



# INTERMEDIATE SMALL BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## PUBLIC DISCLOSURE

**June 17, 2008**

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Vision Bank, National Association  
Charter Number: 12591

101 East Main Street  
Ada, Oklahoma 74820

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**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

***INSTITUTION'S CRA RATING***  
**THIS INSTITUTION IS RATED SATISFACTORY**  
**THE LENDING TEST IS RATED SATISFACTORY**  
**THE COMMUNITY DEVELOPMENT TEST IS RATED SATISFACTORY**

Assigned ratings are based on the following conclusions:

- The bank's loan-to-deposit ratio is reasonable and averaged 81 percent during the evaluation period.
- A majority of the bank's loans were originated within the Assessment Areas (AAs).
- Vision Bank's distribution of loans to businesses and individuals of different income (including low- and-moderate) levels is satisfactory.
- The geographic distribution of loans reflects an excellent dispersion throughout the AA, particularly in moderate-income geographies.
- Vision Bank's community development performance demonstrates satisfactory responsiveness to the community development needs of the AAs.

***Scope of Examination***

A Data Integrity review commenced on October 23, 2007, to evaluate the bank's system of internal controls for collecting, verifying and submitting data reported on the Home Mortgage Disclosure Act Loan Application Register (HMDA LAR).

A sample of HMDA loans originating in 2005, 2006, and 2007 were reviewed. The review indicated that the data the bank is required to collect and report to regulatory agencies under the Community Reinvestment Act (CRA) and the Home Mortgage Disclosure Act (HMDA) is materially accurate. Internal controls over the system to collect and report HMDA data are effective.

This Performance Evaluation is based on 2000 U.S. Census demographic information. Conclusions regarding the Lending Test are based on the origination of home mortgage and small business loans from January 1, 2005 through December 31, 2007. Conclusions regarding the Community Development Test are based on community development activities from January 3, 2005 through June 17, 2008.

## ***Description of Institution***

Vision Bank, National Association (Vision Bank) is an intrastate bank headquartered in Ada, Oklahoma. As of March 31, 2008, Vision Bank’s assets totaled \$485 million. Tier 1 capital totaled \$40 million and the loan-to-deposit ratio equaled 89 percent. Vision Bank is a wholly owned subsidiary of Vision Bancshares, Inc., a one bank holding company.

Vision Bank operates in three different market areas of the state. The main bank is located in east-central Oklahoma in Pontotoc County at 101 East Main in Ada, Oklahoma, along with a Motor Bank located at 12<sup>th</sup> & Rennie and the Arlington Branch located at 1800 Arlington Street, Ada, Oklahoma. The second marketing area is also located in east-central Oklahoma in the communities surrounding the Prague and Meeker branches located in Lincoln County. The Prague branch is located at 820 Jim Thorpe Boulevard, Prague, Oklahoma, and the Meeker branch is located at 409 South Dawson, Meeker, Oklahoma. The third marketing area is in southern Oklahoma surrounding the Durant branch located at 2514 University Boulevard, Durant, Oklahoma. Branch openings since the last CRA examination consist of the Durant branch, which opened on April 17, 2006, and two non deposit taking Loan Production Offices (LPO). One LPO was opened on March 26, 2007, in Sherman, Texas, and the other was opened in Shawnee, Oklahoma, on July 16, 2007. Vision Bank has fourteen ATM locations within their assessment areas (AAs).

Vision Bank’s business strategy is focused on residential real estate and small business lending. The bank has a mortgage department that originates long-term residential mortgages for sale in the secondary market. No legal or financial impediments limit Vision Bank’s ability to meet the credit needs of the AAs. A diverse choice of commercial, residential, and consumer loan products are offered, as well as, retail and commercial deposit products. The bank also offers trust and retail nondeposit investment services. At March 31, 2008, the bank had total loans of \$282 million. The table below details Vision Bank’s loan portfolio composition as of March 31, 2008:

Loan Portfolio Composition as of March 31, 2008		
	\$ (000)	%
Commercial Real Estate	104,194	37%
Residential Real Estate	89,272	32%
Commercial and Industrial	57,117	20%
Individual Loans	16,259	6%
Other	14,996	5%
<b>Total</b>	<b>\$281,838</b>	<b>100%</b>

*Source: March 31, 2008 Report of Condition and Income*

The Office of the Comptroller of the Currency last evaluated Vision Bank’s CRA performance as of January 3, 2005. The bank received an overall rating of “Satisfactory”.

## ***Description of Assessment Area (AA)***

Two AAs were considered in evaluating Vision Bank’s CRA performance. The first AA is comprised of a portion of Oklahoma City’s MSA. It consists of two census tracts in southern Lincoln County. The bank’s Prague and Meeker branches are located in these census tracts. The second AA represents homogenous non-MSA areas located in east-central and south-east Oklahoma. The non-MSA AA includes all fifteen census tracts located in Pottawatomie County, ten census tracts in Pontotoc County, four census tracts in Seminole County, and one census tract in Okfuskee County.

According to the 2000 U.S. Census data, the bank’s Oklahoma City MSA AA (Lincoln County portion) has a population of 11,770. The median family income for the MSA is \$44,898 and HUD’s 2007 updated MSA median family income is \$53,600. The 2007 data is the income information used to determine the income level of families in the MSA. Households below the poverty level total 576 or thirteen percent and households that receive public assistance total 171 or four percent of the total number of households. Of the 4,923 total housing units available in the AA, 3,676 or seventy-five percent are owner occupied. Please refer to the table below for additional information relating to Vision Bank’s MSA AA:

<b>DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE MSA AA</b>	
<b>Population</b>	
Number of Families	3,380
Number of Households	4,405
<b>Geographies</b>	
Number of Census Tracts	2
% Low-Income Census Tracts	0.00%
% Moderate-Income Census Tracts	0.00%
% Middle-Income Census Tracts	100.00%
% Upper-Income Census Tracts	0.00%
% N/A	0.00%
<b>Median Family Income (MFI)</b>	
2000 MFI for AA	\$44,898
2007 HUD-Adjusted MFI	\$53,600
<b>Economic Indicators</b>	
Unemployment Rate	2.15%
2000 Median Housing Value	\$56,345
% of Households Below Poverty Level	13.08%

*Source: 2000 Census data and 2007 HUD updated income data*

According to the 2000 U.S. Census data, Vision Bank’s non-MSA areas have a population of 115,414. The median family income for the AA is \$35,517 and HUD’s 2007 updated MSA median family income is \$42,400. Households below the poverty level total 7,045 or sixteen percent and households that receive public assistance total 2,736 or six percent of the total number of households. Of the 49,005 total housing units available in the AA, 31,028 or sixty-three percent are owner occupied. Please refer to the table below for additional information relating to Vision Bank’s non-MSA AA:

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF THE NON-MSA AA	
<b>Population</b>	
Number of Families	31,286
Number of Households	43,988
<b>Geographies</b>	
Number of Census Tracts	30
% Low-Income Census Tracts	0.00%
% Moderate-Income Census Tracts	20.00%
% Middle-Income Census Tracts	66.67%
% Upper-Income Census Tracts	13.33%
% N/A	0.00%
<b>Median Family Income (MFI)</b>	
2000 MFI for AA	\$37,033
2006 HUD-Adjusted MFI	\$42,400
<b>Economic Indicators</b>	
Unemployment Rate	2.99%
2000 Median Housing Value	\$57,091
% of Households Below Poverty Level	16.00%

*Source: 2000 Census data and 2007 HUD updated income data*

The major employers in the Lincoln County area are primarily located in the city of Shawnee and include the Citizens Pottawatomie Nation, Unity Health Center, Exxon-Mobil Film Division, Wolverine Tube, and the Shawnee Public Schools. The current unemployment rate is 2.15 percent. Major employers in Ada (Pontotoc County) include the Chickasaw Nation, Prepaid Legal, Valley View Hospital, and East Central University. Major employers in Durant (Bryan County) include the Choctaw Nation of Oklahoma, Southeastern Oklahoma State University, and Medical Center of Southeastern Oklahoma. The unemployment rate for the non-MSA areas is 2.99 percent. Banking is very competitive throughout Vision Bank’s AAs.

A community contact was conducted during this review. This interview was conducted with a representative of the local Ada Chamber of Commerce. The contact indicated that area financial institutions are perceived as taking an active role in the community and strive to meet the financial needs of the area.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

THE BANK'S PERFORMANCE UNDER THE LENDING TEST IS RATED "SATISFACTORY"

#### **LOAN-TO-DEPOSIT RATIO**

Vision Bank's loan-to-deposit ratio is satisfactory and meets the standard for satisfactory performance. The bank's average quarterly loan-to-deposit ratio from December 31, 2004 through March 31, 2008, was approximately 81 percent. This average compared to the average of four similar banks with total assets between \$250 million and \$750 million for the same time period in the bank's AAs and contiguous counties. These comparable banks are listed in the following table:

Loan-To-Deposit Ratios		
Institution	Total Assets \$000's (As of 03/31/08)	Average Loan -to- Deposit Ratio
Landmark Bank, N.A., Ada, Oklahoma	551,438	83.94%
<b><i>Vision Bank, N.A., Ada, Oklahoma</i></b>	<b><i>485,260</i></b>	<b><i>80.88%</i></b>
The FNB and Trust Co., Chickasha, Oklahoma	323,811	69.39%
The FNB and Trust Co. of Ardmore, Ardmore, Oklahoma	326,147	60.02%
First Bank & Trust Co., Duncan, Oklahoma	355,847	86.43%

*Source: Institution Reports of Condition from December 31, 2004 to March 31, 2008*

Vision Bank's loan-to-deposit ratio is satisfactory when compared to four comparable banks with an average of 74.95 percent. The bank's loan-to-deposit ratio does not include the home mortgage loans originated by the mortgage company and sold to secondary market investors. From 2005 through 2007, the mortgage company originated 283 service retained loans totaling \$28.6 million. The bank does not have records that track loans originated in which servicing was released. These loans, if retained, would have contributed to a higher ratio.

#### **LENDING IN ASSESSMENT AREA**

Vision Bank's lending in the AAs is satisfactory and meets the standard for satisfactory performance. A majority of the number and dollar amount of the home mortgage and small business loans were originated within the bank's AA. As depicted in the following table, 84 percent of the number and 82 percent of the dollar amount of loans were originated in Vision Bank's AAs.

<b>Lending in Vision Bank's AAs</b>										
Loan Type	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,327	84%	253	16%	1,580	\$78,881	77%	\$22,944	23%	\$101,825
Small Business	43	88%	6	12%	49	\$35,939	92%	\$ 3,047	8%	\$ 38,986
<b>Totals</b>	<b>1,370</b>	<b>84%</b>	<b>259</b>	<b>16%</b>	<b>1,629</b>	<b>\$114,820</b>	<b>82%</b>	<b>\$25,991</b>	<b>18%</b>	<b>\$140,811</b>

Source: Data reported under 2005-2007 CRA and HMDA loans

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

The overall distribution of loans in the bank's AAs is satisfactory and meets the standard for satisfactory performance. Vision Bank's borrower distribution of small business loans is excellent and the distribution of home mortgage loans is satisfactory within Vision Bank's non-MSA AA. The bank's borrower distribution of small business loans and home mortgage loans is excellent in Vision Bank's MSA AA. More weight was given to performance in Vision Bank's non-MSA AA since it represents a majority of the bank's lending.

#### *Vision Bank's non-MSA AA*

The bank's borrower distribution to businesses is excellent as all of the business loans sampled between 2005 through 2007 were to businesses with revenues of less than \$1 million. Due to the significant level of businesses (48.97%) that did not report revenues, a meaningful comparison is not provided.

<b>Borrower Distribution of Loans to Businesses in Vision Bank's non-MSA AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	47.83%	3.19%	48.97%	100%
% of Bank Loans in AA by #	100%	0.00%	0.00%	100%
% of Bank Loans in AA by \$	100%	0.00%	0.00%	100%

Source: Loan sample of 2005-2007 small business loans; Dunn and Bradstreet data.

The bank's borrower distribution of home mortgage loans is satisfactory. While the percentage of mortgage loans to low-income families is lower than the percentage of low-income families in the AA, this performance is not unreasonable in light of the fact that low-income families have a difficult time qualifying for conventional home mortgage products. By definition, a low-income person earns less than \$21,200 annually while the weighted average median housing price is \$57,091. The distribution of home mortgage products to moderate-income families is satisfactory and approximates the percentage of moderate-income families in the AA.

Borrower Distribution of Residential Real Estate Loans in Vision Bank's Non-MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	19.11%	4.16%	18.01%	14.18%	21.49%	17.85%	41.39%	63.81%
Home Improvement	19.11%	12.75%	18.01%	10.13%	21.49%	24.84%	41.39%	52.29%
Home Refinance	19.11%	9.75%	18.01%	12.27%	21.49%	20.94%	41.39%	57.04%

Source: Data reported under 2005-2007 HMDA; U.S. Census data

**Vision Bank's MSA AA**

The bank's borrower distribution to businesses is satisfactory as 85.71 percent of the number and 18.53 percent of the dollar volume of the business loans sampled between 2005 through 2007 were to businesses with revenues of less than \$1 million. The low dollar volume penetration is a result of one loan to a business that had gross revenues representing 71 percent of the total gross revenues of all the businesses in the loan sample. Due to the significant level of businesses (65.29%) that did not report revenues, a meaningful comparison is not provided.

Borrower Distribution of Loans to Businesses in Vision Bank's MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	32.35%	2.35%	65.29%	100%
% of Bank Loans in AA by #	85.71%	14.29%	0.00%	100%
% of Bank Loans in AA by \$	18.53%	81.47%	0.00%	100%

Source: Loan sample of 2005-2007 small business loans; Dunn and Bradstreet data

The bank's borrower distribution of home mortgage loans is excellent. The bank has done a good job providing mortgage products to low-income families despite the difficulty of low-income families to qualify for conventional mortgage products. The distribution of home improvement and refinance loans to low-income families exceeds the percentage of low-income families in the AA. The distribution of home mortgage products to moderate-income families is excellent as the percentage of home purchase loans is near to the percentage of moderate-income families. The percentage of home improvement and refinance loans exceeds the percentage of moderate-income families in the AA.



Borrower Distribution of Residential Real Estate Loans in Vision Bank's MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	24.50%	14.04%	21.95%	21.05%	26.45%	24.56%	27.10%	40.35%
Home Improvement	24.50%	26.09%	21.95%	27.17%	26.45%	21.74%	27.10%	25.00%
Home Refinance	24.50%	25.00%	21.95%	27.94%	26.45%	22.06%	27.10	25.00%

Source: Data reported under 2005-2007 HMDA; U.S. Census data

Vision Bank participates in the Rural First Time Homebuyer Program offered through the Federal Home Loan Bank of Topeka to provide mortgages to low- and moderate-income families. This is a down payment assistance program designed to help first time homebuyers in rural areas purchase a home. Applicants must have an income that is 80 percent or less of the area median income and complete a homebuyer/counseling program prior to receiving the funds. During the evaluation period, the bank originated 13 loans under this program totaling \$867 thousand.

### GEOGRAPHIC DISTRIBUTION OF LOANS

The geographic distribution of small loans to businesses and home mortgage loans is excellent in Vision Bank's non-MSA AA and exceeds the standard for satisfactory performance. A geographic distribution analysis was not performed for Vision Bank's MSA AA since this AA has no low- or moderate-income census tracts. Vision Bank's non-MSA AA has no low-income census tracts with six of the 30 tracts in the AA being moderate-income tracts.

#### *Vision Bank's non-MSA AA*

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

Geographic Distribution of Loans to Businesses in Vision Bank's non-MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Small Business Loans	0.00%	0.00%	29.66%	45.45%	52.98%	50.00%	17.36%	4.55%

Source: Loan sample of 2005-2007 small business loans; Dunn and Bradstreet data

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

<b>Geographic Distribution of Residential Real Estate Loans in Vision Bank’s non-MSA AA</b>								
<b>Census Tract Income Level</b>	<b>Low</b>		<b>Moderate</b>		<b>Middle</b>		<b>Upper</b>	
<b>Loan type</b>	<b>% of AA Owner Occupied Housing</b>	<b>% of Number of Loans</b>	<b>% of AA Owner Occupied Housing</b>	<b>% of Number of Loans</b>	<b>% of AA Owner Occupied Housing</b>	<b>% of Number of Loans</b>	<b>% of AA Owner Occupied Housing</b>	<b>% of Number of Loans</b>
Home Purchase	0.00%	0.00%	9.49%	20.00%	66.64%	58.06%	23.87%	21.94%
Home Improvement	0.00%	0.00%	9.49%	16.62%	66.64%	65.88%	23.87%	17.51%
Home Refinance	0.00%	0.00%	9.49%	13.40%	66.64%	63.92%	23.87%	22.68%

*Source: Data reported under 2005-2007 HMDA; 2000 U.S. Census data*

## **RESPONSES TO COMPLAINTS**

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

## COMMUNITY DEVELOPMENT TEST

THE BANK'S PERFORMANCE UNDER THE COMMUNITY DEVELOPMENT TEST IS RATED  
"SATISFACTORY"

Opportunities for qualified community development loans and investments are limited in the bank's AAs. A majority of the AAs are comprised of rural, low-density areas. The largest cities in the AA are Shawnee with a population of 30,000; and Ada & Durant with populations of less than 16,000. Currently, there are no major community development projects underway in the bank's AAs.

Vision Bank is very active in the communities they serve. This is evidenced by their leadership roles on various civic and non-profit organizations that provide services to low- and moderate-income individuals. The bank is also involved with, or lends to, organizations whose focus is on community or economic development and health care.

The bank's commitment to economic development is evidenced by investments and loans involving economic development activities. The bank has been very active in holding leadership positions and making significant donations to local Chambers of Commerce, which are primarily involved in economic development and small business creation. Vision Bank has made significant investments in the form of revenue bonds to construct the new county jail and renovate the local county courthouse. These investments will be critical in retaining and creating jobs for low- and moderate-income workers at these facilities.

Vision Bank is also committed to meeting the health care needs of the community. The bank has made donations and loans to the local hospital for equipment and expansion. The Valley View Hospital, located in Ada, Oklahoma, is a major health care provider for rural communities and counties in east central Oklahoma. Health care has been identified as a critical need in Ada and surrounding communities.

### COMMUNITY DEVELOPMENT LOANS

The level of community development loans is considered satisfactory. Qualifying community development loans are those that meet the definition of community development, as defined in the CRA regulation.

In May 2007, Vision Bank originated a \$1.1 million loan to purchase medical equipment for Valley View Hospital located in Ada, Oklahoma. In January 2008, the bank originated another loan for \$2.8 million for the purchase of medical equipment. Valley View Hospital is a non-profit organization that meets the essential health care needs for the public welfare of a large portion of rural east central Oklahoma. Valley View Hospital treats all patients regardless of their ability to pay, including the indigent. Valley View reports that a high percentage of their patients are low- to moderate-income. Approximately 54 percent of net patient revenue is from Medicare and state-sponsored Medicaid programs for the years ended 2005 and 2006. Many of the rural population served would not otherwise receive health care due to the lack of income or the inability to drive the distances required to receive services.

The bank originated a \$110 thousand loan to finance an affordable 10 unit apartment complex located in Ada, Oklahoma. The average rent for this complex is \$400 per month, which is slightly below the weighted average monthly rent for the county of \$422 per month. The bank made three other loans for affordable multi-family housing totaling \$490 thousand in towns that are outside, but adjacent to the bank's AAs.

### **QUALIFIED INVESTMENTS**

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the CRA regulation.

During the evaluation period, the bank made over 100 qualified donations totaling \$50 thousand in Vision Bank's AAs. Donations are to local non-profit organizations that provide social services, youth programs, affordable housing, and health care services that target elderly and low- to moderate-income individuals.

In addition, the bank purchased \$4 million in a total of about \$18 million in Sales Tax Revenue Notes issued by the Pontotoc County Facilities Authority to construct a new county jail and perform renovations to the county courthouse located in Ada, Oklahoma. This investment allowed for the construction and renovation of two critical infrastructure projects, in addition to retaining and creating low- to moderate-income jobs. The courthouse is located in a moderate-income census tract.

### **COMMUNITY DEVELOPMENT SERVICES**

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

- ***Financial Literacy***

Vision Bank is dedicated to promoting financial literacy in their communities. With the partnership of the Oklahoma Bankers Association and Oklahoma Society of Certified Public Accountants, Vision Bank officers presented classes on personal finance to students of all levels at East Central University. Several bank staff members spearheaded the implementation of a general education course on personal finance to the University's required "core" curriculum. The class is now one option for every freshman enrolling in the University starting Fall 2008 to meet their education requirement. Bank officers also spend considerable time providing other financial literacy courses to the community, programs such as "How to do Your Banking" and "Lets Talk Money".

- ***Ada, Meeker, & Prague Chambers of Commerce***  
Bank officers are very active in taking leadership positions in local Chambers of Commerce. Bank officers currently serve as board members on the Ada, Meeker, and Prague Chambers and provide technical expertise through their involvement with planning, budgeting, and financing activities. A bank officer serves as Treasurer at the Meeker Chamber. These Chambers are all active with regard to economic development and to the retention and recruiting of new businesses within their respective communities.
- ***Ada Industrial Development Corp., Pontotoc County Industrial Development Corp., Tri-County Indian National Development Corp., Lincoln County Economic Development Authority and Central Oklahoma Economic Development Authority.***  
Bank officers serve as board members of these non-profit organizations whose primary objective is to create and retain quality jobs, recruit new firms and encourage and support new start-up firms.
- ***Court Appointed Special Advocates (CASA)***  
A bank officer serves as a board member of this non-profit organization. Every year millions of children are abused, neglected or abandoned in the United States. CASA provides court appointed advocacy for these children so they can thrive in safe, permanent homes.
- ***Ada and Prague Main Street Association***  
Bank officer serves as President of the Ada Main Street Association and with two bank officers serving as board members of Prague Main Street Association. The focus of these organizations is to revitalize the downtown area and to retain and attract new business to downtown Ada and Prague to make the business district economically viable for independently owned businesses.

## RETAIL DELIVERY SYSTEMS

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

<b>Distribution of Bank Offices and ATMs by Census Tract</b>						
<b>Census Tract Income Level</b>	<b>Tracts in AA</b>		<b>Full-Service Offices</b>		<b>Automated Teller Machines*</b>	
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
Low	0	0.00%	0	0.00%	0	0.00%
Moderate	6	18.75%	2	33.33%	5	35.71%
Middle	22	68.75%	2	33.33%	4	28.57%
Upper	4	12.50%	2	33.33%	5	35.71%
<b>Total</b>	<b>32</b>	<b>100.00%</b>	<b>8</b>	<b>100.00%</b>	<b>14</b>	<b>100.00%</b>

Vision Bank has a separate Call Center staffed by six people to allow customers to perform banking activities during banking hours. Vision Bank also offers 24 hour services via telephone banking (Vision Voice) or by Internet banking. Internet banking services allow viewing account information, transfers between accounts, and for commercial customers wire transfers and cash management features.

## Fair Lending or Other Illegal Credit Practices Review

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