home Improvement	2 <sup>nd</sup>	20.00%	1 <sup>st</sup>	42.28%
Home Refinance	3 <sup>rd</sup>	7.93%	3 <sup>rd</sup>	7.99%
Small Business	2 <sup>nd</sup>	13.86%	1 <sup>st</sup>	40.54%

Table based on 2000 HMDA and small business aggregate data.

**Oklahoma County AA:**

Overall, lending in this AA is good given CRA performance context issues. At 2.27 percent, SNB ranks 12<sup>th</sup> in deposit market share. Heavy competition and limited resources hinder the bank’s ability to obtain market share for mortgage products in Oklahoma County. Competition comes from other banks and numerous mortgage companies operating in the area. The following “Market Rank” figures include only FDIC-insured financial institutions. Non-bank financial institutions (e.g. mortgage companies) are excluded. The “Market Share” data reflects all lenders.

Loan Type	Number of Loans		Dollar Amount of Loans	
	Market Rank	Market Share	Market Rank	Market Share
Home Purchase	10th	0.48%	6th	0.96%
Home Improvement	24th	0.30%	17th	0.80%
Home Refinance	12th	0.35%	7th	0.75%
Small Business	7th	2.02%	4th	7.45%

Table based on 2000 HMDA and small business aggregate data.

**Tulsa County AA:**

Lending in this AA is good given the CRA performance context. At 2.93 percent, SNB ranks 7<sup>th</sup> in deposit market share. Heavy competition and limited resources hinder the bank’s ability to obtain market share for mortgage products in Tulsa County. Competition comes from other banks and numerous mortgage companies operating in the area. The following “Market Rank” figures include only FDIC-insured financial institutions. Non-bank financial institutions (e.g. mortgage companies) are excluded. The “Market Share” data reflects all lenders.

Loan Type	Number of Loans		Dollar Amount of Loans	
	Market Rank	Market Share	Market Rank	Market Share
Home Purchase	3rd	1.17%	3rd	1.79%
Home Improvement	21st	0.29%	16th	0.83%
Home Refinance	14th	0.33%	12th	0.44%
Small Business	9th	1.82%	6th	5.87%

Table based on 2000 HMDA and small business aggregate data.

## ***Distribution of Loans by Income Level of the Geography***

The overall distribution of loans by income level of geographies is good.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4 and 5 in *Appendix C* for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

### ***Home Purchase Loans:***

#### ***Payne County AA:***

The bank's geographic distribution of home purchase loans in Payne County is excellent. The bank's percentage of home purchase loans exceeds the percentage of owner occupied housing units in both the low-income and moderate-income census tracts. The bank's market share in both the low-income and moderate-income census tracts significantly exceeds its overall market share in Payne County.

#### ***Oklahoma County AA:***

The bank's geographic distribution of home purchase loans in the Oklahoma County AA is poor. There were no home purchase loans originated in low-income census tracts and the percentage of home purchase loans in moderate-income census tracts is lower than the percentage of owner occupied units. The market share in moderate-income tracts is lower than its overall market share in Oklahoma County. The poor distribution is primarily the result of the bank focusing its limited home mortgage resources in this AA toward upper-income geographies.

#### ***Tulsa County AA:***

The bank's geographic distribution of home purchase loans in the Tulsa County AA is poor. The bank's percentage of home purchase loans is lower than the percentage of owner occupied units in both the low-income and moderate-income census tracts. The bank's market share in both the low-income and moderate-income census tracts is lower than its overall market share in Tulsa County. The poor distribution is primarily the result of the bank focusing its limited home mortgage resources in this AA toward upper-income geographies.

***Home Improvement Loans:***

***Payne County AA:***

The bank's geographic distribution of home improvement loans in Payne County is excellent. The bank's percentage of home improvement loans exceeds the percentage of owner occupied housing units in both the low-income and moderate-income census tracts. The bank's market share is nominal in the low-income census tract and significantly exceeds the overall market share for Payne County in the moderate-income census tract. However, because this is not a significant bank product, the volume of loans required to meet the demographic in both the low-income and moderate-income census tracts is very low and does not provide a significant basis for comparison.

***Oklahoma County AA:***

The bank's geographic distribution of home improvement loans in Oklahoma County AA is poor. In Oklahoma County, there were no home improvement loans originated in low-income census tracts and home improvement loans in moderate-income census tracts are lower than the percentage of owner occupied units. The bank's market share in the moderate-income census tracts is also somewhat lower than its overall market share. However, because this is not a significant bank product, the volume of loans required to meet the demographic in both the low-income and moderate-income census tracts is very low and does not provide a significant basis for comparison.

***Tulsa County AA:***

The bank's geographic distribution of home improvement loans in Tulsa County AA is poor. In Tulsa County, there were no home improvement loans originated in either low-income or moderate-income census tracts. However, because this is not a significant bank product, the volume of loans required to meet the demographic in both the low-income and moderate-income census tracts is very low and does not provide a significant basis for comparison.

***Home Refinance Loans:***

***Payne County AA:***

The bank's geographic distribution of home refinance loans in the Payne County AA is excellent. SNB has not made any home mortgage refinance loans in the one low-income census tract; however, the volume of loans required to meet the demographic in this tract is very low and does not provide a significant basis for comparison. In this instance, the bank would need to make only one home refinance loan to meet the demographics for the low-income census tract. The percentage of home refinance loans in moderate-income census tracts exceeds the percentage of owner occupied units in these tracts. The bank's market share in moderate-income census tracts also significantly exceeds its overall market share.

***Oklahoma County AA:***

The bank's geographic distribution of home refinance loans in Oklahoma County AA is poor. In Oklahoma County, there were no home refinance loans originated in low-income census tracts, however, the volume of loans required to meet the demographics in these tracts is low and does not provide a significant basis for comparison. The percentage of home refinance loans in moderate-income census tracts is lower than the percentage of owner occupied units in these tracts. The bank's market share in moderate-income census tracts is also lower than its overall market share. The poor distribution is primarily the result of the bank focusing its limited home mortgage resources in this AA toward upper-income geographies.

***Tulsa County AA:***

The bank's geographic distribution of home refinance loans in Tulsa County AA is poor. In Tulsa County, there were no home refinance loans originated in low-income census tracts, however, the volume of loans required to meet the demographics in these tracts is low and does not provide a significant basis for comparison. The percentage of home refinance loans in moderate-income census tracts is lower than the percentage of owner occupied units in these tracts. The bank's market share in moderate-income census tracts exceeds its overall market share. The poor distribution is primarily the result of the bank focusing its limited home mortgage resources in this AA toward upper-income geographies.

***Multi-Family Loans:***

Refer to Table 5 in *Appendix C* for facts and data on the geographic distribution of the bank's origination and purchase of multi-family loans. However, no detailed geographic distribution analysis was performed on this data as the volume of loans required to meet the demographics in both the low-income and moderate-income census tracts is very low and does not provide a significant basis for comparison.

***Small Loans to Businesses***

Refer to Table 6 in *Appendix C* for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

***Payne County AA:***

SNB's geographic distribution of small business loans in the Payne County AA is good. The percentage of small business loans is lower than the percentage of businesses in the low-income census tract. The percentage of small business loans exceeds the percentage of businesses in the moderate-income census tract. The bank's market share in low-income tracts is lower than its overall market share. Market share in the moderate-income tract exceeds its overall market share. Performance in the moderate-income census tract outweighs that in the low-income tract as the moderate-income census tract contains more than double the number of businesses as the low-income census tract.

***Oklahoma County AA:***

SNB’s geographic distribution of small business loans in Oklahoma County AA is adequate. The percentage of small business loans exceeds the percentage of businesses in low-income census tracts. The percentage of small business loans in moderate-income tracts is somewhat lower than the percentage of businesses in moderate-income tracts. The bank’s market share in the low-income census tract exceeds its overall market share. The bank’s market share in the moderate-income tracts is somewhat lower than its overall market share. Performance in the moderate-income census tracts outweighs that in the low-income tracts as the moderate-income census tracts contain roughly four times as many businesses compared to the low-income census tracts.

***Tulsa County AA:***

SNB’s geographic distribution of small business loans in Tulsa County AA is good. The percentage of small business loans exceeds the percentage of businesses in low-income census tracts. The percentage of small business loans in moderate-income tracts is near to the percentage of businesses in moderate-income tracts. The bank’s market share in the low-income census tracts exceeds its overall market share. The bank’s market share in the moderate-income tracts exceeds its overall market share. Performance in the moderate-income census tracts outweighs that in the low-income tracts as the moderate-income census tracts contain over seven times as many businesses compared to the low-income census tracts.

***Small Loans to Farms***

Refer to table 7 in *Appendix C* for the facts and data on the geographic distribution of the bank’s origination and purchase of small loans to farms. However, no detailed geographic distribution analysis was performed on this data as the volume of small farm loans is low and does not provide a significant basis for comparison.

***Lending Gap Analysis***

Maps and reports detailing SNB’s lending activity over the evaluation period for home mortgage loans and loans to small businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified. Home mortgage lending patterns in the Oklahoma County AA and Tulsa County AA centered primarily around the location of the mortgage originators. There is one mortgage originator in Oklahoma County and two in Tulsa County.

***Inside/Outside Ratio***

A majority of the home mortgage loans, loans to small businesses and small farms, and community development loans originated or purchased by SNB over the evaluation period were within its AA’s. Approximately 87 percent of the bank’s home mortgage loans, 83 percent of the small business and small farm loans, and 100 percent of CD loans were within the bank’s AA’s. This performance was positively factored into the overall analysis of the geographic distribution of lending.

## ***Distribution of Loans by Income Level of the Borrower***

SNB's overall distribution of loans by income level of the borrowers is adequate when considering all mitigating factors.

### ***Home Mortgage Loans***

Refer to Tables 8, 9, and 10 in *Appendix C* for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loans originations and purchases.

### ***Home Purchase Loans:***

#### ***Payne County AA:***

The bank's distribution of home purchase loans by borrower income levels in the Payne County AA is adequate. The percentage of home loans to low-income borrowers is significantly lower than the percentage of families in the AA and the percentage of home loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA. The bank's market share of home purchase loans to low-income families is lower than the bank's overall market share. The bank's market share of home purchase loans to moderate-income families is near to the bank's overall market share. However, a strong mitigating factor in this AA is the large population of college students. A significant portion of low-income and moderate-income families is made up of married college students who are generally not in the market for home mortgage products. Also, another strong mitigating factor to the distribution of home purchase loans to low-income borrowers is the fact that 24 percent of the households in this AA live below the poverty level of \$10,200 per year. It is very difficult for households below the poverty level to qualify for home purchase loans. Again, it is likely that a large percentage of these households are composed of college students.

#### ***Oklahoma County AA:***

The bank's distribution of home purchase loans by borrower income levels in the Oklahoma County AA is adequate. The percentage of home loans to low-income borrowers is significantly lower than the percentage of families in the AA and the percentage of home loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families in the AA. The bank's market share for home purchase loans to low-income families is nominal. The market share for moderate-income families is near to the bank's overall market share. A mitigating factor to the distribution of home purchase loans to low-income borrowers is the fact that 14 percent of the households in this AA live below the poverty level of \$13,620 per year. It is very difficult for households living below the poverty level to qualify for home purchase loans.

***Tulsa County AA:***

The bank's distribution of home purchase loans by borrower income levels in the Tulsa County AA is adequate. The percentage of home loans to low-income borrowers is significantly lower than the percentage of families in the AA and the percentage of home loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA. The bank's market share in home purchase loans to low-income families exceeds the bank's overall market share. The bank's market share for home loans to moderate-income families is somewhat lower than the bank's overall market share. A mitigating factor to the distribution of home purchase loans to low-income borrowers is the fact that 13 percent of the households in this AA live below the poverty level of \$14,040 per year. It is very difficult for households living below the poverty level to qualify for home purchase loans.

***Home Improvement Loans:***

***Payne County AA:***

The bank's distribution of home improvement loans by borrower income levels in the Payne County AA is adequate. The percentage of home improvement loans to both low-income and moderate-income families is somewhat lower than the percentage of low-income and moderate-income families in the AA, respectively. The bank's market share of home improvement loans to both low-income and moderate-income families exceeds the bank's overall market share. Also, strong mitigating factors exist in this AA as detailed under the home purchase loan section above. Home improvement loans are not a significant product of the bank in this AA.

***Oklahoma County AA:***

The bank's distribution of home improvement loans by borrower income levels in the Oklahoma County AA is adequate. The bank made no home improvement loans to low-income families during the evaluation period. The percentage of home improvement loans to moderate-income families is somewhat lower than the percentage of moderate-income families in the AA. Market share is nominal to moderate-income families. A high poverty level in this AA as described in the home purchase loan section above mitigates some of the distribution numbers to low-income borrowers. Home improvement loans are not a significant product of the bank in this AA.

***Tulsa County AA:***

The bank's distribution of home improvement loans by borrower income levels in the Tulsa County AA is poor. The percentage of home loans to both low-income and moderate-income borrowers is lower than the percentage of families in the AA. Market share is nominal to both low-income and moderate-income families. A high poverty level in this AA as described in the home purchase loan section above mitigates some of the distribution numbers to low-income borrowers. Home improvement loans are not a significant product of the bank in this AA.

***Home Refinance Loans:***

***Payne County AA:***

The bank’s distribution of home refinance loans by borrower income levels in the Payne County AA is adequate. The percentage of home refinance loans to low-income families is significantly lower than the percentage of low-income families in the AA. The percentage of refinance loans to moderate-income families is lower than the percentage of moderate-income families in the AA. The bank’s market share of home refinance loans to both low-income and moderate-income families is lower than the bank’s overall market share. However, strong mitigating factors exist in this AA as detailed under the home purchase loan section above.

***Oklahoma County AA:***

The bank’s distribution of home refinance loans by borrower income levels in the Oklahoma County AA is poor. The percentage of home refinance loans to low-income families is significantly lower than the percentage of low-income families in the AA. The percentage of refinance loans to moderate-income families is also significantly lower than the percentage of moderate-income families in the AA. The bank’s market share of home refinance loans to both low-income and moderate-income families is lower than the bank’s overall market share. A high poverty level in this AA as described in the home purchase loan section above mitigates some of the distribution numbers to low-income borrowers.

***Tulsa County AA:***

The bank’s distribution of home refinance loans by borrower income levels in the Tulsa County AA is adequate. The percentage of home refinance loans to low-income families is significantly lower than the percentage of families in the AA. The percentage of home refinance loans to moderate-income families is lower than the percentage of families in the AA. The bank’s market share of home refinance loans to low-income families exceeds its overall market share. The bank’s market share to moderate-income families is nominal and lower than its overall market share. A high poverty level in this AA as described in the home purchase loan section above mitigates some of the distribution numbers to low-income borrowers.

***Small Loans to Businesses***

Refer to Table 11 in *Appendix C* for the facts and data used to evaluate the borrower distribution of the bank’s origination/purchase of small loans to businesses.

***Payne County AA:***

The bank’s loan distribution to small businesses in the Payne County AA is adequate. The percentage of bank loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of businesses with revenues of \$1 million or less. However, the bank’s market share to businesses with revenues of \$1 million or less exceeds its overall market share.

***Oklahoma County AA:***

The bank's loan distribution to small businesses in the Oklahoma County AA is adequate. The percentage of bank loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of businesses with revenues of \$1 million or less. However, the bank's market share to businesses with revenues of \$1 million or less exceeds its overall market share.

***Tulsa County AA:***

The bank's loan distribution to small businesses in the Tulsa County AA is adequate. The percentage of bank loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of businesses with revenues of \$1 million or less. However, the bank's market share to businesses with revenues of \$1 million or less exceeds its overall market share.

***Small Loans to Farms***

Refer to Table 12 in *Appendix C* for the facts and data reflecting the borrower distribution of the bank's origination and purchase of small loans to farms. However, no detailed borrower distribution analysis was performed on this data as the bank's volume of small farm loans is low and does not provide a significant basis for comparison.

***Community Development Lending***

Refer to Table 1 Lending Volume in *Appendix C* for the facts and data used to evaluate the bank's level of community development (CD) lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on the aggregate of all multi-family loans, including those that also qualify as CD loans.

SNB's community development lending performance has a positive effect on the lending test rating. The bank's level of community development lending in the Payne County AA is good. All 14 qualifying loans totaling \$990,000 were for affordable housing, an identified need in this AA. CD lending in the Oklahoma County AA is excellent with \$14,024,000 in qualifying loans. Of this amount, \$10,710,000 was for revitalization in the Oklahoma City Empowerment Zone, and \$3,314,000 was for affordable housing projects. CD Lending in the Tulsa County AA is good with \$3,336,000 in loans for economic development and affordable housing. The following are examples of SNB's CD Lending activity:

*An Industrial and Redevelopment Authority.* This entity established a trust to acquire and rehabilitate distressed properties for sale to LMI families. SNB made a \$100,000 loan to move and extensively remodel two houses that will be sold as "affordable homes" in Stillwater, Oklahoma. Under this program, closing costs are waived for qualified LMI borrowers.

*A Construction Company.* SNB made 13 loans totaling \$890,000 to a local company for the construction of 13 single-family homes under the City of Stillwater Affordable Housing Program, which deals exclusively with LMI clients in Payne County.

*Bricktown Area.* This area is included in the MAPS (Metropolitan Area Projects) plan, which was passed by voters to renovate and improve Downtown Oklahoma City, Oklahoma. This plan is also pursuant to the designation of the area as an Empowerment Zone by the U.S. Department of Housing and Urban Development. The Bricktown area is the central piece of a private development effort, which is being done in conjunction with the MAPS project, and incorporated into the Empowerment Zone strategy. SNB has funded four loans in the Bricktown area totaling \$10,710,000 for the rehabilitation of existing buildings.

*A small business investment company (SBIC).* A SBIC based in Tulsa County was formed April 10, 2000 and licensed by the U.S. Small Business Administration (SBA) on May 23, 2000. A \$2,000,000 loan from SNB promotes economic development by helping the SBIC cover short-term funding needs between the time loans to small businesses are to be funded and the time draw requests from the SBA are received.

### ***Product Innovation and Flexibility***

The bank did not report any major innovative or flexible loan products.

### ***Conclusions for Areas Receiving Limited-Scope Reviews***

Based on limited-scope reviews, the bank's performance under the lending test in the Grady County AA is not inconsistent with the bank's overall "High Satisfactory" performance under the lending test. Refer to Tables 1 through 12 in *Appendix C* for the facts and data that support these conclusions.

## ***INVESTMENT TEST***

### ***Conclusions for Areas Receiving Full-Scope Reviews***

The bank's performance under the Investment Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Payne County, Oklahoma County, and Tulsa County AA's is good. Total qualified investments are: \$541 thousand in the Payne County AA, \$257 thousand in the Oklahoma County AA, and \$317 thousand in the Tulsa County AA.

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

SNB made a significant equity investment in the Oklahoma MetaFund Community Development Corporation (CDC) in the evaluation period. This CDC's goals address many of the AA's stated needs. These include economic development in underserved areas, community services for low- and moderate-income persons and geographies, development and rehabilitation of affordable housing, and job creation and self-employment opportunities. It has already combined the resources of 20 Oklahoma banks and more than 60 nonprofit or government groups toward addressing these goals. SNB's investment is the largest of any investor in relation to its capital and assets. The investment is allocated to the bank's AA's by deposit share until the CDC develops a longer historical record. In addition, SNB received a Bank Enterprise Award of \$140,000 from the U.S. Treasury Department's Community Development Financial Institutions (CDFI) Fund as a result of this investment. This relatively large investment by SNB is also significant in view of the limited number of community development investment opportunities for banks in the state.

SNB has also made numerous grants and donations to qualifying community development organizations. A total of 53 grants were given in the Payne County AA, 22 in the Oklahoma County AA, and 29 in the Tulsa County AA. These organizations primarily provide community services to both low-income and moderate-income persons. Examples include The Oklahoma Children's Health Foundation, Rural Enterprises of Oklahoma, Habitat for Humanity, Big Brothers/Big Sisters of Stillwater, and The City Rescue Mission.

### ***Conclusions for Area Receiving Limited-Scope Reviews***

Based on a limited-scope review, the bank's performance under the Investment Test in the Grady County AA is not inconsistent with the bank's overall "High Satisfactory" performance under the Investment Test.

## ***SERVICE TEST***

### ***Conclusions for Areas Receiving Full-Scope Reviews***

The bank's performance under the Service Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Payne County AA is excellent, and in the Oklahoma County and Tulsa County AA's is adequate.

#### ***Retail Banking Services***

Under the Service Test, we focused on branch locations, the availability and effectiveness of alternative delivery systems; reasonableness of business hours and services in meeting the needs of the assessment areas; and level of community development services. Our evaluation of branch locations noted that relatively few offices exist in each AA. Refer to Table 15 in *Appendix C* for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closing.

SNB's branch distribution is good. In the Payne County, Oklahoma County and Tulsa County AA's, there are no branches in low-income census tracts. However, these low-income CTs contain only a small proportion of the overall populations in these AA's at 7.9 percent, 5.6 percent and 5.6 percent, respectively. In the Payne County AA, the branch distribution in moderate-income geographies is excellent as it significantly exceeds the population distribution in moderate-income geographies. In the OKC and Tulsa County AA's, there are no branches in moderate-income geographies. However, the three branches in these two AA's are reasonably accessible to nearby moderate-income geographies. More weight is given to the distribution of branches in the Payne County AA as most deposits are generated in this AA, and throughout the moderate-income geographies since a much larger share of the population lives in these geographies. No branches were opened, closed, or moved during this evaluation period.

Banking hours and services offered throughout the AA's are good and provide accessibility to banking products and services. Lobby and drive-through hours for Monday through Saturday are generally the same at all branches. Extended hours on Saturday are provided at all drive-through facilities. There were no differences noted between banking hours in branches serving either low-income or moderate-income areas and those in middle- and upper-income areas.

SNB's alternative delivery systems have an overall positive impact on the accessibility of bank products and services. The bank's network of 24 ATM locations are augmented by 53 ATM's of its subsidiary, Cash Source, Inc. to improve overall accessibility of bank products and services, especially to customers in both low-income and moderate-income geographies. The distribution of ATM's in both low-income and moderate-income geographies exceeds the population distribution in these tracts in each of the three full-scope AA's. Overall, there are 8 ATM's (10 percent) in low-income areas and 26 ATM's (34 percent) in moderate-income areas.

Another positive alternative delivery system is the bank's three business development offices. One is on the Oklahoma State University (OSU) campus, a moderate-income area in Payne County. A second is on the OSU campus in a moderate-income tract surrounded by low- and moderate-income tracts in north Tulsa, Tulsa County. The third is on the Oklahoma University Medical School campus in Oklahoma County, which is adjacent to moderate-income tracts. While not branches, each office is staffed with personnel to help in completing applications for loan and deposit accounts. Each office also has terminals for any existing customers to access and transact business in their accounts.

Other alternative delivery systems include ExpressLine 24, an automated 24-hour telephone banking product, the Sale and Service Center, a toll-free full-service telephone center which has extended business hours Monday-Friday and on Saturday, and Direct Banker, and internet banking product available to consumers and small business subscribers. We could not place significant weight on these alternative delivery systems when drawing our CRA performance conclusions because no data on how they benefit LMI geographies or individuals was available.

### ***Community Development Services***

The number of CD services that ultimately benefit LMI individuals in the Payne County AA is excellent. Bank personnel are very active in providing their financial expertise mainly to organizations whose primary purpose is to provide affordable housing or community services for both low-income and moderate-income persons. Employees have also helped to develop loan program guidelines for nonprofit affordable housing groups. The number of CD services that ultimately benefit LMI individuals in the Oklahoma County and Tulsa County AA's are adequate. Performance in these two AA's has primarily been for organizations whose primary purpose is to provide community services or economic development assistance.

Note the following examples of CD services:

*Oklahoma MetaFund CDC.* This CDC funds start-up businesses, community development services and affordable housing projects. The bank's chief financial officer serves on the Board of Directors and contributes financial expertise. The bank's CRA Officer serves on the MetaFund's CRA advisory committee.

*Payne County Youth Service Board.* This organization provides alternative housing for battered and homeless youth who have little to no sources of income. A bank officer serves a Chairman of the Finance Committee and provides technical guidance on budgeting, fund allocation and investments.

*Stillwater Partners for Affordable Housing.* This nonprofit organization provides affordable housing assistance to LMI families of Stillwater, Oklahoma. An officer helped establish lending guidelines for LMI clients and helped to establish an affordable housing loan program.

*Edwin Fair Community Health Centers.* This nonprofit organization provides housing and medical services for low-income, disabled persons in Payne County, Oklahoma. A bank officer served as Chairman of the Board and as the Chairman of the Finance Committee. In these capacities, he led the effort to win two large awards from the U.S. Department of Housing and Urban Development (HUD) for multi-family housing for low-income disabled persons. The awards were for \$1,248,800 and \$695,590. He also helped the organization complete the applications for these awards.

### ***Conclusions for Areas Receiving Limited-Scope Reviews***

Based on a limited-scope review, the bank's performance under the Service Test in the Grady County AA is not inconsistent with the bank's performance under the Service Test. Refer to Table 15 in *Appendix C* for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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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 non-metropolitan 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 01/01/99 to 12/31/01 Investment, Service Tests and CD Loans: 03/08/99 to 05/06/02	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Stillwater National Bank and Trust Company (SNB) Stillwater, OK	Home purchase loans, home improvement loans, home refinance loans, small business loans, community development (CD) loans, CD investments, and CD services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Southwest Bancorp, Inc	100% Owner of the bank	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Oklahoma County Payne County Tulsa County Grady County	Full Scope Full Scope Full Scope Limited Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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### Market Profiles for Areas Receiving Full-Scope Reviews

Payne County AA .....	B-2
Oklahoma County AA .....	B-4
Tulsa County AA .....	B-6

## Payne County AA

Demographic Information for Full Scope Area: Payne County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	14	7.14	7.14	28.57	57.14	0.00
Population by Geography	61,507	7.90	6.32	26.12	59.66	0.00
Owner-Occupied Housing by Geography	13,001	0.30	2.16	33.54	64.00	0.00
Business by Geography	2,695	5.53	12.21	35.55	46.72	0.00
Farms by Geography	126	1.59	0.00	37.30	61.11	0.00
Family Distribution by Income Level	14,454	17.89	14.97	17.37	49.77	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	4,750	8.21	5.14	42.15	44.51	0.00
Median Family Income (2000 Census data) HUD Adjusted Median Family Income for 2001 Households Below Poverty Level	29,805 34,000 24.08%	Median Housing Value Unemployment Rate (March 2002 State of Oklahoma)		51,673 1.60%		

(\*) The NA category consists of geographies that have not been assigned an income classification. Source: 1990 US Census unless otherwise noted.

Payne County (Stillwater) is located between the Oklahoma City and Tulsa MSAs. Payne County is the home of Oklahoma State University, the state's second largest public university. SNB has two full-service centers, which include the main office and a "Convenience Banking Center", both of which are located in the heart of the city of Stillwater. The main office is located in a middle-income census tract while the Convenience Banking Center is located in a moderate-income census tract. SNB also operates a business development office on the campus of Oklahoma State University (OSU). This location is an information and business development center and does not solicit deposits, nor provide full-service banking. Alternative delivery systems include 10 proprietary full-service ATM locations and 7 non-proprietary cash dispensing machines spread throughout the Stillwater city limits.

The only low-income census tract located in the assessment area surrounds the Oklahoma State University (OSU) campus to the north and east. This is primarily student housing. The only moderate-income census tract in the assessment area is located in the middle of the city and is comprised largely of commercial buildings and residential housing.

Based on 2000 U.S. Census data, total population of the assessment area is 68,190. The median family income for the assessment area is \$29,805. This compares to the statewide non-MSA HUD updated 2001 median family income at \$34,000.

The Payne County Assessment area accounts for approximately 46 percent of SNB's total deposits and 36 percent of total reported loans during this evaluation period. As of December 31, 2001, a majority of the loan portfolio was real estate related.

The unemployment rate of Payne County reported as of March 31, 2002 is 1.6 percent. Areas of economic strength from 1999 through 2001 included new and expanded job growth in technology-based businesses. Meridian Technology Center has taken a leadership role in economic development by providing a business innovation facility (an incubation program) to encourage the development of new companies. Major employers include: Oklahoma State University, Mercury Marine, Stillwater Public Schools, and Stillwater Medical Center. The credit needs of the Stillwater area include financing for start-up businesses, small business loans, and affordable housing and improvement loans. Due to the predominately middle- and upper-income residents and college students, those needing affordable housing are in a fairly limited market. The level of households below the poverty level located in both low-income and moderate-income geographies are 49 percent and 50 percent, respectively.

Non-farm businesses represent 96 percent (2,695) of total businesses in the assessment area. The overwhelming majority of these businesses are small, with 88 percent reporting sales of less than \$1 million.

Community contacts conducted during this evaluation, as well as a review of peer bank CRA Public Evaluations and community contacts conducted by other regulators, indicated that community development opportunities are limited in this assessment area. Two community contacts were conducted during the examination. The contacts included two affordable housing organizations. The identified needs were for affordable housing, especially in southeast Stillwater. The contacts indicated the involvement of area bank's has been excellent.

## Oklahoma County AA

Demographic Information for Full Scope Area: Oklahoma County AA						
Demographic Characteristics		Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	221	9.50	26.70	39.82	22.17	1.81
Population by Geography	599,611	5.63	26.14	42.27	25.85	0.11
Owner-Occupied Housing by Geography	145,847	3.60	22.19	44.82	29.39	0.00
Business by Geography	31,794	6.82	25.49	38.58	25.75	3.37
Farms by Geography	594	4.04	18.01	41.75	35.52	0.67
Family Distribution by Income Level	161,080	21.03	18.27	22.10	38.60	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	63,304	9.94	35.98	42.20	11.88	0.00
Median Family Income (2000 Census data) HUD Adjusted Median Family Income for 2001 Households Below Poverty Level	33,428 45,400 13.89%	Median Housing Value Unemployment Rate (March 2002 State of Oklahoma)		55,156 4.30%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 US Census unless otherwise indicated

The Oklahoma County Assessment Area is part of the Oklahoma City MSA. SNB has one full-service branch located in Oklahoma City. The branch is located in an upper-income census tract. Alternative delivery systems include 24 proprietary automated teller machines (ATMs). SNB also operates several cash dispensing ATMs through a subsidiary, Cash Source, Inc.

Based on 2000 U.S. Census data, total population of the assessment area is 660,448. The median family income for the assessment area is \$33,428. This compares to the HUD updated annual median family income for the MSA at \$45,400.

This assessment area accounts for a large percentage of the deposits and loans allocated to the Central Oklahoma Division. The division represents approximately 21 percent of SNB's total deposits and 32 percent of total reported loans. In terms of market share, SNB holds approximately 2.27 percent of total bank deposits in the AA. As of December 31, 2001, the majority of the loans from this assessment area are real estate related.

The economic conditions in Oklahoma County are stable and the outlook remains good in the short run, as the rebound in the energy industry will continue to help the region by boosting employment and income growth. As of March 31, 2002 unemployment was 4.3 percent. The retail, government, and service sectors account for the majority of the employers in the AA. The leading employers include the State of Oklahoma, Tinker Air Force Base, Oklahoma Health Center, INTEGRIS Health Center, Oklahoma City Public Schools, and Lucent Technologies. With the recent increase in oil and gas production, the energy sector is rebounding, which will feed through to the service and retail industries, to help not only the local businesses, but the public as well.

Non-farm businesses represent 98 percent (31,794) of total businesses in the assessment area. The majority of these businesses are small, with 87 percent reporting revenues of less than \$1 million.

Mortgage lending competition is fierce, with competitors including community and regional banks, mortgage companies, and anti-poverty organizations. Also affecting lending opportunities is the level of households below the poverty level located in both low-income and moderate-income geographies of 44 percent and 21 percent, respectively. The limitation of disposable income for families living below the poverty level negatively affects their ability to qualify for home ownership.

We reviewed two community contacts during the examination for the Oklahoma County AA. Organizations contacted included a business development organization and affordable housing organization. These contacts noted that there are several opportunities to participate in community service activities, but opportunities are more limited for community development lending and investments. Contacts indicated that local banks are interested and active in seeking community development opportunities. Several contacts indicated affordable housing and rehabilitation of declining areas continue to be the primary needs of the AA.

## Tulsa County AA

Demographic Information for Full Scope Area: Tulsa County AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	158	6.96	24.68	39.24	27.85	1.27
Population by Geography	503,341	5.63	21.02	44.35	29.00	0.00
Owner-Occupied Housing by Geography	123,047	3.51	18.78	45.37	32.34	0.00
Business by Geography	26,939	3.09	23.23	42.97	30.70	0.00
Farms by Geography	530	1.89	17.55	50.75	29.81	0.00
Family Distribution by Income Level	136,842	19.57	17.10	21.43	41.90	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	50,181	9.69	32.67	44.58	13.06	0.00
Median Family Income (2000 Census data) HUD Adjusted Median Family Income for 2001 Households Below Poverty Level	32,578 46,800 12.81%	Median Housing Value Unemployment Rate (March 2002 State of Oklahoma)	65,220 4.30%			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 US Census unless otherwise noted

The Tulsa County AA is part of the Tulsa MSA. SNB has 2 full-service branches located in the city of Tulsa. One is located in a middle-income census tract, while the other is located in an upper-income census tract. Alternative delivery systems include 24 proprietary ATMs located throughout the Tulsa assessment area. SNB also operates 5 cash dispensing ATMs through their subsidiary Cash Source, Inc.

Based on 2000 U.S. Census data, total population of the assessment area is 563,299. The median family income for the assessment area is \$36,156. This compares to the updated median family income for the MSA of \$46,800.

The assessment area accounts for approximately 28 percent of SNB's total deposits and 31 percent of total reported loans during this evaluation period. SNB holds approximately 2.93 percent of the market share of total bank deposits in Tulsa County. As of December 31, 2001, the majority of the loans from this assessment area are real estate related.

The Tulsa economy has been stable. As of March 31, 2002 Tulsa County reported a unemployment rate of 4.3 percent. Job growth has been accelerating in the recent months driven by strong performance in the service-producing industries and construction. Major employers include American Airlines, Tulsa Public Schools, St. John Medical Center, St. Francis Hospital, Hillcrest Medical Center, and Williams Companies.

Non-farm businesses represent 98 percent (26,939) of total businesses in the assessment area. The majority of these businesses are small, with 83 percent reporting sales of less than \$1 million.

Competition is very strong in the assessment area especially for mortgage related products. Mortgage lending competition consists of community and regional banks, mortgage companies, credit unions, and anti-poverty organizations. Also affecting lending opportunities is the of households below the poverty level located in both low-income and moderate-income geographies of 39 percent and 21 percent, respectively. New housing construction and residential home sales are up from 2000. Tulsa has, in the past, experienced an abundance of housing at all price ranges, including affordable housing. However, there has been a trend the last few years of increasing housing costs and decreasing affordable housing inventory.

We reviewed two community contacts during the examination for the Tulsa County AA. The contacts included an urban development organization and a community development center. The primary need identified was for revitalization of the north Tulsa area, where most of the low and moderate-income tracts are located. Affordable housing, small business loans, and technical assistance for individuals attempting to start a small business were also mentioned as needs for the north Tulsa area. A review of peer bank CRA Public Evaluations and community contacts by other regulators in the assessment area indicates there are a number of opportunities to participate in community development lending, investment and service activities. Contacts reviewed indicated participation from area financial institutions has been good.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to *Appendix A: Scope of the Examination*). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

- Table 13. Geographic Distribution and Borrower Distribution of Consumer Loans (Optional)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.
- Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1. Lending Volume**

LENDING VOLUME												Geography: STILLWATER, OK	
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001													
MA/Assessment Area (2001):	% of Rated Area Loans (#) in MA/AA'	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)		
<b>Full Review:</b>													
Payne County AA	35.65	955	83,418	717	75,963	36	1,129	14	990	1,722	161,500	45.91	
Oklahoma County AA	32.34	604	94,125	952	142,119	0	0	6	14,024	1,562	250,268	20.79	
Tulsa County AA	30.91	710	104,386	771	113,338	10	2,681	2	3,336	1,493	223,741	28.36	
<b>Limited Review:</b>													
Grady County AA	1.10	37	2,920	13	429	3	123	0	0	53	3,472	4.94	

\* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is From March 08, 1999 to May 06, 2002.

\*\*\* Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE												Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001																
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Payne County AA	526	39.67	0.30	0.57	2.16	5.89	33.54	6.84	64.00	86.69	15.47	66.67	31.82	9.06	16.78	
Oklahoma County AA	321	24.21	3.60	0.00	22.19	7.48	44.82	13.08	29.39	79.13	0.48	0.00	0.25	0.28	0.75	
Tulsa County AA	462	34.84	3.51	0.22	18.78	3.25	45.37	24.24	32.34	71.86	1.17	0.00	0.70	0.58	1.98	
<b>Limited Review:</b>																
Grady County AA	17	1.28	3.57	5.88	2.25	5.88	53.74	47.06	40.44	41.18	0.50	0.00	0.00	0.84	0.30	

\* Based on 2000 Peer Mortgage Data: Southwest Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT												Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001																
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Payne County AA	77	55.00	0.30	1.30	2.16	6.49	33.54	3.90	64.00	88.31	20.00	0.00	60.00	0.00	26.76	
Oklahoma County AA	36	25.71	3.60	0.00	22.19	8.33	44.82	13.89	29.39	77.78	0.30	0.00	0.19	0.00	0.75	
Tulsa County AA	22	15.71	3.51	0.00	18.78	0.00	45.37	45.45	32.34	54.55	0.29	0.00	0.00	0.38	0.31	
<b>Limited Review:</b>																
Grady County AA	5	3.57	3.57	0.00	2.25	0.00	53.74	60.00	40.44	40.00	0.75	0.00	0.00	1.52	0.00	

\* Based on 2000 Peer Mortgage Data: Southwest Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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

Geographic Distribution: HOME MORTGAGE REFINANCE											Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total	% Owner Occ Units	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Payne County AA	341	41.94	0.30	0.00	2.16	3.23	33.54	6.74	64.00	90.03	7.93	0.00	20.00	1.49	10.05
Oklahoma County AA	236	29.03	3.60	0.00	22.19	7.20	44.82	17.80	29.39	75.00	0.35	0.00	0.12	0.10	0.85
Tulsa County AA	221	27.18	3.51	0.00	18.78	7.69	45.37	20.81	32.34	71.49	0.33	0.00	0.47	0.17	0.47
<b>Limited Review:</b>															
Grady County AA	15	1.85	3.57	0.00	2.25	0.00	53.74	53.33	40.44	46.67	0.24	0.00	0.00	0.00	0.47

\* Based on 2000 Peer Mortgage Data: Southwest Region.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY												Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001																
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total	% of MF Units**	% BANK Loans	% MF Units** *	% BANK Loans	% MF Units** *	% BANK Loans	% MF Units** *	% BANK Loans	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Payne County AA	11	40.74	12.55	0.00	17.34	27.27	9.57	0.00	60.55	72.73	15.38	0.00	33.33	0.00	11.11	
Oklahoma County AA	11	40.74	5.58	0.00	32.00	18.18	41.85	45.45	20.57	36.36	1.01	0.00	0.00	2.86	0.00	
Tulsa County AA	5	18.52	8.47	0.00	23.98	40.00	42.09	40.00	25.45	20.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Grady County AA	0	0.00	16.04	0.00	6.22	0.00	32.08	0.00	45.66	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2000 Peer Mortgage Data: Southwest Region.  
 \*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.  
 \*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES											Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Payne County AA	717	29.23	5.53	0.84	12.21	16.74	35.55	17.85	46.72	64.57	13.86	5.56	22.86	9.09	16.04
Oklahoma County AA	952	38.81	6.82	7.56	25.49	15.34	38.58	33.82	25.75	41.49	2.02	2.35	1.69	1.80	2.74
Tulsa County AA	771	31.43	3.09	4.28	23.23	20.10	42.97	35.41	30.70	40.21	1.82	3.08	2.27	1.39	2.09
<b>Limited Review:</b>															
Grady County AA	13	0.53	4.86	23.08	2.73	0.00	58.08	53.85	34.33	23.08	0.96	25.00	0.00	0.56	1.09

\* Based on 2000 Peer Small Business Data: US&PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2001).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS												Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001																
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total	% of Farms***	% BANK Loans	% of Farms* *	% BANK Loans	% of Farms* *	% BANK Loans	% of Farms* *	% BANK Loans	Over all	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Payne County AA	36	73.47	1.59	5.56	0.00	0.00	37.30	30.56	61.11	63.89	4.76	0.00	0.00	0.00	6.12	
Oklahoma County AA	0	0.00	4.04	0.00	18.01	0.00	41.75	0.00	35.52	0.00	0.00	0.00	0.00	0.00	0.00	
Tulsa County AA	10	20.41	1.89	0.00	17.55	0.00	50.75	90.00	29.81	10.00	1.33	0.00	0.00	2.08	0.00	
<b>Limited Review:</b>																
Grady County AA	3	6.12	1.01	0.00	0.51	0.00	54.04	0.00	44.44	100.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2000 Peer Small Business Data: US&PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2001).

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

Borrower Distribution: HOME PURCHASE											Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total	% Families	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Payne County AA	526	39.67	17.89	2.24	14.97	8.13	17.37	15.24	49.77	74.39	18.00	7.50	14.41	11.76	21.48
Oklahoma County AA	321	24.21	21.03	1.44	18.27	12.59	22.10	9.35	38.60	76.62	0.56	0.00	0.30	0.16	1.09
Tulsa County AA	462	34.84	19.57	3.70	17.10	7.61	21.43	13.70	41.90	75.00	1.47	1.88	0.62	0.69	2.18
<b>Limited Review:</b>															
Grady County AA	17	1.28	20.03	6.67	15.73	6.67	19.48	6.67	44.76	80.00	0.57	0.00	0.00	0.00	1.09

\* Based on 2000 Peer Mortgage Data: Southwest Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 6.11% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT											Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans**	% Families***	% BANK Loans**	% Families***	% BANK Loans**	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Payne County AA	77	55.00	17.89	10.29	14.97	8.82	17.37	16.18	49.77	64.71	17.76	30.00	33.33	11.11	14.93
Oklahoma County AA	36	25.71	21.03	0.00	18.27	11.76	22.10	2.94	38.60	85.29	0.28	0.00	0.00	0.13	0.57
Tulsa County AA	22	15.71	19.57	4.55	17.10	4.55	21.43	18.18	41.90	72.73	0.31	0.00	0.00	0.39	0.44
<b>Limited Review:</b>															
Grady County AA	5	3.57	20.03	0.00	15.73	0.00	19.48	40.00	44.76	60.00	0.78	0.00	0.00	4.76	0.00

\* Based on 2000 Peer Mortgage Data: Southwest Region.

\*\* As a percentage of loans with borrower income information available. No information was available for 7.86% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE											Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>**</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Payne County AA	341	41.94	17.89	2.11	14.97	6.65	17.37	9.37	49.77	81.87	8.94	0.0 <sub>0</sub>	4.00	5.43	11.4 <sub>0</sub>
Oklahoma County AA	236	29.03	21.03	1.30	18.27	4.76	22.10	9.09	38.60	84.85	0.43	0.1 <sub>3</sub>	0.15	0.13	0.85
Tulsa County AA	221	27.18	19.57	2.76	17.10	9.22	21.43	11.98	41.90	76.04	0.31	0.4 <sub>8</sub>	0.00	0.09	0.54
<b>Limited Review:</b>															
Grady County AA	15	1.85	20.03	0.00	15.73	0.00	19.48	0.00	44.76	100.00	0.28	0.00	0.00	0.00	0.56

<sup>\*</sup> Based on 2000 Peer Mortgage Data: Southwest Region.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 2.46% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total	% of Businesses	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Payne County AA	717	29.23	88.16	71.41	75.73	13.67	10.60	13.86	21.36
Oklahoma County AA	952	38.81	86.70	72.58	62.71	20.27	17.02	2.02	3.66
Tulsa County AA	771	31.43	83.20	68.09	66.15	16.73	17.12	1.82	3.06
<b>Limited Review:</b>									
Grady County AA	13	0.53	88.27	92.31	100.00	0.00	0.00	0.96	2.23

\* Based on 2000 Peer Small Business Data: US&PR.

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2001).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 8.56% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS					Geography: STILLWATER, OK				
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Payne County AA	36	73.47	95.24	75.00	94.44	2.78	2.78	4.76	2.56
Oklahoma County AA	0	0.00	89.39	0.00	0.00	0.00	0.00	0.00	0.00
Tulsa County AA	10	20.41	91.13	80.00	20.00	10.00	70.00	1.33	1.75
<b>Limited Review:</b>									
Grady County AA	3	6.12	96.46	66.67	100.00	0.00	0.00	0.00	0.00

\* Based on 2000 Peer Small Business Data: US&PR.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2001).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 24.49% of small loans to farms originated and purchased by the bank.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)**

Geographic and Borrower Distribution: CONSUMER LOANS										Geography: STILLWATER, OK								
Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001																		
	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	
MA/Assessment Area:	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
Not Applicable																		

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: STILLWATER, OK							
Evaluation Period: MARCH 8, 1999 TO MAY 6, 2002									
MS/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Payne County AA	0	0	54	541	54	541	46.48	0	0
Oklahoma County AA	0	0	23	257	23	257	22.08	0	0
Tulsa County AA	0	0	30	317	30	317	27.23	0	0
<b>Limited Review:</b>									
Grady County AA	0	0	4	49	4	49	4.21	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.  
 \*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS														Geography: STILLWATER, OK			
Evaluation Period: MARCH 8, 1999 TO MAY 6, 2002																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Payne County AA	45.91	2	33	0.00	50.0 0	50.0 0	0.00	0	0	0	0	0	0	7.90	6.32	26.1 2	59.6 6
Oklahoma County AA	20.79	1	17	0.00	0.00	0.00	100. 00	0	0	0	0	0	0	5.63	26.1 4	42.2 7	25.8 5
Tulsa County AA	28.36	2	33	0.00	0.00	50.0 0	50.0 0	0	0	0	0	0	0	5.63	21.0 2	44.3 5	29.0 0
<b>Limited Review:</b>																	
Grady County AA	4.94	1	17	0.00	0.00	100. 00	0.00	0	0	0	0	0	0	3.71	2.63	53.9 0	39.7 6

