

PUBLIC DISCLOSURE

October 10, 2006

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Coppermark Bank
Certificate Number: 18957**

**3333 NW Expressway
Oklahoma City, Oklahoma 73125-0676**

**Federal Deposit Insurance Corporation
Division of Supervision and Consumer Protection
1910 Pacific Avenue, 19th Floor
Dallas, Texas 75201**

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.

STATE

CRA RATING FOR TEXAS: Needs to Improve.

The Lending Test is rated: Needs to Improve.

The Community Development Test is rated: Needs to Improve.

The overall rating assigned for Coppermark's performance in the Texas assessment area is based upon the less than satisfactory performance ratings for both the lending and community development tests. CRA intermediate small bank regulatory requirements dictate that an overall satisfactory rating can only be given if both the lending and community development tests are rated satisfactory or better. Although the three Texas branches currently combine for a 265 percent loan-to-deposit ratio, the marginal satisfactory performance in borrower profile and weak geographic distribution lowers the lending test rating. Furthermore, the lack of adequate activity and responsiveness in meeting the community development needs in the Texas assessment area has deemed the less than satisfactory rating for the community development test.

However, consideration was given to Coppermark's very limited presence in the Texas market and that deposits from these branches represent only 4 percent of Coppermark's total deposits and 15 percent of total loans. Therefore, Coppermark's overall CRA rating was nearly entirely derived from the State of Oklahoma rating and examiners gave little weight to the overall performance rating for the State of Texas.

SCOPE OF EXAMINATION

A full-scope review of Coppermark's CRA activities in the Texas assessment area was done using intermediate small bank examination procedures for institutions with multistate branches. All 2005 small business and 2004 HMDA loans originated by Coppermark and within the Texas assessment area were reviewed and compared with corresponding assessment area demographics and aggregate lending data. In addition, community development loans, investments, services, and responsiveness to community development needs since the 2003 evaluation were also reviewed for this evaluation.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXAS

Coppermark operates in Texas with three full-service branch offices that include drive-in facilities at each location. Two of the three offices have opened since the previous evaluation and all are located in the North Dallas and Plano area. Each office also has an automated teller machine and has reasonable hours of operations. As of June 30, 2005, Coppermark was ranked 99th out of 121 institutions in deposit market share in its Texas assessment area.

Geographic Distribution

The institution demonstrated a less than satisfactory record of originating small business and residential real estate loans in the lower-income geographical areas in its assessment area. This is based on the bank's reported loans in 2004 and 2005 when compared to assessment area demographics and aggregate lending data. The bank did not originate any small business loans in a low- or moderate-income tract in the Texas assessment area and only originated one HMDA reportable loan in a moderate-income tract. Although it is noted that none of the three offices are located in a low- or moderate-income tract, that reason alone does not absolve the bank from serving all income level geographies in its assessment area designated by management.

CONCLUSIONS OF COMMUNITY DEVELOPMENT PERFORMANCE

The institution's community development performance in the state of Texas is not consistent with its performance in the State of Oklahoma. The only activities that took place in Texas since 2003 despite opening two new branch offices consists of one community development loan for affordable housing apartments in a low-income tract, one investment to the Dallas Senior Housing Crime Prevention Foundation, and two donations for \$1,500. This small amount of activity indicates a less than satisfactory responsiveness to community development needs in the Texas assessment area.