



PUBLIC DISCLOSURE

September 3, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Liberty National Bank
Charter Number 23516

629 S.W. C Avenue
Lawton, OK 73501

Office of the Comptroller of the Currency
Oklahoma City Field Office
The Harvey Parkway Building
301 N.W. 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 major factors that support this rating include:

- The Lending Test rating is based on the two full-scope assessment areas (AAs) in the state of Oklahoma.
- The loan-to-deposit (LTD) ratio is reasonable.
- A majority of the loans were originated inside the bank's AA.
- The geographic distribution of loans reflects reasonable distribution throughout the bank's AAs.
- The distribution of loans to individuals of different incomes and businesses of different sizes reflects reasonable distribution.
- The Community Development (CD) Test rating is based on the two full-scope AAs in the state of Oklahoma.
- CD activities reflect adequate responsiveness to the needs of the communities within the bank's AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

Liberty National Bank's (LNB) LTD ratio as of December 31, 2018 was 74 percent. The bank's average quarterly LTD ratio from June 30, 2014 through December 31, 2018 was 78 percent. This average was compared to the average of four similar banks located in LNB's AA or the surrounding counties, with total assets between \$440 million and \$650 million, for the same time period. LNB's average LTD ratio of 78 percent is consistent with the average of the four comparable banks of 72 percent. These average LTD ratios are detailed in the following table.

| Loan-to-Deposit Ratios | | |
|--|--|--|
| Institution | Total Assets \$000's (As of 12/31/18) | Average Loan to Deposit Ratio |
| <i>Liberty National Bank, Lawton</i> | \$570,037 | 77.90% |
| All America Bank, Oklahoma City | \$442,235 | 80.12% |
| First Bank & Trust, Duncan | \$587,241 | 75.99% |
| The First National Bank and Trust, Chickasha | \$645,393 | 70.64% |
| First National Bank & Trust Co. of Ardmore | \$551,373 | 62.39% |

Source: Institution Reports of Condition from June 30, 2014 to December 31, 2018.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs. A majority of the number of home mortgage loans and small business loans and a majority of the dollar amount of small business loans were originated in the bank's AAs.

LNB originated and purchased 79 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. The following table provides details on all home mortgage loans and our sample of 120 loans to small businesses.

| 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 | 295 | 78.2 | 82 | 21.8 | 377 | 38,142 | 48.3 | 40,789 | 51.7 | 78,930 |
| Small Business | 98 | 81.7 | 22 | 18.3 | 120 | 12,051 | 75.9 | 3,818 | 24.1 | 15,869 |
| Total | 393 | 79.1 | 104 | 20.9 | 497 | 50,193 | 52.9 | 44,607 | 47.1 | 94,800 |

Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0

Description of Institution

LNB is a community bank headquartered in Lawton, Oklahoma. It is a subsidiary of B.O.E. Bancshares, Incorporated, a one-bank holding company, also headquartered in Lawton, Oklahoma. Since the prior examination, affiliate Chickasha Bank & Trust, Chickasha, Oklahoma was merged with LNB. B.O.E. is also 100% owner of Washita Mortgage, which is currently being dissolved. The loans were previously rolled into LNB's loan portfolio.

The main bank and a drive through are located at 629 S.W. C Avenue, Lawton, Oklahoma. There are six additional full-service branches with drive throughs in Lawton, Elgin, Chickasha, Blanchard, and Apache. There are Automated Teller Machines (ATMs) at each of the seven bank locations and 11 additional stand-alone ATMs throughout the bank's AAs. Since the previous CRA evaluation, LNB closed its Tuttle branch. The branch was closed due to limited branch activity and strong competition from other financial institutions in the area. No other locations have been opened or closed since the previous CRA evaluation. See the tables below for complete branch and ATM information.

| LNB's Branch Locations | | |
|-------------------------------|-----------------------------|---------------|
| <i>Location</i> | <i>Address</i> | <i>City</i> |
| Lawton Main Office | 629 S.W. C Ave. | Lawton, OK |
| Lawton - Gore Branch | 4005 W. Gore | Lawton, OK |
| Lawton - Highway 49 Branch | 23975 St. Highway 49 | Lawton, OK |
| Elgin Branch | 8232 St. Highway 17 | Elgin, OK |
| Chickasha Branch | 1924 S. 4 th St. | Chickasha, OK |
| Blanchard Branch | 1525 N. Council Rd. | Blanchard, OK |
| Apache Branch | 1112 S. Coblake | Apache, OK |

| LNB's ATM Locations | | |
|----------------------------|-----------------------------|---------------|
| <i>Location</i> | <i>Address</i> | <i>City</i> |
| Lawton Main Office | 629 S.W. C Ave. | Lawton, OK |
| Lawton – Gore Branch | 4005 W. Gore Blvd. | Lawton, OK |
| Lawton – Hwy 49 Branch | 23975 St. Highway 49 | Lawton, OK |
| Lawton | 4401 N.W. Cache Rd. | Lawton, OK |
| Lawton | 2 S.E. 45 th St. | Lawton, OK |
| Lawton | 920 S.W. Sheridan Rd. | Lawton, OK |
| Lawton | 3401 N.W. Gore Blvd. | Lawton, OK |
| Lawton | 3401 S.W. 11 th | Lawton, OK |
| Lawton | 315 S.W. 5 th | Lawton, OK |
| Elgin Branch | 8232 St. Highway 17 | Lawton, OK |
| Fletcher | 102 St. Highway 277 | Fletcher, OK |
| Chickasha Branch | 1924 S. 4 th St. | Chickasha, OK |
| Chickasha | 714 E. Choctaw Ave. | Chickasha, OK |
| Chickasha | 3501 S. 4 th St. | Chickasha, OK |
| Alex | 601 St. Highway 19 | Alex, OK |
| Blanchard Branch | 1525 N. Council Rd. | Blanchard, OK |
| Apache Branch | 1112 S. Coblake | Apache, OK |
| Apache | 614 Apache Trail | Apache, OK |

LNB's primary focus is to serve commercial and agricultural customers in Comanche, Cotton, Grady, McClain, Caddo, and Stephens Counties. LNB meets these needs by providing traditional loan and deposit products and services, as well as online banking, internet bill pay, mobile banking, and telephone banking. The bank also offers various government guaranteed loan products. Bank lobby and drive through services are offered Monday through Friday 8:00 A.M. to 5:00 P.M. at all locations. Limited Saturday hours are also offered at all drive throughs.

As of December 31, 2018, the bank's total assets equaled \$551 million, of which \$364 million, or 66 percent, includes various types of loans to individuals, commercial businesses, and agricultural related enterprises. Specifically, the bank's loan portfolio consists of the following:

| Loan Portfolio Composition as of December 31, 2018 | | |
|---|------------------|----------------|
| | \$ (000) | % |
| Commercial/Business Loans | \$235,198 | 64.56% |
| Residential Real Estate Loans | \$59,687 | 16.38% |
| Agricultural Loans | \$59,012 | 16.20% |
| Consumer Loans | \$9,336 | 2.56% |
| Other Loans | \$1,081 | 0.30% |
| Total | \$364,314 | 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 LNB at the last CRA performance evaluation performed as of April 7, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of LNB's Lawton Metropolitan Statistical Area (MSA) AA, a full-scope review of LNB's OKC Partial MSA AA, and a limited-scope review of Non-MSA AA under the Intermediate Small Bank CRA procedures, which includes the lending test and the CD test. 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 and donations, and services.

This Performance Evaluation is based on 2010 U.S. Census data and the updated 2015 American Community Survey (ACS) demographic information. Conclusions regarding the Lending Test are based on all home mortgage loans (home purchase, home refinance, and home improvement) originated in 2016, with a separate assessment based on all home mortgage loans originated in 2017 and 2018. Our review also included a random sample of small business loans originated in 2016, with a separate assessment based on small business loans originated in 2017 and 2018. The 2016 home mortgage loans and small business sample are compared to 2010 Census Data information, whereas the 2017 and 2018 home mortgage loans and small business samples are compared to updated information from the 2015 ACS U.S. Census. Conclusions regarding the

Community Development Test are based on CD loans, investments and service activities from April 7, 2014 through December 31, 2018.

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 AAs located within the MSA 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, and where applicable, multistate ratings.

LNB has only one rating area, the state of Oklahoma, and the bank’s overall rating is based on the full-scope and limited-scope reviews of the AAs within the state. Due to the bank’s focus on commercial lending and the fact that a significant portion of the loan portfolio is composed of commercial loans, we placed more emphasis on the bank’s performance under loans to small businesses.

The state rating is based on performance in all bank AAs. Refer to the “Scope” section under the State 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), in determining a national bank’s 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 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 Oklahoma: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable distribution throughout the AAs.
- The distribution of loans to individuals of different incomes and businesses of different sizes is reasonable.
- CD lending reflects adequate responsiveness to the needs of the bank's AAs.
- CD investments reflect adequate responsiveness to the needs of the bank's AAs.

Description of Institution's Operations in Oklahoma

LNB's overall primary focus is commercial lending, although they offer a variety of loan and deposit products to meet the needs of the community. The bank operates seven branches and has 18 ATMs in three AAs in the state of Oklahoma. The AAs adopted by LNB consist of whole geographies, do not reflect illegal discrimination, and do not arbitrarily exclude LMI geographies. They meet the requirements of the CRA regulations. All AAs were considered in evaluating LNB's CRA performance. The Lawton MSA AA and the OKC Partial MSA AA received full-scope reviews, while the Non-MSA AA received a limited-scope review. Based on the low percentage of loans outstanding compared to the total bank loans of 5.3 percent and the low percentage of deposits compared to total bank deposits of 4.2 percent in the Non-MSA AA, a limited-scope review was performed of this area.

Lawton MSA AA

The Lawton MSA AA consists of 34 contiguous census tracts (CTs), which includes all of Comanche and Cotton Counties. In 2016, the Lawton MSA AA consisted of three low-income CTs, nine moderate-income CTs, 14 middle-income CTs, 7 upper-income CTs, and one CT that does not report any information (Fort Sill military base). Based on updated information in 2017, moderate-income CTs increased to ten and middle-income CTs decreased to nine. Four of the seven bank branches are in the Lawton MSA AA. The main bank is in a moderate-income CT, one Lawton branch is in a middle-income CT, and one Lawton branch is in an upper-income CT. The Elgin branch is in an upper-income CT.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Liberty NB Lawton MSA | | | | | | 2016 |
| | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 34 | 8.8 | 26.5 | 41.2 | 20.6 | 2.9 |
| Population by Geography | 130,291 | 7.6 | 20.2 | 45.4 | 26.7 | 0.1 |
| Housing Units by Geography | 52,519 | 5.5 | 20.6 | 47.3 | 26.6 | 0.0 |
| Owner-Occupied Units by Geography | 27,502 | 2.7 | 10.5 | 50.8 | 36.0 | 0.0 |
| Occupied Rental Units by Geography | 18,697 | 8.1 | 32.0 | 43.9 | 15.9 | 0.0 |
| Vacant Units by Geography | 6,320 | 9.6 | 30.9 | 42.2 | 17.3 | 0.0 |
| Businesses by Geography | 5,604 | 15.0 | 20.6 | 40.8 | 23.1 | 0.5 |
| Farms by Geography | 322 | 2.8 | 5.6 | 52.2 | 39.4 | 0.0 |
| Family Distribution by Income Level | 31,959 | 21.9 | 17.6 | 21.3 | 39.3 | 0.0 |
| Household Distribution by Income Level | 46,199 | 23.8 | 16.0 | 18.7 | 41.5 | 0.0 |
| Median Family Income MSA - 30020 Lawton, OK MSA | | \$50,410 | Median Housing Value | | | \$100,386 |
| | | | Median Gross Rent | | | \$655 |
| | | | Families Below Poverty Level | | | 13.8% |
| <i>Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Liberty NB Lawton MSA | | | | | | 2017-18 |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 34 | 8.8 | 29.4 | 38.2 | 20.6 | 2.9 |
| Population by Geography | 131,643 | 6.1 | 22.7 | 43.8 | 27.3 | 0.1 |
| Housing Units by Geography | 54,500 | 6.6 | 24.0 | 41.8 | 27.6 | 0.0 |
| Owner-Occupied Units by Geography | 25,725 | 3.9 | 15.6 | 43.2 | 37.2 | 0.0 |
| Occupied Rental Units by Geography | 19,944 | 9.6 | 32.1 | 40.0 | 18.2 | 0.0 |
| Vacant Units by Geography | 8,831 | 7.7 | 30.0 | 41.9 | 20.5 | 0.0 |
| Businesses by Geography | 5,804 | 5.3 | 34.9 | 34.9 | 24.8 | 0.2 |
| Farms by Geography | 297 | 1.3 | 11.8 | 39.4 | 47.5 | 0.0 |
| Family Distribution by Income Level | 30,017 | 22.6 | 18.1 | 18.7 | 40.7 | 0.0 |
| Household Distribution by Income Level | 45,669 | 23.8 | 16.3 | 17.8 | 42.1 | 0.0 |
| Median Family Income MSA - 30020 Lawton, OK MSA | | \$57,051 | Median Housing Value | | | \$108,669 |
| | | | Median Gross Rent | | | \$767 |
| | | | Families Below Poverty Level | | | 13.9% |
| <i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Local economic conditions are considered stable to slightly declining. The economy of Lawton is dependent on Fort Sill Military Installation, manufacturing, health services, and retail. However, over the years Lawton has become less dependent on the military, the oil and gas industry, and agricultural industries. The housing market continues to expand and overflow into the bedroom communities surrounding Lawton. The major employers in the area consist of Fort Sill Military Installation, Goodyear Tire & Rubber Company, Lawton Public Schools, and Comanche County Hospital.

LNB faces strong competition from several other national and state-chartered banks and branches of other banks and financial institutions.

A community contact was reviewed to help ascertain the credit needs of the AA. The contact identified the biggest need in their community; which is considered a bedroom community located north of Lawton, as consumer and new housing loans.

OKC Partial MSA

The OKC Partial MSA AA consists of 16 contiguous CTs, which includes all of Grady and McClain Counties. In 2016, the OKC Partial MSA AA consisted of no low-income CTs, four moderate-income CTs, 11 middle-income CTs, and 1 upper-income CT. Based on updated information in 2017, low-income CTs increased to one, moderate-income CTs decreased to two, and upper-income CTs increased to two. Two of the seven bank branches are in this AA. The Chickasha branch is in a low-income CT and the Blanchard branch is in a middle-income CT.

| Table A – Demographic Information of the Assessment Area | | | | | | |
|---|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Liberty NB OKC Partial MSA | | | | | | 2016 |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 16 | 0.0 | 25.0 | 68.8 | 6.3 | 0.0 |
| Population by Geography | 86,937 | 0.0 | 18.4 | 74.0 | 7.7 | 0.0 |
| Housing Units by Geography | 35,382 | 0.0 | 21.2 | 71.9 | 6.9 | 0.0 |
| Owner-Occupied Units by Geography | 24,667 | 0.0 | 16.8 | 75.1 | 8.1 | 0.0 |
| Occupied Rental Units by Geography | 6,543 | 0.0 | 29.9 | 65.6 | 4.5 | 0.0 |
| Vacant Units by Geography | 4,172 | 0.0 | 33.3 | 62.7 | 4.0 | 0.0 |
| Businesses by Geography | 4,953 | 0.0 | 20.3 | 68.3 | 11.3 | 0.0 |
| Farms by Geography | 460 | 0.0 | 16.1 | 76.7 | 7.2 | 0.0 |
| Family Distribution by Income Level | 23,721 | 20.7 | 19.8 | 21.1 | 38.3 | 0.0 |
| Household Distribution by Income Level | 31,210 | 23.2 | 15.8 | 18.0 | 42.9 | 0.0 |
| Median Family Income MSA - 36420 Oklahoma City, OK MSA | | \$58,775 | Median Housing Value | | | \$109,566 |
| | | | Median Gross Rent | | | \$590 |
| | | | Families Below Poverty Level | | | 9.4% |
| <i>Source: 2010 U.S. Census and 2016 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

| Table A – Demographic Information of the Assessment Area | | | | | | |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| Assessment Area: Liberty NB OKC Partial MSA | | | | | | 2017-18 |
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts) | 16 | 6.3 | 12.5 | 68.8 | 12.5 | 0.0 |
| Population by Geography | 90,124 | 1.4 | 8.4 | 71.2 | 19.0 | 0.0 |
| Housing Units by Geography | 36,951 | 1.6 | 9.2 | 72.2 | 17.0 | 0.0 |
| Owner-Occupied Units by Geography | 25,483 | 0.8 | 6.2 | 73.2 | 19.8 | 0.0 |
| Occupied Rental Units by Geography | 7,350 | 2.8 | 16.2 | 69.6 | 11.4 | 0.0 |
| Vacant Units by Geography | 4,118 | 4.7 | 15.0 | 70.7 | 9.6 | 0.0 |
| Businesses by Geography | 5,202 | 1.8 | 12.7 | 63.9 | 21.5 | 0.0 |
| Farms by Geography | 417 | 1.4 | 3.1 | 82.0 | 13.4 | 0.0 |
| Family Distribution by Income Level | 24,317 | 19.7 | 17.6 | 22.2 | 40.5 | 0.0 |
| Household Distribution by Income Level | 32,833 | 22.2 | 15.8 | 18.4 | 43.5 | 0.0 |
| Median Family Income MSA - 36420 Oklahoma City, OK MSA | | \$64,058 | Median Housing Value | | | \$123,634 |
| | | | Median Gross Rent | | | \$673 |
| | | | Families Below Poverty Level | | | 8.5% |
| <i>Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0 (*) The NA category consists of geographies that have not been assigned an income classification.</i> | | | | | | |

Local economic conditions are considered stable with moderate growth. The economy in Chickasha is dependent upon oil and gas, agriculture, and the overall Oklahoma City economy. Chickasha is in the southwest portion of the OKC MSA. The major employers in the area consist of Grady Memorial Hospital, Braum's Dairy, Chickasha Public Schools, and Purcell Private Services.

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

In conducting the assessment of the bank's performance, three community contacts were reviewed to help ascertain the credit needs of the AA. The contacts identified the needs in the community as housing for all levels, assistance for the area schools, and more recently it was retaining full services at the hospital. The contacts indicated that the local financial institutions are involved in the local community activities and are meeting the credit needs of the community.

Scope of Evaluation in Oklahoma

Both the Lawton MSA AA and OKC Partial MSA AA received full-scope reviews and the Non-MSA AA received a limited-scope review. Non-MSA AAs within the same state are combined, analyzed, and presented as one AA for this evaluation. Refer to the table in appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Based on full-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. Overall, the geographic distribution of home mortgage and small loans to businesses is reasonable given the performance context.

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.

Lawton MSA AA

LNB's geographic distribution of home mortgage loans in the Lawton MSA AA reflects reasonable distribution.

In 2016, the percentage of bank loans made in LMI geographies exceeded both the percentage of owner-occupied units and aggregate peer data in LMI tracts.

In 2017 and 2018, the percentage of bank loans in low-income geographies is below the percentage of owner-occupied units and aggregate peer data in low-income tracts. Bank loans made in moderate-income geographies is in line with the percentage of reported owner-occupied units in moderate-income tracts and exceeds the aggregate peer data in moderate-income tracts.

OKC Partial MSA AA

LNB's geographic distribution of home mortgage loans in the OKC Partial MSA AA reflects excellent distribution.

In 2016, the percentage of bank loans made in moderate-income geographies was excellent compared to the percentage of owner-occupied housing units and the aggregate peer data in moderate-income tracts. There are no low-income tracts in this AA in 2016.

In 2017 and 2018, the percentage of bank loans made in LMI geographies was in line the percentage of owner-occupied units and aggregate peer data in LMI tracts. There were no bank loans in low-income tracts; however, there is only one low-income tract in this AA during this time-period. Aggregate peer lending data in the low-income tract amounted to just 0.2 percent.

Loans to Small 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 loans to small businesses.

Lawton MSA AA

Lending to businesses in the Lawton MSA AA reflects reasonable distribution.

In 2016, the percentage of business loans in the low-income tracts is poor compared to the percentage of businesses and aggregate peer data in those tracts. The percentage of business loans in the moderate-income tracts exceeds the percentage of businesses and aggregate peer data located in those tracts. Poor distribution in the low-income tracts is explainable given the locations and composition of those tracts. The Lawton MSA AA includes three low-income tracts. One of those tracts (24.03) is located on Fort Sill military base and thus does not provide commercial lending opportunities. Another tract (17.00) is primarily residential, with some small businesses that have established banking relationships with the competition.

In 2017 and 2018, the percentage of business loans in the low-income tracts exceeds the percentage of businesses and aggregate peer data in those tracts. The percentage of business loans in the moderate-income tracts is below the percentage of businesses and aggregate peer data in those tracts.

OKC Partial MSA AA

Lending to businesses in the OKC Partial MSA AA reflects poor distribution.

In 2016, the percentage of business loans in the moderate-income tracts is poor when compared to the percentage of businesses and aggregate peer data in those tracts. There are no low-income tracts in this AA in 2016.

In 2017 and 2018, the percentage of business loans in the moderate-income tracts is below the percentage of businesses located in those tracts but near the percentage of aggregate peer data in those tracts. The poor distribution in the moderate-income tracts in this AA is explainable due to the location and competition in the area. The moderate-income tracts are in Chickasha, Oklahoma. LNB entered the market area in 2014 when they purchased a bank in that area. LNB was new to the area and had to compete with established banks for market share.

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 and farms 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.

The home mortgage product was given less weight in this portion of the lending test due to the large number of bank loans in which the borrower's income information was not available.

Lawton MSA AA

Home mortgage lending in the AA reflects poor distribution among LMI families.

In 2016, lending to LMI borrowers was below the percentage of LMI families in the AA and aggregate peer data in the AA. Additionally, there was no income information for approximately 21 percent of bank loans in the AA.

In 2017 and 2018, lending to LMI borrowers was below the percentage of LMI families in the AA. However, lending was consistent with aggregate peer data for lending to LMI families in the AA during this time-period. Additionally, there was no income information for approximately 36 percent of bank loans in the AA.

The poor distribution in the Lawton MSA is partially explainable given the presence of Fort Sill military base. Many LMI persons in the AA are new recruits temporarily stationed at Fort Sill for basic training. There are fewer lending opportunities available towards this demographic as these recruits generally receive housing and financial assistance from the military and have less need for home loan products. Additionally, the bank has a high level of competition for these loans given the saturation of financial institutions in the Lawton area.

OKC Partial MSA AA

Home mortgage lending in the AA reflects poor distribution among LMI families.

In 2016, no home mortgage loans were made to low-income borrowers although 21 percent of families in the AA were low-income. Lending to moderate-income borrowers was near the percentage of moderate-income families in the AA and exceeded the aggregate peer data in the AA. Additionally, there was no income information for approximately 17 percent of bank loans in the AA.

In 2017 and 2018, lending to low-income borrowers was below the percentage of LMI families in the AA and near the aggregate peer data of low-income families in the AA. Lending to moderate-income borrowers was below the percentage of LMI families in the AA and aggregate peer data

in the AA. Approximately 19 percent of the bank's home mortgage loans in the AA had no borrower income information available during this time-period.

Loans to Small 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.

Lawton MSA AA

The borrower distribution of loans to small businesses based on a sample of 2016 originations reflects a reasonable distribution of loans to businesses with revenues of less than \$1.0 million and an excellent distribution compared to aggregate peer data.

The borrower distribution of loans to small businesses based on a sample of 2017 and 2018 originations reflects a reasonable distribution of loans to businesses with revenues of less than \$1.0 million and an excellent distribution compared to aggregate peer data.

OKC Partial MSA AA

The borrower distribution of loans to small businesses based on a sample of 2016 originations reflects a reasonable distribution of loans to businesses with revenues of less than \$1.0 million and an excellent distribution compared to aggregate peer data.

The borrower distribution of loans to small businesses based on a sample of 2017 and 2018 originations reflects a reasonable distribution of loans to businesses with revenues of less than \$1.0 million and an excellent distribution compared to aggregate peer data.

Responses to Complaints

LNB received no CRA-related complaints during the evaluation period.

Conclusions for Area Receiving Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope areas.

COMMUNITY DEVELOPMENT TEST

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

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

Number and Amount of Community Development Loans

Qualifying CD loans are those that meet the definition of CD, as defined in the CRA regulations. LNB's level of CD loans indicates adequate responsiveness to the needs of the bank's AAs.

Lawton MSA AA

The level of qualified CD loans in the Lawton MSA AA reflects adequate responsiveness. The bank originated or renewed 18 CD loans totaling \$28.6 million that qualify as CD loans.

The most significant and impactful lending in this AA was the nine loans originated or renewed totaling \$20.2 million that provided funding for health care facilities in the AA. These facilities provide community services to LMI individuals. Six of the loans totaling \$12.3 million were to finance the operations of the Comanche County Hospital and to purchase and renovate a building across from the hospital. The additional location allowed the hospital to expand their services by adding various clinical offices. The new facilities expanded the community services in the AA, as well as created LMI jobs. The hospital treats all patients regardless of their ability to pay.

Three loans for \$7.9 million were to refinance the purchase and operating expenses for a 105-bed skilled nursing facility. The facility provides needed services in the community, including housing Medicare and Medicaid residents. A majority of the jobs at the facility are also LMI jobs. Meeting the credit needs of the Comanche County Hospital and the Skilled Nursing Facility are critical to provide essential health care needs in Comanche County and contiguous counties. Many of the rural population served would not otherwise receive health care due to the lack of income or the inability to drive the distances required to receive services.

Four loans for \$4.7 million were extended to four different borrowers who own and operate multi-family housing complexes that provide affordable housing in the Lawton area. Loans were to purchase, refinance, or make improvements to the apartment complexes. A majority of the units in each complex rent for rates that are below the fair market rents in the area, thus providing housing for LMI individuals. Two of the complexes are also located in moderate-income census tracts.

LNB originated or renewed five loans totaling \$3.7 million to businesses that promoted economic development by creating or maintaining LMI jobs. The largest loan was to refinance the acquisition of a local hotel that helped maintain LMI jobs in a moderate-income census tract. Two loans were extended to the local Chamber of Commerce to expand their current offices. The Chamber is also a strong small business advocate and involved in local economic development projects. The bank originated two additional loans, one to consolidate debt for a manufacturing business and the other to refinance and renovate a convenience store. The majority of the jobs maintained or created by these businesses are LMI jobs.

OKC Partial MSA AA

The level of qualified CD loans in the Lawton MSA AA reflects adequate responsiveness. LNB originated or renewed 15 CD loans totaling \$14.7 million that qualify as CD loans.

LNB originated or renewed 11 loans totaling approximately \$9.6 million that provided funding for community services. The most significant and impactful lending was the six loans totaling \$4 million extended to Grady Memorial Hospital, which is located in a moderate-income tract in Chickasha, OK. In March of 2016, LNB made an \$850 thousand loan to fund the cash flow of the hospital while a new surgery center and x-ray facility were under construction. The loan was renewed in May of 2017. Additional operating expenses of \$100 thousand were financed annually in 2016, 2017, and 2018. In September 2017, the bank purchased a \$2 million participation that was used to purchase equipment for the surgical and x-ray facilities. These loans helped finance the operations of the hospital during the construction of the new facilities and to purchase needed equipment. Meeting the credit needs of the Grady Memorial Hospital is critical to provide essential health care needs in Grady County and contiguous counties. Grady Memorial Hospital treats all patients regardless of their ability to pay. Many of the rural population served would not otherwise receive health care due to the lack of income or the inability to drive the distances required to receive services. It is also estimated that the new facility created 90 new LMI jobs.

LNB extended a loan for \$3.2 million to refinance bonds that were used to fund the construction of the city jail in Chickasha. The jail is in a moderate-income tract and a majority of the jobs created were LMI jobs. Two loans totaling \$931 thousand were extended to the City of Chickasha to purchase police vehicles and a communication system for fire, police, and other community offices. These funds helped meet the critical infrastructure needs in the community, as well as ensuring the safety of law enforcement and the public.

LNB extended a loan for \$500 thousand to the Economic Development Authority to fund the sewer system project at a local school. This was a critical need for capital improvement to the school. Additionally, the majority of the families in the school district are LMI families on the free/reduced lunch program. An additional loan for \$1 million funded the construction of a Goodwill location. Goodwill Industries provides a variety of jobs and services for LMI individuals in the community.

LNB originated or renewed four loans totaling \$5 million to businesses that promoted economic development by creating or maintaining LMI jobs. The largest loan was \$4.3 million to refinance and provide new money for operating expenses for a car dealership. This loan has helped the business maintain jobs; a majority of which are LMI jobs. Three loans were extended to a local borrower to purchase and renovate a convenience store and car wash that was in foreclosure. These loans helped maintain and create LMI jobs in this small community. The business is also located in a moderate-income census tract.

Non-MSA AA

Based on a limited-scope review, the banks performance under the CD Loan Test in the Non-MSA AA is consistent with the bank's overall performance in the full scope areas.

The bank originated one CD loan totaling \$7.9 million that qualifies as a CD loan. The loan was for the construction and permanent financing of a 120-bed skilled nursing and rehabilitation facility in Duncan. This business provided needed services in the community and a majority of the jobs created were LMI jobs.

Number and Amount of Qualified Investments

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose CD, as defined in the CRA regulations. LNB's level of CD investments reflects adequate responsiveness to the needs of the bank's AAs.

Lawton MSA AA

The level of qualified investments and donations, totaling \$5 million during the evaluation period, reflects adequate responsiveness to the CD needs in the bank's AAs. Included in the total, the bank made 20 qualified donations totaling \$9 thousand. These donations and contributions were to local schools and non-profit organizations that provide social services, including youth programs, special needs programs, and health care services that target LMI individuals.

In 2014 and 2015, LNB purchased two school bonds for \$5 million within their AA. These bonds were to renovate, repair, and remodel existing Lawton Public Schools, as well as acquire vehicles for student transportation. No qualified investments have been purchased since the bank became an ISB in 2016 and began reporting qualified investments. We did consider the activity since the prior examination as a positive impact.

OKC Partial MSA AA

The level of qualified investments and donations, totaling \$1.6 million during the evaluation period, reflects adequate responsiveness to the CD needs in the bank's AAs. Included in the total, the bank made 20 qualified donations totaling \$9 thousand. These donations and contributions were to local schools and non-profit organizations that provide social services, including senior citizen and youth programs, homeless shelters, food supplies, and health care services that target LMI individuals.

During the evaluation period, LNB purchased three school bonds for \$1.6 million within their AA. Two bonds were to renovate the cafeteria into classrooms, construct new kitchen area, and acquire a new portable classroom in the Friend Public School district. One bond was for Phase IX construction and furnishing of the new high school and gymnasium in the Purcell Public School District.

Non-MSA AA

Based on a limited-scope review, the banks performance under the CD Investment Test in the Non-MSA AA is consistent with the bank's overall performance in the full scope areas.

The bank purchased one investment for \$125 thousand that qualifies as a CD investment. The school bond was for the construction and to furnish school facilities in the Boone-Apache School District.

Extent to Which the Bank Provides Community Development Services

LNB's level of CD services reflects adequate responsiveness to the needs of the bank's AAs.

Lawton MSA AA

The level of qualified CD services is adequate in the full-scope Lawton MSA AA. Bank officers serve in leadership positions in organizations that provide education opportunities to LMI families and that provide technical expertise and financial assistance to these organizations. The qualifying CD services include the following:

- ***Lawton Public School Foundation/Bond Oversight Committee***
Bank officers serve on the board of directors of this non-profit organization, with one serving as Treasurer. This foundation provides support to the schools and teachers by funding programs and providing supplies that they would not otherwise get through the school system. A majority of the students are from LMI families. One of the officers also serves as Chairman of the Lawton Public Schools Bond Oversight Committee. This committee oversees the issued school bonds and ensures that the funds are dispersed as approved to the schools.
- ***Great Plains Technology Center Foundation***
A bank officer is a board member of this non-profit organization. The foundation provides financial assistance to high school students based on financial need. A majority of the students in the area are from LMI families.

OKC Partial MSA AA

The level of qualified CD services is adequate in the full-scope OKC Partial MSA AA. Bank officers serve in leadership positions in organizations involved in economic and small business development activities. Bank officers serve in leadership positions in organizations that provide community services to LMI families and that provide technical expertise and financial assistance to these organizations. The qualifying CD services include the following:

- ***Chambers of Commerce and Economic Development Organizations***
Bank officers are active in taking leadership positions with the Chickasha Chamber of Commerce, Blanchard Chamber of Commerce, and the Chickasha Economic Development Council. Bank officers have served or are currently serving as board members of these organizations, with one officer serving as President of the Blanchard Chamber of Commerce. Bank officers provide technical expertise through involvement with planning, budgeting, and financing, among other activities.
- ***Grady Memorial Hospital Foundation***
A bank officer serves on the board of directors of this non-profit organization. The foundation supports the medical services and programs of Grady Memorial Hospital and provides cost-effective health care services to its community. Grady County Memorial Hospital accepts patients on Medicaid and provides health care services to LMI families.
- ***Chickasha Public Schools***
A bank officer served as board member on the Chickasha School Board. The officer provided their financial and business expertise on the decisions of the school board. A majority of the students in the Chickasha schools are from LMI families.

- ***Chickasha Lions Club***

A bank officer serves as Secretary/Treasurer for the Lions Club. This organization helps meet community needs through volunteer activities and are dedicated to raising funds to sponsor assorted programs that serve to improve the lives of LMI children and the community at large. The services they are involved in include providing eye exams and glasses for LMI individuals and making annual donations to the Regional Food Bank of Oklahoma for the Grady County Food for Kids Backpack program.

Non-MSA AA

Based on a limited-scope review, the bank's performance under the CD Service Test in the Non-MSA AA is weaker than the bank's overall performance in the full scope areas.

There are currently no bank employees involved in activities that qualify for community development in the Non-MSA AA.

Conclusions for Area Receiving Limited Scope Review

Based on a limited-scope review, the banks performance under the CD Test in the Non-MSA AA is consistent with the bank's overall performance under the CD Test in the full scope areas.

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 MSAs and Non-MSA 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: | 4/7/14 to 12/31/18 | |
| Bank Products Reviewed: | Home mortgage loans (1/1/16 to 12/31/18) Small business loans (1/1/16 to 12/31/18) Community development loans Qualified investments Community development services | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| N/A | | |
| List of Assessment Areas and Type of Examination | | |
| Rating and Assessment Areas | Type of Exam | Other Information |
| Oklahoma | | |
| Lawton MSA AA | Full-scope | The AA consists of 34 census tracts in Comanche and Cotton Counties. The AA is in south western Oklahoma and includes the cities of Lawton, Elgin and Fletcher. |
| OKC Partial MSA AA | Full-scope | The AA consists of 16 census tracts in Grady and McClain Counties. The AA is in south central Oklahoma and includes the cities of Chickasha, Tuttle, Alex and Blanchard. |
| Non-MSA AA | Limited-scope | The AA consists of two Non-MSA areas in south western and central Oklahoma. The south western Non-MSA includes all of Caddo County (eight census tracts) and includes the cities of Anadarko and Apache. The south central Non-MSA includes all of Stephens County (11 census tracts) and the cities of Duncan and Marlow. |

Appendix B: Summary of State Ratings

| RATINGS Liberty National Bank | | | |
|-------------------------------|----------------------|----------------|--------------------------------------|
| Overall Bank: | Lending Test Rating* | CD Test Rating | Overall Bank/State/Multistate Rating |
| Liberty National Bank | Satisfactory | Satisfactory | Satisfactory |
| State: | | | |
| State of Oklahoma | Satisfactory | 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2016**

| 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 |
| Non-MSA | 13 | 3,707 | 12.5 | 1,341 | 0.0 | 0.0 | 0.0 | 22.4 | 15.4 | 13.4 | 42.3 | 30.8 | 38.6 | 35.3 | 53.8 | 48.0 | 0.0 | 0.0 | 0.0 |
| Lawton MSA | 68 | 5,037 | 65.4 | 3,241 | 2.7 | 2.9 | 1.4 | 10.5 | 16.2 | 6.4 | 50.8 | 51.5 | 47.3 | 36.0 | 29.4 | 44.7 | 0.0 | 0.0 | 0.2 |
| OKC Partial MSA | 23 | 1,570 | 22.1 | 3,087 | 0.0 | 0.0 | 0.0 | 16.8 | 30.4 | 8.1 | 75.1 | 69.6 | 79.7 | 8.1 | 0.0 | 12.2 | 0.0 | 0.0 | 0.0 |
| Total | 104 | 10,314 | 100.0 | 7,669 | 1.0 | 1.9 | 0.6 | 16.0 | 19.2 | 8.3 | 56.6 | 52.9 | 58.8 | 26.4 | 26.0 | 32.2 | 0.0 | 0.0 | 0.1 |

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2017-18**

| 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 |
| Non-MSA | 16 | 1,797 | 13.6 | 1,292 | 0.0 | 0.0 | 0.0 | 3.1 | 0.0 | 1.8 | 71.2 | 87.5 | 70.2 | 25.7 | 12.5 | 28.0 | 0.0 | 0.0 | 0.0 |
| Lawton MSA | 75 | 12,294 | 63.6 | 2,986 | 3.9 | 1.3 | 1.5 | 15.6 | 14.7 | 11.1 | 43.2 | 26.7 | 40.8 | 37.2 | 57.3 | 46.6 | 0.0 | 0.0 | 0.0 |
| OKC Partial MSA | 27 | 2,773 | 22.9 | 3,175 | 0.8 | 0.0 | 0.2 | 6.2 | 0.0 | 4.3 | 73.2 | 88.9 | 65.8 | 19.8 | 11.1 | 29.8 | 0.0 | 0.0 | 0.0 |
| Total | 118 | 16,864 | 100.0 | 7,453 | 1.7 | 0.8 | 0.7 | 8.8 | 9.3 | 6.6 | 61.8 | 49.2 | 56.5 | 27.7 | 40.7 | 36.2 | 0.0 | 0.0 | 0.0 |

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 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 | | | | | | | | | | | | | | | | | | | 2016 |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| 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 |
| Non-MSA | 13 | 3,707 | 12.5 | 1,341 | 18.8 | 0.0 | 5.9 | 17.3 | 0.0 | 13.9 | 20.7 | 7.7 | 19.0 | 43.1 | 38.5 | 43.8 | 0.0 | 53.8 | 17.3 |
| Lawton MSA | 68 | 5,037 | 65.4 | 3,241 | 21.9 | 7.4 | 3.5 | 17.6 | 10.3 | 10.2 | 21.3 | 13.2 | 18.9 | 39.3 | 48.5 | 36.6 | 0.0 | 20.6 | 30.8 |
| OKC Partial MSA | 23 | 1,570 | 22.1 | 3,087 | 20.8 | 0.0 | 5.4 | 19.8 | 17.4 | 13.5 | 21.1 | 0.0 | 21.3 | 38.3 | 65.2 | 40.4 | 0.0 | 17.4 | 19.4 |
| Total | 104 | 10,314 | 100.0 | 7,669 | 20.7 | 4.8 | 4.7 | 18.2 | 10.6 | 12.2 | 21.1 | 9.6 | 19.8 | 40.0 | 51.0 | 39.4 | 0.0 | 24.0 | 23.9 |
| <i>Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i> | | | | | | | | | | | | | | | | | | | |

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower | | | | | | | | | | | | | | | | | | | 2017 -18 | |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-----------------|--|
| 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 | |
| Non-MSA | 16 | 1,797 | 13.6 | 1,292 | 20.3 | 6.3 | 6.4 | 16.6 | 12.5 | 16.1 | 19.6 | 31.3 | 22.0 | 43.4 | 43.8 | 40.4 | 0.0 | 6.3 | 15.1 | |
| Lawton MSA | 75 | 12,294 | 63.6 | 2,986 | 22.6 | 8.0 | 3.7 | 18.1 | 16.0 | 11.4 | 18.7 | 9.3 | 18.2 | 40.7 | 34.7 | 33.5 | 0.0 | 32.0 | 33.4 | |
| OKC Partial MSA | 27 | 2,773 | 22.9 | 3,175 | 19.7 | 0.0 | 4.7 | 17.6 | 11.1 | 15.0 | 22.2 | 14.8 | 22.2 | 40.5 | 51.9 | 40.1 | 0.0 | 22.2 | 18.0 | |
| Total | 118 | 16,864 | 100.0 | 7,453 | 21.0 | 5.9 | 4.6 | 17.6 | 14.4 | 13.7 | 20.1 | 13.6 | 20.5 | 41.3 | 39.8 | 37.5 | 0.0 | 26.3 | 23.7 | |

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2016 |
|---|---------------------------------|--------------|------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|-------------|
| 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 |
| Non-MSA | -- | -- | -- | 1,068 | 0.0 | -- | 0.0 | 25.5 | -- | 14.7 | 42.1 | -- | 39.2 | 32.4 | -- | 46.1 | 0.0 | -- | 0.0 |
| Lawton MSA | 27 | 2,061 | 55.1 | 1,489 | 15.0 | 7.4 | 12.1 | 20.6 | 22.2 | 19.7 | 40.8 | 33.3 | 35.1 | 23.1 | 37.0 | 33.0 | 0.5 | 0.0 | 0.1 |
| OKC Partial MSA | 22 | 5,116 | 44.9 | 1,240 | 0.0 | 0.0 | 0.0 | 20.3 | 4.5 | 15.6 | 68.3 | 81.8 | 72.3 | 11.3 | 13.6 | 12.0 | 0.0 | 0.0 | 0.0 |
| Total | 49 | 7,177 | 100 | 3,797 | 5.9 | 4.1 | 4.7 | 21.8 | 14.3 | 17.0 | 50.8 | 55.1 | 48.4 | 21.4 | 26.5 | 29.8 | 0.2 | 0.0 | 0.0 |

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

| Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography | | | | | | | | | | | | | | | | | | | 2017-18 | |
|---|--|--------------|-------------------|-----------------------|--------------------------|---------------------|------------------|-------------------------------|---------------------|------------------|-----------------------------|---------------------|------------------|----------------------------|---------------------|------------------|------------------------------------|---------------------|------------------|--|
| 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 | |
| Non-MSA | -- | -- | -- | 1,041 | 0.0 | -- | 0.0 | 5.2 | -- | 3.7 | 74.3 | -- | 69.8 | 20.5 | -- | 26.5 | 0.0 | -- | 0.0 | |
| Lawton MSA | 27 | 3,802 | 55.1 | 1,442 | 5.3 | 14.8 | 3.3 | 34.9 | 22.2 | 32.3 | 34.9 | 18.5 | 33.0 | 24.8 | 44.4 | 31.2 | 0.2 | 0.0 | 0.2 | |
| OKC Partial MSA | 22 | 3,163 | 44.9 | 1,306 | 1.8 | 0.0 | 1.7 | 12.7 | 4.5 | 5.4 | 63.9 | 81.8 | 72.1 | 21.5 | 13.6 | 20.8 | 0.0 | 0.0 | 0.0 | |
| Total | 49 | 6,965 | 100.0 | 3,789 | 2.7 | 8.2 | 1.8 | 19.7 | 14.3 | 15.2 | 55.0 | 48.9 | 56.6 | 22.6 | 30.6 | 26.3 | 0.1 | 0.0 | 0.1 | |

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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 | | | | | | | | | | | | 2016 |
|---|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|-------------|
| 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 | |
| Non-MSA | -- | -- | -- | 1,068 | 78.9 | -- | 61.3 | 6.1 | -- | 15.1 | -- | |
| Lawton MSA | 25 | 1,603 | 34.1 | 1,489 | 79.0 | 92.6 | 63.6 | 4.7 | 7.4 | 16.2 | 0.0 | |
| OKC Partial MSA | 20 | 3,176 | 65.9 | 1,240 | 84.7 | 90.9 | 49.2 | 5.1 | 9.1 | 10.2 | 0.0 | |
| Total | 45 | 4,479 | 100.0 | 3,797 | 81.0 | 91.8 | 58.3 | 5.2 | 8.2 | 13.8 | 0.0 | |
| <i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i> | | | | | | | | | | | | |

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-18

| 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 |
| Non-MSA | -- | -- | -- | 1,041 | 78.2 | -- | 62.7 | 6.1 | -- | 15.8 | -- |
| Lawton MSA | 24 | 3,178 | 53.2 | 1,442 | 79.0 | 88.9 | 61.2 | 4.7 | 11.1 | 16.2 | 0.0 |
| OKC Partial MSA | 19 | 2,796 | 46.8 | 1,306 | 84.0 | 86.4 | 49.5 | 5.3 | 13.6 | 10.7 | 0.0 |
| Total | 43 | 5,974 | 100.0 | 3,789 | 80.6 | 87.8 | 57.6 | 5.3 | 12.2 | 14.2 | 0.0 |

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0