



PUBLIC DISCLOSURE

May 06, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Great Plains National Bank
Charter Number 23049

2017 West Third
Elk City, OK 73644

Office of the Comptroller of the Currency
Oklahoma City Field Office
The Harvey Parkway Building
301 NW 63rd Street, Suite 490
Oklahoma City, OK 73116-7908

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

This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors supporting the institution's rating include the following;

- The majority of the bank's loans were originated within the bank's assessment areas (AAs).
- The loan-to-deposit ratio is more than reasonable and exceeds the standard for satisfactory performance.
- The bank's distribution of loans reflects a reasonable penetration to individuals and businesses of different income levels and meets the standard for satisfactory performance.
- Great Plains National Bank's community development performance demonstrates adequate responsiveness to the community development needs of its AAs.

SCOPE OF EXAMINATION

This Performance Evaluation is based on 2010 US Census demographic information. Conclusions regarding the Lending Test are based on data from a sample of business loans and residential real estate home mortgage loans extended in 2012 and 2013. Conclusions regarding the Community Development Test are based on community development activities from April 22, 2010 through May 6, 2014.

DESCRIPTION OF INSTITUTION

Great Plains National Bank (GPNB) is a \$559 million community banking institution headquartered in Elk City, Oklahoma, which is located in western central Oklahoma. At March 31, 2014, GPNB had net loans of \$482 million, or 86 percent of total assets. GPNB is a subsidiary of a one-bank holding company, Great Plains Bancshares, Inc. of Hollis, OK. The bank operates fourteen banking centers in twelve Oklahoma communities. The main office and two branches are located in Elk City, Oklahoma, and there are branches in the towns of Hollis, Sayre, Mangum, Granite, Burns Flat, Cordell, Hobart, Woodward, Taloga, Tuttle, and Piedmont. All branches except the Wal-Mart branch in Elk City offer drive-through banking.

Since the previous CRA Performance Evaluation (PE) on April 22, 2010, GPNB has opened an additional branch in the Elk City Wal-Mart, and branches in Tuttle, Piedmont, Woodward, and Taloga, Oklahoma. The bank has fifteen ATM locations. The tables on the next page provide complete information on GPNB's branch and ATM locations.

GPNB's BRANCH LOCATIONS		
Location	Address	City
Main Bank Elk City	2017 W. Third Street	Elk City, OK
Elk City South	1300 S. Main	Elk City, OK
Elk City Wal-Mart	20221 E. 1110 Road	Elk City, OK
Hollis Branch	120 James Jones	Hollis, OK
Sayre Branch	128 E. Main	Sayre, OK
Mangum Branch	101 S. Oklahoma	Mangum, OK
Granite Branch	400 N. Main	Granite, OK
Burns Flat Branch	228 Hwy 44	Burns Flat, OK
Cordell Branch	201 N. Glen English	Cordell, OK
Hobart Branch	429 S. Broadway	Hobart, OK
Tuttle Branch	5002 E. Hwy 37	Tuttle, OK
Piedmont Branch	12001 N.W. Expressway	Piedmont, OK
Woodward Branch	2220 Oklahoma Ave	Woodward, OK
Taloga Branch	100 S. Broadway	Taloga, OK

GPNB's ATM LOCATIONS		
Location	Address	City
#1 Main Bank Elk City	2017 W. Third Street	Elk City, OK
#8 Elk City South	1300 S. Main	Elk City, OK
#10 Elk City Wal-Mart	20221 E. 1110 Road	Elk City, OK
#2 Hollis Branch	120 James Jones	Hollis, OK
#3 Sayre Branch	128 E. Main	Sayre, OK
#6 Mangum Branch	101 S. Oklahoma	Mangum, OK
#4 Mangum ATM only	1306 N. Louis Tittle	Mangum, OK
#11 Granite Branch	400 N. Main	Granite, OK
#5 Burns Flat Branch	226 Hwy 44	Burns Flat, OK
#7 Cordell Branch	201 N. Glen English	Cordell, OK
#9 Hobart Branch	429 S. Broadway	Hobart, OK
#13 Tuttle Branch	5002 E. Hwy 37	Tuttle, OK
#12 Piedmont Branch	12001 N.W. Expressway	Piedmont, OK
#14 Woodward Branch	2220 Oklahoma Ave	Woodward, OK
#15 Taloga Branch	100 S. Broadway	Taloga, OK

GPNB's primary focus is to serve the commercial, agriculture, and consumer customers in the above communities and the surrounding areas in central and southwestern Oklahoma. The bank meets these needs by providing various loan and deposit products, as well as, other financial services. Hours of operation are responsive to the general banking needs of the areas served.

As of March 31, 2014, GPNB's total assets were \$559 million, of which \$488 million, or 87 percent, were comprised of various types of loans to individuals and commercial businesses. The bank's loan portfolio is segmented as follows:

Loan Portfolio Composition as of March 31, 2014		
	\$ (000)	%
Business Loans	\$177,668	36.40%
1-4 Family Residential RE Loans	\$160,513	32.88%
Agriculture Loans	\$111,340	22.81%
Consumer Loans	\$35,308	7.23%
Other Loans	\$3,283	0.68%
Total	\$488,112	100.00%

Source: March 31, 2013 Report of Condition and Income.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. GPNB is involved in and provides support to meet the community's financial needs. The bank received an overall rating of **"Outstanding"** at the last CRA evaluation dated April 22, 2010.

Selection of Areas for Full-Scope Review

Counties where the bank has branches in western Oklahoma, and the western portion of Jackson County, are grouped together in this performance evaluation as the "Non-MSA AAs." These include all of Harmon, Greer, Beckham, Roger Mills, Washita, and Kiowa Counties, and the Jackson County census tracts 9681, 9682, and 9683, which are contiguous areas.

In the "Non-MSA AAs," twelve of the fourteen areas surrounding the GPNB rural Oklahoma banking centers received full-scope reviews. The area surrounding the branches in Woodward, OK (Woodward County) and Taloga, OK (Dewey County) were excluded from this evaluation because these branches were opened January 17, 2014, subsequent to the 2012- 2013 Lending Test date. Moreover, at the evaluation date (May 6, 2014), not enough lending had occurred in these branches to provide a representative sample.

The bank has two branches in Tuttle and Piedmont, Oklahoma that are in the Oklahoma City (OKC) metropolitan statistical area (MSA). The census tracts (CTs) where these branches are located, along with certain contiguous census tracts, are identified in this performance evaluation as the "OKC MSA AAs." This includes census tracts 9.02 and 9.03 in Grady County and census tracts 3002.01 (Piedmont) and 3008.01 (Yukon) in Canadian County.

DESCRIPTION OF ASSESSMENT AREAS

The AAs adopted by GPNB consists of whole geographies, do not reflect illegal discrimination, and do not arbitrarily exclude low- or moderate-income geographies. The AAs meets the requirements of the CRA regulation.

GPNB Non-MSA Assessment Areas:

Six counties that are described above where the bank has branches in western Oklahoma, and the western portion of Jackson County, are grouped together in this performance evaluation as the Non-MSA AAs.

Demographic and Economic Characteristics of GPNB's Non-MSA AAs	
<i>Population</i>	
Number of Families	20,925
Number of Households	39,925
<i>Geographies</i>	
Number of Census Tracts	24
% Low-Income Census Tracts	0.00%
% Moderate-Income Census Tracts	4.17%
% Middle-Income Census Tracts	66.67%
% Upper-Income Census Tracts	29.17%
<i>Median Family Income</i>	
Census MSA Median Family Income	\$47,891
HUD Updated MSA Median Family Income	\$49,900
<i>Economic Indicators</i>	
% Unemployment Rate	2.38%
Median Housing Value	\$77,225
% of Households Below Poverty Level	15.78%

Source: 2010 US Census data & 2013 FFIEC updated income data

The Non-MSA AAs include 24 census tracts, including 1 moderate-income tract, 16 middle-income tracts, and 7 upper-income tracts. Total population of the rural Non-MSA AAs is 82,936. Of the 35,581 total housing units, 21,947 or 57 percent are owner occupied. Households below the poverty level total 4881 or 16 percent, and households that receive public assistance total 971 or 3 percent of the total number of households. Major local employers include Great Plains Regional Hospital, Elk City Public Schools, Wal-Mart, Bar-S Foods, and the City of Elk City.

Local banking competition within the AA is aggressive and includes several community, regional, and national banks and branches of these financial institutions.

A community contact was conducted during this review. The economy in western central and southwestern Oklahoma historically has been based on agriculture and the production of oil and gas. The local agricultural industry has been relatively stable with favorable crop yields and cattle prices. Low interest rates have supported the local housing market. According to the community contact, the area is currently experiencing an oil and gas boom that is affecting the region in several ways. Local communities are growing, including the industrial parks and retail businesses. While the unemployment rate is low, because of well-paid employment in the oil and gas industry, there is a

shortage of workers for other industries. GPNB and other local area financial institutions continue to be very active and strive to meet the financial needs of the area.

GPNB OKC MSA Assessment Areas:

The bank has branches in Tuttle, OK (Grady County) and Piedmont, OK (Canadian County). These branches are located in the OKC MSA as described above, and are grouped as the “OKC MSA AAs.”

Demographic and Economic Characteristics of GPNB’s OKC MSA AAs [Portions of Grady and Canadian Counties]	
<i>Population</i>	
Number of Families	8,092
Number of Households	9,748
<i>Geographies</i>	
Number of Census Tracts	4
% Low-Income Census Tracts	0.00%
% Moderate-Income Census Tracts	0.00%
% Middle-Income Census Tracts	50.00%
% Upper-Income Census Tracts	50.00%
<i>Median Family Income</i>	
Census MSA Median Family Income	\$58,775
HUD Updated MSA Median Family Income	\$60,000
<i>Economic Indicators</i>	
% Unemployment Rate	2.46%
Median Housing Value	\$161,956
% of Households Below Poverty Level	7.30%

Source: 2010 US Census data & 2014 FFIEC updated income data

The GPNB OKC MSA AAs consist of four census tracts, two tracts in Grady County (Tuttle) and two census tracts in Canadian County (Piedmont and Yukon), including two middle-income tracts, and two upper-income tracts. These tracts surround the branch locations and are considered primary trade areas. Total population of these Oklahoma City MSA AA tracts is 28,360. Of the 10,104 total housing units, 8,645 or 86 percent are owner occupied. Households below the poverty level total 712 or 7 percent, and households that receive public assistance total 211 or 2 percent of the total number of households. The towns of Tuttle, Piedmont, and Yukon are rapidly growing suburbs of Oklahoma City.

The economic conditions in the Oklahoma City AA are strong and remain much better than other parts of the county. Major employers are oil and natural gas companies, as well as services, technology, hospitals and universities. The State of Oklahoma and the Federal Government are major employers. A large number of federal workers are

employed at Tinker Air Force Base and the FAA Aeronautical Center. Integris Health, the City of Oklahoma City, and Hobby Lobby Store, Inc. are also major employers.

Local banking competition in the Oklahoma City market is aggressive and includes several community, regional, and nation-wide banks and branches of these financial institutions.

A community contact was conducted during this review to help ascertain the credit needs of the Oklahoma City MSA AAs. According to the contact, the primary community development needs in the area include quality jobs, affordable housing, and transportation.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

This CRA Performance Evaluation assesses the bank's performance, focusing primarily on five performance criteria: the loan-to-deposit ratio; lending in the AA; lending to borrowers of different incomes and to businesses of different sizes; geographic distribution of loans; and responses to complaints.

Loan-to-Deposit Ratio

GPNB's loan-to-deposit (LTD) ratio is more than reasonable. It exceeds the standard for satisfactory performance. The bank's LTD ratio at December 31, 2013 was 109.56 percent. The bank's average quarterly LTD ratio from June 30, 2010 through December 31, 2013 was 93.94 percent. This average was compared to the average of six similar banks during the same period. These banks are located in central and southwestern Oklahoma with total assets between \$255 million and \$640 million. These average LTD ratios are listed in the following table, and all were less than the GPNB average LTD value.

Loan-to-Deposit Ratios		
Institution	Total Assets \$000's (As of 12/31/2013)	Average LTD Ratio
Great Plains National Bank, Elk City, OK	\$539,275	93.94%
Quail Creek Bank, NA, Oklahoma City, OK	\$541,168	87.32%
Vision Bank, NA, Ada, OK	\$639,898	81.96%
Central National Bank & Trust, Enid, OK	\$591,462	81.53%
First National Bank & Trust, Chickasha, OK	\$445,445	77.43%
Bank of Western Oklahoma, Elk City, OK	\$225,537	76.90%
First National Bank & Trust, Elk City, OK	\$316,400	61.57%

Source: Institution Reports of Condition from June 30, 2010 to December 31, 2013

Lending in Assessment Areas

GPNB's lending in its AAs meets the standard for satisfactory performance. A majority of the number and dollar amount of business loans and residential real estate home mortgage loans were originated within the bank's AAs. As depicted in the following table, 80.28 percent of the number and 70.24 percent of the dollar amount of loans sampled were originated in GPNB's AAs.

Lending in AA										
Loan Type	Number of Loans					Dollars of Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Business Loans	30	83.33	6	16.67	36	\$2,148	81.90	\$475	18.10	\$2,623
Residential RE Loans (home mortgages)	27	77.14	8	22.86	35	\$1,045	54.33	\$878	45.67	\$1,923
Totals	57	80.28	14	19.72	71	\$3,193	70.24	\$1,353	14.04	\$4,546

Source: Business Loan and Residential RE Loan Sampling 2012-2013.

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

GPNB's borrower distribution of loans to small businesses and residential real estate home mortgage loans in its combined AAs (the Non-MSA AAs and the OKC MSA AAs) reflect reasonable penetration overall and meets the standard for satisfactory performance.

GPNB Non-MSA Assessment Areas:

The bank's borrower distribution of loans to businesses in its Non-MSA AAs with revenues of \$1 million or less is satisfactory and indicates reasonable penetration into the market of lending to small businesses. The percentage of bank loans by number exceeded the percentage of reporting businesses with revenues of \$1 million or less in the bank's Non-MSA AAs. However, the percentage of bank loans by dollar was below the percentage of reporting businesses with revenues of \$1 million or less. Note that 29.50 percent of the businesses in the AA did not report income data.

Distribution of Loans to Businesses in Non-MSA AAs				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	66.73%	3.77%	29.50%	100%
% of Bank Loans in AA by #	74.07%	25.93%	0.00%	100%
% of Bank Loans in AA by \$	51.63%	48.37%	0.00%	100%

Source: Business Loan Sampling 2012-2013 & 2014 Dunn & Bradstreet Data

The bank's distribution of residential real estate home mortgage loans in its Non-MSA AAs indicates excellent penetration to low- and moderate-income (LMI) borrowers. While the percentage of home mortgage loans to low-income borrowers is only near to the demographic percentage of AA families, the percentage of home mortgage loans to moderate-income borrowers exceeds the demographic. Taken together, lending to LMI

borrowers, at 37.03 percent, exceeds the combined demographic percentage of LMI AA families (34.34 percent).

Distribution of Residential Real Estate Loans in Non-MSA AAs								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Residential Loans	19.53%	14.81%	15.81%	22.22%	20.79%	14.81%	43.87%	48.15%

Source: Residential Loan Sample 2012-2013 & 2010 US Census data

Geographic Distribution of Loans

Because the bank does not have any low-income census tracts and only one moderate-income census tract within its Non-MSA AAs, an analysis of the geographic distribution of loans would not be meaningful and was not performed.

GPNB OKC MSA Assessment Areas:

The bank’s borrower distribution of loans to businesses in its OKC MSA AAs with revenues of \$1 million or less is satisfactory and indicates reasonable penetration into the market of lending to small businesses. The percentage of bank loans by number exceeded the percentage of reporting businesses with revenues of \$1 million or less in the bank’s OKC MSA AAs. However, the percentage of bank loans by dollar was near to but less than the percentage of reporting businesses with revenues of \$1 million or less. Note that 19.52 percent of the businesses in the AA did not report income data.

Distribution of Loans to Businesses in Oklahoma City MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	78.14%	2.34%	19.52%	100%
% of Bank Loans in AA by #	85.00%	15.00%	0.00%	100%
% of Bank Loans in AA by \$	72.26%	27.74%	0.00%	100%

Source: Business Loan Sampling 2012-2013 & Dunn & Bradstreet data

The bank’s distribution of residential real estate home mortgage loans in its OKC MSA AAs indicates reasonable penetration to low-income borrowers and excellent penetration to moderate-income borrowers. While the percentage of home mortgage loans to low-income borrowers is less than the percentage of low-income families in the AA, this performance is not unreasonable in light of the fact that lower-income families have a more difficult time qualifying for conventional home mortgage products.

Distribution of Residential Real Estate Loans in Oklahoma City MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Residential Loans	13.30%	5.00%	13.73%	15.00%	18.50%	10.00%	54.47%	70.00%

Source: Residential Loan Sample 2012-2013 & 2010 US Census data

Geographic Distribution of Loans

Because the bank does not have any LMI census tracts within its OKC MSA AAs, an analysis of the geographic distribution of loans would not be meaningful and was not performed.

COMMUNITY DEVELOPMENT TEST

The bank is rated “Satisfactory” under the Community Development Test, that is, there has been adequate responsiveness to the community development needs in the ten rural Oklahoma communities it serves (its Non-MSA AAs), and in the two separate portions of the Oklahoma City MSA it serves (its OKC MSA AAs), through community development lending, investments, and services. All of the bank’s 14 banking centers are reasonably accessible to LMI persons. Only one branch office, located in Hollis, Oklahoma, is located in a moderate-income census tract. However, eight other branches are located in agency-designated distressed or underserved nonmetropolitan middle-income census tracts.

Number and Amount of Community Development Loans

Qualifying community development loans are those that meet the definition of community development, as defined in the CRA regulation. Community development lending is adequate. The bank originated or refinanced thirteen community development loans during the 2014 CRA Performance Evaluation period from April 22, 2010 through May 5, 2014. These loans totaled \$8,461,025 and targeted job creation, health care, affordable housing, and infrastructure, all of which have been identified as critical needs in the bank’s AAs.

Community development lending benefitting the bank’s Non-MSA AAs was adequate and included the following seven credit activities:

- The bank participated in a loan on December 21, 2010 and provided \$7,250 of funding to a community service organization in Cordell, Oklahoma that provides food to low-income persons and coordinates donations to the needy.
- The bank originated two loans on May 4, 2011 to the Hobart Public Works Authority, totaling \$243 thousand, to refinance and extend a loan to construct a recycling center in Hobart, Oklahoma. On June 28, 2012, the bank refinanced

\$179 thousand of this loan. The US Census Bureau has determined the town of Hobart, in Kiowa County, is located in distressed and underserved middle-income census tracts.

- The bank extended a \$1.1 million line of credit on June 11, 2012 to construct a nursing home facility in Hobart, Oklahoma. This is the only nursing home in Hobart and is one of only two nursing homes in Kiowa County. The facility provides needed rooms for elderly LMI persons. The town of Hobart is located in distressed and underserved middle-income census tracts.
- The bank originated a \$328 thousand loan on October 2, 2012 to finance remodeling a vacant building in Elk City into a healthcare facility. This new community health facility created several new jobs and increased the availability of medical services to LMI persons and families.
- The bank originated a \$75 thousand loan on June 5, 2013 to provide financing to a community health center in Hollis, Oklahoma. This nonprofit community health facility is geared towards providing health services to low-income families.

Community development lending benefitting the bank's Oklahoma City MSA AA was adequate and included the following six credit activities:

- The Bank originated a \$2.3 million loan on November 14, 2011 through its Tuttle Branch, which is located in the Oklahoma City MSA. The loan was made to the Tuttle Public Works Authority to fund certain wastewater system (sewage) improvements to enhance the overall health, safety, and well-being of the citizens of Tuttle, Oklahoma.
- The bank originated two loans on December 27, 2011 totaling \$1.76 million, to acquire and remodel an apartment complex in Oklahoma City. The multi-family property is designed as affordable housing for LMI persons and families. Both loans were refinanced on September 19, 2013, and an additional \$643 thousand of financing was extended to this borrower to expand this multifamily housing project.

Number and Amount 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.

The level of qualified investments for an intermediate small bank is poor. Qualified investments total \$842,504. This figure includes \$815,120 of outstanding qualified bond investments and \$27,384 of qualified donations made by the bank during the evaluation period. Of the outstanding qualified bond investments, \$450,000 were "prior period" bond investments that were purchased before April 22, 2010, the date of the last CRA Performance Evaluation. During the current performance evaluation period, the bank purchased one State of Oklahoma Series 2010B Bond for \$365,120. This bond series

established a comprehensive statewide vehicle for financing water and sewer system improvements in Oklahoma communities. Its coverage included all of the bank's AAs, including the Oklahoma City MSA.

The "prior period" bond investments include three \$150,000 Washita County Independent School District municipal bonds to construct and furnish a new classroom addition at the Cordell elementary school. Cordell, Oklahoma is in Washita County, a Non-MSA AA. The bank also made numerous qualified donations throughout its AAs totaling \$27,384. The bulk of the donations are to local schools. Other donations are to local non-profits that support community services that target LMI families and individuals, and to organizations that promote economic and small business development.

Extent to Which the Bank Provides Community Development Services

The level of qualified community development services is adequate. Bank officers or employees have served in leadership positions in organizations that provide community services to LMI families; and have provided technical expertise and financial assistance to these organizations. Bank officers also serve in leadership positions in organizations that are involved in economic and small business development activities. The following are examples of qualifying community development services. The bulk of the qualifying services were provided in the bank's Non-MSA AAs.

- ***Elk City/ Sayre/ Greer County/ Erick/ Mangum/ Woodward/ and Piedmont Chambers of Commerce.***

Fifteen bank officers or employees serve their respective Chambers of Commerce, including two officers who serve as Directors of their Chamber, and two other officers who chair Chamber Committees. All of these Chambers are focused on economic and community development.

- ***Midwest Oklahoma Industrial Foundation/ Woodward Industrial Foundation.***

Two bank officers serve on the Boards of these organizations, which are dedicated to Economic Development in Burns Flat and Woodward, Oklahoma, respectively.

- ***United Way***

Twenty bank officers or employees have volunteered their time and expertise to assist their local United Way organizations. One bank officer has served on the United Way Elk City Board of Directors and Appropriations Committee. United Way member agencies provide a variety of social services to LMI families in the bank's AAs.

- ***Great Plains Regional Hospital Foundation***

A bank officer serves on the Board of Directors of this regional general medical and surgical hospital with 46 beds in Elk City, Oklahoma.

- ***Quartz Mountain Medical Clinic - Hospital***

A bank officer serves on the Board of Directors of this rural general medical and surgical hospital with 25 beds in Mangum, Oklahoma.

- ***High Plains Outreach Center, Inc. in Woodward, Oklahoma***
A bank officer serves on the Board of Directors of this shelter for the homeless.
- ***Lions Clubs/ Kiwanis Clubs/ Rotary Clubs***
Fifteen bank officers or employees are members of these community service organizations in their respective communities of Elk City, Sayre, Burns Flat, Hollis, Cordell, Magnum, and Woodward, Oklahoma. A bank officer serves on the Board of Directors of the Elk City Kiwanis Club.

Responsiveness to Community Development Needs

Overall, there has been adequate responsiveness by the bank to the community development needs of its AAs through community development lending, investments, and services. While the overall level of qualified investments during the evaluation period is relatively low at \$842,504, the banks community development loans made during the evaluation period total \$8,461,025 and target job creation, health care, affordable housing, and infrastructure, all of which have been identified as critical needs in the bank's AAs. The level of qualified community development services is adequate. Bank officers or employees have served in leadership positions in organizations that provide community services to LMI families; and have provided technical expertise and financial assistance to these organizations.

Responses to Complaints

GPNB received no CRA related complaints during the evaluation period.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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