



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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**Community Reinvestment Act (CRA)
Performance Evaluation**

**Simmons First National Bank
Charter Number: 6680**

**501 Main Street
Pine Bluff, AR 71611**

Office of the Comptroller of the Currency

**Little Rock Field Office
10201 West Markham, Suite 105
Little Rock, AR 72205**

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 **Simmons First National Bank (SFNB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Simmons First National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
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:

- Geographic distribution for home mortgage loans is adequate.
- Borrower distribution for home mortgage loans is adequate.
- Geographic distribution for small loans to businesses is excellent.
- Borrower distribution for small loans to businesses is excellent.
- SFNB has a good level of qualified investments in the Pine Bluff Metropolitan Area (MA) and an adequate level in the Fort Smith MA and the Little Rock/North Little Rock MA.
- Branch distribution is good in the Fort Smith MA and the Little Rock/North Little Rock MA and good in the Pine Bluff MA.
- SFNB has a good level of Community Development (CD) 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.

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 (CD): 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 Office of the Comptroller of the Currency (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 householder 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 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 statistical 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). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100% 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% of the area median income, or a median family income that is less than 50%, 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 Metropolitan Area/Assessment Area (AA).

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 (HUD) 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: Any Metropolitan Statistical Area or metropolitan division, as defined by the Office of Management and Budget (OMB) and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by OMB, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the OMB, as having at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

Moderate-Income: Individual income that is at least 50% and less than 80% of the area median income, or a median family income that is at least 50% and less than 80%, 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 MA. 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 MA, the institution will receive a rating for the multi-state MA.

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.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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 1 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% of the area median income, or a median family income that is more than 120%, in the case of a geography.

Description of Institution

SFNB, headquartered in Pine Bluff, Arkansas is a wholly owned subsidiary of Simmons First National Corporation, a \$2.4 billion multi-bank holding company, and is the lead bank in the company. The holding company provides a full range of consumer and commercial financial products and services, and operates one nationally chartered financial institution in El Dorado and state banks in Dumas, Jonesboro, Lake Village, Rogers, Russellville, and Searcy, Arkansas.

SFNB is an intrastate bank and the third largest commercial bank headquartered in Arkansas with total assets of \$1.2 billion as of September 30, 2005. The bank's deposit market share in Arkansas is 2.3% as of June 30, 2005. Net loans are reported at \$755 million, loan-to-deposit ratio at 80.0% and Tier 1 Capital at \$82 million.

During the evaluation period, SFNB's strategic plan has been to provide a wide array of financial services to consumers and small businesses, and excellent customer service within the market areas. The bank offers a variety of loan products, including the following types of loans: commercial and commercial real estate, consumer, credit card, and single-family real estate. SFNB operates 35 branch offices and 36 automated teller machines (ATM) throughout Arkansas. Banking offices are located in the MAs of Fort Smith, Little Rock/North Little Rock, and Pine Bluff, Arkansas. During the evaluation period, SFNB acquired nine branches from Union Planters Bank, N.A. and opened two branch offices in the Little Rock/North Little Rock MA in the cities of Conway and Little Rock.

SFNB has a large credit card operation with accounts throughout the United States. Credit card loans represent 17% of gross loans as of September 30, 2005. SFNB also originates a large volume of student loans. The bank ranks twentieth in the United States as a student loan originator. Net loans represent 63% of total assets. The loan portfolio is comprised of 35% loans to individuals (including credit cards), 44% loans secured by real estate, 11% commercial and industrial loans, and 9% agricultural loans.

No significant financial barriers limit SFNB's ability to meet the identified credit needs within its AA.

The prior CRA examination is dated February 25, 2002, and the assigned rating was "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

Conclusions regarding the Lending Test are based on home mortgage, small business, and small farm loans from January 2, 2002 through December 31, 2004. The community development lending performance analysis includes loans originated from February 25, 2002, through October 3, 2005.

The evaluation period for the Services Test and Investment Test was dated February 25, 2002, through October 3, 2005. The Services Test was evaluated based on branch distribution; hours of operation; branch openings and closings; alternative delivery systems; retail and commercial deposit and loan products and services; and community development services.

The Investment Test conclusions are based on an evaluation of qualified community development investments and donations.

Data Integrity

A sample of Home Mortgage Disclosure Act (HMDA) and CRA loans from 2003 and 2004 were reviewed for accuracy. The bank's data collection, control, and audit processes were assessed. No errors were noted in the reported data; the bank's data was determined to be reliable.

Selection of Areas for Full-Scope Review

In 2002 and 2003, the Fort Smith MA, Little Rock/North Little Rock MA, and the Pine Bluff MA were selected as full-scope areas. Franklin and Lincoln Counties were selected as limited-scope areas. In 2004, Fort Smith MA, Little Rock/North Little Rock MA, and the Pine Bluff MA were selected as full-scope areas. Fulton, Searcy, Sharp, Stone, and Van Buren Counties were selected as limited-scope areas.

SFNB is headquartered in the Pine Bluff MA, where the majority of the loan and deposit accounts are located. For this evaluation, the census tracts that comprise the city of Little Rock and Faulkner County were combined because they are a part of the Little Rock/North Little Rock MA. The Fort Smith MA was also selected because it is part of a MA.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. More weight was placed on performance in the Pine Bluff MA since approximately 50% of the bank's HMDA and CRA loans and 60% of deposits are reported in this AA.

Other

A community contact was conducted with a non-profit organization that assists low-income families to build assets through home ownership, post-secondary education, and entrepreneurship. The contact stated that SFNB was very responsive to the organization's needs.

Fair Lending or Other Illegal Credit Practices Review

No evidence of illegal discrimination or other illegal credit practices was found.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "**Low Satisfactory.**" Based on the bank's performance context and the full-scope review of the specific MAs and AAs, overall lending performance was adequate in the Fort Smith MA, the Little Rock/North Little Rock MA, and the Pine Bluff MA. Lending performance in the Pine Bluff MA was given the most weight considering the higher loan volume.

Lending Activity

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

Lending activity is adequate. SFNB is the dominant lender in the Pine Bluff MA. Approximately 46% of the bank's loans evaluated for CRA are in this market. During the evaluation period, from January 1, 2002 to December 31, 2004, the bank originated a good volume of loans to small businesses and residential real estate mortgages, which impacted CRA lending performance assessments. Also, the bank facilitated the origination of conventional home mortgage loans by referring qualified borrowers to other lenders. Due to the low volume of multi-family loans, these loans were not considered for geographical and borrower income distribution. During this period, the loan-to-deposit ratio has remained relatively stable, averaging 78%.

Fort Smith MA:

Loan volume in this assessment area was adequate. Overall, the Fort Smith MA accounts for approximately 16% of the bank's loans. The bank had 5.6% of the deposit share in the Fort Smith MA and ranked fifth in this market. SFNB ranked 14th in the AA for home purchase loans and had a 1.9% market share. For home improvement loans, SFNB ranked 7th with a 3.2% market share. The bank ranked 12th for refinance loans with a 2.4% market share. SFNB was ranked 13th with a 2.3% market share for small loans to businesses, and was ranked 5th with a market share of 7.2% for small loans to farms. Numerous nondeposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders competed for market share of loans in this market.

Little Rock/North Little Rock MA:

Loan volume in this assessment area was adequate. Overall, the Little Rock/North Little Rock MA accounts for approximately 18% of the bank's loans. The bank had 1.2% of the deposit share in Faulkner and Pulaski County (two of the counties that comprised the Little Rock/North Little Rock MA) and ranked 16th in this market. SFNB ranked 12th in the AA for home purchase

loans and had a 2.2% market share. For home improvement loans, SFNB ranked 5th with a 6.7% market share. The bank ranked 14th for refinance loans with a 2.3% market share. SFNB was ranked 20th with a 1.3% market share for small loans to businesses, and was ranked 5th with a market share of 7.2% for small loans to farms. Numerous nondeposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders compete for market share of loans in this market.

Pine Bluff MA:

Loan volume in this assessment area was good. Overall, the Pine Bluff MA accounted for approximately 46% of the bank's loans. The bank had 60% of the deposit share in Jefferson County and ranked first in this market. SFNB ranked first in the AA for home purchase loans and had a 22% market share. For home improvement loans, SFNB ranked first with a 65% market share. The bank ranked first for refinance loans with a 13% market share. SFNB was ranked first with a 37% market share for small loans to businesses, and was ranked first with a market share of 90% for small loans to farms. Numerous nondeposit taking institutions such as mortgage and finance companies, mobile home lenders, and various other lenders competed for market share of loans in this market.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

SFNB's overall distribution of loans by income level of the geography was adequate. Geographic distribution for home mortgage products was adequate in the Fort Smith MA, Little Rock/North Little Rock MA, and the Pine Bluff MA for the three years under review. Geographic distribution was excellent for small loans to businesses in the Pine Bluff MA in 2002 and 2004 and adequate in 2003. The geographic distribution for the Fort Smith MA and the Little Rock/North Little Rock MA was adequate for the three years under review. The geographic distribution of small loans to farms was excellent in the Pine Bluff MA for 2003 and 2004 and good in 2002. The geographic distribution of small loans to farms was not meaningful in the Fort Smith MA for 2002 and 2003 since there were few small loans to farms made for these years. However, the geographic distribution of small loans to farms was poor in the Fort Smith MA for the three years under review. The Little Rock/North Little Rock MA was not analyzed for loans to small farms as the percentage of farms in low- and moderate-income geographies was low and SFNB originated few loans in these geographies. No unexplained gaps exist. A majority of loans were originated in the bank's AAs. More weight was given to the Pine Bluff MA due to the higher loan volume in this market.

Home Mortgage Loans

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

The bank's distribution of home mortgage loans by income level of the geography was adequate in the Fort Smith MA, the Little Rock/North Little Rock MA and the Pine Bluff MA. More weight is given to performance in the moderate income CT's since there are significantly more owner-occupied housing units and opportunities for lending.

Home Purchase Loans:

Fort Smith MA:

Home purchase lending was adequate for all three years. In 2002, the bank did not originate any loans in low-income CTs. The percentage of owner-occupied housing units in low-income CTs was very low at 2.55%, indicating little opportunity for home purchase loans in these tracts. In 2003 and 2004, there were no low-income CTs in the AA. The percentage of home purchase loans to moderate-income geographies was lower than the percentage of owner-occupied units for 2002, and somewhat lower than its overall market share for 2003 and 2004. The bank's market share of home purchase loans in moderate-income geographies exceeded its overall market share for 2002, and was somewhat lower than the percentage of owner-occupied units for 2003. Market share data for 2004 was not yet available.

Little Rock/North Little Rock MA:

Home purchase lending was adequate for all three years. SFNB did not have any loans in low-income CTs during the three years under review. However, the percentage of owner-occupied housing units was less than 1.5%, indicating few opportunities to make home purchase loans. The percentage of home purchase loans to moderate-income geographies was lower than the percent of owner-occupied units for 2002, but was somewhat lower than the percent of owner-occupied units for 2003 and 2004. The bank's market share of home purchase loans in moderate-income geographies was somewhat lower than its overall market share for 2002, but near to its overall market share for 2003. Market share data for 2004 was not yet available.

Pine Bluff MA:

Home purchase lending was adequate for all three years. In 2002, SFNB did not report any loans in low-income tracts. The percentage of owner-occupied housing units was very low for low-income CTs, indicating the opportunity for home purchase loans was low to non-existent. In 2003 and 2004, there were no low-income CTs in the AA. The percentage of home purchase loans to moderate-income geographies was lower than the percentage of owner-occupied units for 2002, but somewhat lower than the percentage of owner-occupied units for 2003 and 2004. The bank's market share of home purchase loans in moderate-income geographies was somewhat lower than its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Home Improvement Loans:*Fort Smith AA:*

Home improvement lending was excellent for 2002, adequate for 2003, and poor for 2004. In 2002, SFNB did not originate any home improvement loans in low-income CTs. The percentage of owner-occupied housing units was low, indicating fewer opportunities to originate home improvement loans in low-income tracts. There were no low-income CTs present in the AA for 2003 and 2004. The percentage of home improvement loans to moderate-income geographies was near to the percentage of owner-occupied units for 2002, exceeded the percentage of owner-occupied units for 2003, and was somewhat lower than the percentage of owner-occupied units for 2004. The bank's market share of home improvement loans in moderate-income geographies was near to its overall market share for 2002, but exceeded its overall market share for 2003. Market share data for 2004 was not yet available.

Little Rock/North Little Rock MA:

Home improvement lending was poor for 2002, and good for 2003 and 2004. SFNB did not make any loans in low-income CTs for 2002 and 2004; however, the percentage of owner-occupied housing units was less than 1.5%. This percentage indicates very few opportunities to originate home improvement loans in low-income CTs. The percentage of home improvement loans to moderate-income geographies was somewhat lower than the percentage of owner-occupied units in 2002 and 2003, but was near to the percentage of owner-occupied units for 2004. The bank's market share of home improvement loans in moderate-income geographies was near to its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Pine Bluff MA:

Home improvement lending was good for 2002 and adequate for 2003 and 2004. The percentage of owner-occupied housing units for low-income geographies was either very small or non-existent, indicating fewer or no opportunities to originate home purchase loans. The percentage of home improvement loans to moderate-income geographies was near to the percent of owner-occupied units in 2002 and 2003, but was somewhat lower than the percent of owner-occupied units for 2004. The bank's market share of home improvement loans in moderate-income geographies exceeded its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Home Refinance Loans:

Fort Smith AA:

Home refinancing lending was poor for 2002 and 2003, and 2004. For 2002, SFNB's lending performance in low-income geographies was poor. However, the percentage of owner-occupied housing units in low-income CTs was low, indicating fewer opportunities to originate home refinance loans in these tracts. There were no low-income CTs in the AA for 2003 and 2004.

The percentage of home mortgage refinance loans to moderate-income geographies was lower than the percentage of owner-occupied units for the three years under review. The bank's market share of home mortgage refinance loans in moderate-income geographies was lower than its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Little Rock/North Little Rock MA:

Home refinancing lending was poor for 2002, 2003, and 2004. The percentage of bank loans in low-income CTs was poor in 2002 and 2003 and adequate in 2004. However, the percentage of owner-occupied housing units in low-income geographies was very low, indicating few opportunities to lend in these tracts. The percentage of home refinance loans to moderate-income geographies was lower than the percentage of owner-occupied units in 2002, and somewhat lower than the percentage of owner-occupied units for 2003 and 2004. The bank's market share of home refinance loans in moderate-income geographies was near to its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Pine Bluff MA:

Home refinancing lending was poor for 2002, 2003, and 2004. During the evaluation period, SFNB did not originate any home refinance loans in low-income geographies. There were no low-income CTs in the AA for 2003 and 2004. The percentage of owner-occupied housing units in 2002 for low-income CTs was very low, indicating little to no opportunities of originating home refinance loans in these tracts. The percentage of home refinance loans to moderate-income geographies was lower than the percentage of owner-occupied units in 2002, 2003 and 2004. The bank's market share of home refinance loans in moderate-income geographies was somewhat lower than its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Small Loans to Businesses

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

The distribution of loans by the income level of the geography was adequate in both the Fort Smith MA and Little Rock/North Little Rock MA and excellent in the Pine Bluff MA.

Fort Smith AA:

The distribution of small loans to businesses was adequate for 2002 and 2003, and poor for 2004. The geographic distribution of small loans to businesses in low-income geographies was somewhat lower than the percentage of small businesses located in low-income geographies for 2002. There were no low-income geographies for 2003 and 2004. The bank's market share of small loans to businesses in low-income geographies was somewhat lower than its overall market share for 2002. The geographic distribution of small loans to businesses in moderate-income geographies was somewhat lower than the percentage of small businesses located in moderate-income geographies for 2002, 2003, and poor for 2004. The bank's market share in moderate-income geographies was near to its overall market share for 2002 and somewhat lower than its overall market share for 2003. Market share data for 2004 was not yet available.

Little Rock/North Little Rock MA:

The distribution of small business loans was adequate for 2002, 2003, and 2004. The geographic distribution of small loans to businesses in low-income geographies exceeded the percentage of small businesses located in low-income geographies for all three years. The bank's market share of small loans to businesses in low-income geographies exceeded its overall market share for 2002 and 2003. Market share data for 2004 was not yet available. The geographic distribution of small loans to businesses in moderate-income geographies was lower than the percentage of small businesses located in moderate-income geographies for 2002 and somewhat lower than the percentage of small businesses located in moderate-income geographies for 2003 and 2004. The bank's market share of small loans to businesses in moderate-income geographies was somewhat lower than its overall market share for 2002, and near to its overall market share for 2003. Market share data for 2004 was not yet available.

Pine Bluff MA:

The distribution of small loans to businesses was excellent for 2002 and 2004 and good for 2003. The geographic distribution of small loans to businesses in low-income geographies exceeds the percentage of small businesses located in low-income geographies for 2002. There were no low-income geographies in the AA for 2003 and 2004. The bank's market share of small loans to businesses in low-income geographies exceeded its overall market share for 2002. The geographic distribution of small loans to businesses in moderate-income geographies was near to the percentage of small businesses located in moderate-income CTs for 2002 and 2003, and exceeded the percentage of small businesses located in moderate-income geographies for 2004. The bank's market share of small loans to businesses in moderate-income geographies exceeded its overall market share for 2002, and was near to its overall market share for 2003. Market share data for 2004 was not yet available.

Small Loans to Farms

Refer to Table 7 in Appendix C 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 distribution of small loans to farms by the income level of the geography was not meaningful in the Fort Smith MA due to low volume of loans for 2002 and 2003. The bank's distribution of small loans to farms by the income level of the geography in the Fort Smith MA was poor for 2004. Due to the low volume of loans in the Little Rock/North Little Rock MA, no analysis was performed. The bank's distribution of loans by the income level of the geography was excellent in the Pine Bluff MA.

Fort Smith AA

The bank's distribution of small loans to farms by the income level of the geography was not meaningful in the Fort Smith MA due to low volume of loans for 2002 and 2003. In 2004, the bank's distribution of small loans to farms by the income level of the geography was poor. The geographic distribution of small farm loans in moderate-income geographies was lower than the percentage of small farms located in moderate-income geographies for 2004. Market share data for 2004 was not yet available.

Little Rock/North Little Rock MA:

Lending performance was not analyzed for this AA due to the small number of small loans to farms originated by SFNB. The analyses would not have been meaningful.

Pine Bluff MA:

The distribution of small farm loans was excellent for 2002, 2003, and 2004. The geographic distribution of small loans to farms in low-income geographies was somewhat lower than the percentage of small farms located in low-income geographies for 2002. There were no low-income geographies in the AA for 2003 and 2004. The bank's market share of small loans to farms in low-income geographies exceeded its overall market share for 2002. The geographic distribution of small loans to farms in moderate-income geographies exceeded the percentage of small farms located in moderate-income geographies for 2002, 2003, and 2004. The bank's market share of small loans to farms in moderate-income geographies exceeded its overall market share for 2002, and was near to its overall market share for 2003. Market share data for 2004 was not yet available.

Lending Gap Analysis

Maps and reports were reviewed to identify any gaps in the geographic distribution home mortgage loans, small loans to businesses, and small loans to farms. No unexplained or conspicuous gaps were identified.

Inside/Outside Ratio

During the evaluation period, approximately 62% of the loans reviewed were within the bank's AAs. During 2002, approximately 78% of all loan types reviewed were within the bank's AAs. Further analysis reported 76% of the bank's home mortgage loans, 84% of the small loans to businesses, and 71% of the small loans to farms were within the bank's AAs. During 2003, approximately 54% of the loans reviewed were within the bank's AAs. An additional breakdown shows approximately 46% of the bank's home mortgage loans, 75% of the small loans to businesses, and 53% of the small loans to farms were within the bank's AAs. During 2004, approximately 63% of the loans reviewed were within the bank's AAs. Additionally, 50% of the bank's home mortgage loans, 86% of the small loans to businesses, and 67% of the small loans to farms were within the bank's AAs. This performance was a neutral factor in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

SFNB's overall distribution of loans by income level of the borrower was good. More weight was given to the Pine Bluff MA due to the loan volume in this market. Loan distribution by income level of the borrower was good in the Fort Smith MA, Little Rock/North Little Rock MA, and the Pine Bluff MA. Distribution of loans by income level of the borrower for home mortgage products was good in the Fort Smith MA and Pine Bluff MA, and adequate in the Little Rock/North Little Rock MA. Distribution of loans by income level of the borrower was excellent for small loans to businesses in the Fort Smith MA, Little Rock/North Little Rock MA,

and the Pine Bluff MA. Distribution of loans by income level of the borrower for small loans to farms was excellent in the Pine Bluff MA. Distribution of loans by income level of the borrower for small loans to farms was not analyzed in the Fort Smith MA for 2002 and 2003 due to the low volume of small farm loans. However, the distribution of loans by income level of the borrower for small loans to farms was excellent in the Fort Smith MA for 2004. The Little Rock/North Little Rock MA was not analyzed for small loans to farms since SFNB originated few farm loans in the AA.

Home Mortgage Loans

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

The distribution of loans by income level of the borrower was excellent in the Pine Bluff MA, and good in both the Fort Smith MA and the Little Rock/North Little Rock MA.

Home Purchase Loans:

Fort Smith MA:

Home purchase lending was adequate in 2002 and good for 2003 and 2004. The percentage of home purchase loans to low-income borrowers exceeded the percentage of low-income borrowers for 2002, but was lower than the percentage of low-income borrowers for 2003 and 2004. The bank's market share exceeded the overall market share for low-income borrowers for 2002 and somewhat lower than the overall market share for low-income borrowers for 2003. Market share data for 2004 was not yet available. The percentage of home purchase loans to moderate-income borrowers was lower than the percentage of moderate-income borrowers for 2002, but exceeded the percent of moderate-income borrowers for 2003 and 2004. The bank's market share to moderate-income borrowers was near to its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Little Rock/North Little Rock MA:

Home purchase lending was good for 2002, 2003, and 2004. The percentage of home purchase loans to low-income borrowers was lower than the percentage of low-income borrowers for all three years. The bank's market share for low-income borrowers was somewhat lower than its overall market share for low-income borrowers for 2002 and 2003. Market share data for 2004 was not yet available. The percentage of home purchase loans to moderate-income borrowers was near to the percentage of moderate-income borrowers for 2002 and 2003 and exceeded the percentage of moderate-income borrowers for 2004. The bank's market share for moderate-income borrowers was near to its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Pine Bluff MA:

Home purchase lending was adequate for 2002 and good for 2003 and 2004. The percentage of home purchase loans to low-income borrowers was lower than the percentage of low-income borrowers for 2002, 2003, and 2004. The bank's market share for low-income borrowers

exceeded its overall market share for low-income borrowers for 2002 and 2003. Market share data for 2004 was not yet available. The percentage of home purchase loans to moderate-income borrowers exceeded the percent of moderate-income borrowers for 2002, 2003, and 2004. The bank's market share for moderate-income borrowers exceeded its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Home Improvement Loans:

Fort Smith MA:

Home improvement lending was adequate for 2002, 2003, and 2004. The percentage of home improvement loans to low-income borrowers was lower than the percent of low-income borrowers for 2002, exceeded the percent of low-income borrowers for 2003, and was lower than the percent of low-income borrowers for 2004. The bank's market share was lower than the overall market share for low-income borrowers for 2002, but exceeded the overall market share for low-income borrowers for 2003. Market share data for 2004 was not yet available. The percentage of home improvement loans to moderate-income borrowers was somewhat lower than the percent of moderate-income borrowers for 2002, lower than the percent of moderate-income borrowers for 2003, but exceeded the percent of moderate-income borrowers for 2004. The bank's market share to moderate-income borrowers was near to its overall market share for 2002, but was lower than its overall market share for 2003. Market share data for 2004 was not yet available.

Little Rock/North Little Rock MA:

Home improvement lending was poor for 2002, and adequate for 2003 and 2004. The percentage of home improvement loans to low-income borrowers was lower than the percentage of low-income borrowers for 2002, 2003, and 2004. The bank did not originate any loans to low-income borrowers in 2002; therefore its market share for low-income borrowers was poor. The bank's market share for low-income borrowers in 2003 was somewhat lower than its overall market share for home improvement loans. Market share data for 2004 was not yet available. The percentage of home improvement loans to moderate-income borrowers was lower than the percentage of moderate-income borrowers for 2002. The bank's percentage of home improvement loans to moderate-income borrowers in 2003 was somewhat lower than the percentage of moderate-income families. The market share in 2003 to moderate-income borrowers was near to the bank's overall market share for home improvement loans. In 2004, SFNB's percentage of home improvement loans to moderate-income borrowers was near to the percentage of moderate-income families. Market share data for 2004 was not yet available.

Pine Bluff MA:

Home improvement lending was good for 2002, 2003, and 2004. The percentage of home improvement loans to low-income borrowers was somewhat lower than the percentage of low-income borrowers for all three years. The bank's market share for low-income borrowers exceeded its overall market share for low-income borrowers for 2002 and 2003. Market share data for 2004 was not yet available. The percentage of home improvement loans to moderate-

income borrowers exceeded the percentage of moderate-income borrowers for all three years. The bank's market share for moderate-income borrowers exceeded its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Home Refinance Loans:

Fort Smith MA:

Home refinancing lending was excellent for 2002 and 2004 and good for 2003. The percentage of home refinance loans to low-income borrowers exceeded the percentage of low-income borrowers for 2002 and 2004 and lower than the percentage of low-income borrowers for 2003. The bank's market share for low-income borrowers exceeded its overall market share for 2002 and 2003. Market share data for 2004 was not yet available. The percentage of home refinance loans to moderate-income borrowers exceeded the percent of moderate-income borrowers for 2002, 2003, and 2004. The bank's market share for moderate-income borrowers exceeded its overall market rate for 2002 and 2003. Market share data for 2004 was not yet available.

Little Rock/North Little Rock MA:

Home refinancing lending was adequate for 2002, 2003, and 2004. The percentage of home refinance loans to low-income borrowers was lower than the percent of low-income borrowers for 2002 and 2003, and somewhat lower than the percent of low-income borrowers for 2004. The bank's market share for low-income borrowers was neat to its overall market share for low-income borrowers for 2002 and 2003. Market share data for 2004 was not yet available. The percentage of home refinance loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income borrowers for 2002 and near to the percentage of moderate-income borrowers for 2003 and 2004. The bank's market share for moderate-income borrowers was near to its overall market share for 2002 and exceeded its overall market rate for 2003. Market share data for 2004 was not yet available.

Pine Bluff MA:

Home refinancing lending was adequate for 2002, 2003, and 2004. The percentage of home refinance loans to low-income borrowers was lower than the percentage of low-income borrowers for all three years. The bank's market share for low-income borrowers was near to its overall market share for 2002 and 2003. Market share data for 2004 was not yet available. The percentage of home refinance loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income borrowers for 2002 and 2003, and near to for 2004. The bank's market share for moderate-income borrowers was near to its overall market share for 2002 and 2003. Market share data for 2004 was not yet available.

Small Loans to Businesses

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

The distribution of loans by income level of the borrower was excellent in the Fort Smith MA, Little Rock/North Little Rock MA, and the Pine Bluff MA.

Fort Smith MA:

Distribution of small loans to businesses with revenues of \$1 million or less was excellent for all three years. The distribution of small loans to businesses with revenues of \$1 million or less exceeded the percentage of small businesses with revenues of \$1 million or less for all three years. The bank's market share of small business loans exceeded its overall market share for 2002 and 2003. There was no market share data available for 2004 at this time.

Little Rock/North Little Rock MA:

Distribution of loans to small businesses with revenues of \$1 million or less was good for 2002, and excellent for 2003 and 2004. In 2002, the distribution of loans to small businesses with revenues \$1 million or less was near to the percentage of small businesses with revenues of \$1 million or less, and exceeded the percentage of small business with revenues of \$1 million or less for 2003 and 2004. The bank's market share of small loans to businesses exceeded its overall market share for 2002 and 2003. There was no market share data available for 2004 at this time.

Pine Bluff MA:

Distribution of small loans to businesses with revenues of \$1 million or less was excellent for 2002, 2003 and 2004. The distribution of small loans to businesses with revenues of \$1 million or less exceeded the percentage of small businesses with revenues of \$1 million or less for all three years. The bank's market share of small loans to businesses exceeded its overall market share for 2002 and 2003. There was no market share data available for 2004 at this time.

Small Loans to Farms

Refer to Table 12 in the Appendix C 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 by income level of the borrower was excellent in the Pine Bluff MA for all three years under review, and excellent in the Fort Smith MA in 2004. Loan data in the Fort Smith MA and the Little Rock/North Little Rock MA was not analyzed in 2002 and 2003 due to low loan volume. In 2004, loan data was not analyzed in the Little Rock/North Little Rock MA due to low loan volume.

Fort Smith MA:

Distribution of small loans to farms with revenues of \$1 million or less was excellent for all three years; however, only the 2004 information was meaningful since there were few loans originated during 2002 and 2003. The bank's market share of small loans to farms exceeded its overall market share for 2002 and 2003. There was no market share data available for 2004 at this time.

Little Rock/North Little Rock MA:

Lending performance was not analyzed for this AA due to the low volume of small loans to farms originated by the bank during the evaluation period.

Pine Bluff MA:

Distribution of small loans to farms with revenues of \$1 million or less was excellent for 2002, 2003 and 2004. The distribution of small loans to farms with revenues of \$1 million or less exceeded the percentage of small businesses with revenues of \$1 million or less for all three years. The bank's market share of small loans to farms exceeded its overall market share for 2002 and 2003. There was no market share data available for 2004 at this time.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development 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.

SFNB did not have any loans that were considered community development during the evaluation period.

Product Innovation and Flexibility

SFNB did not have any products that are considered innovative and flexible.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in 2002 and 2003 in the Franklin County and Lincoln County AAs is not inconsistent with the bank's overall "**Low Satisfactory**" performance under the lending test. In the Fulton, Searcy, Sharp, Stone, and Van Buren Counties in 2004 the bank's performance is not inconsistent with the bank's overall "**Low Satisfactory**" performance under the Lending Test. Refer to Tables 1 through 13 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "**High Satisfactory.**" Based on full-scope reviews, the bank's performance in the Fort Smith AA was adequate. The bank's performance in the Pine Bluff MA was good. The bank's performance in the Little Rock AA was adequate.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of 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. SFNB's qualifying investments were centered in investments and grants/donations with the primary purpose of community development. Investment activity in the Pine Bluff MA carries the most weight.

SFNB had an adequate level of investments in the Fort Smith AA. During the evaluation period, SFNB had 115 qualified investments, grants/donations totaling \$121,801. These investments benefited organizations in the Fort Smith AA that provided a variety of services to low- and moderate-income individuals such as constructing affordable housing, eradicating illiteracy, and promoting youth programs.

SFNB had an adequate level of qualified investments in the Little Rock AA. During the evaluation period, SFNB had 70 qualified investments, grants/donations totaling \$92,661.

SFNB had a good level of qualified investments in the Pine Bluff MA. These investments were very responsive to the identified needs in the AA, i.e., affordable housing and small business financing. During the evaluation period, SFNB had 160 qualified investments totaling \$2.9 million. Of this amount, 159 are grants/donations totaling approximately \$575 thousand and one qualified investment or debt instrument totaling \$2.3 million. These investments benefited organizations in the Pine Bluff AA that provided a variety of services to low- and moderate-income individuals such as constructing affordable housing, eradicating illiteracy, and promoting youth programs.

The largest investment was a \$2.3 million Union County Economic Development Bond for water conservation in the Mississippi/Arkansas Delta. The funds will be used to build a Sparta Aquifer and create 1,407 jobs for the region. This investment would benefit both Lincoln & Jefferson Counties, which are part of the Arkansas Delta region.

The bank continues to have an investment in a SBIC (Diamond State Venture), in the amount of \$86,000 that benefits a regional area, primarily states in the southeast.

SFNB and its holding company, Simmons First National Corporation, each made a \$5,000 contribution to victims of Hurricane Katrina.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Franklin, Searcy, Van Buren, Sharp, Stone, and Fulton Counties was weaker than the bank's overall "High Satisfactory" performance under the Investment Test. There were fewer investment opportunities in these AAs.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service test is rated "**High Satisfactory.**" Based on full-scope reviews, the bank's performance in the Little Rock/North Little Rock MA is good. The bank's performance in the Pine Bluff MA and Forth Smith AA is excellent.

The primary delivery system is the bank's branch network. In 2002 and 2003, SFNB had 26 branches; and in 2004, 35 branches. The bank offers a wide variety of loan and deposit products, most of which are available at all banking offices. Commercial and agricultural loan products are limited to a few locations in the branch network, but this does not negatively impact the availability of services to low- and moderate-income areas or individuals. Alternative delivery systems include ATMs, telephone banking, and Internet banking services. Significant weight could not be placed on the alternative delivery systems when drawing conclusions because no data was available to judge the accessibility and effectiveness of such systems to low- and moderate-income geographies and low- and moderate-income individuals. Since the prior evaluation, nine full service branches have opened. In addition to SFNB's branch network, customers have access to 39 branches of affiliate banks in different markets throughout Arkansas. SFNB customers can conduct loan and deposit transactions at any affiliate bank. Banking hours are reasonable throughout the assessment areas, including low- and moderate-income tracts. High volume branches have extended hours on Fridays and half of the bank's branches are open on Saturdays. The bank provides a high level of community development services, primarily in the Pine Bluff MA.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Fort Smith MA:

The distribution of the bank's branch delivery system was good. The bank's service delivery systems were accessible to geographies and individuals of different income levels in the MA. SFNB did not have any branches in low-income tracts. During the evaluation period, the percentage of branches in moderate-income tracts exceeded the percentage of population that resided in the same tracts. No branches were opened in the Fort Smith MA during the evaluation period.

Little Rock/North Little Rock MA:

The distribution of the bank's branch delivery system was good. The bank's service delivery systems were accessible to geographies and individuals of different income levels in the MA. The percentage of branches in low-income tracts exceeded the percentage of population that resided in the same tracts. The percentage of branches in moderate-income tracts was somewhat lower than the percentage of population that resided in the same tracts. Two branches were opened in the Little Rock/North Little Rock MA during the evaluation period.

Pine Bluff MA:

The distribution of the bank’s branch delivery system was excellent. The bank’s service delivery systems are readily accessible to geographies and individuals of different income levels in the MA. SFNB did not have any low-income CTs in the AA. The percentage of branches in moderate-income tracts exceeds the percentage of population that resided in the same tracts. No branches were opened in the Pine Bluff MA during the evaluation period.

Community Development Services

SFNB provided a good level of community development services during the evaluation period. These services included providing technical assistance to nonprofit organizations that serve low- and -moderate income individuals and families. In addition, bank personnel provided assistance to other groups that promote community revitalization and development or affordable housing. The level of community development services was adequate for the Fort Smith MA and good for the Little Rock/North Little Rock MA and Pine Bluff MA.

In the Fort Smith MA, SFNB provided assistance in technical, financial, educational, and affordable housing opportunities to three organizations. The most notable was the Sutton School in Ft. Smith where bank personnel participated in the Sutton School’s Economic Fair. The purpose of the fair was to teach students and their parents the importance of planning and budgeting their personal finances.

In the Little Rock/North Little Rock MA, SFNB provided assistance in technical, financial, educational, and affordable housing opportunities to eight organizations. Some examples included Habitat for Humanity of Conway where bank personnel provided technical expertise to secure a \$31,788 grant from the Federal Home Loan Bank (FHLB). The grant funds were used to subsidize the construction of four new units of affordable housing. In addition, SFNB co-sponsored a Business Opportunity Seminar in conjunction with the Little Rock Chamber of Commerce for minorities, women, or small business owners looking for contract opportunities and financing.

SFNB has demonstrated good performance in providing community development services in the Pine Bluff MA. The bank actively sought opportunities and provided services to a large number of groups. During the evaluation period, SFNB provided educational information or technical assistance to the following types of organizations:

Affordable housing:

- SFNB provided educational information or technical assistance to 20 organizations that promoted affordable housing. The bank’s participation included speaking to low- and moderate-income individuals or groups on affordable housing financing and serving as board members on organizations that promoted or provided affordable housing.

The bank was successful in providing technical expertise to secure a \$75,000 grant from the FHLB. The grant was for applicants referred to the bank by the Association of Community Organizations for Reform Now (ACORN). ACORN provided home ownership counseling for the applicants, with SFNB making the permanent mortgage loan.

SFNB was a sponsor of the ACORN Homebuyer Fair and Workshop set up to provide information on various low- and moderate-income programs including: rural housing, Arkansas Development Finance Authority (ADFA) bond program, and City Grant Fund Programs. Approximately 60 people attended the seminar and workshop.

- A bank officer served on the Community Housing Resource Board, which helped to identify the barriers to affordable housing ownership and developed plans to overcome these barriers. The officer provided assistance in the areas of financing and opportunities for affordable housing financing.

Small business financing:

- Bank officers participated in several seminars that provided information on small business financing, specifically developing business plans, and Small Business Administration (SBA) loans. One notable activity was the bank's sponsorship of an annual Small Business seminar in conjunction with The Economic Development Research Department at University of Arkansas at Pine Bluff (UAPB). The seminar focused on credit, types of SBA loan programs, and how to apply for an SBA loan.

Consumer financial information:

- SFNB provided technical assistance to 14 organizations that educate clientele on general financial information such as budgeting and maintaining good credit. One of the most successful programs that the bank continues to be involved in is the Rapid Assets Individual Development Account (IDA) Program. SFNB bank officers provide technical assistance by serving on the board of the Good Faith Fund, which oversees the IDA Program. The Rapid Assets IDA program is a rapid asset-building strategy for low-income, low-asset individuals or families offered by the Good Faith Fund. It is designed to provide both adults and children with an opportunity to save their own money to begin accumulating assets, and to have their savings matched by state funds. Each dollar that an individual places into an IDA will be matched by three dollars of state funds.

Economic Development:

SFNB provided technical assistance to two organizations that promote economic development through job creation and retention. The most notable is the Economic Development Alliance of Jefferson County (Alliance). Several members of senior management assisted in forming this entity and continue to serve in various capacities providing technical assistance. The purpose of the Alliance is to create more and better jobs for low-and moderate- income citizens of Jefferson County. The Alliance hopes to achieve this goal through job training, attraction of new business, and overall economic revitalization of the area.

Other:

SFNB cashed 480 insurance drafts totaling \$429,636 for displaced hurricane evacuees. The bank also cashed social security and employment security checks for evacuees housed in the bank's assessment areas and throughout the state where SFNB has bank branches or affiliate banks. In addition, SFNB designated a "no fee" ATM in each market to assist disaster victims. The bank also posted information on its website to assist disaster victims.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in Fulton, Franklin, Lincoln, Searcy, Sharp, Stone, and Van Buren counties was not in consistent with the bank's "High Satisfactory" performance under the Service Test.

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	Lending Test (excludes CD Loans): 01/02/02 to 12/31/94 (Month Day, Year to Month Day, Year) Investment and Service Tests and CD Loans: 02/25/02 to 10/03/05	
Financial Institution	Products Reviewed	
Simmons First National Bank (SFNB) Pine Bluff, Arkansas	Home mortgage loans, small loans to businesses, small loans to farms, CD loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>Not applicable</i>		SFNB has several bank affiliates; however, no affiliate products were reviewed.
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Fort Smith MA #2720	Full Scope	City limits of Fort Smith in 2002 and all of Sebastian County in 2003 and 2004
Little Rock/North Little Rock MA # 4400	Full Scope	City Limits of Little Rock and all of Faulkner County
Pine Bluff MA #6240	Full Scope	Entire MA
Franklin County	Limited Scope	Entire County
Lincoln County	Limited Scope	Entire County
Fulton County	Limited Scope	Entire county
Searcy County	Limited Scope	Entire County
Sharp County	Limited Scope	Entire County
Stone County	Limited Scope	Entire County
Van Buren County	Limited Scope	Entire County

Appendix B: Market Profiles for Full-Scope Areas

2004 Fort Smith MA

Demographic Information for Full Scope Area: 2004 Fort Smith MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	0.00	14.29	57.14	28.57	0.00
Population by Geography	132,842	0.00	10.32	64.12	25.56	0.00
Owner-Occupied Housing by Geography	34,159	0.00	7.44	65.58	26.98	0.00
Business by Geography	8,048	0.00	17.21	52.58	30.21	0.00
Farms by Geography	205	0.00	7.32	71.71	20.98	0.00
Family Distribution by Income Level	35,961	17.01	16.56	22.47	43.95	0.00
Distribution of Low and Moderate Income Families throughout MSA Geographies	12,073	0.00	15.42	69.00	15.58	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below Poverty Level		37,051 43,200 13.76%	Median Housing Value Unemployment Rate (2000 US Census)		69,657 2.47%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2004 HUD updated MFI

The Fort Smith MA is located in the northwest Arkansas region. The northern portion of this region consists of the Ozark Mountains. The southern portion of this region consists of the Arkansas River Valley, an area of broad valleys and ridges that separate the Ouachita and Ozark Mountains. The MA is comprised of 28 census tracts in Sebastian County, of which 4 are moderate-income, 16 are middle-income, and 8 are upper-income. Fort Smith is the largest city in Sebastian County. The 2000 population of this geographical area is 132,842. There are 51,130 families in the Fort Smith MSA. The U.S. Census 2000 median family income for the MSA is \$37,051. The updated 2004 HUD MFI used to determine individual income classifications is \$43,200.

The economy is stable. Sebastian County has a civilian labor force of 55,600 in 2000, compared to 52,475 in 1990. The unemployment rate for the MA in 2004 was 5.1%. Dun and Bradstreet reported in 2004 there were 10,562 businesses and 298 farms situated in the Fort Smith MA. Approximately 62.3% of the businesses and 86.6% of the farms reported gross annual revenues less than \$1 million. Retail trade and services comprise the majority of the industries within the Fort Smith MA. Manufacturing and agriculture represents a minor percent of the industries. The most significant employers include Arkansas Best Corporation, Baldor Electric, Fort Smith Public Schools, OK Industries, Rheem Manufacturing Corporation, Riverside Furniture Corporation, Sparks Health System, St. Edward Mercy Medical Center, The Trane Company, and Whirlpool Corporation.

Competition for loan and deposit customers is very active in the MA. SFNB operates seven branches in the Fort Smith MA. The larger competitors are branch facilities of mid-sized and large regional banks and credit unions. The major competitors for both loans and deposits are BancorpSouth (formerly City National Bank), Farmers Bank, First National Bank of Fort Smith, Regions Bank, and Superior Federal Bank FSB. In terms of deposit market share, Simmons ranks eighth in the MSA with a 4.3% market share as of June 30, 2005. First National Bank of Fort Smith ranks first with a 16.5% market share.

2004 Little Rock/North Little Rock MA

Demographic Information for Full Scope Area: 2004 LR-NLR MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	73	6.85	28.77	43.84	20.55	0.00
Population by Geography	296,520	2.19	23.90	47.06	26.85	0.00
Owner-Occupied Housing by Geography	74,399	1.22	17.96	48.82	31.99	0.00
Business by Geography	21,090	9.70	25.48	41.18	23.64	0.00
Farms by Geography	456	3.73	11.62	53.07	31.58	0.00
Family Distribution by Income Level	77,167	21.21	17.47	20.29	41.03	0.00
Distribution of Low and Moderate Income Families throughout MSA Geographies	29,848	3.16	35.17	47.48	14.19	0.00
Median Family Income		46,412	Median Housing Value		84,939	
HUD Adjusted Median Family Income for 2004		54,200	Unemployment Rate (2000 US Census)		2.61%	
Households Below Poverty Level		11.80%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2004 HUD updated MFI

The Little Rock - North Little Rock MA is located in the central Arkansas region. The MA is comprised of 73 census tracts in Faulkner, Grant, Lonoke, Perry, Pulaski and Saline Counties, of which 5 are low-income, 21 are moderate-income, 32 are middle-income, and 15 are upper-income. Little Rock is the capital of Arkansas. The 2000 population of this geographical area is 437,221. There are 166,392 families in the Little Rock - North Little Rock MSA. The U.S. Census 2000 MFI for the MSA is \$46,412. The updated 2004 HUD MFI used to determine individual income classifications is \$54,200.

The economy is stable. The civilian labor force represents approximately 302,170 in 2000. The unemployment rate for the MA was 5.1% as of 2004. Dun and Bradstreet reported in 2004 there were 36,336 businesses and 1,101 farms situated in the MA. Approximately 63.6% of the businesses and 88.3% of the farms reported gross annual revenues less than \$1 million. Retail trade and services comprise the majority of the industries within the MA. Manufacturing and agriculture represents a minor percent of the industries. The most significant employers include Alltel, Acxiom, Dillard's, Jacuzzi, Stephens Inc., Tyson Foods and WalMart. Higher education is also a major employer in the MA with two of the state's larger universities: the University of Arkansas at Little Rock and the University of Central Arkansas (located in Conway, AR).

Competition for loan and deposit customers is very active in the MA. SFNB operates 6 branches in the MA. The larger competitors are branch facilities of mid-sized and large regional banks and credit unions. The major competitors for both loans and deposits are Regions Bank, Metropolitan National Bank, Bank of the Ozarks, Arvest Bank, Twin City Bank and U S Bank National Association. In terms of deposit market share, SFNB ranks 17th in the MA with a 1.29% market share as of June 30, 2005. Regions Bank ranks first with an 18.1% market share.

2004 Pine Bluff MA

Demographic Information for Full Scope Area: 2004 Pine Bluff MA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	0.00	35.48	45.16	19.35	0.00
Population by Geography	98,770	0.00	37.62	38.54	23.84	0.00
Owner-Occupied Housing by Geography	23,457	0.00	31.14	39.82	29.04	0.00
Business by Geography	4,469	0.00	40.19	40.46	19.36	0.00
Farms by Geography	244	0.00	44.26	42.62	13.11	0.00
Family Distribution by Income Level	24,764	23.62	16.20	20.21	39.97	0.00
Distribution of Low and Moderate Income Families throughout MSA Geographies	9,862	0.00	50.28	35.28	14.44	0.00
Median Family Income		37,881	Median Housing Value	51,440		
HUD Adjusted Median Family Income for 2004		44,200	Unemployment Rate (2000 US Census)	3.33%		
Households Below Poverty Level		19.09%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2004 HUD updated MFI

The Pine Bluff MA is located in the southeastern Arkansas region. The geography of the region consists of the Mississippi Delta. The Arkansas, Ouachita, and White Rivers traverse this region. Crowley’s Ridge is also a prominent geological feature of the region. The cities and towns of Altheimer, Dudley, Pine Bluff, Plum Bayou, Redfield, Richland, Spring, Washington, and White Hall comprise the geographical area known as Jefferson County. The 2000 population for the area is 98,770 with 55,085 in the city of Pine Bluff.

There are 31 census tracts in the Pine Bluff MSA, of which 11 are moderate-income, 14 are middle-income, six are upper-income. There are 27,279 families in the Pine Bluff MA. The U.S. Census 2000 median family income for the assessment area is \$37,881. The updated 2004 HUD MFI used to determine individual income classifications is \$44,200.

The area’s economy is weak. Jefferson County has a civilian labor force of 36,150 in 2000, down 5.1% from 1990. The unemployment rate for the county as a whole was 7.1% in 2000, compared to 4.4% for the state of Arkansas. The annual unemployment rate for 2004 was 7.8% in the MA. Dun and Bradstreet reported in 2004 there were 4,719 businesses and 275 farms situated in Jefferson County. Approximately 63.3% of the businesses and 90.9% of the farms reported gross annual revenues less than \$1 million. Retail trade and services comprise 65.1% of the industry in Jefferson County. Agriculture represents 5.5% of the industry followed by construction at 6.3%. The most significant employers include Tyson Foods, Inc., Jefferson Regional Medical Center, International Paper, Department of the Army - Pine Bluff Arsenal, Arkansas Department of Corrections, Pine Bluff Public Schools, Union Pacific Railroad, University of Arkansas at Pine Bluff, Central Moloney, Inc., and the National Center for Toxicological Research.

Competition for loan and deposit customers is very active in the MA. SFNB operates eleven full-service branches in Jefferson County. The larger competitors are branch facilities of mid-sized and large regional banks and credit unions. The major competitors for both loans and deposits include Bank of America, NA and Pine Bluff National Bank. In terms of deposit market share, SFNB ranks first in the assessment area with a 56.3% market share as of June 30, 2005.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Tables without data are not included in this Performance Evaluation (PE).

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/AA.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic 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/AA.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the

investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME		Geography: ARKANSAS 2002						Evaluation Period: JANUARY 2, 2002 TO DECEMBER 31, 2002				
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
2002 Fort Sm	6.13	26	1,046	88	4,846	1	8	0	0	115	5,900	12.68
2002 LR-Nl	26.08	307	32,305	172	12,603	10	1,177	0	0	489	46,085	13.57
2002 Pine Bl	51.15	297	16,958	465	29,215	197	15,028	0	0	959	61,201	63.54
Limited Review:												
2002 Franklin	9.07	38	999	50	2,650	82	932	0	0	170	4,581	7.81
2002 Lincoln	7.57	7	343	50	1,476	85	6,149	0	0	142	7,968	2.40

* Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from February 25, 2002 to December 31, 2002.

*** Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 31, 2002		Geography: ARKANSAS 2002						Evaluation Period: JANUARY 2, 2002 TO DECEMBER							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2002 Fort Smith MSA	6	2.13	2.55	0.00	9.81	0.00	32.89	83.33	54.75	16.67	1.45	0.00	2.20	1.86	1.14
2002 LR-NLR MSA	114	40.43	1.41	0.00	23.43	7.02	42.75	71.93	32.41	21.05	2.25	0.00	1.20	3.24	1.57
2002 Pine Bluff MSA	154	54.61	0.50	0.00	21.68	4.55	44.12	24.68	33.71	70.78	25.22	0.00	16.00	21.26	28.71
Limited Review:															
2002 Franklin County	3	1.06	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	6.81	0.00	0.00	6.81	0.00
2002 Lincoln County	5	1.77	0.00	0.00	22.78	20.00	46.72	80.00	30.50	0.00	10.47	0.00	14.29	11.59	0.00

* Based on 2002 Peer Mortgage Data (SW)

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

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2002		Geography: ARKANSAS 2002								Evaluation Period: JANUARY 2, 2002 TO					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% Owner Occ ^{***} Units	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
2002 Fort Smith MSA	12	8.39	2.55	0.00	9.81	8.33	32.89	16.67	54.75	75.00	2.52	0.00	1.92	1.44	3.25
2002 LR-NLR MSA	40	27.97	1.41	0.00	23.43	10.00	42.75	52.50	32.41	37.50	5.38	0.00	4.71	6.40	4.64
2002 Pine Bluff MSA	74	51.75	0.50	0.00	21.68	20.27	44.12	32.43	33.71	47.30	57.81	0.00	62.50	51.06	61.40
Limited Review:															
2002 Franklin County	17	11.89	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	30.59	0.00	0.00	30.59	0.00
2002 Lincoln County	0	0.00	0.00	0.00	22.78	0.00	46.72	0.00	30.50	0.00	25.00	0.00	0.00	30.00	0.00

^{*} Based on 2002 Peer Mortgage Data (SW)

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

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2002			Geography: ARKANSAS 2002						Evaluation Period: JANUARY 2, 2002 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2002 Fort Smith MSA	5	2.03	2.55	0.00	9.81	0.00	32.89	40.00	54.75	60.00	1.45	0.00	0.00	1.28	1.67
2002 LR-NLR MSA	153	62.20	1.41	0.00	23.43	10.46	42.75	75.16	32.41	14.38	2.47	0.00	1.78	3.30	1.87
2002 Pine Bluff MSA	68	27.64	0.50	0.00	21.68	4.41	44.12	38.24	33.71	57.35	14.66	0.00	6.38	12.8 2	17.2 6
Limited Review:															
2002 Franklin County	18	7.32	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	7.73	0.00	0.00	7.73	0.00
2002 Lincoln County	2	0.81	0.00	0.00	22.78	0.00	46.72	100.00	30.50	0.00	9.62	0.00	0.00	10.8 7	0.00

* Based on 2002 Peer Mortgage Data (SW)

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

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 2002		Geography: ARKANSAS 2002								Evaluation Period: JANUARY 2, 2002 TO DECEMBER 31,					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2002 Fort Smith MSA	3	75.00	1.80	0.00	17.40	66.67	27.67	33.33	53.12	0.00	16.67	0.00	66.67	25.00	0.00
2002 LR-NLR MSA	0	0.00	0.27	0.00	20.74	0.00	29.14	0.00	49.86	0.00	0.00	0.00	0.00	0.00	0.00
2002 Pine Bluff MSA	1	25.00	0.69	0.00	27.98	100.00	23.16	0.00	48.17	0.00	14.29	0.00	100.00	0.00	0.00
Limited Review:															
2002 Franklin County	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2002 Lincoln County	0	0.00	0.00	0.00	32.50	0.00	67.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2002 Peer Mortgage Data (SW)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2002			Geography: ARKANSAS 2002								Evaluation Period: JANUARY 2, 2002 TO				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	% of Business es***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2002 Fort Smith MSA	88	10.67	9.35	6.82	20.64	13.64	20.03	11.36	49.97	68.18	2.47	1.92	2.26	1.78	3.76
2002 LR-NLR MSA	172	20.85	0.94	2.33	22.77	11.05	43.98	47.09	32.31	39.53	1.37	1.69	0.76	1.65	1.62
2002 Pine Bluff MSA	465	56.36	9.74	12.90	25.21	24.09	34.50	24.30	30.55	38.71	32.61	55.05	40.00	29.05	34.48
Limited Review:															
2002 Franklin County	50	6.06	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.55	0.00	0.00	11.66	0.00
2002 Lincoln County	50	6.06	0.00	0.00	19.95	36.00	77.96	52.00	2.09	12.00	30.67	0.00	50.00	33.77	75.00

* Based on 2002 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2002		Geography: ARKANSAS 2002								Evaluation Period: JANUARY 2, 2002 TO					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2002 Fort Smith MSA	1	0.27	1.56	0.00	9.38	0.00	29.69	100.00	59.38	0.00	13.22	0.00	0.00	16.00	0.00
2002 LR-NLR MSA	10	2.67	1.07	0.00	24.60	30.00	44.92	20.00	29.41	50.00	8.56	0.00	7.23	7.14	15.15
2002 Pine Bluff MSA	197	52.53	1.15	0.51	27.01	40.61	54.02	50.25	17.82	8.63	89.14	100.0 0	91.95	88.39	80.95
Limited Review:															
2002 Franklin County	82	21.87	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	32.67	0.00	0.00	32.67	0.00
2002 Lincoln County	85	22.67	0.00	0.00	68.29	61.18	31.71	36.47	0.00	2.35	90.43	0.00	86.67	96.88	100.0 0

* Based on 2002 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 31, 2002			Geography: ARKANSAS 2002				Evaluation Period: JANUARY 2, 2002 TO DECEMBER					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families** *	% BANK Loans****	% Families ***	% BANK Loans****	% Families ***	% BANK Loans****						
Full Review:																
2002 Fort Smith MSA	6	2.13	14.74	33.33	14.46	0.00	22.32	16.67	48.47	50.00	2.01	3.45	1.92	1.89	1.89	
2002 LR-NLR MSA	114	40.43	20.41	4.39	17.21	15.79	21.41	15.79	40.98	64.04	2.63	1.17	2.03	2.22	3.39	
2002 Pine Bluff MSA	154	54.61	25.20	9.93	14.36	20.53	19.36	23.18	41.07	46.36	31.59	35.4 2	36.9 0	31.7 6	28.9 2	
Limited Review:																
2002 Franklin County	3	1.06	19.74	0.00	18.93	0.00	22.95	33.33	38.39	66.67	9.49	20.0 0	6.67	6.67	10.4 5	
2002 Lincoln County	5	1.77	23.52	0.00	14.85	0.00	19.03	40.00	42.61	60.00	11.84	25.0 0	7.14	9.52	13.5 1	

* Based on 2002 Peer Mortgage Data (SW)

** As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchased by bank.

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2002		Geography: ARKANSAS 2002								Evaluation Period: JANUARY 2, 2002 TO DECEMBER					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2002 Fort Smith MSA	12	8.39	14.74	0.00	14.46	8.33	22.32	25.00	48.47	66.67	2.64	0.00	1.75	2.97	3.08
2002 LR-NLR MSA	40	27.97	20.41	0.00	17.21	5.13	21.41	20.51	40.98	74.36	5.21	0.00	1.47	6.09	6.68
2002 Pine Bluff MSA	74	51.75	25.20	13.85	14.36	23.08	19.36	20.00	41.07	43.08	55.08	81.8 2	75.0 0	56.5 2	43.7 5
Limited Review:															
2002 Franklin County	17	11.89	19.74	0.00	18.93	26.67	22.95	33.33	38.39	40.00	32.00	14.2 9	45.4 5	40.0 0	27.0 3
2002 Lincoln County	0	0.00	23.52	0.00	14.85	0.00	19.03	0.00	42.61	0.00	25.00	0.00	0.00	66.6 7	12.5 0

* Based on 2002 Peer Mortgage Data (SW)

** As a percentage of loans with borrower income information available. No information was available for 8.4% of loans originated and purchased by bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2002			Geography: ARKANSAS 2002						Evaluation Period: JANUARY 2, 2002 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
2002 Fort Smith MSA	5	2.03	14.74	20.00	14.46	20.00	22.32	0.00	48.47	60.00	1.94	3.92	4.42	2.36	1.28
2002 LR-NLR MSA	153	62.20	20.41	3.97	17.21	11.26	21.41	23.84	40.98	60.93	2.84	2.73	2.39	2.88	2.93
2002 Pine Bluff MSA	68	27.64	25.20	8.82	14.36	10.29	19.36	14.71	41.07	66.18	18.51	16.67	16.00	18.29	19.15
Limited Review:															
2002 Franklin County	18	7.32	19.74	0.00	18.93	16.67	22.95	27.78	38.39	55.56	8.59	0.00	4.92	10.87	9.66
2002 Lincoln County	2	0.81	23.52	0.00	14.85	0.00	19.03	0.00	42.61	100.00	12.35	33.33	0.00	12.50	12.96

* Based on 2002 Peer Mortgage Data (SW)

** As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

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

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2002			Geography: ARKANSAS 2002			Evaluation Period: JANUARY 2, 2002 TO			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
2002 Fort Smith MSA	88	10.67	78.70	94.32	88.64	6.82	4.55	2.47	4.56
2002 LR-NLR MSA	172	20.85	78.50	76.16	82.56	11.05	6.40	1.37	2.80
2002 Pine Bluff MSA	465	56.36	82.45	83.01	85.59	10.54	3.87	32.61	65.09
Limited Review:									
2002 Franklin County	50	6.06	74.57	94.00	88.00	8.00	4.00	10.55	16.10
2002 Lincoln County	50	6.06	68.21	96.00	92.00	6.00	2.00	30.67	58.54

* Based on 2002 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** 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 2.67% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2002		Geography: ARKANSAS 2002			Evaluation Period: JANUARY 2, 2002 TO				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
2002 Fort Smith MSA	1	0.27	93.75	100.00	100.00	0.00	0.00	13.22	13.79
2002 LR-NLR MSA	10	2.67	94.65	100.00	60.00	30.00	10.00	8.56	9.36
2002 Pine Bluff MSA	197	52.53	92.53	95.94	77.66	13.20	9.14	89.14	90.43
Limited Review:									
2002 Franklin County	82	21.87	92.59	100.00	98.78	1.22	0.00	32.67	34.89
2002 Lincoln County	85	22.67	95.12	82.35	78.82	14.12	7.06	90.43	89.74

* Based on 2002 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002).

**** 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 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS 2002		Geography: ARKANSAS 2002				Evaluation Period: JANUARY 2, 2002 TO DECEMBER 31,			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
2002 Fort Smith MSA	0	0	0	0	0	0	0.00	0	0
2002 LR-NLR MSA	0	0	0	0	0	0	0.00	0	0
2002 Pine Bluff MSA	0	0	10	41	10	41	100.00	0	0
Limited Review:									
2002 Franklin County	0	0	0	0	0	0	0.00	0	0
2002 Lincoln County	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 2, 2002 TO DECEMBER 31, 2002								Geography: ARKANSAS 2002				Evaluation Period:					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
2002 Fort Smith MSA	12.68	4	15.38	0.00	25.00	50.00	25.00	0	0	0	0	0	0	2.84	14.23	31.95	50.98
2002 LR-NLR MSA	13.57	6	23.08	16.67	16.67	50.00	16.67	0	0	0	0	0	0	1.57	27.62	41.18	29.63
2002 Pine Bluff MSA	63.54	10	38.46	0.00	40.00	50.00	10.00	0	0	0	0	0	0	0.67	26.75	43.84	28.74
Limited Review:																	
2002 Franklin County	7.81	3	11.54	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
2002 Lincoln County	2.40	3	11.54	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	28.06	35.00	36.95

Table 1. Lending Volume

LENDING VOLUME		Geography: ARKANSAS 2003						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
2003 Fort Smith MSA	10.26	185	14,169	95	4,739	9	277	0	0	289	19,185	11.85
2003 LR-NLR MSA	29.53	656	73,076	166	17,163	10	570	0	0	832	90,809	14.07
2003 Pine Bluff MSA	46.18	554	42,368	530	33,065	217	15,202	0	0	1,301	90,635	63.52
Limited Review:												
2003 Franklin County	8.45	93	3,682	62	1,895	83	2,196	0	0	238	7,773	8.05
2003 Lincoln County	5.57	23	1,024	50	1,005	84	8,567	0	0	157	10,596	2.51

* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 02, 2003 to December 31, 2003.

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

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 31, 2003		Geography: ARKANSAS 2003						Evaluation Period: JANUARY 1, 2003 TO DECEMBER							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	51	9.62	0.00	0.00	8.82	3.92	64.37	56.86	26.81	39.22	1.86	0.00	1.15	1.60	2.68
2003 LR-NLR MSA	204	38.49	1.41	0.00	17.78	8.33	48.82	54.90	31.99	36.76	2.22	0.00	1.66	2.48	2.10
2003 Pine Bluff MSA	254	47.92	0.00	0.00	28.81	9.84	37.48	41.34	33.71	48.82	22.26	0.00	14.97	24.53	22.71
Limited Review:															
2003 Franklin County	15	2.83	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	7.04	0.00	0.00	7.04	0.00
2003 Lincoln County	6	1.13	0.00	0.00	18.04	0.00	46.86	100.00	35.10	0.00	5.04	0.00	0.00	6.19	0.00

* Based on 2003 Peer Mortgage Data (Western)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2003			Geography: ARKANSAS 2003						Evaluation Period: JANUARY 1, 2003 TO						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]				
	#	% of Total ^{**}	% Owner Occ ^{***} Units	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	18	9.78	0.00	0.00	8.82	16.67	64.37	61.11	26.81	22.22	3.22	0.00	8.33	3.05	2.47
2003 LR-NLR MSA	52	28.26	1.41	1.92	17.78	9.62	48.82	57.69	31.99	30.77	6.73	8.33	5.88	7.46	5.84
2003 Pine Bluff MSA	74	40.22	0.00	0.00	28.81	21.62	37.48	35.14	33.71	43.24	64.91	0.00	76.19	61.90	62.75
Limited Review:															
2003 Franklin County	31	16.85	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	33.33	0.00	0.00	33.33	0.00
2003 Lincoln County	9	4.89	0.00	0.00	18.04	0.00	46.86	88.89	35.10	11.11	39.13	0.00	0.00	42.11	50.00

^{*} Based on 2003 Peer Mortgage Data (Western)

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

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2003			Geography: ARKANSAS 2003						Evaluation Period: JANUARY 1, 2003 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	114	14.36	0.00	0.00	8.82	0.00	64.37	55.26	26.81	44.74	2.42	0.00	0.00	2.26	2.92
2003 LR-NLR MSA	400	50.38	1.41	0.25	17.78	5.25	48.82	48.25	31.99	46.25	2.30	0.85	1.60	2.45	2.28
2003 Pine Bluff MSA	225	28.34	0.00	0.00	28.81	7.11	37.48	24.89	33.71	68.00	12.98	0.00	7.37	10.45	15.61
Limited Review:															
2003 Franklin County	47	5.92	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	9.13	0.00	0.00	9.13	0.00
2003 Lincoln County	8	1.01	0.00	0.00	18.04	0.00	46.86	87.50	35.10	12.50	5.33	0.00	0.00	5.69	4.76

* Based on 2003 Peer Mortgage Data (Western)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 2003		Geography: ARKANSAS 2003						Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	2	66.67	0.00	0.00	13.53	50.00	64.29	50.00	22.18	0.00	6.67	0.00	25.00	5.56	0.00
2003 LR-NLR MSA	0	0.00	6.18	0.00	17.45	0.00	43.47	0.00	32.91	0.00	0.00	0.00	0.00	0.00	0.00
2003 Pine Bluff MSA	1	33.33	0.00	0.00	36.72	0.00	46.86	100.00	16.41	0.00	33.33	0.00	0.00	50.00	0.00
Limited Review:															
2003 Franklin County	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2003 Lincoln County	0	0.00	0.00	0.00	67.82	0.00	29.89	0.00	2.30	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2003 Peer Mortgage Data (Western)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2003		Geography: ARKANSAS 2003								Evaluation Period: JANUARY 1, 2003 TO					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	95	10.52	0.00	0.00	19.05	13.68	60.60	57.89	20.35	28.42	2.34	0.00	1.78	2.59	2.84
2003 LR-NLR MSA	166	18.38	11.80	15.06	23.53	17.47	41.29	42.77	23.39	24.70	1.27	2.12	1.21	1.33	1.19
2003 Pine Bluff MSA	530	58.69	0.00	0.00	42.98	34.53	35.01	27.55	22.01	37.92	37.35	0.00	38.85	31.33	47.41
Limited Review:															
2003 Franklin County	62	6.87	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	12.40	0.00	0.00	13.48	0.00
2003 Lincoln County	50	5.54	0.00	0.00	17.49	32.00	80.30	52.00	2.22	16.00	33.78	0.00	61.54	30.59	80.00

* Based on 2003 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2003).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2003		Geography: ARKANSAS 2003								Evaluation Period: JANUARY 1, 2003 TO					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	9	2.23	0.00	0.00	11.51	0.00	58.99	22.22	29.50	77.78	7.20	0.00	0.00	2.41	20.00
2003 LR-NLR MSA	10	2.48	4.08	0.00	11.79	0.00	55.33	40.00	28.80	60.00	7.17	0.00	17.39	3.87	16.67
2003 Pine Bluff MSA	217	53.85	0.00	0.00	42.22	47.00	39.44	44.24	18.33	8.76	90.04	0.00	88.70	96.97	76.00
Limited Review:															
2003 Franklin County	83	20.60	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	33.33	0.00	0.00	33.47	0.00
2003 Lincoln County	84	20.84	0.00	0.00	61.70	67.86	38.30	29.76	0.00	2.38	94.38	0.00	95.00	92.59	100.00

* Based on 2003 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 31, 2003		Geography: ARKANSAS 2003								Evaluation Period: JANUARY 1, 2003 TO DECEMBER					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	51	9.62	17.33	4.17	16.73	20.83	22.04	35.42	43.89	39.58	2.27	0.88	2.23	3.31	2.05
2003 LR-NLR MSA	204	38.49	21.35	7.00	17.54	17.50	20.35	27.50	40.76	48.00	2.69	1.79	2.29	2.96	2.95
2003 Pine Bluff MSA	254	47.92	23.74	9.27	16.02	21.37	19.57	29.84	40.67	39.52	30.58	33.3 3	33.5 4	33.6 4	26.9 2
Limited Review:															
2003 Franklin County	15	2.83	16.63	13.33	17.41	26.67	25.36	20.00	40.60	40.00	11.03	11.7 6	16.0 0	9.09	9.84
2003 Lincoln County	6	1.13	20.71	16.67	16.84	16.67	23.27	0.00	39.18	66.67	6.25	20.0 0	5.88	0.00	8.89

* Based on 2003 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2003		Geography: ARKANSAS 2003								Evaluation Period: JANUARY 1, 2003 TO DECEMBER					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{**}	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	18	9.78	17.33	23.53	16.73	5.88	22.04	5.88	43.89	64.71	3.17	6.78	0.99	0.86	4.21
2003 LR-NLR MSA	52	28.26	21.35	8.00	17.54	14.00	20.35	18.00	40.76	60.00	6.79	5.33	5.93	5.23	8.09
2003 Pine Bluff MSA	74	40.22	23.74	12.50	16.02	22.22	19.57	27.78	40.67	37.50	66.06	75.0 0	72.7 3	68.9 7	58.7 0
Limited Review:															
2003 Franklin County	31	16.85	16.63	12.90	17.41	25.81	25.36	12.90	40.60	48.39	33.33	40.0 0	50.0 0	15.3 8	36.5 9
2003 Lincoln County	9	4.89	20.71	22.22	16.84	22.22	23.27	0.00	39.18	55.56	39.13	100. 00	66.6 7	0.00	27.7 8

^{*} Based on 2003 Peer Mortgage Data (Western)

^{**} As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2003			Geography: ARKANSAS 2003						Evaluation Period: JANUARY 1, 2003 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2003 Fort Smith MSA	114	14.36	17.33	3.74	16.73	21.50	22.04	26.17	43.89	48.60	3.15	2.35	4.17	3.76	2.69
2003 LR-NLR MSA	400	50.38	21.35	2.88	17.54	15.18	20.35	21.20	40.76	60.73	2.96	1.56	3.21	2.79	3.09
2003 Pine Bluff MSA	225	28.34	23.74	3.32	16.02	9.48	19.57	17.06	40.67	70.14	17.09	12.50	12.12	15.72	18.85
Limited Review:															
2003 Franklin County	47	5.92	16.63	4.35	17.41	19.57	25.36	19.57	40.60	56.52	10.45	6.25	11.25	7.76	12.26
2003 Lincoln County	8	1.01	20.71	0.00	16.84	0.00	23.27	25.00	39.18	75.00	8.42	0.00	0.00	13.33	9.09

* Based on 2003 Peer Mortgage Data (Western)

** As a percentage of loans with borrower income information available. No information was available for 5.0% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2003		Geography: ARKANSAS 2003			Evaluation Period: JANUARY 1, 2003 TO				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
2003 Fort Smith MSA	95	10.52	62.74	85.26	87.37	9.47	3.16	2.34	3.82
2003 LR-NLR MSA	166	18.38	61.82	74.10	77.11	11.45	11.45	1.27	2.22
2003 Pine Bluff MSA	530	58.69	64.16	83.40	84.91	10.57	4.53	37.35	62.17
Limited Review:									
2003 Franklin County	62	6.87	55.48	95.16	95.16	3.23	1.61	12.40	17.99
2003 Lincoln County	50	5.54	59.11	90.00	98.00	2.00	0.00	33.78	59.21

* Based on 2003 Peer Small Business Data -- US and PR

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

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

**** 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 2.99% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2003		Geography: ARKANSAS 2003			Evaluation Period: JANUARY 1, 2003 TO				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
2003 Fort Smith MSA	9	2.23	87.05	100.00	88.89	11.11	0.00	7.20	7.38
2003 LR-NLR MSA	10	2.48	87.30	60.00	80.00	10.00	10.00	7.17	6.39
2003 Pine Bluff MSA	217	53.85	87.22	95.85	81.57	10.60	7.83	90.04	91.63
Limited Review:									
2003 Franklin County	83	20.60	82.69	100.00	93.98	3.61	2.41	33.33	35.62
2003 Lincoln County	84	20.84	95.74	84.52	70.24	16.67	13.10	94.38	93.42

* Based on 2003 Peer Small Business Data -- US and PR

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

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

**** 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 0.99% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS 2003		Geography: ARKANSAS 2003				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31,			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
2003 Fort Smith MSA	0	0	4	61	4	61	2.24	0	0
2003 LR-NLR MSA	0	0	9	40	9	40	1.47	0	0
2003 Pine Bluff MSA	0	0	16	2,612	16	2,612	96.10	0	0
Limited Review:									
2003 Franklin County	0	0	0	0	0	0	0.00	0	0
2003 Lincoln County	0	0	2	5	2	5	0.18	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 1, 2003 TO DECEMBER 31, 2003								Geography: ARKANSAS 2003				Evaluation Period:					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
2003 Fort Smith MSA	11.85	4	15.38	0.00	25.00	50.00	25.00	0	0	0	0	0	0	0.00	11.92	64.65	23.44
2003 LR-NLR MSA	14.07	6	23.08	16.67	16.67	50.00	16.67	0	0	0	0	0	0	2.58	23.51	47.06	26.85
2003 Pine Bluff MSA	63.52	10	38.46	0.00	40.00	50.00	10.00	0	0	0	0	0	0	0.00	35.37	36.68	27.94
Limited Review:																	
2003 Franklin County	8.05	3	11.54	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
2003 Lincoln County	2.51	3	11.54	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	30.66	38.05	31.29

Table 1. Lending Volume

LENDING VOLUME		Geography: ARKANSAS 2004						Evaluation Period: JANUARY 2, 2004 TO DECEMBER 31, 2004				
MA/Assessment Area (2004):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
2004 Fort Smith MSA	15.72	180	11,924	154	8,313	90	2,092	0	0	424	22,329	10.98
2004 LR-NLR MSA	17.83	299	34,764	171	16,904	11	832	0	0	481	52,500	13.99
2004 Pine Bluff MSA	46.03	419	29,623	592	33,775	231	17,378	0	0	1,242	80,776	60.36
Limited Review:												
2004 Fulton County	2.34	23	1,217	21	665	19	486	0	0	63	2,368	3.36
2004 Searcy County	4.97	47	2,148	30	1,350	57	2,214	0	0	134	5,712	3.56
2004 Sharp County	3.15	40	2,050	27	2,310	18	544	0	0	85	4,904	2.62
2004 Stone County	3.48	45	2,672	17	1,004	32	1,381	0	0	94	5,057	0.91
2004 Van Buren County	6.49	80	4,032	52	2,527	43	1,910	0	0	175	8,469	4.22

* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.
 ** The evaluation period for Community Development Loans is from January 02, 2004 to October 03, 2005.
 *** Deposit Data as of June 30, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 31, 2004		Geography: ARKANSAS 2004						Evaluation Period: JANUARY 2, 2004 TO DECEMBER					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp		
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans							
Full Review:																	
2004 Fort Smith MSA	63	11.78	0.00	0.00	7.44	3.17	65.58	71.43	26.98	25.40	0.00	0.00	0.00	0.00	0.00		
2004 LR-NLR MSA	140	26.17	1.22	0.00	17.96	7.86	48.82	59.29	31.99	32.86	0.00	0.00	0.00	0.00	0.00		
2004 Pine Bluff MSA	258	48.22	0.00	0.00	31.14	19.38	39.82	35.66	29.04	44.96	0.00	0.00	0.00	0.00	0.00		
Limited Review:																	
2004 Fulton County	8	1.50	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
2004 Searcy County	11	2.06	0.00	0.00	30.62	36.36	69.38	63.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
2004 Sharp County	13	2.43	0.00	0.00	11.72	0.00	88.28	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
2004 Stone County	13	2.43	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
2004 Van Buren County	29	5.42	0.00	0.00	20.14	10.34	79.86	89.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00		

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.
 ** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
 *** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT DECEMBER 31, 2004			Geography: ARKANSAS 2004						Evaluation Period: JANUARY 2, 2004 TO						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
2004 Fort Smith MSA	53	30.81	0.00	0.00	7.44	1.89	65.58	69.81	26.98	28.30	0.00	0.00	0.00	0.00	0.00
2004 LR-NLR MSA	27	15.70	1.22	0.00	17.96	14.81	48.82	40.74	31.99	44.44	0.00	0.00	0.00	0.00	0.00
2004 Pine Bluff MSA	66	38.37	0.00	0.00	31.14	19.70	39.82	45.45	29.04	34.85	0.00	0.00	0.00	0.00	0.00
Limited Review:															
2004 Fulton County	1	0.58	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Searcy County	4	2.33	0.00	0.00	30.62	0.00	69.38	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Sharp County	11	6.40	0.00	0.00	11.72	27.27	88.28	72.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Stone County	3	1.74	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Van Buren County	7	4.07	0.00	0.00	20.14	14.29	79.86	85.71	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2004			Geography: ARKANSAS 2004						Evaluation Period: JANUARY 2, 2004 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2004 Fort Smith MSA	64	15.02	0.00	0.00	7.44	1.56	65.58	82.81	26.98	15.63	0.00	0.00	0.00	0.00	0.00
2004 LR-NLR MSA	132	30.99	1.22	0.76	17.96	8.33	48.82	56.82	31.99	34.09	0.00	0.00	0.00	0.00	0.00
2004 Pine Bluff MSA	95	22.30	0.00	0.00	31.14	9.47	39.82	35.79	29.04	54.74	0.00	0.00	0.00	0.00	0.00
Limited Review:															
2004 Fulton County	14	3.29	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Searcy County	32	7.51	0.00	0.00	30.62	18.75	69.38	81.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Sharp County	16	3.76	0.00	0.00	11.72	12.50	88.28	87.50	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Stone County	29	6.81	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Van Buren County	44	10.33	0.00	0.00	20.14	27.27	79.86	72.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 2004		Geography: ARKANSAS 2004						Evaluation Period: JANUARY 2, 2004 TO DECEMBER 31, 2004								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]					
	#	% of Total ^{**}	% of MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	Overa ll	Low	Mod	Mid
Full Review:																
2004 Fort Smith MSA	0	0.00	0.00	0.00	13.20	0.00	51.74	0.00	35.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 LR-NLR MSA	0	0.00	5.60	0.00	18.03	0.00	43.47	0.00	32.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Pine Bluff MSA	0	0.00	0.00	0.00	37.74	0.00	46.34	0.00	15.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:																
2004 Fulton County	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Searcy County	0	0.00	0.00	0.00	29.13	0.00	70.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Sharp County	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Stone County	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Van Buren County	0	0.00	0.00	0.00	16.99	0.00	83.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

^{*} The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

^{**} Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

^{***} Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2004			Geography: ARKANSAS 2004								Evaluation Period: JANUARY 2, 2004 TO				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
2004 Fort Smith MSA	154	14.47	0.00	0.00	17.21	4.55	52.58	72.73	30.21	22.73	0.00	0.00	0.00	0.00	0.00
2004 LR-NLR MSA	171	16.07	9.70	12.28	25.48	16.96	41.18	40.35	23.64	30.41	0.00	0.00	0.00	0.00	0.00
2004 Pine Bluff MSA	592	55.64	0.00	0.00	40.19	41.22	40.46	31.42	19.36	27.36	0.00	0.00	0.00	0.00	0.00
Limited Review:															
2004 Fulton County	21	1.97	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Searcy County	30	2.82	0.00	0.00	20.15	16.67	79.85	83.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Sharp County	27	2.54	0.00	0.00	3.45	3.70	96.55	96.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Stone County	17	1.60	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Van Buren County	52	4.89	0.00	0.00	57.63	53.85	42.38	46.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

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

*** Source Data - Dun and Bradstreet (2003).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2004			Geography: ARKANSAS 2004						Evaluation Period: JANUARY 2, 2004 TO							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography					
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overa ll	Low	Mod	Mid
Full Review:																
2004 Fort Smith MSA	90	17.96	0.00	0.00	7.32	0.00	71.71	93.33	20.98	6.67	0.00	0.00	0.00	0.00	0.00	0.00
2004 LR-NLR MSA	11	2.20	3.73	0.00	11.62	0.00	53.07	45.45	31.58	54.55	0.00	0.00	0.00	0.00	0.00	0.00
2004 Pine Bluff MSA	231	46.11	0.00	0.00	44.26	45.45	42.62	51.95	13.11	2.60	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:																
2004 Fulton County	19	3.79	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Searcy County	57	11.38	0.00	0.00	28.00	38.60	72.00	61.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Sharp County	18	3.59	0.00	0.00	3.45	33.33	96.55	66.67	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Stone County	32	6.39	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2004 Van Buren County	43	8.58	0.00	0.00	45.95	48.84	54.05	51.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

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

*** Source Data - Dun and Bradstreet (2003).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 31, 2004			Geography: ARKANSAS 2004						Evaluation Period: JANUARY 2, 2004 TO DECEMBER						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2004 Fort Smith MSA	63	11.78	17.01	6.67	16.56	23.33	22.47	26.67	43.95	43.33	0.00	0.00	0.00	0.00	0.00
2004 LR-NLR MSA	140	26.17	21.21	4.69	17.47	29.69	20.29	21.09	41.03	44.53	0.00	0.00	0.00	0.00	0.00
2004 Pine Bluff MSA	258	48.22	23.62	10.48	16.20	23.39	20.21	30.24	39.97	35.89	0.00	0.00	0.00	0.00	0.00
Limited Review:															
2004 Fulton County	8	1.50	20.76	0.00	23.92	25.00	22.79	50.00	32.53	25.00	0.00	0.00	0.00	0.00	0.00
2004 Searcy County	11	2.06	29.02	0.00	21.33	27.27	23.67	27.27	25.98	45.45	0.00	0.00	0.00	0.00	0.00
2004 Sharp County	13	2.43	21.98	0.00	23.35	33.33	24.33	33.33	30.34	33.33	0.00	0.00	0.00	0.00	0.00
2004 Stone County	13	2.43	24.24	23.08	24.01	15.38	22.43	23.08	29.33	38.46	0.00	0.00	0.00	0.00	0.00
2004 Van Buren County	29	5.42	19.98	0.00	20.72	25.00	22.88	17.86	36.42	57.14	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

** As a percentage of loans with borrower income information available. No information was available for 5.0% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2004		Geography: ARKANSAS 2004								Evaluation Period: JANUARY 2, 2004 TO DECEMBER 31, 2004					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overa ll	Low	Mod	Mid	Upp
Full Review:															
2004 Fort Smith MSA	53	30.81	17.01	5.66	16.56	18.87	22.47	30.19	43.95	45.28	0.00	0.00	0.00	0.00	0.00
2004 LR-NLR MSA	27	15.70	21.21	7.69	17.47	15.38	20.29	34.62	41.03	42.31	0.00	0.00	0.00	0.00	0.00
2004 Pine Bluff MSA	66	38.37	23.62	12.90	16.20	19.35	20.21	24.19	39.97	43.55	0.00	0.00	0.00	0.00	0.00
Limited Review:															
2004 Fulton County	1	0.58	20.76	0.00	23.92	100.00	22.79	0.00	32.53	0.00	0.00	0.00	0.00	0.00	0.00
2004 Searcy County	4	2.33	29.02	0.00	21.33	50.00	23.67	25.00	25.98	25.00	0.00	0.00	0.00	0.00	0.00
2004 Sharp County	11	6.40	21.98	18.18	23.35	18.18	24.33	27.27	30.34	36.36	0.00	0.00	0.00	0.00	0.00
2004 Stone County	3	1.74	24.24	33.33	24.01	66.67	22.43	0.00	29.33	0.00	0.00	0.00	0.00	0.00	0.00
2004 Van Buren County	7	4.07	19.98	14.29	20.72	42.86	22.88	14.29	36.42	28.57	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

** As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2004			Geography: ARKANSAS 2004						Evaluation Period: JANUARY 2, 2004 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Overa II	Low	Mod	Mid	Upp
Full Review:															
2004 Fort Smith MSA	64	15.02	17.01	18.33	16.56	16.67	22.47	30.00	43.95	35.00	0.00	0.00	0.00	0.00	0.00
2004 LR-NLR MSA	132	30.99	21.21	11.71	17.47	12.61	20.29	18.02	41.03	57.66	0.00	0.00	0.00	0.00	0.00
2004 Pine Bluff MSA	95	22.30	23.62	3.45	16.20	14.94	20.21	12.64	39.97	68.97	0.00	0.00	0.00	0.00	0.00
Limited Review:															
2004 Fulton County	14	3.29	20.76	14.29	23.92	0.00	22.79	50.00	32.53	35.71	0.00	0.00	0.00	0.00	0.00
2004 Searcy County	32	7.51	29.02	6.25	21.33	31.25	23.67	28.13	25.98	34.38	0.00	0.00	0.00	0.00	0.00
2004 Sharp County	16	3.76	21.98	6.25	23.35	31.25	24.33	37.50	30.34	25.00	0.00	0.00	0.00	0.00	0.00
2004 Stone County	29	6.81	24.24	3.45	24.01	20.69	22.43	34.48	29.33	41.38	0.00	0.00	0.00	0.00	0.00
2004 Van Buren County	44	10.33	19.98	13.95	20.72	11.63	22.88	34.88	36.42	39.53	0.00	0.00	0.00	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

** As a percentage of loans with borrower income information available. No information was available for 8.0% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2004			Geography: ARKANSAS 2004			Evaluation Period: JANUARY 2, 2004 TO			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
2004 Fort Smith MSA	154	14.47	62.04	84.42	87.01	6.49	6.49	0.00	0.00
2004 LR-NLR MSA	171	16.07	62.61	80.70	75.44	14.04	10.53	0.00	0.00
2004 Pine Bluff MSA	592	55.64	63.44	85.30	86.82	9.12	4.05	0.00	0.00
Limited Review:									
2004 Fulton County	21	1.97	60.93	95.24	95.24	4.76	0.00	0.00	0.00
2004 Searcy County	30	2.82	54.73	93.33	96.67	0.00	3.33	0.00	0.00
2004 Sharp County	27	2.54	63.54	85.19	88.89	3.70	7.41	0.00	0.00
2004 Stone County	17	1.60	65.03	88.24	76.47	23.53	0.00	0.00	0.00
2004 Van Buren County	52	4.89	58.50	92.31	84.62	11.54	3.85	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

**** 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 1.97% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS DECEMBER 31, 2004			Geography: ARKANSAS 2004			Evaluation Period: JANUARY 2, 2004 TO			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
2004 Fort Smith MSA	90	17.96	86.34	100.00	97.78	2.22	0.00	0.00	0.00
2004 LR-NLR MSA	11	2.20	85.53	100.00	81.82	9.09	9.09	0.00	0.00
2004 Pine Bluff MSA	231	46.11	90.16	96.10	77.49	14.29	8.23	0.00	0.00
Limited Review:									
2004 Fulton County	19	3.79	88.46	100.00	94.74	5.26	0.00	0.00	0.00
2004 Searcy County	57	11.38	88.00	100.00	94.74	3.51	1.75	0.00	0.00
2004 Sharp County	18	3.59	93.10	100.00	94.44	5.56	0.00	0.00	0.00
2004 Stone County	32	6.39	89.47	93.75	87.50	12.50	0.00	0.00	0.00
2004 Van Buren County	43	8.58	91.89	100.00	88.37	9.30	2.33	0.00	0.00

* The evaluation period for Optional Product Line(s) is from January 02, 2004 to December 31, 2004.
 ** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
 *** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2004).
 **** 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 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: ARKANSAS 2004				Evaluation Period: JANUARY 2, 2004 TO OCTOBER 3, 2005			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
2004 Fort Smith MSA	0	0	6	10	6	10	8.55	0	0
2004 LR-NLR MSA	0	0	8	10	8	10	8.55	0	0
2004 Pine Bluff MSA	0	0	16	97	16	97	82.91	0	0
Limited Review:									
2004 Fulton County	0	0	0	0	0	0	0.00	0	0
2004 Searcy County	0	0	0	0	0	0	0.00	0	0
2004 Sharp County	0	0	0	0	0	0	0.00	0	0
2004 Stone County	0	0	0	0	0	0	0.00	0	0
2004 Van Buren County	0	0	0	0	0	0	0.00	0	0

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS JANUARY 2, 2004 TO DECEMBER 31, 2004								Geography: ARKANSAS 2004				Evaluation Period:					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
2004 Fort Smith MSA	10.98	7	20.00	0.00	14.29	42.86	42.86	0	0	0	0	0	0	0.00	10.32	64.12	25.56
2004 LR-NLR MSA	13.99	6	17.14	16.67	16.67	50.00	16.67	2	0	0	0	1	1	2.19	23.90	47.06	26.85
2004 Pine Bluff MSA	60.36	13	37.14	0.00	46.15	46.15	7.69	0	0	0	0	0	0	0.00	37.62	38.54	23.84
Limited Review:																	
2004 Fulton County	3.36	1	2.86	0.00	0.00	100.00	0.00	1	0	0	0	1	0	0.00	0.00	100.00	0.00
2004 Searcy County	3.56	2	5.71	0.00	50.00	50.00	0.00	2	0	0	1	1	0	0.00	28.74	71.26	0.00
2004 Sharp County	2.62	2	5.71	0.00	50.00	50.00	0.00	2	0	0	1	1	0	0.00	10.81	89.19	0.00
2004 Stone County	0.91	1	2.86	0.00	0.00	100.00	0.00	1	0	0	0	1	0	0.00	0.00	100.00	0.00
2004 Van Buren County	4.22	3	8.57	0.00	0.00	100.00	0.00	3	0	0	0	3	0	0.00	22.57	77.43	0.00