



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

April 3, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The City National Bank and Trust Company of Lawton, Oklahoma
Charter Number 5753

500 Montgomery Square
Lawton, OK 73501

Office of the Comptroller of the Currency

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, 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 lending test is rated: Satisfactory

The community development test is rated: Satisfactory

The Lending Test and Community Development test ratings are based on one full-scope Assessment Area (AA) and four limited scope AAs in the State of Oklahoma and one full-scope AA in the State of Kansas. The full-scope AA in Oklahoma, the Lawton MSA Partial AA, received the most weight as the bank is headquartered in this AA and has the vast majority of the bank's loans and deposits.

The major factors that support this rating include:

- A substantial majority of loans were originated within the bank's AAs.
- The loan-to-deposit (LTD) ratio is reasonable and meets the standard for satisfactory performance.
- The distribution of loans reflects reasonable penetration to individuals of different income levels and businesses of different sizes and meets the standard for satisfactory performance.
- The geographic distribution of loans reflects reasonable dispersion throughout the AAs and meets the standard for satisfactory performance.
- Community development (CD) performance demonstrates adequate responsiveness to the CD needs of the AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio is reasonable and meets the standard for satisfactory performance.

As of December 31, 2022, City National Bank & Trust Company of Lawton's (CNB) LTD ratio was 84.88 percent. CNB's average quarterly LTD ratio from December 31, 2019 through December 30, 2022 (the evaluation period) was 71.25 percent, which is in line with that of four similarly situated banks located in CNB's AA or the surrounding counties. The average for these comparable institutions was 72.35 percent. Refer to the table on the following page.

Loan-To-Deposit Ratios		
Institution	Total Assets \$000's (As of 12/31/2022)	Average Loan -to-Deposit Ratio
<i>The City National Bank and Trust, Lawton, OK</i>	<i>\$434,132</i>	<i>71.25%</i>
First National Bank & Trust, Shawnee, OK	\$814,463	64.80%
First Bank & Trust Co., Duncan, OK	\$824,264	87.47%
Liberty National Bank, Lawton, OK	\$990,001	72.80%
The First National Bank and Trust Co., Chickasha, OK	\$1,014,057	64.31%

Source: Institution Reports of Condition from December 31, 2019, to December 31, 2022

Over the evaluation period, CNB's LTD ratio showed a downward trend through 2021, reaching a low of 59.69 percent in the first quarter of 2021. This was attributable to the COVID-19 pandemic, which adversely impacted loan demand. Additionally, the pandemic resulted in an increase in deposit balances as depositors received federal stimulus funds and financial support. The ratio rebounded significantly in 2022 with levels of loan demand and consumer spending reaching pre-pandemic levels. This trend of a decline in the ratio in 2020 and 2021 with a rebound in 2022 was also reflected in the comparable institutions listed above.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment areas (AAs).

The bank originated and purchased 87.9 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	159	91.4	15	8.6	174	34,549	87.6	4,908	12.4	39,457
Small Business	24	60.0	16	40.0	40	3,327	70.8	1,375	29.2	4,702
Consumer	137	91.3	13	8.7	150	860	88.7	110	11.3	970
Total	320	87.9	44	12.1	364	38,736	85.8	6,393	14.2	45,129

Description of Institution

CNB is a community bank headquartered in Lawton, Oklahoma. CNB is a subsidiary of JRMB II, a two-bank holding company. Both JRMB II and FSNB, National Association, CNB's sister bank, are located in Lawton. Intercompany transactions are limited, as each bank has separate Board of Directors and officers. Each bank focuses on serving separate clientele, with some overlap within the city of Lawton.

Brick-and-mortar branches with drive-through locations in the Lawton MSA Partial include the main bank located at 500 Montgomery Square, 5th Street at D Avenue, the Gore branch located at 4113 W. Gore Blvd., and the Marketplace branch located at 1836 NW 82nd Street. Three additional locations in the Lawton community include branches located inside the Wal-Mart store at 1002 N. Sheridan Road, inside the Country Mart East grocery store at 4510 SE Lee Blvd., and inside the Wal-Mart Super Center at 6301 NW Quannah Parker Trail way.

The limited-scope AAs in Oklahoma include five stand-alone branches with drive-through facilities, three of which are located in the Oklahoma City metro area, and the other two located in the Tulsa metro area. In addition to the six Lawton locations and the four stand-alone branches, CNB has 29 additional Wal-Mart Super Center or Wal-Mart Neighborhood Market branches and one Homeland supermarket branch located throughout the State of Oklahoma. CNB has 54 automated teller machines (ATMs), of which, 21 accept deposits.

CNB's primary focus is to serve the consumer, commercial, and agricultural needs of customers located in the AAs. The bank's focus and ability to meet these needs differs from the Lawton market to the other AAs as the bank is better able to identify and meet Lawton business needs at the main bank while the branch structure throughout the other AAs, including the Walmart branches in Kansas, target and fulfill consumer needs. The bank's lending strategy focuses mainly on commercial loans and residential real estate loans in the Lawton AA and consumer lending at the Wal-Mart locations. CNB meets customer needs by providing various types of loan and deposit products and services, as well as Internet Banking with Bill Payment and a 24-hour Telephone Access System. The bank also offers Small Business Administration loans. Bank lobby services are provided Monday through Saturday at most locations, with all of the Wal-Mart locations having extended hours Monday through Saturday. CNB has a Trust Department located at the main bank.

As of December 31, 2022, the bank's total assets amounted to \$434 million, of which \$315 million or 72.6 percent consisted of loans. CNB's loan portfolio consists of the following:

Loan Portfolio Composition as of December 31, 2022		
	\$(000)	% of Portfolio
Real Estate Loans	272,616	86.68%
Commercial Loans	16,792	5.34%
Consumer Loans	14,683	4.67%
Other Loans	9,703	3.08%
Agricultural Loans	715	0.23%
Total Loans	314,509	100.00%

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. A "Satisfactory" rating was assigned to CNB at the last CRA performance evaluation performed on December 2, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

To assess the bank's performance under the Community Reinvestment Act regulations, we analyzed the bank's activities in and around its declared AAs. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AAs through qualified CD lending, investments, donations, and services.

Conclusions regarding the lending test are based on samples of business and residential real estate loans originated between January 1, 2019, and December 31, 2021. Conclusions regarding the CD test are based on the bank's CD activities during the same period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings consisting of Oklahoma and Kansas. Significantly more weight was given to the performance in the State of Oklahoma since 99 percent of the bank's loans originated in Oklahoma. Operations in Kansas are limited to three Wal-Mart branches and, therefore, does not materially influence the overall rating.

The state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by, or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- CNB exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- CNB's distribution of loans by geography is reasonable and meets the standard for satisfactory performance.
- CNB exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services.

Description of Institution's Operations in Oklahoma

The bank operates 38 locations and 54 ATMs in the State of Oklahoma. The bank's primary focus overall is commercial lending in addition to the traditional suite of loan and deposit products to meet the needs of the communities in which they serve.

Five AAs were considered in evaluating CNB's CRA performance. These AAs are defined as the Lawton MSA Partial, the Oklahoma City MSA Partial, the Tulsa MSA Partial, the Enid MSA, and the OK Rural Non-MSA.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Lawton MSA Partial AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lawton MSA Partial						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	9.4	31.3	34.4	21.9	3.1
Population by Geography	125,531	6.4	23.8	41.1	28.6	0.1
Housing Units by Geography	51,481	7.0	25.4	38.4	29.2	0.0
Owner-Occupied Units by Geography	23,887	4.2	16.8	38.9	40.1	0.0
Occupied Rental Units by Geography	19,353	9.9	33.1	38.1	18.8	0.0
Vacant Units by Geography	8,241	8.2	32.2	37.7	21.9	0.0
Businesses by Geography	6,852	5.2	33.2	32.3	29.1	0.2
Farms by Geography	317	2.5	14.2	24.0	59.3	0.0
Family Distribution by Income Level	28,272	22.4	18.3	18.6	40.7	0.0
Household Distribution by Income Level	43,240	23.5	16.4	17.9	42.1	0.0
Median Family Income MSA - 30020 Lawton, OK MSA		\$57,051	Median Housing Value			\$110,561
			Median Gross Rent			\$772
			Families Below Poverty Level			13.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Lawton MSA Partial AA consists of the 32 census tracts in Comanche County. Based on the 2015 updated ACS data, the United States Census Bureau identifies three census tracts as low income, 10 tracts as moderate income, 11 tracts as middle income, seven tracts as upper income and one tract is not applicable. Additionally, there are 28,272 families and 43,240 households. The 28,272 families statistically break into low, moderate, middle, and upper incomes at 22 percent, 18 percent, 19 percent, and 41 percent, respectively. According to the 2015 updated ACS the population of Comanche County is 125,531. There are 51,481 total housing units available in this AA with 23,887, or 46.4 percent, being owner occupied. Renter occupied is 19,353, or 37.6 percent, and vacant housing is 8,241, or 16.0 percent. Families living below poverty level total 13.9.

The Lawton MSA Partial AA is a competitive market area with 14 different financial institutions taking deposits. Based on the FDIC Market Share Data for 2021, CNB has 10.86 percent of all deposits, ranking fifth amongst institutions in the AA. Primary competitors include Liberty National Bank, Arvest Bank, FSNB National Association, and BancFirst with 22.06 percent, 13.59 percent, 12.49 percent, and 11.62 percent of the deposit market share respectively.

In the Lawton MSA Partial AA, the Fort Sill Army Post is the largest employer, providing government jobs. In addition to government and government related jobs; education, health, leisure, and hospitality jobs are also prevalent in the Lawton MSA Partial AA. Other large employers in the area include Goodyear Tire and Rubber Company, Lawton Public Schools, and the Comanche County Memorial Hospital.

According to our community contact, the local economy has begun to stabilize since the pandemic. They noted a lack of desirable housing in Lawton city limits as a potential credit need. Additionally, the contact shared some opportunities for local financial institutions to participate, including a HUD-sponsored first-time home-buyers program. The contact indicated that banks in the area generally meet the credit needs of the area.

Scope of Evaluation in Oklahoma

The Lawton MSA Partial AA is the full-scope AA for the evaluation in Oklahoma due to the level of lending and share of bank deposits in this AA. Additionally, the bank is headquartered in Lawton. Loan products reviewed in the full-scope AA were all HMDA loans originated in 2019, 2020 and 2021 and a random sample of small business loans for the same time-period. Since the bank has a larger volume of small business loans and home mortgages in Lawton but is heavily focused on consumer loans outside of Lawton as supported by the Walmart branch structure, our sample for the limited-scope AAs differed from the Lawton AA. We sampled consumer loans for the limited-scope AAs described below.

Limited-scope AAs have been defined for the municipalities outside Comanche County, in which the bank has stand-alone branches, Wal-Mart Super Center, or Wal-Mart Neighborhood Market branch locations. These AAs are designated as the Oklahoma City MSA Partial, the Tulsa MSA Partial, the Enid MSA, and OK Rural Non-MSA. Loan applications are taken at these locations and then forwarded to the main bank in Lawton where the credit underwriting decision is made. Regional Managers have some lending authority as designated by the Board of Directors. The limited-scope AAs are described below; however, due to the limited market share that these Wal-Mart branches have within their respective communities, in-depth demographic data is not provided.

The Oklahoma City MSA Partial AA includes five of the seven counties in the Oklahoma City MSA consisting of Oklahoma, Cleveland, Grady, Canadian, and Logan counties. This AA encompasses 288 contiguous census tracts in central Oklahoma. Based on the 2015 updated ACS survey, there are 31 census tracts designated as low income, 87 tracts as moderate income, 99 tracts as middle income, 68 tracts as upper income, and three tracts as not applicable.

The Tulsa MSA Partial AA includes two of the seven counties in the Tulsa MSA consisting of Tulsa and Wagoner counties. This AA encompasses 197 contiguous census tracts in northeastern Oklahoma. Based on the 2015 updated ACS survey, 19 census tracts as designated as low income, 57 tracts as moderate income, 58 tracts as middle income, and 63 tracts as upper income. The total population of the AA is 676,000.

The Enid MSA AA includes Garfield County in its entirety, which comprises the whole MSA. CNB operates one Wal-Mart branch in this AA. The AA consists of 12 census tracts. Based on the 2015 updated ACS survey, no tracts were designated as low income, three tracts were moderate income, six tracts were middle income, and three tracts were upper income. The total population of the AA is 62,192.

The OK Rural Non-MSA includes the counties of Kay, Ottawa, Pottawatomie, Stephens, and Washington in their entirety. The AA encompasses 60 census tracts. Based on the 2015 updated ACS survey, two census tracts were designated as low income, 12 tracts as moderate income, 33 tracts as middle income, and 13 tracts as upper income. The total population of the AA is 245,374.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's performance under the Lending Test in Oklahoma is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on full- and limited-scope reviews, the bank's lending performance in the state of Oklahoma is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home mortgage lending in the Lawton MSA Partial AA reflects reasonable dispersion among LMI geographies and meets the standard for satisfactory performance.

From January 1, 2019 to December 31, 2021 (evaluation period), CNB's dispersion to low-income geographies was poor when compared to both home ownership and aggregate bank lending. CNB did not originate any home mortgage loans in low-income tracts during the evaluation period. The demographic data showing 4.2 percent of homeowners in low-income geographies and aggregate bank lending in low-income geographies of 1.2 percent indicates limited opportunity in the market area to lend in low-income geographies. The distribution to moderate-income geographies was excellent. CNB originated 24.1 percent of their home mortgage loans in moderate-income tracts, exceeding the 16.8 percent of homeowners in the moderate-income tracts and exceeding aggregate bank lending in moderate-income geographies of 12.1 percent.

Small Loans to Businesses

Refer to Table Q in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Small business lending in the Lawton MSA Partial AA reflects excellent dispersion among LMI geographies.

During the evaluation period, CNB had excellent dispersion to small businesses in low-income geographies with 8.3 percent penetration compared to 5.2 percent of AA businesses located in low-income geographies and 3.6 percent aggregate bank lending in the low-income geographies. Dispersion to small businesses in moderate-income geographies was also excellent with 37.5 percent penetration compared to

33.2 percent of AA businesses located in moderate-income geographies and 33.2 percent aggregate bank lending in the moderate-income areas.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home mortgage lending to borrowers of different incomes is poor.

During the evaluation period, CNB had satisfactory distribution of home mortgage loans to low-income families overall. While CNB had poor distribution of home mortgage loans to low-income families based on census data at 6.9 percent compared to 22.4 percent of low-income families, CNB's performance compared to aggregate lending was excellent exceeding the 3.7 percent aggregate lending distribution to low-income families.

CNB had a poor distribution to moderate-income families with 5.7 percent penetration compared to 18.3 percent moderate-income families in the AA and 12.2 percent aggregate bank lending.

Small Loans to Businesses

Refer to Table R in the state of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

Lending to small businesses, those with less than \$1 million in gross annual revenue, in the Lawton MSA Partial AA reflects reasonable penetration and meets the standard for satisfactory performance. For the evaluation period, the penetration to small businesses was lower than the percentage of small businesses in the AA and exceeded the aggregate level of lending.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the OKC MSA Partial AA, Tulsa MSA Partial AA, Enid MSA AA, and OK Rural Non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope area.

Distribution of Loans by Income Level of the Geography

Refer to Table U in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The bank's geographic distribution of consumer loans is excellent for the limited-scope areas and exceeds the performance in the full-scope Lawton MSA Partial AA. The distribution of consumer loans to LMI tracts exceeded the distribution of households in LMI tracts in each of the AAs.

Distribution of Loans by Income Level of the Borrower

Refer to Table V in the State of Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The overall borrower distribution of consumer loans in the limited-scope AAs is reasonable and is consistent with the performance in the full-scope Lawton MSA Partial AA. The penetration to low-income borrowers was lower than the percentage of low-income borrowers in each limited-scope AA. However, the penetration to moderate-income borrowers exceeded the percentage of moderate-income borrowers in each of the AAs.

Responses to Complaints

The bank did not have any CRA related complaints in this state during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development (CD) Test in the state of Oklahoma is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope and limited-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's assessment area(s).

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Lawton MSA Partial	48	44.44	22,257	22.09
OKC MSA Partial	24	22.22	42,463	42.36
Tulsa MSA Partial	29	26.85	34,595	34.33
OK Rural Non MSA	7	6.48	1,462	1.45
Enid MSA	0	0	0	0

CD lending in the full-scope Lawton MSA Partial AA reflects adequate responsiveness. During the evaluation period, CNB originated or renewed 48 CD loans totaling \$22.3 million in the Lawton MSA Partial AA. CNB extended 35 economic development loans totaling \$19.1 million, which created or permanently retained approximately 367 LMI jobs, 10 affordable housing loans totaling \$663 thousand, and two community service loans totaling \$1.9 million.

Some of the more impactful economic development loans, in which LMI jobs were created or permanently retained, were to local auto dealerships. CNB originated or renewed four loans to dealerships totaling \$7.5 million creating or retaining 52 LMI jobs.

While not included in the table above, CNB was active in the SBA Paycheck Protection Program (PPP) within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis. CNB's participation resulted in the origination of 34 PPP loans totaling \$480 thousand that stabilized the economy by helping to maintain LMI jobs in the AA.

Number and Amount of Qualified Investments

Assessment Area	Qualified Investments									
	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lawton MSA Partial	1	1,501	72	176	73	71.57	1,677	45.57	0	0
OKC MSA Partial	3	1,299	12	275	15	14.71	1,574	42.77	0	0
Tulsa MSA Partial	1	303	8	7	9	8.82	310	8.42	0	0
OK Rural Non MSA	1	45	3	4	5	3.92	49	1.33	0	0
Enid MSA	1	70	0	0	1	0.98	70	1.90	0	0

* Prior Period Investments' means investments made in a previous evaluation 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.

The level of qualified CD investments in the full-scope Lawton MSA Partial AA reflects adequate responsiveness. The largest investment entails a \$1.5 million mortgage-backed security funding a multifamily property to facilitate housing needs of LMI families / individuals.

Additionally, CNB donated \$95.6 thousand to qualified non-profit organizations in the Lawton MSA Partial AA during the evaluation period.

Extent to Which the Bank Provides Community Development Services

The level of qualified CD services in the full-scope Lawton MSA Partial AA is excellent. CNB employees provided 134 hours of financial literacy training, budgeting classes, and credit counseling through qualified organizations to LMI persons in the AA.

Bank officers provide leadership and financial expertise by serving on the boards or committees of nonprofit organizations that provides various social services to LMI individuals or promotes economic development. A senior executive officer serves as Treasury Chairman for the Comanche County Industrial Development Authority (CCIDA) and Treasury Secretary for the Lawton Economic Development Authority (LEDA). A bank officer serves on the Allocation Committee for the Junior League of Lawton.

CNB conducted a significant level of financial literacy training, which is recognized as a significant need nationwide. Bank wide, CNB conducted 589 hours of financial literacy training. Much of the financial literacy was targeted to members of the Comanche Nation Tribe, as well as local schools and non-profit organizations.

Comanche Nation Tribe

The bank extended approximately 63 hours of employee time to provide financial literacy training in several different ways to members of the Comanche Nation. CNB has enjoyed a relationship since late

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

2005 when they were selected by the Comanche Nation Business Committee (CBC) to distribute gaming revenue as Per Capita payments to members of the Nation. Since then, the relationship has grown to include additional value-added services as either management of the bank or the CBC saw an increasing need.

A dedicated phone number allows members of the tribe to contact the bank toll-free for customer service from CNB's Contact Center pertaining to their per capita needs. This area has over 30 employees available 47 hours of the week, six days a week. They handle a variety of calls related to their Per Capita distribution, account management, and basic financial literacy. The average call volume on this line was over 920 hours per year for 2020 and 2021. CNB's Trust Department also has walk-in service available during banking hours five days a week, which is popular with the elders, and allows members to drop off documents to any branch locations.

The Covid-19 pandemic starting in spring 2020 presented new issues during the fall distributions. Native American tribes had higher incidence of hospitalizations and deaths. The other impact was loss of jobs and displaced families. Comanche Nation shut-down their casinos for nearly 90 days and occasionally tribal headquarters was shut down due to outbreaks. CNB made accommodations by moving the customer service desk to the lobby including bank protocols of mandatory masks, clear partitions, and regular sanitation. Early correspondence to members encouraged direct deposit. CNB also offered members the ability to complete a notarized address update that could be sent electronically to their enrollment office since access to their headquarters required appointments. Additionally, the CBC asked the bank to provide a drive-thru elder distribution in December 2020 that minimized contact. The bank organized an outdoor drive-thru to disburse checks and had tribal members visit one of CNB's drive-thru banking locations to cash the check with no fee. The CBC also authorized the bank to prepare gift cards for each elder from federal government money they received for pandemic relief. 650 checks were distributed within a four-hour period. Transmission continued to be a concern in 2021 with another drive-thru elder event moved indoors to avoid the cold weather conditions encountered the previous year. While Comanche Nation employees prepared to-go meals and directed traffic, CNB distributed 660 elders checks within four hours again.

Any Comanche Nation member located in the United States and its territories may now open specific branded Comanche Nation accounts on-line as well as sign up for direct deposit of per capita funds. The Comanche Pride checking account was created in 2009 in an effort to provide a deposit product most suitable for tribal members. The Comanche Pride account does not have an account maintenance fee and offers many features at no cost: online banking access, Comanche Nation branded checks, as well as choice of either paper or electronic itemized account statements. This account offers the under-banked to have a direct deposit account that remains open with no service fee. The Elite Comanche Pride offers early pay (access to direct deposit one day early), online bill-pay, and CNB Rewards. Both accounts offer a free debit card branded with the tribe's logo. As of February 2023, the bank has 4,446 accounts open for members from all product lines of checking, savings, and loans.

From January 2019 through February 2020, CNB employees provided 63 hours of financial literacy and profession training to tribal members at 21 separate events. Training was provided to approximately 312 attendees. Due to the pandemic, financial literacy and professional training could not be conducted in-person during most of 2020 and all of 2021 in order to keep employees and tribal members safe. In 2022, the bank's Training Department was able to begin classes again with different tribal programs including the workforce programs and summer youth employment program. The subject matter ranged from basic

budgeting for youth and adults to self-development. Overall, there were five classes with 201 attendees at different Comanche Nation locations in 2022.

Some members need a letter of verification of income for special assistance and to be eligible for low-income programs offered by the government. Upon request, the bank will complete the required verification letter at no cost. In 2019, CNB was also able to resolve an ongoing issue of minors being turned down for Social Security income due to their money that is placed into an IGRA trust being counted as an asset. CNB was aware of over two dozen children that were being denied benefits. Many hours were spent discussing the issue with CNB's legal counsel and the tribe's legal counsel. In April 2019, CNB received a letter from Social Security stating that the assets in trust would no longer count against minors. CNB continues to prepare packets for minors and their families upon request to present to Social Security, which state the beneficial ownership in the IGRA Trust.

The Comanche Nation has grown from over 12,000 members in 2005 to currently over 17,600 members. Of these, nearly 2,100 are over age 62 and over 4,500 are below the age of 18. They have members in all 50 states and some are even in other countries. CNB's mission to address the needs of a growing Nation through additional services beyond yearly distributions. As the Comanche Nation continues to grow, its relationship with CNB does as well. CNB continuously adapt and strive to offer the products and services that best meet the needs of a rapidly growing community.

Conclusions for Areas Receiving Limited Scope Reviews

Based on limited-scope reviews, the bank's performance under the CD Test in the OKC MSA Partial AA, Tulsa MSA Partial AA, Enid MSA AA, and OK Rural Non-MSA AA is consistent with the bank's overall performance under the CD Test in the full scope area(s).

State Rating

State of Kansas

CRA rating for the State of Kansas²: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- CNB exhibits an excellent distribution of loans to individuals of different income levels given the product lines offered by the bank.
- CNB's distribution of loans by geography is excellent and meets the standard for outstanding performance.
- CNB exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services

Description of Institution's Operations in Kansas

CNB has three branches located inside Wal-Marts in Wichita KS. The bank's full scope AA in the State of Kansas is the Wichita MSA Partial consisting of Sedgwick County, one of five counties in the Wichita MSA. The Wichita MSA Partial encompasses 124 census tracts. Based on the 2015 updated ASC data, the U.S. Census Bureau identifies 16 census tracts as low-income, 35 tracts as moderate-income, 38 tracts as middle-income, and 35 tracts as upper-income. The total population of the AA is 506,529. Additionally, there are 124,645 families and 192,961 households. The AA contains 213,700 housing units with 123,624, or 57.8 percent being owner occupied. There is also a large volume of rental occupied units in the AA. Rental occupied units total 69,337 or 32.4 percent, and vacant housing totals 20,739 or 9.7 percent of the available housing type. Families below the poverty level total 11.0 percent. Wichita is the largest city in the State of Kansas. Located in south-central Kansas on the Arkansas River, Wichita is the county seat of Sedgwick County and the principal city of the Wichita MSA. As an industrial hub and the largest city in the state, Wichita is an area center of culture, media, and trade. Wichita is known as "The Air Capital of the World" as the major aircraft manufacturing companies are located in Wichita and the city remains a major center of the U.S. aircraft industry. The Wichita economy is heavily dependent on the aircraft industry. Healthcare is Wichita's second largest industry employing 37,000 people. Local banking competition includes several other independent national and state-chartered banks, and branches of other banks and financial institutions based in Kansas, as well as, across the nation.

² This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wichita MSA Partial						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	12.1	29.0	27.4	31.5	0.0
Population by Geography	506,529	9.3	24.9	28.5	37.2	0.0
Housing Units by Geography	213,700	10.4	26.8	29.4	33.4	0.0
Owner-Occupied Units by Geography	123,624	5.8	19.6	29.0	45.6	0.0
Occupied Rental Units by Geography	69,337	16.1	36.1	31.6	16.2	0.0
Vacant Units by Geography	20,739	18.7	39.2	24.0	18.1	0.0
Businesses by Geography	28,846	6.1	28.4	27.1	38.4	0.0
Farms by Geography	903	4.2	15.2	22.5	58.1	0.0
Family Distribution by Income Level	124,645	21.7	17.7	20.9	39.8	0.0
Household Distribution by Income Level	192,961	24.3	16.8	18.3	40.6	0.0
Median Family Income MSA - 48620 Wichita, KS MSA		\$64,331	Median Housing Value			\$123,957
			Median Gross Rent			\$745
			Families Below Poverty Level			11.0%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Kansas

Only one AA was designated for the State of Kansas, which is the Wichita MSA Partial, consisting of Sedgwick County. Sedgwick County is one of five counties in the Wichita MSA. This MSA will be evaluated under full-scope procedures. The Wichita MSA Partial consists of three Wal-Mart branches opened in 2012. Lending performance was assessed by reviewing consumer loans originating in 2019, 2020, and 2021. Consumer loans are the predominant product in Kansas as the Wal-Mart branch structure supports the consumer lending needs in contrast to the small business and home mortgage products in the Lawton AA with the main bank presence.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

Based on a full-scope review, the bank's performance under the Lending Test in Kansas is rated Outstanding.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State of Kansas.

Consumer Loans

Refer to Table U in the state of Kansas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

During the evaluation period, CNB had excellent dispersion to low-income geographies. The bank originated 27.6 percent of loans to low-income geographies exceeding the 9.5 percent low-income geographies in the AA. CNB also had excellent distribution of consumer loans to moderate-income geographies. The bank originated 31.0 percent of consumer loans to moderate-income geographies compared to 25.5 percent of moderate-income geographies in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to individuals of different income levels given the product lines offered by the bank.

Consumer Loans

Refer to Table V in the state of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

During the evaluation period, CNB had excellent dispersion of consumer loans to low-income families. The bank originated 44.8 percent of consumer loans to low-income families compared to 24.3 percent low-income families in the AA. CNB originated 13.8 percent of consumer loans to moderate-income families, slightly less than the 16.8 percent of moderate-income families in the AA.

Responses to Complaints

The bank did not have any CRA related complaints in this state during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Kansas is rated Satisfactory.

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area(s).

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Wichita MSA Partial	2	100	7,685	100

CD lending in the full-scope Wichita MSA Partial AA reflects adequate responsiveness. During the evaluation period, CNB extended two economic development loans totaling \$7.7 million, which created or permanently retained approximately 85 LMI jobs. While not included in the table above, CNB extended two PPP loans totaling \$8,500 within the AA to help sustain operations of local businesses and allow them to maintain employment of their workforce during the COVID-19 crisis.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Wichita MSA Partial	3	933	2	3	5	100	936	100	0	0

* Prior Period Investments' means investments made in a previous evaluation 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.

The level of qualified CD investments in the Kansas full-scope AA reflects adequate responsiveness. The bank has three prior period investments with an outstanding balance of \$933 thousand. The investments include a municipal bond with an outstanding book value of \$147 thousand issued by the city of Park City, Kansas as part of a \$2.9 million General Obligation Bond Series to help fund the Echo Hills Commercial Addition infrastructure improvements. These improvements are necessary for the development of an outlet mall that will house 80-100 retailers and create up to 1,000 new jobs, most of which will be for LMI workers. The other two investments are CRA qualified mortgage-backed securities with an outstanding book balance totaling \$786 thousand.

Additionally, CNB made two donations totaling \$3,000 to local schools with majority LMI students for the purchase of computer equipment during the evaluation period.

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

Extent to Which the Bank Provides Community Development Services

The level of qualified CD services in the Wichita MSA Partial AA reflects adequate responsiveness. CNB employees provided 127 hours of financial literacy training to local elementary and middle schools reaching over 2,117 LMI students.

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 MSA(s) and non-MSA(s) 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:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home mortgage, small business, consumer loans. Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Oklahoma		
Lawton MSA Partial	Full scope	AA consists of all census tracts in Comanche County
OKC MSA Partial	Limited scope	AA consists of all census tracts in Oklahoma, Logan, Grady, Cleveland, and Canadian Counties
Tulsa MSA Partial	Limited scope	AA consists of all census tracts in Tulsa and Creek Counties
Enid MSA	Limited scope	AA consists of all census tracts in Garfield County
OK Rural Non-MSA	Limited scope	AA consists of all census tracts in Washington, Stephens, Pottawatomie, Ottawa, Muskogee, and Kay Counties
State of Kansas		
Wichita MSA Partial	Full scope	AA consists of all census tracts in Sedgwick County

Appendix B: Summary of MMSA and State Ratings

RATINGS – City National Bank

Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
City National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Oklahoma	Satisfactory	Satisfactory	Satisfactory
Kansas	Outstanding	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope 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: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

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

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical area. 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 metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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) 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 Consolidated Report of Condition and Income (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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of 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: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - 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 aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000)

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

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 aggregate peer data for the years the data is available. Because aggregate 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 assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - 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 in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - 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 households by income level in each MMSA/assessment area.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate			
Lawton MSA Partial	87	14,204	100.0	4,328	4.2	0.0	1.2	16.8	24.1	12.1	38.9	36.8	39.8	40.1	39.1	46.9	0.0	0.0	0.0			
Total	87	14,204	100.0	4,328	4.2	0.0	1.2	16.8	24.1	12.1	38.9	36.8	39.8	40.1	39.1	46.9	0.0	0.0	0.0			

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers					
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate			
Lawton MSA Partial	87	14,204	100.0	4,328	22.4	6.9	3.7	18.3	5.7	12.2	18.6	16.1	18.9	40.7	60.9	28.2	0.0	10.3	37.0			
Total	87	14,204	100.0	4,328	22.4	6.9	3.7	18.3	5.7	12.2	18.6	16.1	18.9	40.7	60.9	28.2	0.0	10.3	37.0			

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Lawton MSA Partial	24	3,326,553	60.0	1,878	5.2	8.3	3.6	33.2	37.5	33.2	32.3	20.8	27.5	29.1	33.3	35.7	0.2	0.0	0.1		
Total	24	3,326,553	60.0	1,878	5.2	8.3	3.6	33.2	37.5	33.2	32.3	20.8	27.5	29.1	33.3	35.7	0.2	0.0	0.1		

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Lawton MSA Partial	24	3,326,553	60.0	1,878	82.7	70.8	42.5	3.6	29.2	13.7	0.0		
Total	24	3,326,553	60.0	1,878	82.7	70.8	42.5	3.6	29.2	13.7	0.0		

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2019-21

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Enid MSA	28	245,591	93.3	0.0	0.0	28.7	36.0	43.4	50.0	27.8	14.0	0.0	0.0
OK Rural Non-MSA	28	243,050	93.3	2.7	7.1	15.5	28.6	57.2	28.6	24.6	35.7	0.0	0.0
OKC MSA Partial	27	121,091	90.0	6.1	7.4	26.0	33.3	38.8	44.4	28.9	14.8	0.3	0.0
Tulsa MSA Partial	25	155,715	83.3	7.0	12.0	27.9	32.0	35.0	32.0	30.1	24.0	0.0	0.0
Total	108	765,447	90.0	5.7	6.5	25.2	32.4	40.3	38.9	28.6	22.2	0.1	0.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Enid MSA	28	245,591	93.3	21.8	17.9	17.0	28.6	20.1	28.6	41.2	25.0	0.0	0.0	
OK Rural Non-MSA	28	243,050	93.3	23.6	14.3	16.1	28.6	16.8	25.0	43.4	32.1	0.0	0.0	
OKC MSA Partial	27	121,091	90.0	23.5	14.8	16.7	40.7	18.0	14.8	41.9	25.9	0.0	3.7	
Tulsa MSA Partial	25	155,715	83.3	24.6	16.0	16.6	28.0	17.7	20.0	41.1	28.0	0.0	8.0	
Total	108	765,447	90.0	23.9	15.7	16.6	31.5	17.9	22.2	41.6	27.8	0.0	2.8	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Wichita MSA Partial	29	94,916	96.7	9.5	27.6	25.5	31.0	29.9	20.7	35.1	20.7	0.0	0.0	
Total	29	94,916	96.7	9.5	27.6	25.5	31.0	29.9	20.7	35.1	20.7	0.0	0.0	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-21	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Wichita MSA Partial	29	94,916	96.7	24.3	44.8	16.8	13.8	18.3	31.0	40.6	10.3	0.0	0.0	
Total	29	94,916	96.7	24.3	44.8	16.8	13.8	18.3	31.0	40.6	10.3	0.0	0.0	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.