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Comptroller of the Currency Administrator of National Banks

Washington, DC 20219

# **Public Disclosure**

December 31, 2003

# Community Reinvestment Act Performance Evaluation

Home National Bank Charter Number: 13891

126 S. Summit Arkansas City, KS 74631

Office of the Comptroller of the Currency C. Scott Schainost, ADC 3450 North Rock Road Suite 505 Wichita, KS 67226

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 **Home National Bank** with respect to the Lending, Investment, and Service Tests:

|                           | Home National Bank<br>Performance Tests |                 |              |  |  |  |  |
|---------------------------|-----------------------------------------|-----------------|--------------|--|--|--|--|
| Performance Levels        | Lending Test*                           | Investment Test | Service Test |  |  |  |  |
| Outstanding               |                                         |                 |              |  |  |  |  |
| High Satisfactory         |                                         | Х               |              |  |  |  |  |
| Low Satisfactory          | Х                                       |                 | Х            |  |  |  |  |
| 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:

- Home National demonstrated adequate responsiveness to community credit needs. The overall geographic distribution of loans by income level of the geography is adequate. The bank's distribution of loans to borrowers of different income levels and businesses of different sizes is adequate.
- Home National showed a good responsiveness to community development investment needs. Investments included community services for low- and moderate-income individuals (LMI), and affordable housing.
- Home National's branch offices are reasonably accessible to all geographies and residents. The bank's office hours are reasonable and services offered do not vary by location. The bank provides an adequate level of 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**

Home National Bank (Home National) is a \$763 million interstate financial institution headquartered in Blackwell, Oklahoma. The bank is a wholly owned subsidiary of HNB Corporation, a \$792 million, one bank holding company located in Arkansas City, Kansas. Home National has five branches and seven ATMs in the state of Kansas, eight branches and nine ATMs in Oklahoma, and three branches and three ATMs in the state of Arizona.

Home National has two assessment areas (AAs) in Kansas, three in Oklahoma, and one in Arizona. The Arkansas City, Kansas AA includes all of Cowley County and the Garden City, Kansas AA includes all of Finney County. The Blackwell, Oklahoma AA includes all of Noble, Kay, and Payne counties. The Bartlesville, Oklahoma AA includes all of Washington County and the Shidler, Oklahoma AA includes portions of Osage County. In May 2003, Home National bought branches in Shidler and Bartlesville Oklahoma and established the Bartlesville and Shidler AAs. We did not review the Bartlesville and Shidler AAs as they only had seven months of performance. The bank's Arizona AA is comprised of 34 census tracts in Maricopa County. We did not review the Arizona AA as it had only nine months of performance. Further details of the bank's AAs are discussed later in this evaluation.

Home National is a full-service banking institution offering a full range of commercial, real estate, and consumer credit products. Net loans and leases represent 71% of the bank's total assets. On September 30, 2003, the bank's \$540 million loan portfolio consisted of 68% real estate, 16% commercial loans, 10% agriculture loans, 4% consumer loans, and 1% municipal loans, and 1% other. On September 30, 2003, Tier One Capital totaled \$67 million. The bank's primary focus during the evaluation period was real estate and commercial loans.

Home National Bank in Scottsdale, Arizona merged into Home National Bank, Blackwell, Oklahoma on March 16, 2002. Home National purchased two branches in Shidler and Bartlesville, Oklahoma since the last CRA examination.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA. The Office of the Comptroller of the Currency last evaluated Home National's CRA performance on January 10, 2000. The bank received an overall rating of "Satisfactory" under the Small Bank Performance Standards.

Refer to Appendix C: Market Profiles for Full-Scope Areas, to review the demographic data for the bank's AAs.

## Scope of the Evaluation

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

The evaluation of lending products included small business, small farm, home purchase, home refinance, home improvement, and community development loans. The evaluation period for the Lending Test was from January 1, 2001, to December 31, 2002. The bank began reporting small business and small farm loans in 2001 when it became subject to large bank data collection and reporting requirements. Since the bank is not a HMDA reporter, we selected a sample of 20 home purchase loans, 20 home mortgage refinance loans, and 20 home improvement loans in each full scope AA. We did not pull a mortgage sample in the limited scope AA since mortgage lending was not a primary product in that market. The evaluation period for community development loans was January 11, 2000, to December 31, 2003.

The Investment Test included a review of investments, grants, and donations made within the AAs 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 AAs. The evaluation period for community development investments and services was from January 11, 2000 to December 31, 2003.

### **Data Integrity**

The bank reported data is considered accurate. We selected a statistical sample of 120 small business/small farm loans originated during 2001 and 2002 to test the accuracy of data reported by the bank. We verified community development loans, investments, and services during the CRA examination to ensure they met the definition of community development.

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

In each state where the bank has an office, a sample of assessment areas (AAs) within that state was selected for full-scope reviews. Refer to the "Scope" section under each State Rating for details regarding how the areas were selected.

## Ratings

The bank's overall rating is a blend of the state ratings. Performance in the state of Oklahoma received more weight in the overall rating as this area accounts for 41% of the deposits, 52% of the loan originations, and 50% of the offices.

The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each state rating for details regarding how the areas were weighted in arriving at the overall state rating.

# Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

## **State Rating**

## State of Kansas

### CRA Rating for Kansas:

The lending test is rated: Low Satisfactory The investment test is rated: Low Satisfactory The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Home National demonstrated adequate responsiveness to community credit needs. Business lending activity is good as the bank had a first place market share. The bank's distribution of loans to borrowers of different income levels and businesses of different sizes is adequate.
- Home National showed adequate responsiveness to community development needs in the state of Kansas by providing \$53 thousand in qualified investments and donations.
- Home National provides an adequate level of community development services. The bank's branch offices are reasonably accessible to all geographies and individuals. The bank's office hours are reasonable and services offered do not vary by location.

## **Description of Institution's Operations in Kansas**

Home National operates five branches and seven ATMs within two AAs in the state of Kansas. The two AAs include all of Cowley County and Finney County. Home National ranked 1<sup>st</sup> in deposit market share in Cowley County with 38% of the deposits. The bank with the next largest deposit market share has captured 23% of deposits. Home National ranked 5<sup>th</sup> in deposit market share in Finney County with 8% of the deposits. The bank's primary competition in Cowley County is CornerBank, N.A., State Bank, and Union State Bank. Primary competition in Finney County is Bank of America, N.A., Western State Bank, and Commerce Bank, N.A.

Refer to the market profiles for the state of Kansas in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## Scope of Evaluation in Kansas

We performed a full-scope evaluation of the Arkansas City AA. This area comprises 41% of Home National's total deposits. In addition, 80% of Home National's Kansas branches and 86% of Kansas ATMs are located in the Arkansas City AA. We performed a limited-scope review of the Garden City AA. We did not identify any significant variances in the bank's performance in the limited-scope AA to warrant expanding our review in these areas. Ratings are based primarily on the area receiving a full-scope review.

We gave more weight to small business lending performance as it is the bank's primary product line and represents 65% of the bank's total reported loan originations during this evaluation period in the full-scope review area.

Refer to Appendix A for more information regarding the scope of the examination.

We contacted one executive at the Arkansas City Chamber of Commerce and one executive in the Arkansas City City Manager's office. The contacts indicated small business loans and affordable housing were the primary credit needs of the community. The contacts indicated area financial institutions are cooperative in meeting the credit needs of the community and provide strong financial leadership.

## LENDING TEST

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

The bank's performance under the lending test in Kansas is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Arkansas City AA is adequate.

## Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect good responsiveness in relation to area credit needs and the bank's deposit market share. Home National ranked 1<sup>st</sup> in the AA with a deposit market share of 38%. Home National ranked 1<sup>st</sup> in Small Business Lending in 2002 with approximately 51% of the small business loan market. The bank also ranked first in Small Farm Lending in 2002 with approximately 84% of the market. No market share information is available on mortgage lending since the bank is not a HMDA reporter. The bank's loan-to-deposit ratio over the evaluation period reflects good levels of lending when compared to peer banks. The bank's average loan to deposit ratio since the last CRA examination represented 88% compared to the average loan-to-deposit ratio of 20 peer banks at 72%. For peer banks, we chose institutions with the majority of their deposits in the AA.

During the evaluation period, the bank originated 431 small loans to businesses totaling \$23,234 thousand and 406 small loans to farms totaling \$12,707 thousand.

## Distribution of Loans by Income Level of the Geography

The analysis of the distribution of loans by income level of the geography is not meaningful since the AA does not have any LMI census tracts.

### Lending Gap Analysis

Our geographic distribution analysis included a review for any unexplained lending gaps in the Arkansas City AA. Home National achieved penetration in all census tracts. There are no LMI census tracts in the AA.

### Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside analysis at the bank level. A majority of the bank's loans, 75% were originated to borrowers within the AA. By loan type, 78% of small business loans, 67% of small farm loans, 90% of home purchases, 95% of home mortgage refinance loans, and 95% of home improvement loans were originated in the AAs. We viewed this as a positive characteristic in our assessment of lending.

## Distribution of Loans by Income Level of the Borrower

#### Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home National's distribution of home mortgage loans to borrowers of different income levels is good.

The bank's distribution of loans to low-income borrowers for home purchase loans compares favorably to demographics. This represents excellent performance when considering that nine percent of the families in the AA have incomes below the poverty level. Individuals at the poverty level would find it difficult to qualify for home loans. While the bank's distribution of home purchase loans to moderate-income borrowers is significantly below demographics, this is considered adequate performance. A significant barrier exists which prohibits the bank from extending home purchase loans in a large section of the AA where LMI borrowers reside. A large flood plain exists in the east and south sections of the AA. Eighty percent of the families in the flood plain are LMI. Currently, a dike system is being constructed which will eventually alleviate the flood plain.

The bank's distribution of loans to LMI for home improvement loans exceeds demographics and is considered excellent performance.

While the bank's distribution of LMI for home mortgage refinance loans is significantly below demographics, this is considered to be adequate performance. A significant barrier exists which prohibits the bank from extending home mortgage refinance loans in a large section of the AA where LMI borrowers reside. A large flood plain exists in the east and south sections of the AA. Eighty percent of the families in the flood plain are LMI. Currently, a dike system is being constructed which will eventually alleviate the flood plain.

### Small Loans to Businesses

Refer to Table 11 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is adequate. The percentage of loans to small businesses is below the percentage of small businesses in the AA. While the percentage is below demographics, the bank did not collect income information on 46% of loans to small businesses. The bank's practice was to document income not known, if the income information was older than two years old. During the examination, bank personnel performed a sample of 54 small business and small farm loans to code the income information correctly. Eighty-five percent of the loan sample had revenues less than \$1 million.

## Small Loans to Farms

Refer to Table 12 in the state of Kansas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of loans to farms of different sizes is adequate. The percentage of loans to small farms is below the percentage of farms in the AA. While the percentage is below demographics, the bank did not collect income information on 44% of loans made to small farms. The bank's practice was to document income not known, if the income information was older than two years old. During the examination, bank personnel performed a sample of 54 small business and small farm loans to code the income information correctly. Eighty-five percent of the loan sample had revenues less than \$1 million.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's level of community development 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 all multi-family loans,

including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending had a neutral impact on the Lending Test. During the evaluation period, Home National originated one community development loan in the AA totaling \$600 thousand to a business that provides affordable housing to LMI individuals.

Home National extended an additional \$430 thousand to the same entity mentioned above to construct 24 housing units for LMI individuals. These units are outside the AA, but were to an organization that covers the state of Kansas, which includes the bank's AAs.

## Product Innovation and Flexibility

Bank management indicated it does not have any 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 Garden City AA is not inconsistent with the bank's overall satisfactory performance under the lending test in Kansas

Refer to the Tables 1 through 13 in the state of Kansas section of appendix D 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 in Kansas is rated "Low Satisfactory".

Refer to Table 14 in the state of Kansas section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Home National showed adequate responsiveness to moderate community needs in the Arkansas City AA. The bank made donations totaling \$53 thousand during the evaluation period. The programs assisted by the donations provide food, shelter, counseling services, and other benefits to LMI. The bank also had an additional \$1,600 thousand in prior period investments. The bank had an investment balance of \$450 thousand for an industrial revenue bond. This bond was used for the construction of an industrial park that attracted small businesses to the area. The bank also had continuing investments of \$1,150 thousand for qualifying school bonds. The school bonds were used for construction, renovation, and operating costs for schools that provide education, counseling, and food with more than half of the students identified as LMI.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Garden City AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the investment test in Kansas.

## SERVICE TEST

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

The bank's performance under the service test in Kansas is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Arkansas City AA is adequate.

## **Retail Banking Services**

Refer to Table 15 in the state of Kansas section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings

The demographics indicate 100% of the AA population resides in the middle- and upper-income census tracts, as there are no low- or moderate-income census tracts in the Arkansas City AA.

Home National's delivery systems are reasonably accessible to all geographies and individuals of different income levels in the Arkansas City AA. The bank has four branch locations and six ATMs in the full-scope AA. Only one of the six ATMs does not accept deposits. Three of the branches with ATMs are located within the middle-income census tracts. One branch/ATM is located in an upper-income census tract. The two stand-alone ATM's are located one each in a middle- and upper-income tract.

Two of the four branches in the Arkansas City AA offer extended banking hours on Friday afternoon and Saturday morning. One of the drive-up facilities does not offer services on Saturday, but does offer extended hours on Friday. The main downtown office location does not offer any extended hours. All branches offer substantially the same products and services.

The bank has not opened or closed any branches or ATMs in the Arkansas City AA since the prior CRA examination; therefore, delivery systems have not been impacted in any of the census tracts.

Other delivery services for the Arkansas City AA include automated twenty-four hour telephone banking, internet banking, and bank by mail. The AA's largest minority population is Hispanic, and the bank has provided Spanish language training to employees at locations with significant Hispanic populations. We did not place any

significant weight on these alternative delivery systems, as there was no information available to show whether these services are effective in reaching LMI.

## **Community Development Services**

Home National's performance in providing community development services in the Arkansas City AA is adequate. Home National supported approximately seven community service organizations that have varying mission statements. The bank's involvement in these community organizations has helped promote community development. The following are examples that demonstrate how bank associates used their financial expertise to assist these organizations.

- Bank officers participated in a city sponsored revitalization program by serving on the planning committee. The bank has pledged funds for no-fee loans to low- and moderate-income individuals; however, no funds have been disbursed as of the Performance Evaluation date.
- Bank officers provided credit counseling and home loan application training to lowand moderate-income workers relocating to the city for employment. The bank provided a bi-lingual, Spanish speaking employee for translation.
- Branch President served on the Board of Directors for an organization that provides counseling and shelter to low- and moderate-income women and children who need protection from abusive relationships.
- Bank officers served on the Boards and committees of various nationally recognized organizations that provide goods and services to low- and moderate-income individuals and families.

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

Based on limited-scope reviews, the bank's performance under the service test in the Garden City AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the service test in Kansas. Refer to Table 15 in the state of Kansas section of appendix D for the facts and data that support these conclusions.

## State Rating

## State of Oklahoma

CRA Rating for Oklahoma: The lending test is rated: Low Satisfactory The investment test is rated: High Satisfactory The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Home National demonstrated adequate responsiveness to community credit needs. The geographic distribution of loans by income level of the geography is adequate. The bank's distribution of loans to borrowers of different income levels and businesses of different sizes is adequate.
- Home National showed good responsiveness to community development investment needs in Oklahoma, providing \$291 thousand in qualified investments and donations.
- Home National provides an adequate level of community development services. The bank's branch offices are reasonably accessible to all geographies and individuals. The bank's office hours are reasonable and services offered do not vary by location.

## **Description of Institution's Operations in Oklahoma**

Home National operates eight branches and nine ATMs in the state of Oklahoma. The Oklahoma AA includes all of Kay, Noble, and Payne Counties. Home National ranked 2nd in deposit market share in these counties with 12% of the deposits. Stillwater National Bank and Trust ranked 1<sup>st</sup> in deposit market share with 33% of the deposits. The bank's primary competition is Stillwater National Bank, BancFirst, and Pioneer Bank and Trust.

Refer to the market profiles for the state of Oklahoma in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

## Scope of Evaluation in Oklahoma

Home National has three AAs in the state of Oklahoma. We performed a full-scope evaluation of the Blackwell AA. We did not review the Bartlesville and Shidler AAs since the branches had only been in operation for seven months.

We gave more weight to small business lending performance as it is the bank's primary product line and represents 83% of the bank's total reported loan originations during this evaluation period.

Refer to Appendix A for more information regarding the scope of the evaluation.

During this evaluation, we contacted one executive from each of the following: the City of Stillwater, the Chamber of Commerce, and a charity housing organization. The contacts indicated affordable housing and small business loans were the primary credit needs of the community. The consensus is that area financial institutions are meeting the credit needs of the community.

## LENDING TEST

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

The bank's performance under the lending test in Oklahoma is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Blackwell AA is adequate.

## Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the state of Oklahoma section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending levels reflect adequate responsiveness in relation to area credit needs and the bank's deposit market share. Home National ranked 2nd in the AA with a deposit market share of 12%. Home National ranked 7th in Small Business Lending in 2002 with approximately 4% of the small business loan market. The bank also ranked 6th in Small Farm Lending in 2002 with approximately 1% of the market. No market share information is available on mortgage lending since the bank is not a HMDA reporter. The bank's loan-to-deposit ratio over the evaluation period reflects good levels of lending when compared to peer banks. The bank's average loan to deposit ratio since the last CRA examination represented 88% compared to the average loan-to-deposit ratio of 20 peer banks at 72%. For peer banks, we chose institutions with the majority of their deposits in the AA.

During the evaluation period, the bank originated 601 small loans to businesses totaling \$46,504 thousand and 180 small loans to farms totaling \$9,614 thousand.

## Distribution of Loans by Income Level of the Geography

#### Home Mortgage Loans

Refer to tables 2, 3, 4 and 5 in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

Home National's geographic distribution of home mortgage loans in the Blackwell AA is good. While the bank's geographic distribution of home purchase, home improvement, and home mortgage refinance loans to low-income geographies in the Blackwell AA are below demographics, it is considered adequate performance. Oklahoma State University makes up approximately ninety-eight percent of the low-income geography. Rental units account for ninety-three percent of total housing in the low-income census tract. The high number of rental units in the geography precludes the bank from having a significant opportunity to make home mortgage loans in the census tract. Fifty-six percent of the families in the low-income census tract are low-income families and forty-nine percent of those families live below the poverty level, which suggests that a significant number of the families living in this tract would find it difficult to qualify for mortgage loans.

The percentage of home purchase, home improvement, and home mortgage refinance loans in the moderate-income geography all exceed the demographics of the area and exhibit excellent performance. Our sample did not include any multifamily home loans.

#### Small Loans to Businesses

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

The geographic distribution of small loans to businesses located in LMI geographies is adequate. Oklahoma State University comprises the majority of the low- income census tract and there are few opportunities for business lending. A lot of the new businesses locating in Stillwater are part of National and Regional corporations and/or franchises that do not look for financing locally. There are also seven other institutions with offices in the census tract, which compete for the loans to small businesses.

#### **Small Loans to Farms**

Refer to table 7 in appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The bank's geographic distribution of small farm loans is adequate. The bank's lending in low-income tracts is comparable to the geographic distribution of small farms in the tracts. Geographic data for 2002 indicate the low-income tracts have a very small

population of four farms with sales of under \$1 million. There are no small farms in the moderate-income tracts.

#### Lending Gap Analysis

Our geographic distribution analysis included a review for any unexplained lending gaps in the Blackwell AA. Home National achieved penetration in both the low and moderate-income tracts.

#### Inside/Outside Ratio

For the geographic distribution analysis under the Lending Test, we performed an inside/outside analysis at the bank level. A majority of the bank's loans, 75% were originated to borrowers within the AA. By loan type, 78% of small business loans, 67% of small farm loans, 90% of home purchases, 95% of home mortgage refinance loans and 95% of home improvement loans were originated in the AAs. We viewed this as a positive characteristic in our assessment of lending.

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

#### Home Mortgage Loans

Refer to Tables 8, 9 and 10 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home National's distribution of home mortgage loans by income level of the borrower in the Blackwell AA is adequate.

The bank's distribution of loans to low-income borrowers for home purchase, home refinance, and home improvement loans is good considering that eleven percent of the families in the AA have incomes below the poverty level, which presents a significant barrier to home ownership. The distribution of home purchase loans to moderate-income borrowers substantially exceeds demographics and is considered excellent performance. The distribution of home improvement loans to moderate-income borrowers is slightly less than demographics and is considered adequate performance. The distribution of home mortgage refinance to moderate-income borrowers is slightly less than demographics and exhibits poor performance. Bank management could not explain their poor performance in this area considering its excellent performance with home purchase loans.

#### Small Loans to Businesses

Refer to Table 11 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to businesses of different sizes is adequate. The percentage of loans to small businesses is below the percentage of small businesses in the AA. While the percentage is below demographics, the bank did not collect income information on 46% of loans to small businesses. The bank's practice was to document income not known, if the income information was older than two years old. During the examination, bank personnel performed a sample of 54 small business and small farm loans to code the income information correctly. Eighty-five percent of the loan sample had revenues less than \$1 million.

#### Small Loans to Farms

Refer to Table 12 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of loans to farms of different sizes is adequate. The percentage of loans to small farms is below the percentage of farms in the AA. While the percentage is below demographics, the bank did not collect income information on 44% of loans made to small farms. The bank's practice was to document income not known, if the income information was older than two years old. During the examination, bank personnel performed a sample of 54 small business and small farm loans to code the income information correctly. Eighty-five percent of the loan sample had revenues less than \$1 million.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Oklahoma section of appendix D for the facts and data used to evaluate the bank's level of community development 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 all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending had a neutral impact on the Lending Test. During the evaluation period, Home National originated one community development loan totaling \$175 thousand to a not-for-profit organization that provides affordable housing to LMI individuals.

Home National extended an additional \$6,109 thousand in ten loans to construct affordable housing units for LMI individuals. These units are outside the AA, but were to an organization that covers the state of Oklahoma, which includes the bank's AAs.

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

Bank management indicated it does not have any innovative or flexible loan products

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Oklahoma is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Blackwell AA is good.

Refer to Table 14 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Home National showed good responsiveness to community development investment needs in the Blackwell AA. The bank's qualified investments during the evaluation period totaled \$291 thousand. The bank made a \$250 thousand investment in a CRA Qualified Investment Fund. This fund was initiated nationwide in June 1999 and is a complex, innovative concept that allows geographical areas with a limited supply of qualified investments to purchase shares in a CRA-dedicated mutual fund. The fund allows banks to specify direct underlying securities located in its AA. The bank donated funds totaling \$41 thousand to 35 area agencies that provide food, shelter, and other services to LMI.

The bank also had \$800 thousand invested in qualifying school bonds that were originated prior to this evaluation period, but are still outstanding. The school bonds were used for construction, renovation, and operating costs for schools that provide education, counseling, and food with more than half of the students identified as LMI.

## SERVICE TEST

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

The bank's performance under the service test in Oklahoma is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Blackwell AA is adequate.

## **Retail Banking Services**

Refer to Table 15 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Home National's delivery systems are reasonably accessible to all geographies and individuals of different income levels in the Blackwell AA. The bank has six branch locations (including the main office) and seven ATMs in the full-scope AA. Only one of the seven ATMs does not accept deposits. Three of the branches, one with an ATM, are located in the middle-income census tracts, two branches, one with an ATM, are located in an upper-income census tract, and one branch/ATM is located in a moderate-income census tract. The four remaining stand-alone ATMs are located as follows: two in upper-income, one in middle-income, and one in moderate-income census tracts.

The ATM located in the moderate-income census tract is near the low-income census tract, with easy access available. The demographics indicate 6.7% of the population resides in the lower- and moderate-income census tracts in the Blackwell AA.

Three of the six branches in the Blackwell AA offer extended banking hours on Friday afternoon and Saturday morning. One of these branches is located in a moderate-income census tract. For the remaining three locations, one branch offers extended hours on Friday, but no Saturday hours, one downtown branch has normal weekday business hours, and one branch is located in a retirement facility and offers service two days a week. All branches offer substantially the same products and services.

The bank has not opened or closed any branches or ATMs in the Blackwell AA since the prior CRA examination; therefore, delivery systems have not been impacted in any of the census tracts.

Other delivery services for the Blackwell AA include automated twenty-four hour telephone banking, Internet banking, and bank by mail. We did not place any significant weight on these alternative delivery systems, as there was no information available to show whether these services are effective in reaching LMI.

### **Community Development Services**

Home National's performance in providing community development services in the Blackwell AA is adequate. Home National supported approximately six community service organizations that have varying mission statements. The bank's involvement in these community organizations has helped promote community development. The following are examples that demonstrate how bank associates used their financial expertise to assist these organizations.

- Bank officers, in partnership with the city and the Economic Development Advisory Board, hosted an open house to screen low- and moderate-income individuals for an affordable housing program that would result in debt free ownership after five years of occupancy.
- A senior officer participates on the Board and finance committee for an organization that provides goods and services to low- and moderate-income families, and homeless persons.
- A branch president serves on the Board and finance committee for an organization that provides home improvements for low- and moderate-income homeowners.
- Bank officers serve on the Boards and committees of various nationally recognized organizations that provide goods and services to low- and moderate-income individuals and families.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and 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").

| Time Period Reviewed                                                                        | s CD loans): 01/01/01 to 12/31/02<br>e Tests and<br>o 12/31/03 |                                                                                                                  |
|---------------------------------------------------------------------------------------------|----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| Financial Institution                                                                       |                                                                | Products Reviewed                                                                                                |
| (Home National Bank<br>Blackwell, Oklahoma                                                  |                                                                | Small Business, Small Farm, RE<br>purchase, refinancings and home<br>improvement loans, Qualified<br>Investments |
| Affiliate(s)                                                                                | Affiliate<br>Relationship                                      | Products Reviewed                                                                                                |
| [Instructions: Provide only if<br>affiliate products are<br>reviewed.]                      |                                                                |                                                                                                                  |
| N/A                                                                                         | N/A                                                            | N/A                                                                                                              |
| List of Assessment Areas and Ty                                                             | pe of Examination                                              |                                                                                                                  |
| Assessment Area                                                                             | Type of Exam                                                   | Other Information                                                                                                |
| State of Kansas<br>Arkansas City AA<br>Garden City AA<br>State of Oklahoma<br>Ponca City AA | Full-scope<br>Limited-scope<br>Full-scope                      |                                                                                                                  |

# Appendix B: Summary of State Ratings

|                    | RATINGS BANK NAME       |                           |                        |                         |  |  |  |  |  |  |
|--------------------|-------------------------|---------------------------|------------------------|-------------------------|--|--|--|--|--|--|
| Overall Bank:      | Lending Test<br>Rating* | Investment Test<br>Rating | Service Test<br>Rating | Overall State<br>Rating |  |  |  |  |  |  |
| Home National Bank | Low Satisfactory        | High Satisfactory         | Low Satisfactory       | Satisfactory            |  |  |  |  |  |  |
| State:             |                         |                           | •                      |                         |  |  |  |  |  |  |
| State of Kansas    | Low Satisfactory        | Low Satisfactory          | Low Satisfactory       | Satisfactory            |  |  |  |  |  |  |
| State of Oklahoma  | Low Satisfactory        | High Satisfactory         | Low Satisfactory       | Satisfactory            |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |
|                    |                         |                           |                        |                         |  |  |  |  |  |  |

(\*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

# Appendix C: Market Profiles for Full-Scope Areas

## Table of Contents

## Market Profiles for Areas Receiving Full-Scope Reviews

| ARKANSAS CITY, KANSAS ASSESSMENT AREA | C-2 |
|---------------------------------------|-----|
| BLACKWELL , OKLAHOMA ASSESSMENT AREA  | C-4 |

#### State of Kansas

### Arkansas City AA

| Demographic Information for Full Scope Area: Arkansas City AA                |                  |                   |                     |                  |                 |               |  |  |  |  |
|------------------------------------------------------------------------------|------------------|-------------------|---------------------|------------------|-----------------|---------------|--|--|--|--|
| Demographic Characteristics                                                  | #                | Low<br>% of #     | Moderate<br>% of #  | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |  |  |  |
| Geographies (Census Tracts/BNAs)                                             | 11               | 0.00              | 0.00                | 72.73            | 27.27           | 0.00          |  |  |  |  |
| Population by Geography                                                      | 36,915           | 0.00              | 0.00                | 73.81            | 26.19           | 0.00          |  |  |  |  |
| Owner-Occupied Housing by Geography                                          | 10,002           | 0.00              | 0.00                | 71.60            | 28.40           | 0.00          |  |  |  |  |
| Business by Geography                                                        | 1,982            | 0.00              | 0.00                | 75.28            | 24.72           | 0.00          |  |  |  |  |
| Farms by Geography                                                           | 205              | 0.00              | 0.00                | 73.66            | 26.34           | 0.00          |  |  |  |  |
| Family Distribution by Income Level                                          | 10,077           | 15.56             | 17.30               | 22.85            | 44.29           | 0.00          |  |  |  |  |
| Distribution of Low and Moderate Income Families throughout AA Geographies   | 3,311            | 0.00              | 0.00                | 78.86            | 21.14           | 0.00          |  |  |  |  |
| Median Family Income                                                         |                  | 28,067            | Median Housing Valu | Ie               | 37,117          |               |  |  |  |  |
| HUD Adjusted Median Family Income for 2002<br>Households Below Poverty Level | 44,200<br>11.59% | Unemployment Rate | (Nov. 2003)         | 5.30%            |                 |               |  |  |  |  |

(\*) The NA category consists of geographies that have not been assigned an income classification. Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Arkansas City AA consists of Cowley County, a non-metropolitan area located in southern Kansas. The delineation of the AA does not reflect any illegal discrimination, nor does it arbitrarily exclude any low- or moderate-income geographies. The AA had a 1990 census population of 36,915. The AA has 11 census tracts, which are designated 0% low- and moderate-income, 73% middle-income, and 27% upper-income. Twenty-nine percent of the AA's population is not in the work force and 17 percent are over the age of 65. Sixteen percent of the households in the AA are retired and 11 percent of the households in the AA have income below poverty level. The weighted average of Non-MA updated Kansas median family income for 2002 is \$44,200. The median housing value from the 1990 census data is \$37,117. One-to-four family units represent 86% of the total housing units, rental units account for 30% of the housing, and 10% are mobile homes.

Home National has four bank offices and six ATMs in the AA (See **Service Test** for details). Home National has the largest deposit market share of all the banks in the AA with 38% of all deposits. Within the AA, there are eight FDIC insured financial institutions with 19 offices. The bank with the next largest deposit market share has 23% of the deposits. Home National's primary competition is CornerBank, NA, State Bank, and Union State Bank. The bank's primary business focus during the evaluation period was real estate and commercial loans.

The Arkansas City AA is comprised of seven major cities, with Arkansas City and Winfield being the two largest cities and approximately 11 miles apart. The economies are closely related as the major road that connects them contains a business corridor with ongoing development. The area contains diverse industries including rail, agriculture, and manufacturing. Aircraft plants in nearby Wichita provide additional employment. Major employers are the aircraft industry, General Electric, the public school districts, two colleges, and the South Central Regional Medical Center. The November 2003 unemployment rate was 5.3%, slightly higher than the November 2003 Kansas unemployment rate at 4.8%.

During this evaluation, we contacted one executive at the Arkansas City Chamber of Commerce and one executive in the Arkansas City City Manager's office. The contacts indicated small business loans and affordable housing were the primary credit needs of the community. The contacts indicated area financial institutions are cooperative in meeting the credit needs of the community and provide strong financial leadership.

### State of Oklahoma

### Blackwell AA

|                                                                              |                  | Low                 | Moderate | Middle | Unnor           | NA*    |
|------------------------------------------------------------------------------|------------------|---------------------|----------|--------|-----------------|--------|
| Demographic Characteristics                                                  | #                | % of #              | % of #   | % of # | Upper<br>% of # | % of # |
| Geographies (Census Tracts/BNAs)                                             | 30               | 3.33                | 3.33     | 43.34  | 50.00           | 0.00   |
| Population by Geography                                                      | 120,608          | 4.03                | 3.22     | 39.81  | 52.94           | 0.00   |
| Owner-Occupied Housing by Geography                                          | 30,084           | 0.13                | 0.93     | 44.56  | 54.38           | 0.00   |
| Business by Geography                                                        | 6,636            | 2.76                | 5.95     | 45.60  | 45.69           | 0.00   |
| Farms by Geography                                                           | 421              | 0.95                | 0.00     | 62.23  | 36.82           | 0.00   |
| Family Distribution by Income Level                                          | 31,061           | 16.15               | 14.46    | 18.40  | 50.99           | 0.00   |
| Distribution of Low and Moderate Income Families throughout AA Geographies   | 9,506            | 4.10                | 2.57     | 55.51  | 37.82           | 0.00   |
| Median Family Income                                                         | 24,139           | Median Housing Valu | e        | 46,581 |                 |        |
| HUD Adjusted Median Family Income for 2002<br>Households Below Poverty Level | 34,200<br>19.27% | Unemployment Rate   |          |        |                 |        |

(\*) The NA category consists of geographies that have not been assigned an income classification. Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The Blackwell AA consists of Kay, Noble, and Payne Counties, located in north central Oklahoma. The delineation of the AA does not reflect any illegal discrimination, nor does it arbitrarily exclude any low- or moderate-income geographies.

The AA had a 1990 census population of 120,608. The AA has 30 census tracts, which are designated 3% low-income, 3% moderate-income, 43% middle-income, and 50% upper-income. Thirty-one percent of the AA's population is not in the work force and 14% are over the age of 65. Twelve percent of the households in the AA are retired and 19% of the households in the AA have income below poverty level. The weighted average of Non-MA updated Oklahoma median family income for 2002 is \$34,200. The median housing value from the 1990 census data is \$46,581. One-to-four family units represent 79% of the total housing units, rental units account for 36% of the housing, and 9% are mobile homes.

Home National has six bank offices and seven ATMs in the AA (See **Service Test** for details). Home National has the second largest deposit market share of all the banks in the AA with 12% of all deposits. Within the AA, there are 23 FDIC insured financial institutions with 49 offices. The bank with the largest deposit market share is Stillwater National Bank and Trust with 33% of the deposits. Other primary competitors are BancFirst and Pioneer Bank and Trust. The bank's primary business focus during the evaluation period was real estate and commercial loans.

The Blackwell AA is comprised of six major cities. Kay County cities are Ponca City, Blackwell, and Tonkawa. Perry is the only major city in Noble County. Payne County has two major cities, Stillwater, home of Oklahoma State University, and Cushing. The area economy has a concentration in the petroleum industry, but construction, metal fabrication, meat processing, medical and agriculture offer some diversity. Major employers include the Ponca City School District, Oklahoma State University, Via Christi Regional Medical Center, Air Systems Components, and IBP.

The November 2003 unemployment rate was 6.3% in Kay County, 3.7% in Noble County, and 2.4% in Payne County. The November 2003 Oklahoma unemployment rate was 5.1%.

During this evaluation, we contacted one executive from each of the following; the City of Stillwater, the Chamber of Commerce, a charity housing organization. The contacts indicated affordable housing and small business loans were the primary credit needs of the community. The consensus is that area financial institutions are meeting the credit needs of the community.

# Appendix D: Tables of Performance Data

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|-------------------|

| CONTENT OF STANDARDIZED TABLES | D-2 |
|--------------------------------|-----|
|--------------------------------|-----|

## **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of 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. Deposit data are complied by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table 1.Lending Volume Presents the number and dollar amount of reportable loans<br/>originated and purchased by the bank over the evaluation period by<br/>MA/assessment area. Community development loans to statewide or regional<br/>entities or made outside the bank's assessment area may receive positive CRA<br/>consideration. Refer to Interagency Q&As \_\_.12(i) 5 and 6 for guidance on<br/>when a bank may receive positive CRA consideration for such loans. When<br/>such loans exist, insert a line item with the appropriate caption, such as<br/>"Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area<br/>column and record the corresponding numbers and amounts in the "Community<br/>Development Loans" column.
- **Table 1.Other Products** Presents the number and dollar amount of any unreported<br/>category of loans originated and purchased by the bank, if applicable, over the<br/>evaluation period by MA/assessment area. Examples include consumer loans<br/>or other data that a bank may provide, at its option, concerning its lending<br/>performance. This is a two-page table that lists specific categories.
- Table 2.Geographic Distribution of Home Purchase Loans Compares the<br/>percentage distribution of the number of loans originated and purchased by the<br/>bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of owner-occupied housing units throughout those<br/>geographies. The table also presents market share information based on the<br/>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 Table2.
- Table 5.Geographic Distribution of Multifamily Loans- Compares the percentage<br/>distribution of the number of multifamily loans originated and purchased by the<br/>bank in low-, moderate-, middle-, and upper-income geographies to the<br/>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<br/>distribution of the number of loans originated and purchased by the bank to<br/>low-, moderate-, middle-, and upper-income borrowers to the percentage<br/>distribution of families by income level in each MA/assessment area. The table<br/>also presents market share information based on the most recent aggregate<br/>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<br/>distribution of the number of small loans (less than or equal to \$500,000)<br/>originated and purchased by the bank to farms with revenues of \$1 million or<br/>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 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 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 -<br/>Compares the percentage distribution of the number of the bank's branches in<br/>low-, moderate-, middle-, and upper-income geographies to the percentage of<br/>the population within each geography in each MA/AA. The table also presents<br/>data on branch openings and closings in each MA/AA.

## **Table 1. Lending Volume**

| LENDING VOLUME                   |                                 |    |                                       | Geography: HOME NATIONAL BANK |                                  |     |                         | Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002 |                 |     |           |                         |
|----------------------------------|---------------------------------|----|---------------------------------------|-------------------------------|----------------------------------|-----|-------------------------|---------------------------------------------------------|-----------------|-----|-----------|-------------------------|
|                                  | % of Home Mortgage****<br>Rated |    | Small Loans to Small Loans to Farms [ |                               | Community<br>Development Loans** |     | Total Reported<br>Loans |                                                         | % of Rated Area |     |           |                         |
| MA/Assessment Area:              | Area<br>Loans (#)<br>in MA/AA*  | #  | \$ (000's)                            | #                             | \$ (000's)                       | #   | \$ (000's)              | #                                                       | \$ (000's)      | #   | \$(000's) | Deposits in<br>MA/AA*** |
| State of Oklahoma                |                                 |    |                                       |                               |                                  |     |                         |                                                         |                 |     |           |                         |
| Full Scope:<br>Blackwell AA      | 100.00                          | 60 | 2,973                                 | 601                           | 46,504                           | 180 | 9,614                   | 1                                                       | 175             | 781 | 56,118    | 100.00                  |
| State of Kansas                  |                                 |    |                                       |                               | •                                |     |                         |                                                         | •               |     |           |                         |
| Full Scope:<br>Arkansas City AA  | 83.62                           | 60 | 3,346                                 | 431                           | 23,234                           | 406 | 12,707                  | 1                                                       | 600             | 837 | 35,941    | 84.35                   |
| Limited Scope:<br>Garden City AA | 16.38                           | NP | NP                                    | 91                            | 8,703                            | 73  | 6,255                   | 0                                                       | 0               | 164 | 14,958    | 15.65                   |

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Community Development Loans is From January 11, 2000 to December 31, 2003.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

<sup>\*\*\*\*</sup>Number and dollar amont represent a sample selected from the bank's Home Mortgage Loans.

#### **Table 1. Other Products**

| LENDING VOLUME                   |                                 |    |                        | Ge | ography: HOME                | NAT | ONAL BA         | NK | Evaluatio         | on Pe | riod: JANI    | JARY 1 | , 2001 TO DE | CEMBER 31, 2002   |
|----------------------------------|---------------------------------|----|------------------------|----|------------------------------|-----|-----------------|----|-------------------|-------|---------------|--------|--------------|-------------------|
|                                  | % of Rated Area<br>Loans (#) in |    | al Optional<br>.oans** |    | Business Real<br>e Secured** | -   | Home<br>quity** |    | Motor<br>ehicle** | Crea  | lit Card**    |        | er Secured   | % of Rated Area   |
| MA/Assessment<br>Area :          | MA/AA*                          | #  | \$ (000's)             | #  | \$ (000's)                   | #   | \$<br>(000's)   | #  | \$<br>(000's)     | #     | \$<br>(000's) | #      | \$(000's)    | Deposits in AA*** |
| State of Oklahoma                |                                 |    |                        |    |                              |     |                 |    | • • •             |       |               |        | • • •        | •                 |
| Full Scope:<br>Blackwell AA      | NA                              | NA | NA                     | NA | NA                           | NA  | NA              | NA | NA                | NA    | NA            | NA     | NA           | 100.00            |
| State of Kansas                  | •                               |    |                        |    |                              | •   |                 |    |                   |       |               |        |              |                   |
| Full Scope:<br>Arkansas City AA  | NA                              | NA | NA                     | NA | NA                           | NA  | NA              | NA | NA                | NA    | NA            | NA     | NA           | 84.35             |
| Limited Scope:<br>Garden City AA | NA                              | NA | NA                     | NA | NA                           | NA  | NA              | NA | NA                | NA    | NA            | NA     | NA           | 15.65             |

<sup>\*</sup> Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

<sup>\*\*</sup> The evaluation period for Optional Product Line(s) is From January 01, 2001 to December 31, 2002.

<sup>\*\*\*</sup> Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

#### **Table 1. Other Products**

| LENDING VOLUME                   | Ge                 | eography: HOME NATIONAL BANK | Evaluation Period: JANUARY | 1, 2001 TO DECEMBER 31, 2002 |
|----------------------------------|--------------------|------------------------------|----------------------------|------------------------------|
|                                  | Other Unsecured Co | nsumer Loans*                | Other Optic                | onal Loans*                  |
| MA/Assessment Area :             | #                  | \$ (000's)                   | #                          | \$ (000's)                   |
| State of Oklahoma                |                    |                              |                            |                              |
| Full Scope:<br>Blackwell AA      | NA                 | NA                           | NA                         | NA                           |
| State of Kansas                  |                    |                              |                            |                              |
| Full Scope:<br>Arkansas City AA  | NA                 | NA                           | NA                         | NA                           |
| Limited Scope:<br>Garden City AA | NA                 | NA                           | NA                         | NA                           |

<sup>\*</sup> The evaluation period for Optional Product Line(s) is From January 01, 2001 to December 31, 2002.

## Table 2. Geographic Distribution of Home Purchase Loans

| Geographic Distribution:         | HOME PL | JRCHASE                 |                            |                 | Geograp                       | hy: HOME I         | NATIONAL E                    | BANK <b>Eva</b>  | luation Per                   | iod: JANI          | JARY 1, 20 | 01 TO [ | DECEMI   | 3ER 31  | , 2002 |
|----------------------------------|---------|-------------------------|----------------------------|-----------------|-------------------------------|--------------------|-------------------------------|------------------|-------------------------------|--------------------|------------|---------|----------|---------|--------|
|                                  |         | al Home<br>se Loans**** | Low-In<br>Geogra           |                 |                               | e-Income<br>aphies |                               | Income<br>aphies | Upper-Ir<br>Geogra            |                    | Market     | Share   | (%) by C | Geograp | ohy*   |
| MA/Assessment Area:              | #       | % of<br>Total**         | % Owner<br>Occ<br>Units*** | % BANK<br>Loans | %<br>Owner<br>Occ<br>Units*** | % BANK<br>Loans    | %<br>Owner<br>Occ<br>Units*** | % BANK<br>Loans  | %<br>Owner<br>Occ<br>Units*** | %<br>BANK<br>Loans | Overall    | Low     | Mod      | Mid     | Upp    |
| State of Oklahoma                | _       |                         |                            |                 |                               |                    |                               |                  |                               |                    |            |         |          |         |        |
| Full Scope:<br>Blackwell AA      | 20      | 100.00                  | 0.13                       | 0.00            | 0.93                          | 5.00               | 44.56                         | 40.00            | 54.38                         | 55.00              | NA         | NA      | NA       | NA      | NA     |
| State of Kansas                  |         |                         |                            |                 |                               |                    |                               |                  |                               |                    |            |         |          |         |        |
| Full Scope:<br>Arkansas City AA  | 20      | 100.00                  | NA                         | NA              | NA                            | NA                 | 71.60                         | 20.00            | 28.40                         | 80.00              | NA         | NA      | NA       | NA      | NA     |
| Limited Scope:<br>Garden City AA | NP      | NP                      | NA                         | NA              | NA                            | NA                 | 64.53                         | NP               | 35.47                         | NP                 | NA         | NA      | NA       | NA      | NA     |

<sup>\*</sup> Market share is not available as bank is not a HMDA reporter.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> 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.

<sup>\*\*\*\*</sup>Number and dollar amount represent a sample selected from the bank's home purchase loans.

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

| Geographic Distribution:                       | HOME I | MPROVE                    | MENT                          |                 | Ge                            | ography: HC        | OME NATIO                     | NAL BANK        | Evaluation                    | Period: JAN      | NUARY 1, | 2001 T(  |          | MBER 31 | , 2002 |
|------------------------------------------------|--------|---------------------------|-------------------------------|-----------------|-------------------------------|--------------------|-------------------------------|-----------------|-------------------------------|------------------|----------|----------|----------|---------|--------|
| MA/Assessment Area:                            | Impro  | Home<br>vement<br>is **** |                               | ncome<br>aphies |                               | e-Income<br>aphies |                               | Income          |                               | Income<br>aphies | Mark     | ket Shar | e (%) by | Geograp | hy*    |
|                                                | #      | % of<br>Total**           | %<br>Owner<br>Occ<br>Units*** | % BANK<br>Loans | %<br>Owner<br>Occ<br>Units*** | % BANK<br>Loans    | %<br>Owner<br>Occ<br>Units*** | % BANK<br>Loans | %<br>Owner<br>Occ<br>Units*** | % BANK<br>Loans  | Overall  | Low      | Mod      | Mid     | Upp    |
| State of Oklahoma                              |        |                           |                               |                 |                               |                    |                               |                 |                               |                  |          |          |          |         |        |
| Full Scope:<br>Blackwell AA<br>State of Kansas | 20     | 100.00                    | 0.13                          | 0.00            | 0.93                          | 25.00              | 44.56                         | 35.00           | 54.38                         | 40.00            | NA       | NA       | NA       | NA      | NA     |
| Full Scope:<br>Arkansas City AA                | 20     | 100.00                    | NA                            | NA              | NA                            | NA                 | 71.60                         | 35.00           | 28.40                         | 65.00            | NA       | NA       | NA       | NA      | NA     |
| Limited Scope:<br>Garden City AA               | NP     | NP                        | NA                            | NA              | NA                            | NA                 | 64.53                         | NP              | 35.47                         | NP               | NA       | NA       | NA       | NA      | NA     |

<sup>\*</sup> Market share is not available as the bank is not a HMDA reporter.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> 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.

<sup>\*\*\*\*</sup>Number and dollar amount represent a sample selected from the bank's home improvement loans.

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

| Geographic Distribution          | : HOME N       | IORTGAGI                  | E REFINAN                     | ICE              | Geo                        | ography: HO        | ME NATION                  | IAL BANK         | Evaluation F               | Period: JANI     | JARY 1, 2 | 001 TO   | DECEM  | BER 31 | , 2002 |
|----------------------------------|----------------|---------------------------|-------------------------------|------------------|----------------------------|--------------------|----------------------------|------------------|----------------------------|------------------|-----------|----------|--------|--------|--------|
| MA/Assessment Area:              | Mor<br>Refinan | Home<br>tgage<br>ce Loans |                               | ncome<br>raphies |                            | e-Income<br>aphies |                            | Income<br>aphies |                            | Income<br>aphies | Marke     | et Share | (%) by | Geogra | ohy*   |
|                                  | #              | % of<br>Total**           | %<br>Owner<br>Occ<br>Units*** | % BANK<br>Loans  | % Owner<br>Occ<br>Units*** | % BANK<br>Loans    | % Owner<br>Occ<br>Units*** | % BANK<br>Loans  | % Owner<br>Occ<br>Units*** | % BANK<br>Loans  | Overall   | Low      | Mod    | Mid    | Upp    |
| State of Oklahoma                |                |                           |                               |                  |                            |                    |                            |                  |                            |                  | •         |          |        |        |        |
| Full Scope:<br>Blackwell AA      | 20             | 100.00                    | 0.13                          | 0.00             | 0.93                       | 5.00               | 44.56                      | 35.00            | 54.38                      | 60.00            | NA        | NA       | NA     | NA     | NA     |
| State of Kansas                  |                |                           |                               |                  |                            |                    |                            |                  |                            |                  |           |          |        |        |        |
| Full Scope:<br>Arkansas City AA  | 20             | 100.00                    | NA                            | NA               | NA                         | NA                 | 71.60                      | 55.00            | 28.40                      | 45.00            | NA        | NA       | NA     | NA     | NA     |
| Limited Scope:<br>Garden City AA | NP             | NP                        | NA                            | NA               | NA                         | NA                 | 64.53                      | NP               | 35.47                      | NP               | NA        | NA       | NA     | NA     | NA     |

<sup>\*</sup> Market share is not available as the bank is not a HMDA reporter

<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.

<sup>\*\*\*</sup> 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.

<sup>\*\*\*\*</sup>Number and dollar amount represent a sample selected from the bank's refinance home loans.

### Table 5. Geographic Distribution of Multifamily Loans

|                     | -  |                 |                     |                 | 1                |                 |                  |                 |                  |                 | 1       |          |          |         |      |
|---------------------|----|-----------------|---------------------|-----------------|------------------|-----------------|------------------|-----------------|------------------|-----------------|---------|----------|----------|---------|------|
|                     | -  | tal             |                     |                 |                  |                 |                  |                 |                  |                 |         |          | (0())    | ~       |      |
|                     |    | amily           | -                   | ncome           |                  | e-Income        |                  | Income          |                  | Income          | Marke   | et Share | (%) by ( | Geograp | ohy* |
| MA/Assessment Area: |    | S ****          | 0                   | aphies          | 0                | aphies          | 0                | aphies          | 0                | aphies          |         |          | ·        |         | ·    |
|                     | #  | % of<br>Total** | % of MF<br>Units*** | % BANK<br>Loans | % MF<br>Units*** | % BANK<br>Loans | % MF<br>Units*** | % BANK<br>Loans | % MF<br>Units*** | % BANK<br>Loans | Overall | Low      | Mod      | Mid     | Upp  |
| State of Oklahoma   |    |                 |                     |                 |                  |                 |                  |                 |                  |                 |         | I        |          | LI      |      |
| Full Scope:         |    |                 |                     |                 |                  |                 |                  |                 |                  |                 |         |          |          |         | l    |
| Blackwell AA        | NA | NA              | 9.60                | NA              | 13.26            | NA              | 14.37            | NA              | 62.77            | NA              | NA      | NA       | NA       | NA      | NA   |
| State of Kansas     |    |                 |                     |                 |                  |                 |                  |                 |                  |                 |         |          |          |         |      |
| Full Scope:         |    |                 |                     |                 |                  |                 |                  |                 |                  |                 |         |          |          |         |      |
| Arkansas City AA    | NA | NA              | NA                  | NA              | NA               | NA              | 77.39            | NA              | 22.61            | NA              | NA      | NA       | NA       | NA      | NA   |
| Limited Scope:      |    |                 |                     |                 |                  |                 |                  |                 |                  |                 |         |          |          |         |      |
| Garden City AA      | NA | NA              | NA                  | NA              | NA               | NA              | 36.88            | NA              | 63.12            | NA              | NA      | NA       | NA       | NA      | NA   |

<sup>\*</sup> Market share not available as the bank is not a HMDA reportable.

<sup>\*\*</sup> Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

<sup>\*\*\*</sup> 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.

<sup>\*\*\*\*</sup>No multifamily loans in our sample of home mortgage loans.

# Table 6. Geographic Distribution of Small Loans to Businesses

| Geographic Distributio           | n: SMA | LL LOANS                  | S TO BUSINES              | SES                | Geogra                    | aphy: HO           | ME NATIONAL               | BANK               | Evaluatio                 | n Period:          | JANUARY | 1, 2001 <sup>-</sup> | TO DECE    | EMBER 3  | 1, 2002 |
|----------------------------------|--------|---------------------------|---------------------------|--------------------|---------------------------|--------------------|---------------------------|--------------------|---------------------------|--------------------|---------|----------------------|------------|----------|---------|
| MA/Assessment                    | Bus    | l Small<br>siness<br>bans | Low-Inco<br>Geograp       |                    | Moderate-lı<br>Geograp    |                    | Middle-Inc<br>Geograp     |                    | Upper-In<br>Geograp       |                    | Mar     | ket Share            | e (%) by ( | Geograph | ıy*     |
| Area:                            | #      | % of<br>Total**           | % of<br>Businesses<br>*** | %<br>BANK<br>Loans | Overall | Low                  | Mod        | Mid      | Upp     |
| State of Oklahoma                |        |                           |                           |                    |                           |                    |                           |                    |                           |                    |         |                      |            |          |         |
| Full Scope:<br>Blackwell AA      | 601    | 100.00                    | 2.76                      | 0.17               | 5.95                      | 1.83               | 45.60                     | 37.60              | 45.69                     | 60.40              | 7.88    | 0.00                 | 3.33       | 9.23     | 8.51    |
| State of Kansas                  |        |                           |                           |                    |                           |                    |                           |                    |                           |                    |         |                      |            |          |         |
| Full Scope:<br>Arkansas City AA  | 431    | 82.57                     | NA                        | NA                 | NA                        | NA                 | 75.28                     | 65.20              | 24.72                     | 34.80              | 29.89   | NA                   | NA         | 31.21    | 33.79   |
| Limited Scope: Garden City<br>AA | 91     | 17.43                     | NA                        | NA                 | NA                        | NA                 | 65.53                     | 71.43              | 34.47                     | 28.57              | 2.75    | NA                   | NA         | 2.72     | 3.46    |

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2002).

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

| Geographic Distribution:         | SMALL | LOANS TO            | O FARMS          |                 | Geography       | : HOME NA          | TIONAL BA        | NK               | Evaluatio       | n Period: J/     | ANUARY  | 1, 2001 <sup>-</sup> | TO DECE  | EMBER 3 | 1, 2002 |
|----------------------------------|-------|---------------------|------------------|-----------------|-----------------|--------------------|------------------|------------------|-----------------|------------------|---------|----------------------|----------|---------|---------|
|                                  |       | al Small<br>1 Loans | -                | ncome<br>aphies |                 | e-Income<br>aphies | Middle-<br>Geogr | Income<br>aphies | Upper-<br>Geogr | Income<br>aphies | Mar     | ket Shar             | e (%) by | Geograp | ohy*    |
| MA/Assessment Area:              | #     | % of<br>Total**     | % of<br>Farms*** | % BANK<br>Loans | % of<br>Farms** | % BANK<br>Loans    | % of<br>Farms**  | % BANK<br>Loans  | % of<br>Farms** | % BANK<br>Loans  | Overall | Low                  | Mod      | Mid     | Upp     |
| State of Oklahoma                | 1     | I                   |                  | L               |                 | L                  |                  | L                | L               | L                | I       |                      | I.       | I.      | •       |
| Full Scope:<br>Blackwell AA      | 180   | 100.00              | 0.95             | 0.00            | 0.00            | 0.00               | 62.23            | 75.00            | 36.82           | 25.00            | 20.32   | 0.00                 | 0.00     | 24.59   | 14.07   |
| State of Kansas                  | •     |                     |                  |                 |                 |                    |                  |                  |                 |                  |         |                      |          |         |         |
| Full Scope:<br>Arkansas City AA  | 406   | 84.76               | NA               | NA              | NA              | NA                 | 73.66            | 55.67            | 26.34           | 44.33            | 90.79   | NA                   | NA       | 85.71   | 97.06   |
| Limited Scope:<br>Garden City AA | 73    | 15.24               | NA               | NA              | NA              | NA                 | 72.26            | 68.49            | 27.74           | 31.51            | 11.26   | NA                   | NA       | 11.52   | 10.83   |

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2002).

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

| Borrower Distribution: H         | OME F | VURCHAS                       | E                    |                            | Ge                   | ography: HOM         | IE NATIONA           | AL BANK             | Evaluation Pe      | eriod: JANU     | ARY 1, 200 | 01 TO D | ECEMB   | ER 31, | 2002 |
|----------------------------------|-------|-------------------------------|----------------------|----------------------------|----------------------|----------------------|----------------------|---------------------|--------------------|-----------------|------------|---------|---------|--------|------|
| MA/Assessment Area:              | Pu    | al Home<br>rchase<br>ins **** | Low-Inc<br>Borrov    |                            |                      | ate-Income<br>rowers |                      | -Income<br>owers    | Upper-Ir<br>Borrov |                 |            | Marko   | et Shar | re*    |      |
|                                  | #     | % of<br>Total**               | %<br>Families<br>*** | %<br>BANK<br>Loans<br>**** | %<br>Families<br>*** | % BANK<br>Loans****  | %<br>Families<br>*** | % BANK<br>Loans**** | %<br>Families***   | % BANK<br>Loans | Overall    | Low     | Mod     | Mid    | Upp  |
| State of Oklahoma                |       |                               |                      |                            |                      |                      |                      |                     | •                  |                 |            | •       | •       |        |      |
| Full Scope:<br>Blackwell AA      | 20    | 100.00                        | 16.15                | 10.00                      | 14.46                | 35.00                | 18.41                | 20.00               | 50.99              | 35.00           | NA         | NA      | NA      | NA     | NA   |
| State of Kansas                  |       |                               |                      |                            |                      |                      |                      |                     |                    |                 |            | _       | _       |        | _    |
| Full Scope:<br>Arkansas City AA  | 20    | 100.00                        | 15.56                | 15.00                      | 17.30                | 5.00                 | 22.85                | 30.00               | 44.29              | 50.00           | NA         | NA      | NA      | NA     | NA   |
| Limited Scope:<br>Garden City AA | NP    | NP                            | 11.69                | NP                         | 19.05                | NP                   | 24.44                | NP                  | 44.82              | NP              | NA         | NA      | NA      | NA     | NA   |

<sup>\*</sup>Market share is not available as the bank is not a HMDA reporter.

<sup>\*\*</sup> As a percentage of loans with borrower income information available.

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

| Borrower Distribution: H         | IOME II | MPROVEM                         | ENT           |                     | G                    | eography: HC        | ME NATIO      | NAL BANK            | Evaluation    | Period: JAN      | IUARY 1, 2 | 2001 TC | DECEN   | /IBER 31 | , 2002 |
|----------------------------------|---------|---------------------------------|---------------|---------------------|----------------------|---------------------|---------------|---------------------|---------------|------------------|------------|---------|---------|----------|--------|
| MA/Assessment Area:              | Impr    | al Home<br>ovement<br>ins ***** |               | Income<br>owers     |                      | te-Income<br>owers  |               | e-Income<br>rowers  |               | -Income<br>owers |            | Marl    | ket Sha | re*      |        |
|                                  | #       | % of<br>Total**                 | %<br>Families | % BANK<br>Loans**** | %<br>Families<br>*** | % BANK<br>Loans**** | %<br>Families | % BANK<br>Loans**** | %<br>Families | % BANK<br>Loans  | Overall    | Low     | Mod     | Mid      | Upp    |
| State of Oklahoma                |         |                                 |               |                     | L                    |                     | L             |                     |               |                  |            |         |         |          |        |
| Full Scope:<br>Blackwell AA      | 20      | 100.00                          | 16.15         | 5.00                | 14.46                | 10.00               | 18.41         | 20.00               | 50.99         | 65.00            | NA         | NA      | NA      | NA       | NA     |
| State of Kansas                  |         |                                 |               |                     |                      |                     |               |                     |               |                  |            |         |         |          |        |
| Full Scope:<br>Arkansas City AA  | 20      | 100.00                          | 15.56         | 20.00               | 17.30                | 20.00               | 22.85         | 25.00               | 44.29         | 35.00            | NA         | NA      | NA      | NA       | NA     |
| Limited Scope:<br>Garden City AA | NP      | NP                              | 11.69         | NP                  | 19.05                | NP                  | 24.44         | NP                  | 44.82         | NP               | NA         | NA      | NA      | NA       | NA     |

<sup>\*</sup> Market share not available as bank is not a HMDA reporter.

<sup>\*\*</sup> As a percentage of loans with borrower income information available.

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

<sup>\*\*\*\*</sup> 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.

<sup>\*\*\*\*\*</sup>Number and dollar amount represent a sample selected from the bank's home improvement loans.

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

| Borrower Distribution: H         | OME M       | ORTGAG                              | E REFINAN              | CE                  | Ge            | ography: HO         | ME NATION            | NAL BANK            | Evaluation    | Period: JANI        | JARY 1, 2 | 001 TO | DECEM  | IBER 31 | , 2002 |
|----------------------------------|-------------|-------------------------------------|------------------------|---------------------|---------------|---------------------|----------------------|---------------------|---------------|---------------------|-----------|--------|--------|---------|--------|
| MA/Assessment Area:              | Mor<br>Refi | l Home<br>tgage<br>nance<br>ns **** | Low-Incor<br>Borrowers | -                   |               | te-Income<br>owers  |                      | e-Income<br>rowers  |               | -Income<br>rowers   |           | Mark   | et Sha | re*     |        |
|                                  | #           | % of<br>Total**                     | %<br>Families          | % BANK<br>Loans**** | %<br>Families | % BANK<br>Loans**** | %<br>Families<br>*** | % BANK<br>Loans**** | %<br>Families | % BANK<br>Loans**** | Overall   | Low    | Mod    | Mid     | Upp    |
| State of Oklahoma                |             |                                     |                        |                     | 1             |                     | 1                    | 1                   |               |                     |           |        |        | 1       |        |
| Full Scope:<br>Blackwell AA      | 20          | 100.00                              | 16.15                  | 5.00                | 14.46         | 0.00                | 18.41                | 5.00                | 50.99         | 90.00               | NA        | NA     | NA     | NA      | NA     |
| State of Kansas                  |             |                                     |                        |                     |               |                     |                      |                     |               |                     |           |        |        |         |        |
| Full Scope:<br>Arkansas City AA  | 20          | 100.00                              | 15.56                  | 0.00                | 17.30         | 5.00                | 22.85                | 45.00               | 44.29         | 50.00               | NA        | NA     | NA     | NA      | NA     |
| Limited Scope:<br>Garden City AA | NP          | NP                                  | 11.69                  | NP                  | 19.05         | NP                  | 24.44                | NP                  | 44.82         | NP                  | NA        | NA     | NA     | NA      | NA     |

<sup>\*</sup> Market share is not available as bank is not a HMDA reporter.

<sup>\*\*</sup> As a percentage of loans with borrower income information available.

<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

<sup>\*\*\*\*</sup>Number and dollar amount represent a sample selected from the bank's refinance home loans.

### Table11. Borrower Distribution of Small Loans to Businesses

| Borrower Distribution: SI                      | Total<br>Loa | Small<br>ns to<br>nesses | Business<br>Revenues of   | ses With<br>\$1 million or |                      | Original Amount Regardles             | valuation Period: JANUAF<br>s of Business Size |       | ket Share*                 |
|------------------------------------------------|--------------|--------------------------|---------------------------|----------------------------|----------------------|---------------------------------------|------------------------------------------------|-------|----------------------------|
| MA/Assessment Area:                            | #            | % of<br>Total**          | % of<br>Businesses<br>*** | % BANK<br>Loans****        | \$100,000 or<br>less | >\$100,000 to \$250,000               | >\$250,000 to<br>\$1,000,000                   | All   | Rev\$ 1 Million or<br>Less |
| State of Oklahoma                              | •            | •                        |                           |                            |                      |                                       |                                                |       |                            |
| Full Scope:<br>Blackwell AA<br>State of Kansas | 601          | 100.00                   | 79.31                     | 36.61                      | 81.53                | 12.98                                 | 5.49                                           | 7.88  | 12.43                      |
|                                                | 1            | 1                        | 1                         |                            |                      | · · · · · · · · · · · · · · · · · · · |                                                |       |                            |
| Full Scope:<br>Arkansas City AA                | 431          | 82.57                    | 73.26                     | 44.55                      | 89.79                | 6.73                                  | 3.48                                           | 29.89 | 50.53                      |
| Limited Scope:<br>Garden City AA               | 91           | 17.43                    | 73.40                     | 53.85                      | 81.32                | 10.99                                 | 7.69                                           | 2.75  | 4.13                       |

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

<sup>\*\*\*\*</sup> 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 45.95% of small loans to businesses originated and purchased by the bank.

#### Table12. Borrower Distribution of Small Loans to Farms

| Borrower Distribution: S         | MALL LO | ANS TO F            | ARMS                     | Geog                     | raphy: HOME NA       | TIONAL BANK E             | valuation Period: JANUAR     | Y 1, 2001 TO  | DECEMBER 31, 2002           |  |
|----------------------------------|---------|---------------------|--------------------------|--------------------------|----------------------|---------------------------|------------------------------|---------------|-----------------------------|--|
|                                  |         | l Small<br>to Farms | Farms With<br>\$1 millio | Revenues of<br>n or less | Loans b              | by Original Amount Regard | less of Farm Size            | Market Share* |                             |  |
| MA/Assessment Area:              | #       | % of<br>Total**     | % of<br>Farms***         | % BANK<br>Loans****      | \$100,000 or<br>less | >\$100,000 to \$250,000   | >\$250,000 to<br>\$1,000,000 | All           | Rev \$ 1 Million or<br>Less |  |
| State of Oklahoma                |         |                     |                          |                          |                      |                           |                              |               |                             |  |
| Full Scope:<br>Blackwell AA      | 180     | 100.00              | 96.67                    | 57.22                    | 86.11                | 11.11                     | 2.78                         | 20.32         | 13.27                       |  |
| State of Kansas                  |         |                     |                          |                          |                      |                           |                              |               |                             |  |
| Full Scope:<br>Arkansas City AA  | 406     | 84.76               | 97.07                    | 52.46                    | 94.09                | 4.68                      | 1.23                         | 90.79         | 84.17                       |  |
| Limited Scope:<br>Garden City AA | 73      | 15.24               | 90.75                    | 71.23                    | 75.34                | 20.55                     | 4.11                         | 11.26         | 9.62                        |  |

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

<sup>\*\*\*\*</sup> 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 43.70% 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 Bo                  | orrower                    | <sup>-</sup> Distribut  | ion: CON                  | SUMER L               | OANS                               |                       | Ge                  | eography:                    | HOME N              | ATIONAL                     | BANK                | Evaluat                 | ion Peric             | d: JANU                          | ARY 1, 2            | 001 to DEC                 | EMBER               | 31, 2002              |  |  |
|------------------------------------|----------------------------|-------------------------|---------------------------|-----------------------|------------------------------------|-----------------------|---------------------|------------------------------|---------------------|-----------------------------|---------------------|-------------------------|-----------------------|----------------------------------|---------------------|----------------------------|---------------------|-----------------------|--|--|
| MA/Assessment<br>Area:             |                            | Geographic Distribution |                           |                       |                                    |                       |                     |                              |                     |                             |                     |                         | Borrower Distribution |                                  |                     |                            |                     |                       |  |  |
|                                    | Total<br>Consumer<br>Loans |                         | Low-Income<br>Geographies |                       | Moderate-<br>Income<br>Geographies |                       |                     | Middle-Income<br>Geographies |                     | Upper-Income<br>Geographies |                     | Low-Income<br>Borrowers |                       | Moderate-<br>Income<br>Borrowers |                     | Middle-Income<br>Borrowers |                     | -Income<br>rowers     |  |  |
|                                    | #                          | % of<br>Total*          | % of<br>Hhlds<br>**       | % of<br>Bank<br>Loans | % of<br>Hhlds<br>**                | % of<br>Bank<br>Loans | % of<br>Hhlds<br>** | % of<br>Bank<br>Loans        | % of<br>Hhlds<br>** | % of<br>Bank<br>Loans       | % of<br>Hhlds<br>** | % of<br>Bank<br>Loans   | % of<br>Hhlds<br>**   | % of<br>Bank<br>Loans            | % of<br>Hhlds<br>** | % of Bank<br>Loans         | % of<br>Hhlds<br>** | % of<br>BANK<br>Loans |  |  |
| State of Oklahom                   | a                          |                         |                           |                       |                                    |                       |                     |                              |                     |                             | •                   | •                       | •                     |                                  |                     |                            | •                   |                       |  |  |
| Full Scope:<br>Blackwell AA        | NA                         | NA                      | NA                        | NA                    | NA                                 | NA                    | NA                  | NA                           | NA                  | NA                          | NA                  | NA                      | NA                    | NA                               | NA                  | NA                         | NA                  | NA                    |  |  |
| State of Kansas                    |                            |                         |                           |                       |                                    |                       |                     |                              |                     |                             |                     |                         |                       |                                  |                     |                            |                     |                       |  |  |
| Full Scope:<br>Arkansas City<br>AA | NA                         | NA                      | NA                        | NA                    | NA                                 | NA                    | NA                  | NA                           | NA                  | NA                          | NA                  | NA                      | NA                    | NA                               | NA                  | NA                         | NA                  | NA                    |  |  |
| Limited Scope:<br>Garden City AA   | NA                         | NA                      | NA                        | NA                    | NA                                 | NA                    | NA                  | NA                           | NA                  | NA                          | NA                  | NA                      | NA                    | NA                               | NA                  | NA                         | NA                  | NA                    |  |  |

<sup>\*</sup> Consumer loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

#### Table 14. Qualified Investments

| QUALIFIED INVESTMEN               | NTS         |                 | Geography     | HOME NATIONAL  | BANK | Evaluation Period: JANUARY 10, 2000 TO OCTOBER 31, 2003 |                        |   |           |  |  |  |  |
|-----------------------------------|-------------|-----------------|---------------|----------------|------|---------------------------------------------------------|------------------------|---|-----------|--|--|--|--|
| MA/Assessment Area:               | Prior Perio | od Investments* | Current Perio | od Investments |      | Total Investments                                       | Unfunded Commitments** |   |           |  |  |  |  |
|                                   | #           | \$(000's)       | #             | \$(000's)      | #    | \$(000's)                                               | % of Total             | # | \$(000's) |  |  |  |  |
| State of Oklahoma                 |             |                 |               |                |      | I                                                       |                        |   |           |  |  |  |  |
| Full Scope:<br>Blackwell AA       | 3           | 800             | 36            | 291            | 39   | 1,091                                                   | 100.00                 | 0 | 0         |  |  |  |  |
| Statewide/Regional<br>Investments |             |                 |               |                |      |                                                         |                        |   |           |  |  |  |  |
| State of Kansas                   |             |                 |               |                |      | ·                                                       |                        |   |           |  |  |  |  |
| Full Scope:<br>Arkansas City AA   | 3           | 1,600           | 28            | 53             | 31   | 1,653                                                   | 67.47                  | 0 | 0         |  |  |  |  |
| Limited Scope:<br>Garden City AA  | 0           | 0               | 12            | 797            | 12   | 797                                                     | 32.53                  | 0 | 0         |  |  |  |  |

<sup>\* &#</sup>x27;Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

<sup>\*\* &#</sup>x27;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 BranchOpenings/Closings

| DISTRIBUTION OI                  | F BRANCH D            | DELIVERY S   | YSTEM AN              | D BRAN | ICH OPE                                          | NINGS/0 | CLOSING                  | 6 Geograph     | IY: HOME NA    | TIONA                                              | L BANK | Evalu | ation P |                                          |      | 10, 2000<br>31, 2003 |       |
|----------------------------------|-----------------------|--------------|-----------------------|--------|--------------------------------------------------|---------|--------------------------|----------------|----------------|----------------------------------------------------|--------|-------|---------|------------------------------------------|------|----------------------|-------|
|                                  | Deposits              |              |                       | Branch | es                                               |         | Branch Openings/Closings |                |                |                                                    |        |       |         | Population                               |      |                      |       |
| MA/Assessment<br>Area:           | % of<br>Rated<br>Area | # of<br>BANK | % of<br>Rated<br>Area |        | Location of Branches by ncome of Geographies (%) |         |                          | # of<br>Branch | # of<br>Branch | Net change in Location of<br>Branches<br>(+ or - ) |        |       |         | % of Population within Each<br>Geography |      |                      |       |
|                                  | Deposits Bra<br>in AA | Branches     | Branche<br>s in AA    | Low    | Mod                                              | Mid     | Upp                      | Openings<br>*  | Closings       | Low                                                | Mod    | Mid   | Upp     | Low                                      | Mod  | Mid                  | Upp   |
| State of Oklahom                 | a                     |              |                       |        |                                                  |         |                          |                |                |                                                    |        |       |         | •                                        |      |                      |       |
| Full Scope:<br>Blackwell AA      | 100.00                | 6            | 100.00                | 0.00   | 16.67                                            | 50.00   | 33.33                    | 0              | 0              | 0                                                  | 0      | 0     | 0       | 4.03                                     | 3.22 | 39.81                | 52.94 |
| State of Kansas                  | State of Kansas       |              |                       |        |                                                  |         |                          |                |                |                                                    |        |       |         |                                          |      |                      |       |
| Full Scope:<br>Arkansas City AA  | 84.35                 | 4            | 80.00                 | NA     | NA                                               | 75.00   | 25.00                    | 0              | 0              | 0                                                  | 0      | 0     | 0       | NA                                       | NA   | 73.81                | 26.19 |
| Limited Scope:<br>Garden City AA | 15.65                 | 1            | 20.00                 | NA     | NA                                               | 0.00    | 100.00                   | 0              | 0              | 0                                                  | 0      | 0     | 0       | NA                                       | NA   | 69.28                | 30.72 |

\*The bank opened two new branches during the evaluation period. One is in the Bartlesville AA and one is in the Shidler AA. We did not review these AAs during this evaluation because we only had seven months of data.