

Comptroller of the Currency Administrator of National Banks

Southwestern District Office 1600 Lincoln Plaza 500 North Akard Street Dallas, Texas 75201-3394

PUBLIC DISCLOSURE

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

March 27, 1997

City National Bank of Fort Smith Charter Number: 10609 1222 Rogers Avenue Fort Smith, Arkansas 72902 NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of *City National Bank of Fort Smith* prepared by the Office of the Comptroller of the Currency (OCC), the institution's supervisory agency.

The evaluation represents the OCC's current assessment and rating of the institution's CRA performance based on an examination conducted as of *December 31*, *1996*. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination.

The purpose of the Community Reinvestment Act of 1977 (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall (1) assess the institution's record of helping to meet the credit needs of its entire community, including LMI neighborhoods, consistent with safe and sound operations of the institution, and (2) take that record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub. L. No. 101-73, amended the CRA to require the Agencies to make public certain portions of their CRA performance assessments of financial institutions.

Basis for the Rating

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics, including the competitive environment in which it operates. Assessing the CRA performance is a process

that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors, which are grouped together under 5 performance categories, as detailed in the following section of this evaluation.

GLOSSARY OF TERMS AND COMMON ABBREVIATIONS

The following terms and abbreviations are used throughout this Performance Evaluation.

<u>Metropolitan Statistical Area (MSA)</u>- Area consisting of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

<u>Census Tract (CT)</u> - Small, locally defined statistical areas within a MSA. These areas are determined by the United States Census Bureau in an attempt to group homogeneous populations. A CT has defined boundaries per 10-year census and an average population of 4,000.

<u>Median Family Income</u> - The median income determined by the United States Census Bureau. This figure is based on estimations developed by the Department of Housing and Urban Development and is updated annually.

LMI (**LMI**) - Income levels which are less than 80% of the median family income. Low-income means an income level which is less than 50% of median family income.

<u>Community Reinvestment Act (CRA)</u>- A statute that requires federal regulators to evaluate a financial institution's lending performance in light of the credit needs in the institution's local community. The regulator must also evaluate whether the institution's defined community is reasonable. [THIS IS A GENERIC DESCRIPTION OF THE BANK'S REQUIREMENTS AND NOT A LEGAL EXPLANATION OF THE REQUIREMENTS CONTAINED IN 12 U. S. C. 2901, AS AMENDED AND 12 C. F. R. 25, AS AMENDED.]

Home Mortgage Disclosure Act (HMDA)- A statute that requires certain mortgage lenders that do business or have banking offices in MSAs to file annual summary reports of their lending activity. The reports include such data as the race, gender, and the income of the applicant(s), the amount of loan requested and its disposition (e.g made, turned down, withdrawn). The types of loan applications reported include governmentally-guaranteed home purchase and home improvement loans, conventional home purchase loans, home improvement loans, refinancings of home purchase and home improvement loans and loans for the purchase of multi-family (5 or more units) dwellings. [This is a generic description of the BANK'S REQUIREMENTS AND NOT A LEGAL EXPLANATION OF THE REQUIREMENTS CONTAINED IN 12 U. S. C. 2801, AS AMENDED AND 12 C.F.R. 203, AS AMENDED.]

City National Bank of Ft. Smith - CNB

ASSIGNMENT OF RATING

Identification of Ratings

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

Outstanding record of meeting community credit needs.

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including LMI neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory record of meeting community credit needs.

An institution in this group has a satisfactory record of ascertaining and helping to meet the credit needs of its entire delineated community, including LMI neighborhoods, in a manner consistent with its resources and capabilities.

Needs to improve record of meeting community credit needs.

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including LMI neighborhoods, in a manner consistent with its resources and capabilities.

Substantial noncompliance record of meeting community credit needs.

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including LMI neighborhoods, in a manner consistent with its resources and capabilities.

BANK PROFILE

City National Bank of Ft. Smith reported total assets of \$407 million at December 31, 1996. It is the second largest commercial bank in the city. CNB is a full service institution and offers specialty products such as mortgage banking, trust services, and retail nondeposit investment products. The business focus of the bank is commercial, small business, and retail lending. The composition of the bank's loan portfolio is detailed in Assessment Factor I. At December 31, 1996, CNB's net loans-to-deposits ratio was 67%. Additional information on the bank is provided in Assessment Factor G.

Major commercial bank competitors in the Ft.Smith, AR-OK MSA range in asset size from \$328 million to \$529 million. Net loans-to-deposits ratios for these institutions are comparable to CNB's.

COMMUNITY PROFILE

Ft. Smith, Arkansas is located in northwest Arkansas on the northeastern border of Oklahoma. The city is located in the Ft. Smith, Arkansas-Oklahoma MSA. The MSA consists of Sebastian and Crawford Counties in Arkansas and Sequoyah County in Oklahoma. It is the third largest MSA in the state with a population of 175,911, based on 1990 census information. Ft. Smith is the largest city in the MSA with a population of 75,000. The 1990 median family income for the MSA is \$26,404.

Ft. Smith is the economic base of the MSA and has experienced modest expansion in recent years. The economy is diversified with various light manufacturers, service, and retail businesses. Agriculture (primarily poultry) and natural gas also help to support the local economy. Major employers in the area include OK Foods, Arkansas Best, Beverly Enterprises, Whirlpool, Donrey Media, and Gerber Foods. Westark Community College, a two-year junior college, is the area's only institution of secondary education.

DISCUSSION OF INSTITUTION'S PERFORMANCE

Institution's Rating:

Based on the findings presented below, this institution is rated: *Outstanding Record of Meeting Community Credit Needs*. The evaluation period covers July 5, 1994 through March 27, 1997.

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

<u>Assessment Factor A</u> - Activities conducted by the institution to ascertain the credit needs of its community, including the extent of the institution's efforts to communicate with members of its community regarding the credit services being provided by the institution.

• CNB maintains ongoing and meaningful contacts with a wide range of individuals, groups, and community officials. Needs identified through these contacts have resulted in the development and enhancement of special loan products and/or bank lending policies.

CNB's ascertainment efforts are integrated throughout the bank. The bank's CRA Strategic Plan outlines ascertainment goals, accountability for achieving those goals, and dates for completion. Ascertainment of community credit needs are obtained in a variety of ways:

- regular contact with a variety of individuals, groups, and community leaders, civic, and charitable organizations;
- board membership and technical advice in organizations that provide affordable housing and community development;
- Officer Call program; and
- participation in community development and revitalization programs.

Examples of organizations the bank maintains contact with includes the following: Elizabeth McGill Center, Chamber of Commerce in cities or towns located in the bank's delineated community, Community Services Clearinghouse, Sebastian County Housing Authority and Department of Human Services, Crawford-Sebastian Community Development Council, Inc., Habitat for Humanity, Arkansas Development Finance Authority, Credit Counseling of Arkansas, Inc., and city government officials throughout the delineated community.

Through these contacts, CNB has identified credit needs which include affordable housing, home improvement needs, medical and dental services, and a special loan program to help LMI persons qualify for credit. These programs are described in Assessment Factors C and I.

<u>Assessment Factor C</u> - The extent of participation by the institution's board of directors in formulating the institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.

• CRA is a demonstrated and important component of the bank's Board of Directors' planning and supervision processes. The Board actively participates with bank management in the oversight of CRA performance.

CNB's Board of Directors actively participate in the bank's CRA program. A CRA Officer has been designated by the Board to coordinate CRA activities. The Board annually approves the CRA policy and statement. CNB has two committees for CRA: CRA Steering Committee with Board membership, and a CRA Committee consisting of senior bank management. The Board receives monthly status reports of CRA efforts. A CRA Strategic Plan is formulated annually. The plan includes a mission statement, specific objectives, and accountability for specific activities.

CRA training is provided to the Board and all employees on an annual basis. Training for new employees is mandatory and they are required to pass a CRA knowledge test.

An annual self-assessment of the bank's CRA performance is performed by the holding company's audit department. The assessment provides an overall rating as well as recommendations, if applicable. The Board reviews the self-assessment and any corrective action taken by management.

Management performs a detailed quarterly analysis of the disposition of loan applications, approvals, and denials. The reports specifically address activity in LMI tracts. An annual analysis of the bank's HMDA reportable loans is also performed. Additionally, a geo-coding report is prepared semi-annually on all the bank's loan products which shows where loans are made in the bank's delineated community.

The CRA Statement is expanded and describes the bank's policies, programs, and the results of the annual self-assessment. Technical requirements of the CRA have been met.

The Board has approved several innovative lending programs to assist LMI individuals. Loan volumes are listed in Assessment Factor I.

Arkansas Oklahoma Gas (AOG) Loan Program: This is a home improvement program in conjunction with the AOG. The utility company has contracted with various home

improvement contractors for the installation and repair of heating and cooling systems. CNB provides financing through AOG for those contractors with no equity requirements.

<u>Health Advance</u>: This is a program designed to provide financing for medical and dental services to individuals who either have no coverage or are under insured.

<u>Pilot Loan Program (PLP)</u>: The PLP program was developed to assist LMI persons in qualifying for loans. The qualifying terms are less stringent than the bank's traditional products. The loans typically have slightly lower rates, higher loan to value ratios, longer terms, and higher debt to income ratios. The minimum loan amount is \$100.

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED

<u>Assessment Factor B</u> - The extent of the institution's marketing and special creditrelated programs to make members of the community aware of the credit services offered by the institution.

• CNB markets its products and services through various media and reaches all segments of the delineated community and does not exclude LMI areas.

CNB uses television, radio, newspaper, and outdoor advertisement as the primary means for informing the community of the products and services available. Brochures, statement inserts, and seminars are used to target specific programs, i.e., FHA Title I home improvement program. Advertising dollars are focused on installment, commercial, and home loans. The bank also advertises in the *Thrifty Nickel*, a free weekly publication which is widely available throughout the community, particularly LMI areas. Additionally, CNB advertises in two minority newspapers, *Lincoln Echo and The Quest*, for the black and Asian communities, respectively.

The bank has sponsored and/or participated in several seminars throughout the community on FHA Title I home improvement loans, SBA lending, credit counseling, and basic banking and credit education. The Fort Smith area has a sizeable Asian and Hispanic community. As a result, CNB has worked with leaders in those communities to provide interpreters to transact banking needs. The bank also has its consumer loan application written in Spanish.

<u>Assessment Factor I</u> - The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business or small farm loans within its community, or the purchase of such loans originated in its community.

• CNB addresses a significant portion of the community's identified credit needs through traditional and non-traditional banking products.

CNB offers and extends the types of credits listed in the CRA statement. A significant portion of the loans originated at CNB are made within the bank's delineated community. The bank's internal analysis for 1995 shows that 88% of the number and 77% of the dollar volume of loans were made within the bank's delineated community. Total loan penetration for 1996 was not available at the time of this evaluation. Loan portfolio composition for 1995 and 1996 is as follows:

LOAN TYPE	12/31/9	95	12/31/96		
	\$ (000's)	%	\$ (000's)	%	
Commercial	41,861	20.5	47,598	21.0	
Commercial RE	82,114	40.2	89,028	39.4	
1-4 family first lien	44,985	22.0	49,121	21.7	
1-4 family second lien	9,832	4.8	11,639	5.1	
Multifamily	8,617	4.2	7,300	3.2	
Installment	15,307	7.5	19,211	8.5	
Agricultural	1,465	0.7	2,327	1.0	
TOTAL	204,181	100.0	226,244	100.0	

A significant portion of HMDA loans were also made within the bank's delineated community. In 1995, CNB originated 89% of the number and 83% of the dollar volume of loans within its community. For 1996, 88% of the number and 90% of the dollar volume of loans originated in the bank's delineated community. The following chart shows the number and dollar volume of HMDA loans originated in the Ft. Smith, AR-OK MSA for 1995 and 1996.

PRODUCT	1	995	1996		
TYPE	#	\$ (000's)	#	\$ (000's)	
Home Purchase	358	22,572	421	27,378	
Home Improvement	380	2,974	382	2,826	
Refinancing	122	8,796	175	13,625	
Multi-Family	2	415	1	149	
TOTAL	862	34,757	979	43,978	

In 1995, CNB originated more loans in home purchase, home improvement, and refinancings than any other lender its market. Originations for all products totaled 862 loans, comprising 16% of the market. CNB's market penetration for the origination of home improvement loans is strong at 34%. This is more than triple the originations by the lender that holds the number two position.

In 1996, CNB started collecting data for small businesses and small farms. A small business or small farm loan is any loan that originated at \$250,000 or less. A small business or farm is defined as a business or farm with total annual revenues of less than \$1 million.

_	BU	JSINESS	FARM		
LOAN SIZE	#	\$ (000's)	#	\$ (000's)	
<=100	532	15,978	95	2,389	
>100 & <=250	59	9,792	17	3,240	
>250	41	18,080	13	4,200	
TOTAL	632	43,850	125	9,559	
BUS. REVENUE†	#	\$ (000's)	#	\$ (000's)	
Revenue <=1 mil	565	34,116	125	9,559	
Revenue > 1 mil	64	9,734	0	0	
TOTAL	629	43,850	125	9,559	

†No revenue reported for 3 loans.

Of the business loans reported in 1996, twelve had a loan size greater than \$250,000 and revenue size greater than \$1 million. These loans total \$5,395,000.

Other Lending Activity

In 1995, CNB originated 2,221 consumer loans totaling \$18 million. Lending volume for the entire year of 1996 was not available, but through June 30, 1996, CNB originated 1,186 consumer loans totaling \$10.5 million.

Loan volume for special lending programs (described in Assessment Factor C) that target LMI individuals is as follows:

<u>Arkansas Oklahoma Gas (AOG) Loan Program</u>: Since the June 1994 evaluation, CNB has originated 272 loans totaling \$949,371.

<u>Health Advance</u>: Since the June 1994 evaluation, CNB has originated 62 loans totaling \$141,511.

<u>Pilot Loan Program (PLP)</u>: In 1995, the bank originated 29 loans in the amount of \$108,865. The volume for 1996 was 32 loans totaling \$105,940.

<u>Assessment Factor J</u> - The institution's participation in governmentally-insured, guaranteed or subsidized loan programs for housing, small businesses, or small farms.

• CNB frequently participates in governmentally insured, guaranteed, or subsidized loan programs for housing, small business, and small farms.

CNB had loan activity in 1995 and 1996 for the major government-insured programs available under Fair Housing Administration (FHA), Small Business Administration (SBA), Veterans Administration (VA), the Farmers Home Administration (FmHA), and the Arkansas Development Finance Authority (ADFA).

	19	95	1996		
PROGRAM	#	\$ (000's)	#	\$ (000's)	
FHA Title I	168	1,598	157	1,391	
FHA	270	6,949	279	8,338	
SBA	8	1,330	12	1,633	
VA	35	2,507	50	4,172	
FmHA†	3	43	3	161	
ADFA	22	1,148	37	2,121	

†FmHA loans for 1996 were originated before the restructuring of the agency. The FmHA was restructured in 1996 to the Farm Service Agency and Small Business Administration Agriculture Guaranteed Loans. The restructuring combined the guaranteed programs for individual farmers and agriculture businesses.

CNB ranks fifth in the state as an SBA Lender. CNB was designated as an "Approved Lender" in March 1996 for the Farm Service Agency and Small Business Administration Agriculture Guaranteed Loans. Since May 1996, the bank has originated 25 loans totaling \$4,319,333.

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

Reasonableness of Delineated Community

• The delineation is considered reasonable and does not exclude LMI areas.

The bank's delineated community is defined as a 20 mile radius from CNB's main office in downtown Ft. Smith, Arkansas. The Board approved delineation is based on the bank's effective trade area. The delineated community is actually the entire Ft. Smith, AR-OK MSA which consists of Sebastian and Crawford Counties in northwestern Arkansas, and Sequoyah County in southeastern Oklahoma. Also included in the bank's delineation is a portion of Le Flore County in southeastern Oklahoma.

The bank's delineated community contains 45 CTs and/or block numbering areas (BNAs). Six CTs are designated as LMI. Four of the BNAs are in Le Flore County and are designated as middle-income.

<u>Assessment Factor E</u> - The geographic distribution of the institution's credit extensions, credit applications, and credit denials.

• CNB has a reasonable distribution of credit extensions, applications, and denials in LMI tracts and to LMI applicants.

Tract Income Distribution

There are 41 CTs in the three counties that comprise the Fort Smith, AR-OK MSA, of which 6 or 15% are designated as LMI CTs. The following chart shows the number and dollar volume of loans originated in the MSA by tract income levels for 1995 and 1996:

CENSUS/ BNA TRACT INCOME	1995				1996			
TRACT INCOME	#	%	\$ 000's	%	#	%	\$ 000's	%
Low/Moderate	49	5.7	1,311	3.8	65	6.7	1,313	3.0
Middle	538	62.4	17,461	50.2	615	62.8	24,059	54.7
Upper	275	31.9	15,985	46.0	299	30.5	18,606	42.3
TOTAL	862	100.0	34,757	100.0	979	100.0	43,978	100.0

In 1995, CNB originated more HMDA loans than its competitors in LMI tracts. By product type CNB was in the top six lenders for home purchase loans and refinancings, and the top lender for home improvement loans in LMI tracts. Approximately 34% of home improvement loans in LMI tracts were made by CNB. The majority of the bank's home improvement loans are FHA Title I, which is a program specifically targeted for LMI individuals and/or areas.

Applicant Income Distribution

CNB has reasonable loan penetration to LMI borrowers in terms of numbers and dollar volumes given the percentage of LMI families in the MSA. Based on 1990 census information, the MSA has 49,765 families of which 18,661 or 38% are LMI. The following chart shows the number and dollar volume of HMDA loans originated by applicant income level for 1995 and 1996.

APPLICANT	1995†				1996‡			
INCOME	#	%	\$ 000's	%	#	%	\$ 000's	%
Low/Moderate	195	22.6	3,509	10.1	236	24.1	5,004	11.4
Middle	190	22.0	5,654	16.3	230	23.5	9,083	20.7
Upper	463	53.7	24,467	70.4	506	51.7	29,335	66.7
TOTAL	848	98.3	33,630	96.8	972	99.3	43,422	98.8

^{†14} loans from CNB's 1995 HMDA-LAR did not have income reported.

CNB originated the most HMDA loans to LMI applicants than any other lender in the Ft. Smith, AR-OK MSA. The bank is in the top seven lenders for originations of home purchase loans and refinancings to LMI applicants, and ranks number one for home-improvement loans to LMI applicants. About 35% of home improvement loans to LMI applicants were made by CNB.

<u>Assessment Factor G</u> - The institution's record of opening and closing offices and providing services at offices.

• CNB offers a variety of services and products and is conveniently located to all segments of the community, including LMI areas.

CNB has eight full-service banking offices and one loan production office (LPO). Two of the eight branches are located in LMI tracts. Six banking offices are located in the city of Ft. Smith, one in Van Buren, and one in Greenwood. The Van Buren and Greenwood branches have mortgage departments. Currently, the bank has 12 automated teller machines (ATMs), three of which are cash dispensing machines only. Six ATMs are located in the branches and the remainder are at nonbranch locations. Lobby hours are reasonable and most offices have drive-in services and Saturday banking. The Central Mall branch is open during the hours the mall is open, except for Sunday. The WalMart branch will have extended hours.

The Board has adopted and approved a Branch Closing Policy which outlines the procedures for notifying the community of a branch closing. No branches have been closed since the July 1994 evaluation. The branches in Van Buren (March 1995) and Greenwood (March 1996) opened since the July 1994 evaluation. A new full service branch opened March 26, 1997 in the WalMart Supercenter.

^{‡ 7} loans from CNB's 1996 HMDA-LAR did not have income reported.

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

<u>Assessment Factor D</u> - Any practices intended to discourage applications for types of credit set forth in the institution's CRA Statement(s).

• No practices are evident which would discourage credit applications.

CNB solicits credit applications from all segments of the community. The bank has adequate policies, procedures, and training programs to inform lending personnel of antidiscrimination laws and regulations. Training is conducted annually.

<u>Assessment Factor \mathbf{F} </u> - Evidence of prohibited discriminatory or other illegal credit practices.

• CNB treats all applicants fairly throughout its lending process. No evidence of discrimination was disclosed.

In conjunction with this evaluation, the bank's regulatory agency conducted a Fair Lending review of residential mortgage activity for 1996. The largest volume in residential mortgage loans was in home improvement products. A sample size of 75 loans was selected, consisting of 13 denied black applicants and 62 approved white applicants. Based on this review, it was concluded that denied applicants were treated fairly.

Management performs a second review of denied applications to determine if applicants were given every consideration in the underwriting process.

V. COMMUNITY DEVELOPMENT

<u>Assessment Factor H</u> - The institution's participation, including investments, in local community development and redevelopment projects or programs.

• CNB has maintained a high level of participation in community development related activities, sometimes in the leadership role.

CNB is one of four financial institutions who are members of the Community Coalition Corporation (CCC). The CCC was established in 1995 for the primary purpose of channeling federal housing dollars to eligible local non-profit housing providers. In order to qualify for federal funds to finance various projects, the CCC had to become a Community Housing Development Corporation (CHDO). The CCC works closely with the Cornerstone Community Development Corporation (Cornerstone CDC). The Cornerstone CDC is involved in the purchase and/or rehabilitation of homes that are sold to LMI individuals. The

Cornerstone CDC developed a non-profit organization called the Elizabeth McGill Center, Inc. This organization assists LMI individuals in social services which include counseling and adult education. The McGill Center is currently the only non-profit housing provider in the CHDO.

The McGill Center loans are rotated among the banks in the CCC. From December 1994 through October 1995, CNB made seven loans to Cornerstone CDC totaling \$144,225. CNB also made two loans in 1995 to the now defunct Mallalieu Black Community Developers totaling \$15,191.

In November 1996, CNB made a loan to the William O'Darby Ranger Memorial Foundation. The purpose of this organization is to help with the renovation of homes in the historical district of Ft. Smith. These homes are located in a LMI tract. The organization acts as a liaison between the government and homeowners due to the requirements involved in renovating a home in an area designated as a historical district.

CNB made six loans totaling \$3.6 million to nursing homes and rehabilitation centers whose clientele include senior citizens who receive government assistance.

Other ways CNB invests in its community is through the purchase of municipal bonds. In November 1996, CNB purchased \$300,000 in Greenwood, Arkansas school district bonds and \$1.3 million in Van Buren, Arkansas school district bonds.

<u>Assessment Factor K</u> - The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions and other factors.

• CNB has met community credit needs consistent with its size, financial capacity, location, and economic environment.

CNB has met the credit needs of the community through its lending activities that are detailed in Assessment Factors I, J, and E.

Assessment Factor L - Any other factors that, in the regulatory authority's judgment, reasonably bear upon the extent to which an institution is helping to meet the credit needs of its entire community.

• CNB has engaged in other meaningful activities, which contribute to their efforts to help meet the community's credit needs.

CNB employees have been involved in the Habitat for Humanity project. Bank employees have donated personal time to construct homes for Habitat. CNB also makes a quarterly monetary contribution of \$150.

The bank contributes to the community through monetary donations to various civic, charitable, and non-profit organizations. In 1996, monetary contributions totaled \$73,942.

ADDITIONAL INFORMATION

None.