

PUBLIC DISCLOSURE

November 30, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Coppermark Bank
Certificate Number: 18957**

**3333 Northwest Expressway
Oklahoma City, Oklahoma 73112**

**Federal Deposit Insurance Corporation
Division of Supervision and Consumer Protection
Dallas Regional Office**

**1601 Bryan Street
Dallas, Texas 75201-4586**

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

INSTITUTION'S CRA RATING: This institution is rated: Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The Federal Deposit Insurance Corporation (FDIC) rated Coppermark Bank Satisfactory at its previous October 10, 2006, CRA evaluation utilizing intermediate small bank examination procedures. For this evaluation, examiners reviewed the tests and performance factors applicable to intermediate small banks with multistate branches. Performance factors applicable to intermediate small banks are the Lending Test and the Community Development Test. Individual ratings for each test are summarized below. A detailed analysis of each test is provided elsewhere in this report.

Lending Test

Coppermark Bank demonstrated a satisfactory record regarding the Lending Test. After it was determined that the bank displayed satisfactory performance regarding the loan-to-deposit ratio and lending within the assessment areas, examiners focused on performance, first by the loan dispersion based on the borrowers' profiles and then by the loan geographic distribution, to arrive at the performance rating. The institution exhibited the following records regarding the performance criteria used to evaluate this test:

- The loan-to-deposit ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans and other lending-related activities are in the institution's assessment areas, reflecting a reasonable commitment to meeting the credit needs of the assessment area.
- The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The bank received no CRA-related complaints since the previous evaluation. As such, this factor was not considered in evaluating the bank's performance.

Table 8 – Distribution 2008 Texas Residential Loans By Tract Income Level

Tract Income Level	% of Families*	2008 Peer Lending Data Percents **		Coppermark Bank 2008 HMDA Loans			
		% of #	% of \$	#	%	\$(000)	%
Low	7	1	1	0	0	0	0
Moderate	25	11	7	0	0	0	0
Middle	33	34	28	1	25	165	15
Upper	35	54	64	3	75	957	85
Total	100	100	100	4	100	1,122	100

Source: *2000 U.S. Census; ** 2008 HMDA aggregate data; 2008 HMDA LAR.

CONCLUSIONS OF COMMUNITY DEVELOPMENT PERFORMANCE IN TEXAS

The institution's community development performance in the state of Texas is not consistent with its performance in the State of Oklahoma. The bank has two community development loans in the Texas area.

- One is participation in the Loan Star CRA Fund in the amount of \$1 million.
- One is continued participation in the Senior Housing Crime Prevention in the amount of \$250,000.
- Bank staff in Texas is participating in community services by teaching the FDIC Money Matters to young adults at the Dallas Boys and Girls Club.