



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

January 7, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Central National Bank & Trust Company of Enid
Charter Number 12044

324 West Broadway
Enid, OK 73701

Office of the Comptroller of the Currency

8282 South Memorial Drive, Suite 300
Tulsa, OK 74133

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.

Table of Contents

OVERALL COMMUNITY REINVESTMENT ACT (CRA) RATING	3
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION	10
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	12
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS	13
LENDING TEST	13
COMMUNITY DEVELOPMENT TEST	18
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-- 1 -

Overall CRA Rating

This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The following factors support the overall rating:

- A majority of the loans were originated inside the bank's assessment areas (AA).
- The penetration of loans to individuals and businesses of different income levels is reasonable 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) lending is satisfactory and indicates adequate responsiveness to the needs of the bank's AAs.
- The amount of qualified CD services indicates adequate responsiveness within the AAs.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the Metropolitan Area (MA)/assessment area.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) (AA) or outside the AA provided the bank has adequately addressed the community development needs of its AA.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

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

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 (MSA): 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 MSA 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.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

Description of Institution

Central National Bank & Trust (CNB&T Enid) is a \$664 million single-state financial institution headquartered in Enid, Oklahoma, which is located in north central Oklahoma. As of December 31, 2018, CNB&T Enid had loans of \$546 million, or 82 percent of total assets. The bank is a subsidiary of Central Service Corporation, a three-entity holding company headquartered in Enid, Oklahoma. Subsidiaries of the holding company include Central National Bank & Trust Co. (wholly owned), CSC Capital Corp (wholly owned/inactive), and Central Service Capital Trust I (an unconsolidated subsidiary established to issue trust preferred securities). CNB&T Enid also has three wholly owned subsidiaries, including CSC Insurance Agency, Central Registration Co. of Enid, and CSC Enid Properties. These subsidiaries were not considered in the evaluation.

CNB&T Enid has three AAs, all located within the State of Oklahoma. These AAs include the Enid OK MSA, 115 census tracts in the Tulsa OK MSA, and the non-MSA counties of Washington, Woodward, and Kay (partial). CNB&T Enid is ranked first in market share in the Enid, OK MSA with approximately 30 percent of deposit market share. The bank ranks sixth in their non-MSA area with approximately five percent of the deposit market share, and they are ranked 50th in the Tulsa MSA AA with less than onepercent of deposit market share.

The bank operates eight full-service banking centers within the State of Oklahoma. The Main Bank and two branches are located in Enid, with branches located in Woodward, Mooreland, Blackwell, Bartlesville, and Tulsa. All branches, except the Tulsa branch, offer drive-in banking. Bank lobby hours are provided Monday through Friday at all locations, with three locations offering extended hours on Fridays or Saturdays. No branches have been opened or closed since the previous CRA evaluation. However, the Tulsa branch was relocated to its current location in April 2016.

The bank also operates 17 Automated Teller Machines (ATM) locations, six of which accept deposits and are included in the current AAs. Each banking location except Mooreland has an ATM, with an additional nine ATMs in the Enid area and one additional ATM in Blackwell. The following tables provide complete information on CNB&T Enid's branches and Oklahoma ATM locations.

CNB&T Enid's Branch Locations		
Location	Address	City
Broadway Office (Main Bank)	324 W. Broadway Ave.	Enid, OK
Willow Office	2219 W. Willow Rd.	Enid, OK
30th Street Office	301 S. 30th St.	Enid, OK
Tulsa Office	8811 S. Yale Ave.	Tulsa, OK
Blackwell Office	102 N. Main St.	Blackwell, OK
Woodward Office	2727 Williams Ave.	Woodward, OK
Mooreland Office	127 S. Main St.	Mooreland, OK
Bartlesville Office	1415 SE Washington Blvd.	Bartlesville, OK

CNB&T Enid's ATM Locations		
Location	Address	City
Broadway Office	324 W. Broadway Ave.	Enid, OK
30th Street Office Drive-up ATM	301 S. 30th St.	Enid, OK
Willow Office Drive-up ATM	2219 W. Willow Rd.	Enid, OK
East Broadway	1115 E. Broadway Ave.	Enid, OK
Central National Bank Center	302 S. Grand Ave.	Enid, OK
Central National Bank Center	301 S. Independence Ave.	Enid, OK
St. Mary's Hospital	305 S. 5th St.	Enid, OK
Oakwood Mall Food Court	4125 W. Owen K. Garriott Rd.	Enid, OK
Holdings Drive-up ATM	215 N. Oakwood Rd.	Enid, OK
Jumbo Foods East	221 S. 30th St.	Enid, OK
Jumbo Foods West	2311 W. Willow Rd.	Enid, OK
UPS Store Drive-up ATM	2504 W. Owen K. Garriott Rd.	Enid, OK
Bartlesville Office	1415 SE Washington Blvd.	Bartlesville, OK
Blackwell Main	102 N. Main St.	Blackwell, OK
United Supermarket Drive-up ATM	1221 W. Doolin Ave.	Blackwell, OK
Tulsa Office	8811 S. Yale Ave.	Tulsa, OK
Woodward Office	2727 Williams Ave.	Woodward, OK

The bank's strategic focus in the Tulsa market is primarily commercial/business lending, while the Enid market and the Non-MSA markets in Woodward, Kay, and Washington counties are focused on a mix of commercial and agricultural lending.

CNB&T Enid has five market areas. The loan product mix for the Enid OK MSA and Woodward, Kay, and Washington Counties is significantly different from the Tulsa market. Therefore, a separate primary loan product analysis was performed for the partial Tulsa MSA AA.

The bank has several lending programs focused primarily toward small businesses. These include the HUD MAP Lending Program, Heavy Equipment Lending, and Healthcare Lending programs. They also offer SBA 7(a) and SBA 504 loan programs. They also have a prepaid card line of business which is targeted toward unbanked and underbanked individuals.

CNB&T Enid offers a full range of retail and commercial deposit and loan products at all locations. The bank also has a Wealth Management Department (including Trust) in the Main Bank in Enid, but serves all customers at any location. The bank also offers free Internet Banking and free Bill-Pay products. Treasury Management services and Remote Deposit Capture (RDC) are available for qualifying business customers, and Mobile RDC is available for mobile banking users. CNB&T Enid also has an extensive prepaid card line of business.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. CNB&T Enid is involved in and provides support to meet the community's financial needs. The bank received an overall rating of "**Satisfactory**" at the last CRA evaluation dated January 4, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of CNB&T Enid's CRA activities in its assessment areas under the Intermediate Small Bank CRA procedures, which includes the Lending Test and the Community Development (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.

Conclusions regarding the Lending Test are based on samples of the primary loan products originated within each AA from the date of the last performance evaluation, January 4, 2016, through December 31, 2018. Conclusions regarding the CD Test are based on the bank's CD activities during the same time period.

As of December 31, 2018, CNB&T Enid's total assets were \$664 million, of which \$546 million, or 82 percent, comprised various types of loans. CNB&T Enid has five market areas. The loan product mix for the Enid, OK MSA, Woodward County, Washington County, and partial Kay County areas differs significantly from the product mix for the partial Tulsa MSA AA. Therefore, a separate primary loan product analysis was performed for the partial Tulsa MSA AA. The primary product analysis for the Enid, OK MSA and the Oklahoma Non-MSA AAs was performed using the bank's total loan portfolio. The overall bank's loan portfolio mix consists of the following:

CNB&T Enid Bank-wide Primary Lending Product Analysis		
Loan Category	\$ (000)	%
Business Loans*	\$315,058	57.7%
Agricultural Loans	\$157,422	28.8%
Residential Real Estate Loans**	\$52,376	9.5%
Consumer Loans	\$16,838	3.1%
Other Loans	\$4,648	0.9%
Total	\$546,342	100.0%

*Business loans exclude "Multifamily RE "which are included on the HMDA LAR

**Residential Real Estate includes "Multifamily RE" properties

In the Enid, OK MSA and the Oklahoma Non-MSA AAs, the 2019 CRA performance evaluation will be made on the basis of lending patterns for business loans, agricultural loans, and HMDA residential real estate lending originated during the evaluation period.

The Tulsa market has a different loan portfolio mix than the bank's other markets. Approximately 91 percent of loans originated in CNB&T Enid's Tulsa branch were business loans, while residential real estate loans accounted for only 8.7 percent. During the evaluation period, only 11 HMDA-reportable loans were made by the Tulsa branch. Since insufficient HMDA loans were made in the partial Tulsa MSA AA to

perform a meaningful analysis, HMDA residential real estate will not be assessed in the partial Tulsa MSA AA. The following table shows the primary product analysis for the Tulsa branch:

CNB&T Enid Tulsa Branch Primary Loan Product Analysis		
Loan Category	\$ (000)	%
Business Loans*	\$195,084	91.1%
Residential Real Estate Loans**	\$18,546	8.7%
Consumer Loans	\$388	0.2%
Agricultural Loans	\$91	0.0%
Other Loans	\$5	0.0%
Total	\$214,114	100.0%

*Business loans exclude "Multifamily RE" which are included on the HMDA LAR

**Residential Real Estate includes "Multifamily RE" properties

In the partial Tulsa MSA AA, the 2019 CRA performance evaluation will be made only based on lending patterns for business loans originated during the evaluation period.

Data Integrity

Prior to this CRA performance evaluation, we verified the accuracy of the data available to the public in accordance with the HMDA regulation. A CRA Data Integrity examination was conducted in November and December 2018 to evaluate the bank's process to accurately collect and report HMDA loan data. We found the bank had an appropriate process, and effective internal controls, to accurately collect and report HMDA information. As a result, we relied on filed HMDA data during this CRA review to assess a portion of the residential real estate lending performance. We also reviewed the integrity of the bank's CD activities to ensure these activities qualify for credit under the CRA regulation.

Selection of Areas for Full-Scope Review

CNB&T Enid has three assessment areas. We performed a full-scope review of all three assessment areas. There are no limited-scope review areas.

Ratings

The bank's overall rating is based on those areas that received full-scope reviews. Business lending received the most weight considering the bank's strategic focus.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 assessment area 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 (HUD), and the Consumer Financial Protection Bureau, 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.

Conclusions with Respect to Performance Tests

The bank's performance under the Lending Test is rated Satisfactory. Based on our sample of lending during the evaluation period, which includes loans made between January 4, 2016 and December 31, 2018, CNB&T Enid meets the standard for satisfactory performance for lending within the AA.

Community Development lending, investments, and services are Satisfactory and indicate adequate responsiveness to the needs of the bank's AA.

LENDING TEST

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

Loan-to-Deposit (LTD) Ratio

CNB&T Enid's LTD ratio is more than reasonable. The bank's quarterly LTD ratio since the previous CRA evaluation averaged 89.42 percent. We compared the bank's LTD ratio to four similarly situated banks in their market area. The aggregate average LTD ratio for the competing banks was 60.63 percent, with a low average of 43.09 percent and a high average of 86.20 percent.

Loan-to-Deposit Ratios			
Institution	Location	Total Assets as of 9/30/2018 (000's)	Average LTD Ratio
Central National Bank & Trust Company of Enid	Enid, OK	\$653,363	89.42%
Valley National Bank	Tulsa, OK	\$647,359	86.20%
The Security National Bank of Enid	Enid, OK	\$321,821	60.86%
BancCentral, National Association	Alva, OK	\$510,658	52.38%
Stock Exchange Bank, The	Woodward, OK	\$240,289	43.09%

Source: Institution Reports of Condition from December 31, 2015 to September 30, 2018

Lending in Assessment Area

Based on our sample of lending during the evaluation period, from January 4, 2016 to December 31, 2018, CNB&T Enid meets the standard for satisfactory performance for lending within the AA. We randomly selected 159 business loans and 100 farm loans originated during the evaluation period. These loans were combined with the 125 loans reported on the bank's HMDA Loan Application Registers for 2016, 2017, and 2018. Based on the combined loan samples, the majority of loans in terms of number were originated inside CNB&T Enid's AAs. The dollar volume of loans inside the AA was less than a majority due to several large dollar loans included in the samples.

Table D - 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										
2016	43	82.7	9	17.3	52	1,672	43.4	2,177	56.6	3,849
2017	20	64.5	11	35.5	31	2,425	37.2	4,090	62.8	6,515
2018	30	71.4	12	28.6	42	3,260	34.1	6,296	65.9	9,556
Subtotal	93	74.4	32	25.6	125	7,357	36.9	12,563	63.1	19,920
Small Business	102	64.2	57	35.8	159	14,530	53.8	12,459	46.2	26,989
Farms	64	64.0	36	36.0	100	6,123	36.2	10,787	63.8	16,910
Total	259	67.4	125	32.6	384	28,010	43.9	35,809	56.1	63,819
<i>Source: Evaluation Period: 1/4/2016 - 12/31/2018 Bank Data Due to rounding, totals may not equal 100.0</i>										

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

The overall borrower distribution of loans by income level reflects reasonable penetration to borrowers of different incomes and to businesses and farms of different sizes.

Enid, OK MSA Assessment Area

Based on the data in Tables P in appendix C and the following performance context factors, the borrower distribution of home mortgage loans in the AA reflects excellent penetration. In 2016, the percentage of loans to low-income borrowers was near to the percentage of low-income families, and the percentage significantly exceeded the aggregate percentage of lending in the AA. The proportion of loans to moderate-income borrowers significantly exceeded the proportion of moderate-income families, as well as, the aggregate percentage of lending in the AA. In 2017 and 2018, the percentage of loans to low-income borrowers was well below the percentage of low-income families and below the aggregate percentage of lending in the AA. Home mortgage lending to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage in the AA. The bank's ability to lend to low-income borrowers is limited by strong competition within the AA, high closing costs, and the fact that borrowers at these income levels are less likely to meet home mortgage lending standards.

Based on the data in Tables R in appendix C, the borrower distribution of business loans in the AA reflects reasonable penetration and meets the standard. In 2016, the bank's percentage of lending to AA small businesses was reasonable and comparable to the percentage of reporting AA small businesses with gross annual revenues of less than \$1 million and exceeded the percentage of aggregate lending in the AA. For 2017-

2018, the bank's percentage of lending to AA small businesses was also reasonable and comparable to the percentage of reporting AA small businesses with gross annual revenues of less than \$1 million. The bank's percentage of lending to AA small businesses exceeded the aggregate distribution of loans to those businesses.

Based on the data in Tables T in appendix C, the borrower distribution of farm loans in the AA reflects reasonable penetration and meets the standard for satisfactory performance. In 2016, the bank's percentage of loans to AA small farms was comparable to the percentage of reporting small farms in the AA with gross annual revenues of less than \$1 million and was well above the percentage of aggregate lending in the AA. For 2017-2018, the bank's percentage of loans to small farms was reasonable when compared to the percentage of small farms reported with revenues of less than \$1 million in the AA and was well above aggregate lending in the AA.

Oklahoma Non-MSA Assessment Area

Based on the data in Tables P in appendix C and the following performance context factors, the borrower distribution of home mortgage loans in the AA reflects reasonable penetration. In 2016, the percentage of loans to low-income borrowers was below the percentage of low-income families, but the percentage significantly exceeded the aggregate percentage of lending in the AA. The proportion of loans to moderate-income borrowers exceeded the proportion of moderate-income families and was well above the aggregate percentage of lending in the AA. In 2017 and 2018, the bank made no home mortgage loans to low-income borrowers in the AA. Home mortgage lending to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage in the AA. The bank's ability to lend to low-income borrowers is limited by high closing costs and the fact that borrowers at these income levels are less likely to meet home mortgage lending standards.

Based on the data in Tables R in appendix C, the borrower distribution of business loans in the AA reflects reasonable penetration and meets the standard. In 2016, the bank's percentage of lending to AA small businesses was excellent and exceeded the percentage of reporting AA small businesses with gross annual revenues of less than \$1 million and also exceeded the percentage of aggregate lending in the AA. For 2017-2018, the bank's percentage of lending to AA small businesses was reasonable and comparable to the percentage of reporting AA small businesses with gross annual revenues of less than \$1 million. The bank's percentage of lending to AA small businesses was stronger than the aggregate distribution of loans to those businesses.

Based on the data in Tables T in appendix C, the borrower distribution of farm loans in the AA reflects reasonable penetration and meets the standard for satisfactory performance. In 2016, the bank's percentage of loans to AA small farms exceeded the percentage of reporting small farms in the AA with gross annual revenues of less than \$1 million and also exceeded the percentage of aggregate lending in the AA. For 2017-2018, the bank's percentage of loans to small farms was comparable to the percentage

of small farms reported with revenues of less than \$1 million in the AA and was well above aggregate lending in the AA.

Partial Tulsa MSA Assessment Area

Based on the data in Tables R in appendix C, the borrower distribution of business loans in the AA reflects reasonable penetration and meets the standard. In 2016, the bank's percentage of lending to AA small businesses was reasonable and was not significantly lower than the percentage of reporting AA small businesses with gross annual revenues of less than \$1 million. They also exceeded the percentage of aggregate lending in the AA. For 2017-2018, the bank's percentage of lending to AA small businesses was reasonable and not significantly lower than the percentage of reporting AA small businesses with gross annual revenues of less than \$1 million. The bank's percentage of lending to AA small businesses was stronger than the aggregate distribution of loans to those businesses.

Geographic Distribution of Loans

The overall geographic distribution of home mortgage loans and loans to small businesses and farms reflects reasonable dispersion.

Enid, OK MSA Assessment Area

In 2016, there was only one low-income and two moderate-income CTs in this AA. In 2017-2018, there were no low-income CTs and three moderate income CTs in this AA.

Based on the data in Tables O in appendix C, the geographic distribution of home mortgage loans reflects excellent dispersion. The bank's percentage of home mortgage loans in 2016 in low-income geographies was excellent. The percentage of bank loans exceeded the percentage of owner-occupied housing units and significantly exceeded the aggregate distribution of loans in this AA. The bank's percentage of loans in moderate-income CTs was also excellent. The bank's percentage of loans in moderate-income CTs significantly exceeded the percentage of owner-occupied housing units and the aggregate distribution of loans in the AA. For 2017-2018, there were no low-income CTs in this AA. The percentage of bank loans in moderate-income geographies was excellent. The percentage of bank loans exceeded both the percentage of owner-occupied housing units and the aggregate lending in the AA.

Based on the data in Tables Q in appendix C, the geographic distribution of loans to small businesses reflects excellent dispersion. The bank's percentage of loans to businesses in the 2016 low-income CT was excellent and significantly exceeded both the percentage of AA businesses and aggregate distribution of loans in this CT. The bank's percentage of loans to businesses in moderate-income geographies was reasonable. The bank's percentage of loans was comparable to the demographic and exceeded the aggregate distribution of loans in these CTs. For 2017-2018, there were no low-income CTs in the AA. The bank's percentage of loans to businesses in

moderate-income geographies was excellent and exceeded both the percentage of AA small businesses and the aggregate distribution in these geographies.

Based on the data in Tables S in appendix C, the geographic distribution of loans to farms reflects reasonable dispersion. In 2016, the bank did not make any loans to farms in the low-income CT which was comparable to no loans in low-income CTs for the aggregate. The low-income CT is located in the center of the city of Enid with very little opportunity to make farm loans. The bank's percentage of loans to farms in moderate-income geographies was excellent and significantly exceeded both the percentage of AA farms and the aggregate distribution in these geographies. For 2017-2018, there were no low-income CTs in the AA. The bank's percentage of loans to farms in moderate-income geographies was excellent and exceeded both the percentage of AA farms and the aggregate distribution in these geographies.

Oklahoma Non-MSA Assessment Area

In 2016, there were no low-income CTs and three moderate income CTs in this AA. In 2017-2018, there was only one low-income and three moderate-income CTs in this AA.

Based on the data in Tables O in appendix C, the geographic distribution of home mortgage loans reflects reasonable dispersion. For 2016, there were no low-income CTs in this AA. The bank's percentage of loans in moderate-income CTs was reasonable. The bank's percentage of loans in moderate-income CTs was comparable to the percentage of owner-occupied housing units and exceeded the aggregate distribution of loans in the AA. For 2017-2018, the bank did not make any loans in low-income geographies in this AA. The percentage of bank loans in moderate-income geographies was reasonable. The percentage of bank loans was comparable to the percentage of owner-occupied housing units and exceeded the aggregate lending in the AA.

Based on the data in Tables Q in appendix C, the geographic distribution of loans to small businesses reflects reasonable dispersion. There were no low-income CTs in the AA in 2016. The percentage of bank loans to businesses in moderate-income geographies was reasonable. The bank's percentage of loans was comparable to both the demographic and the aggregate distribution of loans in these CTs. For 2017-2018, the bank did not make any loans in the low-income CT. The bank's percentage of loans to businesses in moderate-income geographies was reasonable. The bank's percentage of loans was comparable to the demographic and exceeded the aggregate distribution of loans in these CTs.

Based on the data in Tables S in appendix C, the geographic distribution of loans to farms reflects poor dispersion. The bank made no farm loans in low- or moderate-income geographies during the evaluation period. The low-income CT and two of the moderate-income CTs are in the city of Bartlesville, and are composed of mostly residential and commercial areas, and do not provide opportunities to make farm loans.

Partial Tulsa MSA Assessment Area

Based on the data in Tables Q in appendix C, the geographic distribution of loans to small businesses reflects excellent dispersion. The bank's percentage of loans to businesses in 2016 low-income geographies was excellent and significantly exceeded both the percentage of AA businesses and aggregate distribution of loans in these geographies. The bank's percentage of loans to businesses in moderate-income geographies was also excellent. The bank's percentage of loans exceeded both the demographic and the aggregate distribution of loans in these CTs. For 2017-2018, the bank's percentage of loans to businesses in low-income geographies was excellent and exceeded both the percentage of AA businesses and aggregate distribution of loans in these geographies. The bank's percentage of loans to businesses in moderate-income geographies was comparable to both the percentage of AA small businesses and the aggregate distribution in these geographies.

Responses to Complaints

CNB&T Enid's response to complaints was reasonable during the evaluation period.

COMMUNITY DEVELOPMENT TEST

CNB&T Enid's performance under the CD Test is **Satisfactory**. The bank's level of CD activities demonstrates adequate responsiveness to the community development needs of their AAs.

During the CD Test evaluation period, CNB&T Enid originated 21 CD loans totaling \$12.3 million, \$1.2 million in investments, \$186 thousand in donations, and provided qualified officer and employee services to 19 different qualified organizations.

Number and Amount of Community Development Loans

Enid, OK MSA Assessment Area

The level of qualified CD loans in the Enid, OK MSA AA reflects adequate responsiveness to the needs of the community. The bank originated or renewed 13 CD loans totaling \$3.7 million during the evaluation period. Key lending in the AA included loans to finance community services, revitalization and stabilization projects, and loans to promote economic development.

Significant loans included two loans to expand a business and two loans to establish a new business in downtown Enid as part of the Main Street Enid Plan. The bank also provided three loans to one customer to open a restaurant in a moderate-income census tract that created several low- and middle-income (LMI) jobs. They also provided \$1.7 million in financing for a company providing medical assistance to persons on Medicare and Medicaid.

Oklahoma Non-MSA Assessment Area

The level of qualified CD loans in the Oklahoma Non-MSA AA reflects adequate responsiveness to the needs of the community. The bank originated or renewed five CD loans totaling \$3.1 million during the evaluation period. Key lending in the AA included loans to finance community services and to promote economic development.

Significant loans included a loan to purchase an office building in a designated Federal Opportunity Zone. The bank also financed the purchase of land for a new school in a low-income school district.

Partial Tulsa MSA Assessment Area

The level of qualified CD loans in the Partial Tulsa MSA AA reflects adequate responsiveness to the needs of the community. The bank originated or renewed three CD loans totaling \$5.5 million during the evaluation period. CD lending in the AA included loans to promote economic development.

Significant loans included a loan to purchase and rehabilitate a hotel that maintained existing LMI jobs and created new LMI jobs. The bank also originated a loan to a restaurant that created 10 to 15 new LMI jobs.

Number and Amount of Qualified Investments

Enid, OK MSA Assessment Area

The level of qualified investments in the Enid, OK MSA AA indicates poor responsiveness to the needs of the AA, and the level of qualified donations indicates adequate responsiveness to the needs of the community.

CNB&T Enid did not have any qualified investments in the Enid, OK MSA during the evaluation period. Competition for investments in the AA is very strong. While the bank did bid on investments, other banks were able to underbid CNB&T Enid for those investments.

CNB&T Enid donated \$111 thousand to 20 qualified community organizations in this AA during the evaluation period.

Oklahoma Non-MSA Assessment Area

The level of qualified investments in the Enid, OK MSA AA indicates excellent responsiveness to the needs of the AA given the bank's limited market share in the AA,

and the level of qualified donations indicates adequate responsiveness to the needs of the community. CNB&T Enid purchased a \$500 thousand school bond from a low-income school district. The bank also had two investments that were purchased prior to the current evaluation period with a remaining balance of \$685 thousand.

CNB&T Enid donated \$29 thousand to 25 qualified community organizations in this AA during the evaluation period.

Partial Tulsa MSA Assessment Area

The level of qualified investments in the Partial Tulsa MSA AA indicates poor responsiveness to the needs of the AA, and the level of qualified donations indicates adequate responsiveness to the needs of the community. CNB&T Enid did not have any qualified investments in the Partial Tulsa MSA during the evaluation period.

CNB&T Enid donated \$43 thousand to seven qualified community organizations in this AA during the evaluation period.

Extent to Which the Bank Provides Community Development Services

Enid, OK MSA Assessment Area

The level of qualified CD services provided by bank employees within the Enid, OK MSA AA indicates adequate responsiveness to the needs of the community. Nine bank officers and employees serve in leadership positions in organizations that provide community services to LMI families or support economic development within the AA.

- Autrey Tech Incubator Program – a bank officer serves as a board member for this program that provides resources and training for small business startups in the AA.
- United Way of Enid and NW Oklahoma – three bank employees serve as board members for the area United Way which provides funding for nonprofits that assist LMI individuals within the community.

Oklahoma Non-MSA Assessment Area

The level of qualified community development services provided by bank employees within the Oklahoma Non-MSA AA indicates adequate responsiveness to the needs of the community. Eight bank officers and employees serve in leadership positions in organizations that provide community services to LMI families or support economic development within the AA.

- Bartlesville/Blackwell Chambers of Commerce – two bank employees serve as board members for area Chambers of Commerce which provide support for small businesses within the AA.

- Youth and Family Services – one bank officer serves as President of the Board of this local organization in Bartlesville which provides various types of assistance to LMI families.

Partial Tulsa MSA Assessment Area

The level of qualified CD services provided by bank employees within the Partial Tulsa MSA AA indicates adequate responsiveness to the needs of the community. Three bank officers and employees serve in leadership positions in organizations that provide community services to LMI families or support economic development within the AA.

- Tulsa Chamber of Commerce – a bank officer serves as a member of the Chamber’s Business Task Force which provides support for small business growth.

Responsiveness to Community Development Needs

Overall, CNB&T Enid’s community development activities demonstrate adequate responsiveness to the needs and opportunities throughout their AAs.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/04/16 to 12/31/18) Investment and Service Tests and CD Loans: (01/04/16 to 12/31/18)	
Financial Institution	Products Reviewed	
Central National Bank & Trust Company of Enid (CNB&T Enid) Enid, OK	Business Loans Farm Loans HMDA Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Enid, OK MSA (21420)	Full-scope	
Partial Tulsa, OK MSA (46140)	Full-scope	
Oklahoma Non-MSA AA	Full-scope	

Appendix B: Community Profiles for Full-Scope Areas

Enid, OK MSA Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: Enid, OK MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	8.3	16.7	58.3	16.7	0.0
Population by Geography	60,580	10.7	20.3	50.4	18.5	0.0
Housing Units by Geography	26,814	10.5	20.6	50.3	18.6	0.0
Owner-Occupied Units by Geography	15,987	7.6	19.0	48.5	24.9	0.0
Occupied Rental Units by Geography	7,707	11.7	25.2	54.7	8.5	0.0
Vacant Units by Geography	3,120	22.6	17.6	48.8	11.1	0.0
Businesses by Geography	3,536	4.8	28.9	46.2	20.1	0.0
Farms by Geography	259	0.8	17.8	47.9	33.6	0.0
Family Distribution by Income Level	15,461	19.1	18.7	19.5	42.7	0.0
Household Distribution by Income Level	23,694	19.5	18.3	17.5	44.7	0.0
Median Family Income MSA - 21420 Enid, OK MSA		\$50,152	Median Housing Value			\$83,498
Families Below Poverty Level		13.1%	Median Gross Rent			\$595

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.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Enid, OK MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	12	0.0	25.0	50.0	25.0	0.0
Population by Geography	62,192	0.0	30.4	44.2	25.4	0.0
Housing Units by Geography	26,856	0.0	30.1	43.0	26.9	0.0
Owner-Occupied Units by Geography	15,938	0.0	26.6	40.3	33.2	0.0
Occupied Rental Units by Geography	7,999	0.0	33.0	49.7	17.2	0.0
Vacant Units by Geography	2,919	0.0	41.3	39.4	19.3	0.0
Businesses by Geography	3,617	0.0	33.4	40.3	26.3	0.0
Farms by Geography	230	0.0	17.4	47.0	35.7	0.0
Family Distribution by Income Level	16,911	19.0	19.9	22.3	38.8	0.0
Household Distribution by Income Level	23,937	21.8	17.0	20.1	41.2	0.0
Median Family Income MSA - 21420 Enid, OK MSA		\$57,419	Median Housing Value			\$97,211
Families Below Poverty Level		9.9%	Median Gross Rent			\$746

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.

The Enid, OK MSA AA consists of all of Garfield County located in north-central Oklahoma. Enid is the largest city in the county and the county seat. Three of CNB&T Enid's full service branches are located in this AA. The Main Branch and the 30th Street Branch are both located in moderate-income CTs. The Willow Branch is located in an upper-income CT.

Approximately 78 percent of CNB&T Enid's deposits are attributed to the Enid, OK MSA, and the bank holds 30.45 percent of the deposit market share in the county. The most common employment sectors are healthcare, military, oil and gas, agricultural, and food production. The retail industry also provides a significant number of jobs in the county.

The tables above summarize the demographic characteristics of the Enid, OK MSAAA. The first table shows the demographic characteristics of the AA according to the 2010 census data, while the second table shows those same characteristics based on the 2015 census data. Population in the AA increased along with the number of businesses from one census to the next. The population of the AA according to the 2015 census data was up to 62,192 persons, with businesses increasing to 3,617. The number of farms in the AA decreased from 259 to 230 in the same period. The median family income increased by approximately 14.49 percent, while the median housing value increased by approximately 16.42 percent. The percentages of families below the poverty level decreased from 13.1 percent to 9.9 percent. Unemployment in the AA is up to 5.41 percent, which is above both state and national averages. A little over a third of the population within the AA is classified as low- or moderate-income. The most recent information on the tables show 38.9 percent of families are considered low- or moderate-income.

There is strong competition within the AA for financial services, with 14 banks and numerous credit unions located in Enid and the surrounding area. This competition limits opportunities within the AA despite state and federal efforts to promote development in the area. Over 50 percent of Garfield County has been designated by the Oklahoma State Department of Commerce as a State Enterprise Zone. These zones are considered disadvantaged and offer tax incentives to attract businesses. A small portion of the county in South Enid has also been designated a Federal Opportunity Zone, which offers more incentives to attract businesses.

Local community contacts within the AA indicated a need for support programs for small businesses and a need to revitalize blighted areas in Enid. They also stated there is a need for operating funds for farms.

Oklahoma Non-MSA Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: Oklahoma Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	0.0	14.3	52.4	33.3	0.0
Population by Geography	83,789	0.0	8.0	51.5	40.5	0.0
Housing Units by Geography	38,041	0.0	8.5	53.8	37.8	0.0
Owner-Occupied Units by Geography	24,781	0.0	5.4	50.4	44.2	0.0
Occupied Rental Units by Geography	8,948	0.0	16.5	56.9	26.7	0.0
Vacant Units by Geography	4,312	0.0	9.6	66.8	23.6	0.0
Businesses by Geography	5,081	0.0	10.6	60.4	29.0	0.0
Farms by Geography	322	0.0	2.8	70.2	27.0	0.0
Family Distribution by Income Level	22,655	16.7	16.0	20.3	47.1	0.0
Household Distribution by Income Level	33,729	19.4	15.5	16.5	48.5	0.0
Median Family Income Non-MSAs - OK		\$47,749	Median Housing Value			\$90,478
Families Below Poverty Level		9.7%	Median Gross Rent			\$608

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.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Oklahoma Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	21	4.8	14.3	42.9	38.1	0.0
Population by Geography	85,377	2.4	10.1	45.4	42.2	0.0
Housing Units by Geography	38,761	2.5	9.9	46.3	41.3	0.0
Owner-Occupied Units by Geography	24,118	1.5	8.9	45.2	44.5	0.0
Occupied Rental Units by Geography	9,396	3.7	10.8	49.0	36.5	0.0
Vacant Units by Geography	5,247	5.3	12.6	47.0	35.1	0.0
Businesses by Geography	5,014	3.0	4.6	50.7	41.8	0.0
Farms by Geography	279	0.4	5.7	61.3	32.6	0.0
Family Distribution by Income Level	22,525	17.8	16.0	17.8	48.4	0.0
Household Distribution by Income Level	33,514	19.5	15.4	15.8	49.3	0.0
Median Family Income Non-MSAs - OK		\$51,698	Median Housing Value			\$100,983
Families Below Poverty Level		11.2%	Median Gross Rent			\$672

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.

CNB&T Enid’s Oklahoma Non-MSA AA consists of 21 census tracts including all of Washington and Woodward Counties, and the western census tracts of Kay County.

Washington County consists of 13 census tracts, of which one is low-income, two are moderate-income, five are middle-income, and five are upper-income.

The Bartlesville branch is located in an upper-income census tract in Washington County. The bank's Non-MSA AA was expanded to include all of Washington County since the previous PE. Woodward County consists of five census tracts, of which two are middle-income and three are upper-income. The Woodward and Mooreland branches are located in Woodward County. The Woodward branch is located in an upper-income census tract, and the Mooreland branch is located in a middle-income census tract. The bank's AA also includes three census tracts in Kay County; one of these census tracts is moderate-income and two are middle-income. The Blackwell branch is located in a middle-income census tract in Kay County.

The tables above summarize the demographic characteristics of the Oklahoma Non-MSA AA. The first table shows the demographic characteristics of the AA according to the 2010 census data, while the second table shows those same characteristics based on the 2015 census data. Population in the AA increased while the number of businesses and farms declined from one census to the next. The population of the AA according to the 2015 census data had increased to 85,377 persons, with businesses decreasing to 5,014, and the number of farms in the AA decreasing from 322 to 279 in the same period. The median family income increased by approximately 8.3 percent, while the median housing value increased by approximately 11.6 percent. The percentages of families below the poverty level increased from 9.7 percent to 11.2 percent. More than 30 percent of the population within the AA is classified as low- or moderate-income.

The economy in the Oklahoma Non-MSA AAs has remained relatively stable despite recent declines in the oil and gas industry. Historically, the most significant industry in Washington County was the oil business due to the large presence of ConocoPhillips in Bartlesville. While jobs in the oil and gas industry had declined, they are now stable. Walmart has also opened a distribution center in the county and now provides a significant number of jobs.

The most significant industries in the Woodward County portion of the AAs are agriculture, oil and gas, healthcare, and education. The Woodward area has also seen a large increase in wind energy projects. While economic growth in the county has slowed, established farms and ranches provide stability during downturns in oil and gas production.

The Kay County portion of the AA has historically relied on jobs created by the oil industry. Since the decline in oil prices, the county has found other job sectors to stabilize the economy. The county has seen increases in small business activity and manufacturing.

The community credit needs and business opportunities in the Oklahoma Non-MSA AAs are also served by several other national and state chartered banks. Competition within the area is significant. Community contacts within the AAs stated there is a need for more agricultural and small business lending in the AA.

Partial Tulsa MSA Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: Partial Tulsa MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	115	3.5	27.8	28.7	40.0	0.0
Population by Geography	390,106	3.1	26.1	29.3	41.4	0.0
Housing Units by Geography	177,319	3.5	26.9	30.6	39.0	0.0
Owner-Occupied Units by Geography	96,934	0.9	19.1	30.0	50.0	0.0
Occupied Rental Units by Geography	64,102	6.2	37.4	31.2	25.2	0.0
Vacant Units by Geography	16,283	8.2	32.3	31.4	28.0	0.0
Businesses by Geography	41,320	3.8	24.5	26.1	45.6	0.0
Farms by Geography	642	2.3	19.6	30.8	47.2	0.0
Family Distribution by Income Level	96,705	18.0	16.5	19.2	46.3	0.0
Household Distribution by Income Level	161,036	22.1	16.6	17.9	43.5	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$58,038	Median Housing Value			\$148,548
Families Below Poverty Level		9.3%	Median Gross Rent			\$706
<i>Source: 2010 U.S. Census and 2016 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Partial Tulsa MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	115	2.6	28.7	29.6	39.1	0.0
Population by Geography	399,992	2.3	27.4	31.0	39.3	0.0
Housing Units by Geography	181,643	2.6	28.3	32.4	36.8	0.0
Owner-Occupied Units by Geography	94,712	0.3	19.1	31.4	49.2	0.0
Occupied Rental Units by Geography	69,122	5.4	38.7	34.0	21.8	0.0
Vacant Units by Geography	17,809	3.4	37.1	30.6	28.9	0.0
Businesses by Geography	42,199	2.0	21.4	33.0	43.6	0.0
Farms by Geography	727	1.8	19.7	35.8	42.8	0.0
Family Distribution by Income Level	99,476	18.9	16.4	19.4	45.3	0.0
Household Distribution by Income Level	163,834	22.5	16.0	18.0	43.5	0.0
Median Family Income MSA - 46140 Tulsa, OK MSA		\$61,182	Median Housing Value			\$159,761
Families Below Poverty Level		10.1%	Median Gross Rent			\$790
<i>Source: 2015 ACS Census and 2018 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 Partial Tulsa MSA AA consists of 115 census tracts in Tulsa County generally bounded on the north by Highway 412, on the east by the Tulsa County line, on the south and on the west by the Arkansas River.

In January 2016, the bank expanded its Tulsa AA's southern boundary from the Creek Turnpike to the Arkansas River in anticipation of the relocation of its Tulsa branch further south. Of the 115 census tracts in the bank's Tulsa AA, three tracts are low-income, 33 tracts are moderate-income, 34 tracts are middle-income, and 45 tracts are upper-income. The current Tulsa branch is located in an upper-income census tract in south Tulsa.

The tables above summarize the demographic characteristics of the Partial Tulsa MSA AA. The first table shows the demographic characteristics of the AA according to the 2010 census data, while the second table shows those same characteristics based on the 2015 census data. Population in the AA increased along with the number of businesses and farms from one census to the next. The population of the AA according to the 2015 census data increased to 399,992 persons, with businesses increasing to 42,199. The number of farms in the AA increased from 642 to 727 in the same period. The median family income increased by approximately 5.4 percent, while the median housing value increased by approximately 7.5 percent. The percentages of families below the poverty level increased from 9.3 percent to 10.1 percent. More than 30 percent of the population within the AA is classified as low- or moderate-income. The most recent information on the tables shows that 35.3 percent of families are considered low- or moderate-income.

The economy in Tulsa remains strong, and unemployment rates remain below statewide and national averages. Key industry sectors in Tulsa include aerospace, energy, telecommunication, healthcare, technology, manufacturing, transportation, education, and construction. Hospitals, casinos, and public school systems also provide a large number of jobs in the Tulsa AA.

The community credit needs and business opportunities in the Tulsa area are also served by several other national and state chartered banks. Competition from these financial institutions is strong. There are 55 banks or other financial institutions operating in the Tulsa MSA. Bank of Oklahoma, followed by Arvest Bank, have the largest deposit market shares. CNB&T Enid has only one Tulsa banking office and is ranked 50th in deposit market share, banking only 0.07 percent of the Tulsa MSA reported deposits. Community contacts indicated there is a need for small business loans, as well as a need for greater financial education related to mortgages.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas 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 loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data is compiled by the FDIC and available as of June 30th of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 MA/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 originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because 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 (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less.

In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer 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) 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. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's 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 (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer 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
Enid, OK MSA AA	18	373	41.9	1,628	7.6	22.2	2.5	19.0	33.3	13.6	48.5	33.3	52.6	24.9	11.1	31.3	0.0	0.0	0.0
OK Non-MSA AA	25	1,299	58.1	1,860	0.0	0.0	0.0	5.4	4.0	3.0	50.4	72.0	46.1	44.2	24.0	50.9	0.0	0.0	0.0
Total	43	1,672	100.0	3,488	3.0	9.3	1.2	10.7	16.3	7.9	49.7	55.8	49.1	36.6	18.6	41.7	0.0	0.0	0.0

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
Enid, OK MSA AA	26	3,559	52.0	1,546	0.0	0.0	0.0	26.6	26.9	15.3	40.3	34.6	42.0	33.2	38.5	42.8	0.0	0.0	0.0
OK Non-MSA AA	14	832	28.0	2,033	1.5	0.0	0.5	8.9	7.1	6.1	45.2	57.1	43.9	44.5	35.7	49.5	0.0	0.0	0.0
Total	40	4,391	100.0	3,579	0.9	0.0	0.3	15.9	20.0	10.1	43.2	42.5	43.1	40.0	37.5	46.6	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 — 12/31/2018 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
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Enid, OK MSA AA	18	373	41.9	1,628	19.1	16.7	5.0	18.7	38.9	13.8	19.5	22.2	20.2	42.7	5.6	44.8	0.0	16.7	16.2
OK Non-MSA AA	25	1,299	58.1	1,860	16.7	8.0	4.0	16.0	12.0	12.0	20.3	16.0	15.2	47.1	48.0	43.4	0.0	16.0	25.4
Total	43	1,672	100.0	3,488	17.7	11.6	4.5	17.1	23.3	12.8	20.0	18.6	17.5	45.3	30.2	44.0	0.0	16.3	21.1

*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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Enid, OK MSA AA	26	3,559	52.0	1,546	19.0	3.8	6.5	19.9	26.9	14.0	22.3	11.5	22.8	38.8	34.6	41.5	0.0	23.1	15.2
OK Non-MSA AA	14	832	28.0	2,033	17.8	0.0	5.3	16.0	7.1	14.2	17.8	7.1	17.7	48.4	57.1	41.7	0.0	28.6	21.2
Total	40	4,391	100.0	3,579	18.3	2.5	5.8	17.7	20.0	14.1	19.7	10.0	19.9	44.3	42.5	41.6	0.0	25.0	18.6

*Source: 2015 ACS Census ; 01/01/2017 — 12/31/2018 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
Enid, OK MSA AA	21	3,468	39.6	632	4.8	28.6	4.0	28.9	28.6	26.6	46.2	28.6	43.5	20.1	14.3	25.9	0.0	0.0	0.0
OK Non-MSA AA	20	1,496	37.7	1,420	0.0	0.0	0.0	10.6	10.0	10.6	60.4	50.0	60.5	29.0	40.0	28.9	0.0	0.0	0.0
Partial Tulsa MSA AA	12	1,151	22.6	8,981	3.8	8.3	4.6	24.5	25.0	22.5	26.1	25.0	23.4	45.6	41.7	49.6	0.0	0.0	0.0
Total	53	6,115	100.0	11,033	3.5	13.2	3.9	23.4	20.8	21.2	31.0	35.8	29.3	42.1	30.2	45.6	0.0	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
Enid, OK MSA AA	22	5,279	34.4	714	0.0	0.0	0.0	33.5	40.9	28.2	40.4	31.8	40.8	26.1	27.3	31.1	0.0	0.0	0.0
OK Non-MSA AA	22	1,094	34.4	1,328	3.0	0.0	3.0	4.6	4.6	3.9	50.8	54.6	52.6	41.6	40.9	40.4	0.0	0.0	0.0
Partial Tulsa MSA AA	20	6,109	31.2	9,301	1.9	5.0	2.4	21.5	15.0	20.7	33.2	45.0	32.2	43.4	35.0	44.7	0.0	0.0	0.0
Total	64	12,482	100.0	11,343	1.9	1.6	2.3	20.7	20.3	19.2	35.4	43.8	35.2	42.0	34.4	43.4	0.0	0.0	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

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
Enid, OK MSA AA	21	3,468	39.6	632	79.2	71.4	34.5	6.5	28.6	14.4	0.0
OK Non-MSA AA	20	1,496	37.7	1,420	80.0	85.0	50.8	5.9	10.0	14.2	5.0
Partial Tulsa MSA AA	12	1,151	22.6	8,981	84.5	58.3	45.4	6.3	41.7	9.2	0.0
Total	53	6,115	100.0	11,033	83.7	73.6	45.4	6.3	24.5	10.1	1.9

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 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
Enid, OK MSA AA	22	5,279	34.4	714	78.6	63.6	37.4	6.6	31.8	14.8	4.5
OK Non-MSA AA	22	1,094	34.4	1,328	79.1	72.7	48.0	6.0	9.1	14.9	18.2
Partial Tulsa MSA AA	20	6,109	31.2	9,301	84.1	50.0	44.7	6.4	50.0	9.6	0.0
Total	64	12,482	100.0	11,343	83.2	62.5	44.6	6.3	29.7	10.5	7.8

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 S — Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2016**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Enid, OK MSA AA	15	2,760	40.5	75	0.8	0.0	0.0	17.8	46.7	12.0	47.9	26.7	56.0	33.6	26.7	32.0	0.0	0.0	0.0
OK Non-MSA AA	22	2,631	59.5	236	0.0	0.0	0.0	2.8	0.0	0.4	70.2	22.7	84.7	27.0	77.3	14.8	0.0	0.0	0.0
Total	37	5,391	100.0	311	0.3	0.0	0.0	9.5	18.9	3.2	60.2	24.3	77.8	29.9	56.8	19.0	0.0	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 S — Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-18**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Enid, OK MSA AA	23	2,100	51.1	106	0.0	0.0	0.0	17.1	21.7	9.4	47.0	56.5	50.9	35.9	21.7	39.6	0.0	0.0	0.0
OK Non-MSA AA	22	1,144	48.9	319	0.5	0.0	0.0	6.0	0.0	10.3	61.0	63.6	65.8	32.5	36.4	23.8	0.0	0.0	0.0
Total	45	3,244	100.0	455	0.3	0.0	0.0	11.0	11.1	10.1	54.7	60.0	62.1	34.0	28.9	27.8	0.0	0.0	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*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Enid, OK MSA AA	15	2,760	40.5	75	98.8	86.7	56.0	0.4	0.0	0.8	13.3
OK Non-MSA AA	22	2,631	50.5	236	98.4	100.0	84.3	0.9	0.0	0.6	0.0
Total	37	5,391	100.0	311	98.6	94.6	77.5	0.7	0.0	0.7	5.4
<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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Enid, OK MSA AA	23	2,100	51.1	106	98.7	65.2	34.0	0.4	8.7	0.9	26.1
OK Non-MSA AA	22	1,144	48.9	319	97.9	90.9	78.7	1.0	4.5	1.0	4.5
Total	45	3,244	100.0	425	98.3	77.8	67.5	0.8	6.7	1.0	15.6
<i>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</i>											