



PUBLIC DISCLOSURE

December 2, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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

500 Montgomery Square
Lawton, OK 73501

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

Assigned ratings are based on the following conclusions:

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

Scope of the Evaluation

Evaluation Period/Products Evaluated

To assess The City National Bank and Trust Company of Lawton, Oklahoma's (CNB's) performance under the Community Reinvestment Act (CRA) regulations, we analyzed the bank's activities in and around its declared AAs. This Performance Evaluation (PE) is based on 2010 US Census demographic information when assessing 2016 lending performance and the 2015 updated American Community Survey (ACS) when assessing 2017-2018 lending performance.

We divided CNB's AA into six distinct areas for review. In the State of Oklahoma, the Lawton Metropolitan Statistical Area (MSA) Partial received a full-scope review. Limited-scope reviews were performed for the Oklahoma City (OKC) MSA Partial, the Tulsa MSA Partial, the OK Rural Non-MSA, and the Enid MSA. Enid was added as a new AA consisting of Garfield County in July 2015. In the State of Kansas, the Wichita MSA Partial received a full-scope review. The State of Kansas does not have any limited-scope AAs. In full-scope reviews, the data used to evaluate performance under each test is analyzed considering complete performance context information, quantitative factors (e.g. lending volume, distribution of branches, geographical and borrower distribution) and qualitative factors (e.g. innovation and complexity of products offered). Full-scope reviews are conducted in AAs where the bank

has a substantial share of its deposit and loan business. The Lawton MSA Partial contains 77 percent of the bank's loans and 82 percent of the bank's deposits in the State of Oklahoma. The State of Oklahoma contains 99 percent of the bank's total loans and deposits. Limited-scope reviews are targeted to specific products over a defined portion of the AA.

The full-scope review of the Lawton MSA Partial AA included a review of small business loans and Home Mortgage Disclosure Act (HMDA) reportable loans (home purchase, home refinance, and home improvement loans). These are the major loan products for the bank within the Lawton MSA Partial AA. The four limited-scope AAs in Oklahoma consist almost entirely of Wal-Mart branches, of which the majority of lending is composed of consumer loans. Lending performance in the four limited-scope AAs was evaluated by sampling unsecured consumer loans originated in 2016, 2017, and 2018. The full-scope review of the Wichita MSA Partial AA, consisting of three Wal-Mart branches, included a review of CD/Savings secured consumer loans. Insufficient consumer originations occurred in 2016 for the limited-scope Enid MSA in Oklahoma and for the full-scope Wichita MSA Partial in Kansas to perform a meaningful lending analysis and therefore the lending analysis for those AAs was based solely on 2017-2018 consumer originations.

Data Integrity

Examiners conducted a data integrity examination in June 2019 to evaluate the bank's process to accurately collect and report HMDA data. The review determined that the bank had an adequate process, along with internal controls, to accurately collect and report HMDA information. As a result, HMDA submitted data was used during this CRA review to assess lending performance in the Lawton MSA Partial AA.

Selection of Areas for Full-Scope Review

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

Ratings

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

In the State of Oklahoma, significantly more weight was given to performance in the full-scope Lawton MSA Partial AA since it holds over 80 percent of the bank's loans and deposits. More weight was given to performance regarding small business lending versus home mortgage lending. The bank was a consistent small business lender throughout the evaluation period, whereas home mortgage lending declined during the evaluation period primarily due to loss of staffing in the mortgage department.

Description of Institution

CNB is headquartered in Lawton, Oklahoma. The J. R. Montgomery Bancorporation, a two-bank holding company, owns 100 percent of CNB and 100 percent of FSNB N.A. Intercompany transactions are limited, as each bank has separate Board of Directors and officers. Each bank focuses on serving separate clientele, with some overlap noted within the City of Lawton.

Brick-and-mortar branches with drive-through locations in the Lawton MSA Partial include the main bank located at 500 Montgomery Square, 5th Street at D Avenue, the Gore branch located at 4113 W. Gore Blvd., and the Marketplace branch located at 18836 NW 82nd Street. Three additional locations in the Lawton community include branches located inside the Wal-Mart store at 1002 N. Sheridan Road, inside the Country Mart East grocery store at 4510 SE Lee Blvd., and inside the Wal-Mart Super Center at 6301 NW Quanah Parker Trail way.

The limited-scope AAs in Oklahoma include three stand-alone branches with drive-through facilities located at 5801 E 41st Street and 5800 S Lewis Avenue, Suite 159, both in Tulsa, Oklahoma and 1425 S Santa Fe Avenue, Suite A in Edmond, Oklahoma. In addition to the six Lawton locations and the three stand-alone branches, CNB has 28 additional Wal-Mart Super Center or Wal-Mart Neighborhood Market branches located throughout the State of Oklahoma. CNB has 52 automated teller machines (ATMs), of which, 15 accept deposits.

CNB's primary focus is to serve the consumer, commercial, and agricultural needs of customers located in the AAs. CNB meets these needs by providing various types of loan and deposit products and services, as well as Internet Banking with Bill Payment and a 24-hour Telephone Access System. The bank also offers Small Business Administration loans. Bank lobby services are provided Monday through Saturday at most locations, with all of the Wal-Mart locations having extended hours Monday through Saturday. Six bank locations have Monday through Saturday drive-through services. CNB has a Trust Department located at the main bank. The bank's lending strategy focuses mainly on commercial loans and residential real estate loans in the Lawton AA and retail lending at the Wal-Mart locations.

As of December 31, 2018, CNB's total assets equaled \$341 million, of which \$199 million or 58 percent were comprised of various types of loans to individuals, commercial businesses, and commercial and residential real estate. Specifically, the bank's loan portfolio consists of the following:

Loan Category	\$ (000)	%
Real Estate Loans	\$162,927	82%
Commercial Loans	\$15,590	8%
Individual Loans	\$9,960	5%
Agriculture Loans	\$1,687	1%
Other Loans	\$8,668	4%
Total	\$198,832	100.00%

There are no legal or financial impediments to prevent the bank from meeting the credit needs of the AAs. CNB 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 February 22, 2016.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable and meets the standard for satisfactory performance. The bank's LTD ratio at September 30, 2019, was 68 percent. The bank's average quarterly LTD ratio from March 30, 2016, through September 30, 2019, was 61 percent. This average was compared to the average of four similar banks located in CNB's AA or the surrounding counties, with total assets between \$250 million and \$700 million, for the same time period. CNB's average LTD ratio is slightly lower than the average of the four comparable banks of 68 percent. These average LTD ratios are detailed in the following table.

Loan-To-Deposit Ratios		
Institution	Total Assets \$000's (As of 9/30/19)	Average Loan -to-Deposit Ratio
<i>The City National Bank and Trust, Lawton, OK</i>	\$365,662	60.67%
First National Bank & Trust, Shawnee, OK	\$252,918	42.95%
First Bank & Trust Co., Duncan, OK	\$563,218	79.46%
Liberty National Bank, Lawton, OK	\$564,816	81.26%
The First National Bank and Trust Co., Chickasha, OK	\$659,231	69.86%

Source: Institution Reports of Condition from March 30, 2016 to September 30, 2019

Lending in Assessment Area

A substantial majority of the bank's loans were originated inside its AAs.

The bank originated 86.7 percent of its total loans and 96.7 percent of the dollar volume of loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	99	93.4	7	6.6	106	12,613	97.4	332	2.6	12,945
Small Business	57	95.0	3	5.0	60	1,941	96.32	74	3.68	2,015
Consumer	196	81.67	44	18.33	240	437	79.89	110	20.11	547
Total	352	86.7	54	13.3	406	14,794	96.7	516	3.3	15,310

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.

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:

- CNB's distribution of home mortgage, consumer and small business loans by income levels reflects a reasonable penetration and meets the standard for satisfactory performance.
- The bank's distribution of loans by geography is reasonable and meets the standard for satisfactory performance.
- CD lending is reasonable and indicates adequate responsiveness to the needs of the bank's AAs.
- CNB provided an adequate level of qualified CD investments and an outstanding level of CD services within its AAs.

Description of Institution's Operations in Oklahoma

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

In the State of Oklahoma, the full-scope Lawton MSA Partial comprises the 32 census tracts in Comanche County. Comanche and Cotton Counties make up the Lawton MSA. The Lawton MSA Partial AA encompasses 32 contiguous census tracts in southwestern Oklahoma. Based on the 2015 updated ACS data, the United States Census Bureau identifies three census tracts as low income, ten tracts as moderate income, 11 tracts as middle income, seven tracts as upper income and one tract is not applicable. Additionally, there are 28,272 families and 43,240 households. The 28,272 families statistically break into low, moderate, middle, and upper incomes at 22 percent, 18 percent, 19 percent, and 41 percent, respectively. According to the 2015 updated ACS the population of Comanche County is 125,531. There are 51,481 total housing units available in this AA with 23,887, or 46.4 percent, being owner occupied. Renter occupied is 19,353, or 37.6 percent, and vacant housing is 8,241, or 16.0 percent. Families living below poverty level total 13.9 percent. The main bank is located in a low-income census tract, with the Gore branch and two Wal-Mart branches located in middle-income tracts. The majority of the census tracts in the Lawton MSA Partial AA are moderate- and middle-income census tracts. The following table describes major demographic and economic characteristics of the Lawton MSA Partial AA, based on the updated 2015 ACS survey.

Table A – Demographic Information of the Assessment Area

Assessment Area: Lawton MSA Partial						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	32	9.4	31.3	34.4	21.9	3.1
Population by Geography	125,531	6.4	23.8	41.1	28.6	0.1
Housing Units by Geography	51,481	7.0	25.4	38.4	29.2	0.0
Owner-Occupied Units by Geography	23,887	4.2	16.8	38.9	40.1	0.0
Occupied Rental Units by Geography	19,353	9.9	33.1	38.1	18.8	0.0
Vacant Units by Geography	8,241	8.2	32.2	37.7	21.9	0.0
Businesses by Geography	5,546	5.5	36.5	31.9	25.9	0.2
Farms by Geography	249	1.6	14.1	27.7	56.6	0.0
Family Distribution by Income Level	28,272	22.4	18.3	18.6	40.7	0.0
Household Distribution by Income Level	43,240	23.5	16.4	17.9	42.1	0.0
Median Family Income MSA – Lawton, OK		\$57,051	Median Housing Value			\$110,561
			Median Gross Rent			\$772
			Families Below Poverty Level			13.9%
<i>Source: 2015 updated ACS U.S. Census and 2018 D&B Data Due to rounding, totals may not equal 100.0</i> (*) The NA category consists of geographies that have not been assigned an income classification.						

The local economy of Comanche County is stable. Growth and employment have been flat and real estate markets have slowed in the recent past, but the area has started to see some improvement. The economy of Lawton is dependent upon consumer goods and service businesses to the military. However, over the past several years, Lawton has strived to become less dependent on the Fort Sill Army Post, oil and gas, and agricultural industries. The major employers in the Lawton MSA consist of Fort Sill Army Post, Goodyear Tire and Rubber Company, Lawton Public Schools, and Comanche County Memorial Hospital.

Local banking competition includes several other independent national and state-chartered banks, and branches of other banks and financial institutions based in Oklahoma, as well as, across the nation. The local economy is stable. The local economy continues to benefit from some of the larger employers in the area, like Fort Sill Army Post and Goodyear. The real estate market has remained stable, with several housing developments currently underway. The housing projects are targeted to the upper end of the price range. According to the community contact, the immediate credit needs of the community are affordable housing, including rental units. The contact stated that the local banks are involved in community projects.

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

The Oklahoma City MSA Partial AA includes five of the seven counties in the Oklahoma City MSA consisting of Oklahoma, Cleveland, Grady, Canadian, and Logan counties. This AA encompasses 288 contiguous census tracts in central Oklahoma. Based on the 2015 updated ACS survey, there are 31 census tracts designated as low income, 87 tracts as moderate income, 99 tracts as middle income, 68 tracts as upper income, and 3 tracts as not applicable.

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

The Enid MSA AA includes Garfield County in its entirety, which comprises the whole MSA. CNB operates one Wal-Mart branch in this AA. The AA consists of 12 census tracts. Based on the 2015 updated ACS survey, no tracts were designated as low income, 3 tracts were moderate income, 6 tracts were middle income, and 3 tracts were upper income. The total population of the AA is 62,192.

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

Scope of Evaluation in Oklahoma

One full-scope AA was selected for the State of Oklahoma. The full-scope AA is the Lawton MSA Partial. There are four limited-scope AAs in the state; Oklahoma City MSA Partial, Tulsa MSA Partial, Enid MSA and OK Rural Non-MSA. Loan products reviewed in the full-scope AA were all HMDA loans originated in 2016, 2017 and 2018 and a random sample of small business loans for the same time period. Unsecured consumer loans were sampled in the limited-scope AAs for the same time period with the exception of the Enid MSA, which did not include 2016. The State of Oklahoma holds over 99 percent of the bank's total loans and deposits. In the full-scope Lawton MSA Partial AA, small business loans were given more weight than home mortgage loans as home mortgage lending declined over the evaluation period.

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- and limited-scope reviews, the bank's lending performance in the State of Oklahoma is reasonable.

The bank's borrower distribution of loans to borrowers of different incomes was reasonable. The geographic distribution of loans was reasonable. Full-scope reviews were conducted based home mortgage lending and small business lending in the Lawton MSA Partial AA. The limited-scope reviews were based on consumer lending in the Tulsa MSA Partial AA, Oklahoma City MSA Partial AA, Enid MSA AA, and an OK Rural Non-MSA AA.

Geographic Distribution of Loans

The bank exhibits reasonable geographic distribution of loans in the state. Below are the performance results for home mortgage and small business lending in the full-scope Lawton MSA Partial AA.

Home Mortgage Loans

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

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

For 2016, CNB's dispersion to low-income geographies was excellent when compared to both home ownership and aggregate bank lending. CNB originated 3.8 percent of their home mortgage loans in low-income tracts exceeding the 2.9 percent of homeowners in low-income geographies and exceeding aggregate bank lending in low-income geographies of 1.5 percent. The distribution to moderate-income geographies was also excellent. CNB originated 14.1 percent of their home mortgage loans in moderate-income tracts exceeding the 11.2 percent of homeowners in the moderate-income tracts and exceeding aggregate bank lending in moderate-income geographies of 6.7 percent.

For 2017-2018, CNB's dispersion to low-income geographies was poor when compared to the percentage of home ownership in low-income areas but exceeding aggregate lending performance in those tracts. The bank's dispersion to moderate-income geographies was very poor when compared to the percentage of home ownership in moderate-income tracts and poor when compared to aggregate bank lending.

Small Loans to Businesses

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

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

In 2016, CNB had poor dispersion to small businesses in low-income geographies with 7.1 percent penetration compared to 15.7 percent of AA businesses located in low-income geographies and 12.5 percent aggregate bank lending in the low-income geographies. Dispersion to small businesses in moderate-income geographies was poor with 14.3 percent penetration compared to 21.5 percent of AA businesses located in moderate-income geographies and 20.3 percent aggregate bank lending in the moderate-income areas.

In 2017-2018, CNB had excellent dispersion to small businesses in low-income geographies compared to AA businesses and aggregate bank lending with 20.7 percent of loans originated to low-income geographies compared to 5.5 percent AA businesses and 3.4 percent aggregate bank lending. Dispersion to small businesses in moderate-income geographies is poor with 13.8 percent compared to 36.5 percent of AA businesses and 33.6 percent aggregate bank lending.

Conclusions for Areas Receiving Limited-Scope Reviews

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

The bank's geographic distribution of unsecured consumer loans is reasonable for the limited-scope areas and is not inconsistent with full-scope performance. The distribution of unsecured consumer loans to low-income tracts in the OKC MSA Partial for 2016 was excellent and reasonable for 2017-2018 for overall satisfactory performance. The distribution to LMI tracts in the Tulsa MSA Partial was excellent for both the evaluation periods of 2016 and 2017-2018. The OK Rural Non-MSA AA had no loans originated in low-income tracts for either the 2016 or 2017-2018 periods, but had excellent performance in the moderate-income tracts for both time periods. The Enid MSA has no low-income tracts. Performance in the moderate-income tracts was excellent.

Lending to Borrowers of Different Incomes

Overall, CNB exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes. While home loan originations to LMI families in the Lawton MSA AA is generally poor when compared to the percentage of LMI families, the bank's performance is excellent when compare to aggregate bank lenders (HMDA reporting banks).

Home Mortgage Loans

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

Home mortgage lending to borrowers of different incomes is poor.

In 2016, CNB had very poor distribution of home mortgage loans to low-income families with a 6.4 percent compared to 22.0 percent of low-income families. However, CNB's performance compared aggregate lending was excellent exceeding the 3.4 percent aggregate lending distribution to low-income families. CNB had a reasonable distribution to moderate-income families with 16.7 penetration compared to 17.6 percent moderate-income families in the AA. The bank's performance is excellent when compared to aggregate lending with only 9.9 percent penetration to moderate-income families.

In 2017-2018, CNB had very poor distribution of loans to low-income families. The bank originated 5.8 percent of their loans to low-income families comparing to the 22.4 percent of low-income families in the AA. CNB's performance was excellent compared to aggregate lenders with only 4.0 percent penetration to low-income families. CNB's performance in moderate-income families was poor with 10.1 percent distribution compared to the 18.3 percent of moderate-income families in the AA. The bank's performance is reasonable compared to aggregate lending of 10.3 percent penetration to moderate-income families in the AA.

Small Loans to Businesses

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

Lending to small businesses with less than \$1 million in gross annual revenues (GAR) is excellent. The bank had excellent distribution to small businesses with less than \$1 million GAR with 100 percent of loans in the 2016 evaluation period and 96.5 percent of loans in the 2017-2018 evaluation period being originated to businesses with less than \$1 million in GAR.

Conclusions for Areas Receiving Limited-Scope Reviews

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

The overall borrower distribution of unsecured consumer loans in the limited-scope AAs is excellent and exceeds the performance in the full-scope Lawton MSA Partial AA. In the OKC MSA Partial AA and the Enid MSA, the distribution of loans to LMI borrowers was excellent for both time periods. Overall distribution of loans to LMI borrowers in the Tulsa MSA Partial and the OK Rural Non-MSA AAs was also excellent.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in Oklahoma is rated "Satisfactory."

Overall, CNB's CD performance demonstrates adequate responsiveness to the CD needs of its Oklahoma AAs. CD lending reflected adequate performance overall, but excellent responsiveness was noted in the area of economic development through lending to small businesses that retain or create permanent LMI jobs. Lending reflected adequate responsiveness in addressing affordable housing, community services, and revitalize/stabilize lending needs.

Opportunities for qualified CD loans and investments are limited in CNB's full-scope Lawton MSA Partial AA. Lawton is the largest city in the Lawton MSA AA with a population of 97,000. The rest of Comanche County is primarily rural low-density areas.

The officers and employees of CNB are active in the communities they serve. This is evidenced by their leadership roles on various civic and non-profit organizations that provide services to LMI individuals. Bank employees have committed significant hours to providing financial literacy training within their communities, particularly to the Comanche Nation Tribe, which has been recognized as a significant need within various community groups. The bank is also involved with, invests in, or lends to organizations whose focus is on community or economic development.

Community Development Loans

Qualifying CD loans are those that meet the definition of CD, as defined in the CRA regulation. This includes activities that promote affordable housing, community services, and economic development, revitalization, and stabilization that benefits LMI individuals and geographies. Activities are considered to promote economic development if they support permanent job creation, retention, and/or improvement for LMI persons. Qualified CD activities that help revitalize or stabilize a community are activities that attract new businesses or persons to a community or are activities that help retain existing businesses or persons in a community. Qualified activities may include, for example, providing financing to help retain businesses in an area that employ LMI persons; or providing financing to attract a new employer who will create permanent job opportunities for LMI persons.

Number and Amount of Community Development Loans

CD lending in the full-scope Lawton MSA Partial AA reflects adequate responsiveness. During the evaluation period, CNB originated or renewed 64 CD loans totaling \$25.4 million in the Lawton MSA Partial AA. CNB extended 56 economic development loans totaling \$17.1 million, which created or permanently retained approximately 600 LMI jobs, six affordable housing loans totaling \$172.0 thousand, and two community service loans totaling \$8.3 million.

Some of the more impactful economic development loans, in which LMI jobs were created or permanently retained, were to local auto dealerships. CNB originated or renewed six loans to dealerships totaling \$4.6 million creating or retaining 142 LMI jobs. CNB also originated a \$500 thousand loan to a cosmetic manufacturing company retaining 49 LMI jobs.

Conclusions for Areas Receiving Limited-Scope Reviews

Overall, performance in the limited-scope AAs is not inconsistent with the performance in the full-scope AA. In the OKC MSA Partial, CNB originated 24 CD loans totaling \$11.9 million. In the Tulsa MSA Partial, CNB originated 17 CD loans for \$466 thousand and in the OK Rural Non-MSA CNB originated two CD loans totaling \$14.7M. No CD loans were originated in the Enid MSA.

Community Development Investments

Qualifying investments are bond or equity investments, deposits, membership shares, or grants that have as their primary purpose CD, as defined in the CRA regulation.

Number and Amount of Qualified Investments

The level of qualified CD investments in the full-scope Lawton MSA Partial AA reflects adequate responsiveness. The bank invested \$1.6 million to purchase a mortgage-backed security for a Section 8 qualified apartment complex located in a low-income census tract.

The bank also donated \$86.3 thousand to qualified non-profit organizations in the Lawton MSA Partial AA during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs is consistent with the full-scope Lawton MSA Partial AA performance. The limited-scope areas of OKC MSA Partial, Tulsa MSA Partial, Enid MSA, and Rural Non-MSA combined for total investments of \$4.4 million and donations of \$14.5 thousand. Investment included qualified CRA qualified mortgage backed securities \$1.97 million, school bonds \$1.1 million, and municipal bonds \$1.3 million.

Extent to Which the Bank Provides Community Development Services

The level of qualified CD services in the full-scope Lawton MSA Partial AA is excellent. CNB employees provided over 270 hours of financial literacy training through qualified organizations to LMI persons in the AA and provided qualified officer and employee services to organizations that primarily serve LMI persons or that promote economic development. These employees provided technical and financial expertise to assist each organization.

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

CNB conducted a significant level of financial literacy training, which is recognized as a significant need nationwide. Bank wide, CNB conducted 270 hours of financial literacy training reaching over 11 thousand people. Much of the financial literacy was targeted to members of the Comanche Nation Tribe, as well as, local schools and non-profit organizations.

Comanche Nation Tribe

The bank extended approximately 137 hours of employee time to provide financial literacy training in several different ways to members of the Comanche Nation. CNB has enjoyed a relationship since late 2005 when CNB was selected by the Comanche Nation Business Committee (CBC) to distribute gaming revenue as Per Capita payments to members of the Nation. Since then, the relationship has grown to include additional value-added services as either management of the bank or the CBC recognize an increasing need.

A dedicated phone number allows members of the tribe to contact the bank toll-free for customer service pertaining to their Per Capita needs. CNB has over two dozen employees available 62 hours a week, six days a week. The bank handles a variety of calls related to tribal members' Per-Capita distribution, account management, and basic financial literacy. The average call volume on this line was over 1,000 hours per year during 2016, 2017, and 2018. For first quarter 2019, nearly 300 hours have been logged. The bank also has walk-in service available during banking hours five days a week, which is popular with the elders.

In an effort to provide a deposit product most suitable for tribal members that was simple and easy to manage, the bank created the Comanche Pride checking account in 2009. Additionally, the bank created the Elite Comanche Pride checking account in Spring 2016. The Comanche Pride account does not have an account maintenance fee and offers many features at no cost: online banking access, Comanche Nation branded checks, as well as, choice of either paper or electronic itemized account statements. This account offers the under-banked to have a direct deposit account that remains open with no service fee. The Elite Comanche Pride offers early pay (access to direct deposit one day early), online bill-pay, and CNB Rewards. Both accounts offer a free debit card branded with the tribe's logo. As of April 2019, the bank has 3,905 accounts open for members from all product lines of checking, savings, and loans.

Over the last 16 months, employees in CNB's Training Department have conducted multiple classes to different age groups of Comanche Nation members. The subject matter includes Basic Budgeting I and II, Fraud & Identity Theft, Workforce Management, Life as a Homeowner, and Career Development. The Career Development was a full-day class that had 95 attendees ages 14-24. Overall, there were 18 classes with 48 hours of classroom training conducted at different Comanche Nation locations.

The Comanche Nation Elder's Council is comprised of members age 62 and over. The bank's Trust Officer has made presentations at three of their meetings since late summer 2016. In October 2016 and September 2018, the presentation consisted of additional financial literacy as the bank officer provided an increased understanding of how the Per Capita funds were distributed and the process to sign up for direct deposit. In February 2018, the discussion was based on the beneficiary process for Per Capita funds. Each presentation was to an audience of 50-60 members and lasted 30 minutes. Time was allotted to allow questions in an open forum format, totaling approximately one hour of financial literacy.

The Comanche Nation Fair, a cultural celebration, is held late September each year. In two of the last three years, the bank has set up a booth in the vendor area to greet and provide financial literacy to members as needed. Account Services and Trust Department employees assist members who have banking, Per Capita, or other related questions. The bank's presence at this event provides service to members of the Nation who may not otherwise have the ability or resources to contact/visit the bank in person. Over the last three years, a total of 56 hours were spent assisting members of the Nation at the Fair (4 employees for 7 hours), half of which were dedicated to financial literacy.

Elder's Day is a Christmas party with a meal, shopping, and distribution of a special elder's (seniors) check to each member age 62 or above. CNB provides banking services and financial literacy assistance to these members, many of whom are handicapped and/or wheel-chair bound and this provides them access to their money at no cost and the ability to shop for Christmas gifts. CNB sets up four teller stations/employees and makes another four employees available to the elders for other banking/ financial assistance. Over 520 stubs/checks were distributed in December 2018. A total of over 144 hours was dedicated to Elder's Day over the last three years.

Approximately 100 tribal members are incarcerated and require special handling of their Per Capita funds. Some select a power of attorney and others want their Per Capita sent to their inmate trust account. CNB's specialized service allows them to separate those payments from the normal mass distribution and prepare either a cashier's check or money order based upon the instructions of their institution. CNB spends approximately one hour per inmate to read correspondence from the inmate, research the address/ payment method, prepare the proper payment method, input notes and other details to ensure the payment is delivered to their inmate trust account. This consumes approximately 100 hours a year.

Some members need a letter of verification of income for special assistance and to be eligible for low-income programs offered by the government. Upon request, the bank will complete the required verification letter. CNB has also been working for over 5 years to resolve a growing issue of minors being turned down for Social Security income due to their money that is placed into an IGRA trust being counted as an asset. Many hours were spent corresponding with the Social Security Regional Office to complete their requests and follow-up on the status. Meanwhile, over two dozen children known to the bank were being denied benefits. In April 2019, CNB received a letter from Social Security stating that the assets in trust would no longer count against minors.

The Comanche Nation has grown from over 12,000 members in 2005 to currently over 17,000 members. Of these, approximately 1,700 are over age 62 and over 4,800 are below the age of 18. They have members in all 50 states and some are even in other countries. CNB's mission is to address the needs of a growing Nation though additional services beyond yearly distributions. As the Comanche Nation continues to grow, its relationship CNB does, as well. CNB continuously adapts and strives to offer the products and services that best meet the needs of a rapidly growing community.

Credit Builder Program

CNB offers an innovative low interest lending product service known as the "*Credit Builder Program*" that during 2016 – 2018 helped over 740 customers, primarily low- to moderate-income with no credit or poor credit, build or improve their credit histories. The goal of the "*Credit Builder*" loan is that with the payment history and good credit habits developed through the program, the customer helps their overall credit profile and substantially increases their level of financial literacy and responsibility. From 2016-2018, the bank originated 18 "*Credit Builder*" loans to customers with no credit totaling \$19 thousand and originated 725 "*Savings Secured*" loans to customers with poor credit totaling \$1.6 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs is consistent with the full-scope Lawton MSA Partial AA performance. The limited-scope areas of OKC MSA Partial, Tulsa MSA Partial, Enid MSA, and OK Rural Non-MSA combined had 519 hours of financial literacy training to LMI persons and non-profit organizations.

State Rating

State of Kansas

CRA rating for the State of Kansas: Satisfactory.

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Satisfactory.

The major factors that support this rating include:

- CNB's distribution of CD/Savings secured consumer loans by income levels reflects a reasonable penetration and meets the standard for satisfactory performance.
- The bank's distribution of loans by geography is reasonable and meets the standard for satisfactory performance.
- Community development lending is reasonable and indicates adequate responsiveness to the needs of the bank's AAs.
- The bank provided an adequate amount of qualified CD investments and services within its AAs.

Description of Institution's Operations in Kansas

CNB has 3 branches located inside Wal-Marts in Wichita KS. The bank's full scope AA in the State of Kansas is the Wichita MSA Partial consisting of Sedgwick County, one of five counties in the Wichita MSA. The Wichita MSA Partial encompasses 124 census tracts. Based on the 2015 updated ASC data, the U.S. Census Bureau identifies 16 census tracts as low-income, 35 tracts as moderate-income, 38 tracts as middle-income, and 35 tracts as upper-income. The total population of the AA is 506,529. Additionally, there are 124,645 families and 192,961 households. The 125,000 families typically are stratified into low, moderate, middle, and upper-incomes at 21.7 percent, 17.7 percent, 20.9 percent, and 39.8 percent, respectively. The AA contains 213,700 housing units with 123,624, or 57.8 percent being owner occupied. There is also a large volume of rental occupied units in the AA. Rental occupied units total 69,337 or 32.4 percent, and vacant housing totals 20,739 or 9.7 percent of the available housing type. Families below the poverty level total 11.0 percent. One Wal-Mart branch is located in a moderate-income tract and the other two Wal-Mart branches are located in middle-income tracts. Wichita's economy is relatively stable with slow but steady growth forecasted. Wichita is the largest city in the State of Kansas and the 49th largest city in the U.S. Located in south-central Kansas on the Arkansas River, Wichita is the county seat of Sedgwick County and the principal city of the Wichita MSA. As an industrial hub and the largest city in the state, Wichita is an area center of culture, media, and trade. Wichita is known as "The Air Capital of the World" as the major aircraft manufacturing companies are located in Wichita and the city remains a major center of the U.S. aircraft industry. The Wichita economy is heavily dependent on the aircraft industry. Healthcare is Wichita's second largest industry employing 37,000 people. Local banking competition includes several other independent national and state-chartered banks, and branches of other banks and financial institutions based in Kansas, as well as, across the nation.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wichita MSA Partial						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	12.9	28.2	30.6	28.2	0.0
Population by Geography	506,529	9.7	24.5	31.8	34.0	0.0
Housing Units by Geography	213,700	10.8	26.4	32.6	30.2	0.0
Owner-Occupied Units by Geography	123,624	6.0	19.3	32.9	41.7	0.0
Occupied Rental Units by Geography	69,337	16.7	35.5	33.9	14.0	0.0
Vacant Units by Geography	20,739	19.9	38.0	25.9	16.3	0.0
Businesses by Geography	26,038	7.3	27.6	31.4	33.7	0.0
Farms by Geography	843	3.3	14.6	25.9	56.2	0.0
Family Distribution by Income Level	124,645	21.7	17.7	20.9	39.8	0.0
Household Distribution by Income Level	192,961	24.3	16.8	18.3	40.6	0.0
Median Family Income Non-MSAs - GA	\$64,897	Median Housing Value		\$123,957		
		Median Gross Rent		\$745		
		Families Below Poverty Level		11.0%		
<i>Source: 2015 updated ACS and 2018 D&B Data Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Kansas

Only one AA was designated for the State of Kansas, which is the Wichita MSA Partial, consisting of Sedgwick County. Sedgwick County is one of five counties in the Wichita MSA. This MSA will be evaluated under full-scope procedures. The Wichita MSA Partial consists of three Wal-Mart branches opened August 30, 2012. Lending performance was assessed by reviewing CD/Savings secured consumer loans originating in 2017-2018. An assessment was not performed for 2016 as there were insufficient consumer loans originated to conduct a meaningful lending analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Outstanding. The bank's borrower distribution of consumer loans to borrowers of different incomes was excellent. The geographic distribution of consumer loans was also excellent.

Based on a full-scope review of consumer lending, the bank's lending performance in the State of Kansas is excellent. A full-scope review was conducted on CD/Savings secured consumer lending in the Wichita MSA Partial AA. There is no consumer lending analysis for 2016 due to insufficient consumer originations.

Distribution of Loans by Income Level of the Geography

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

Consumer Loans

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

For 2017-2018, CNB had excellent dispersion to low-income geographies. The bank originated 28.6 percent of loans to low-income geographies compared to 9.9 percent low-income geographies in the AA. The bank had reasonable distribution of consumer loans to moderate-income geographies. The bank originated 21.4 percent of consumer loans to moderate-income geographies compared to 25.1 percent of moderate-income geographies in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits excellent distribution of loans to individuals of different income.

Consumer Loans

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

Consumer lending to LMI families is excellent. In 2017-2018, CNB had excellent dispersion of consumer loans to low- and moderate-income families. The bank originated 66.7 percent of consumer loans to low-income families compared to 21.7 percent low-income families in the AA. CNB originated 25 percent of consumer loans to moderate-income families compared to 17.7 percent of moderate-income families in the AA.

COMMUNITY DEVELOPMENT TEST

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

The level of CD lending was poor as the bank did not purchase or originate any CD loans during the evaluation period. Investments and services reflected adequate responsiveness for an overall adequate level of CD performance.

Number and Amount of Community Development Loans

CNB did not purchase or originate any CD loans during the evaluation period.

Number and Amount of Qualified Investments

Qualifying investments are bond or equity investments, deposits, membership shares, or grants that have as their primary purpose CD, as defined in the CRA regulation.

The level of qualified CD investments in the Kansas full-scope AA reflects adequate responsiveness. The bank has a prior period investment with an outstanding balance of \$152 thousand to purchase a municipal bond issued by the city of Park City, Kansas. This is part of a \$2.9 million General Obligation Bond Series to help fund the Echo Hills Commercial Addition infrastructure improvements. These improvements are necessary for the development of an outlet mall that will house 80-100 retailers and create up to 1,000 new jobs, most of which will be for LMI workers. The bank had two current period investments consisting of two CRA qualified mortgage backed securities totaling \$1.4 million.

The bank made a donation to a local food bank and an in-kind donation to an elementary school totaling \$7.7 thousand.

Extent to Which the Bank Provides Community Development Services

CNB employees provided 103 hours of financial literacy training to local elementary and middle schools reaching over 1,288 LMI students.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2016 to 12/31/2018	
Bank Products Reviewed:	Home Mortgage, Small Business, Consumer Loans. Community Development Loans, Qualified Investments, Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Areas	Type of Exam	Other Information
State of Oklahoma Lawton MSA Partial OKC MSA Partial Tulsa MSA Partial Enid MSA OK Rural Non-MSA	Full-Scope Limited-Scope Limited-Scope Limit-Scope Limited-Scope	
State of Kansas Wichita MSA Partial	Full-Scope	

Appendix B: Summary of State Ratings

RATINGS City National Bank and Trust, Lawton OK			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
City National Bank	Satisfactory	Satisfactory	Satisfactory
Oklahoma	Satisfactory	Satisfactory	Satisfactory
Kansas	Outstanding	Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male

householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The

Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

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

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

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

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

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

Table S. Assessment Area Distribution of Farm Loans 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. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

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

STATE OF OKLAHOMA

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		
2016 Lawton MSA Partial	78	6,049	100.0	3,126	2.9	3.8	1.5	11.2	14.1	6.7	47.4	38.5	45.4	38.5	43.6	46.3	0.0	0.0	0.2		
Total	78	6,049	100.0	3,126	2.9	3.8	1.5	11.2	14.1	6.7	47.4	38.5	45.4	38.5	43.6	46.3	0.0	0.0	0.2		

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank 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																			2017-2018		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Lawton MSA Partial	69	9,290	100.0	2,818	4.2	2.9	1.6	16.8	8.7	12.1	38.9	42.0	39.0	40.1	46.4	47.3	0.0	0.0	0.0		
Total	69	9,290	100.0	2,818	4.2	2.9	1.6	16.8	8.7	12.1	38.9	42.0	39.0	40.1	46.4	47.3	0.0	0.0	0.0		

Source: 2015 Updated ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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 Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2016 Lawton MSA Partial	78	6,049	100.0	3,126	22.0	6.4	3.4	17.6	16.7	9.9	21.0	17.9	19.1	39.3	43.6	36.6	0.0	15.4	31.0
Total	78	6,049	100.0	3,126	22.0	6.4	3.4	17.6	16.7	9.9	21.0	17.9	19.1	39.3	43.6	36.6	0.0	15.4	31.0

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank 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																	2017-2018		
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	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Lawton MSA Partial	69	9,290	100.0	2,818	22.4	5.8	4.0	18.3	10.1	10.3	18.6	14.5	20.0	40.7	60.9	32.3	0.0	8.7	33.4
Total	69	9,290	100.0	2,818	22.4	5.8	4.0	18.3	10.1	10.3	18.6	14.5	20.0	40.7	60.9	32.3	0.0	8.7	33.4

Source: 2015 Updated ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 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	
2016 Lawton MSA Partial	28	1,095,601	93.3	1,444	15.7	7.1	12.5	21.5	14.3	20.3	38.1	53.6	33.1	24.2	25.0	34.1	0.5	0.0	0.1	
Total	28	1,095,601	93.3	1,444	15.7	7.1	12.5	21.5	14.3	20.3	38.1	53.6	33.1	24.2	25.0	34.1	0.5	0.0	0.1	

Source: 2016 D&B Data; 01/01/2016 – 12/31/2016 Bank Data; “—” data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Are Distribution of Loans to Small Businesses by Income Category of the Geography																		2017-2018		
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	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	% Business es	% Bank Loans	Aggregate	
Lawton MSA Partial	29	845,715	96.7	1,388	5.5	20.7	3.4	36.5	13.8	33.6	31.9	34.5	30.4	25.9	31.0	32.4	0.2	0.0	0.2	
Total	29	845,715	96.7	1,388	5.5	20.7	3.4	36.5	13.8	33.6	31.9	34.5	30.4	25.9	31.0	32.4	0.2	0.0	0.2	

Source: 2018 D&B Data; 01/01/2017 – 12/31/2018 Bank 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	
2016 Lawton MSA Partial	28	1,095,601	93.3	1,444	79.3	100.0	63.9	4.7	0.0	16.0	--	
Total	28	1,095,601	93.3	1,444	79.3	100.0	63.9	4.7	0.0	16.0	--	

Source: 2016 D&B Data; 01/01/2016 – 12/31/2016 Bank 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											2017-2018	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Lawton MSA Partial	29	845,715	96.7	1,388	79.1	96.6	61.5	4.9	3.5	15.9	--	
Total	29	845,715	96.7	1,388	79.1	96.6	61.5	4.9	3.5	15.9	--	

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2016	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Tulsa MSA Partial	20	49,475	66.7	8.8	10.0	26.2	40.0	30.7	15.0	34.3	35.0	0.0	0.0
OKC MSA Partial	24	45,490	80.0	5.3	12.5	26.2	29.2	39.8	37.5	28.7	20.8	0.0	0.0
OK Rural Non-MSA	27	81,255	90.0	1.5	0.0	15.2	22.2	55.3	55.6	28.0	22.2	0.0	0.0
Total	71	176,220	78.0	6.0	5.6	24.5	23.3	39.5	30.0	30.0	20.0	0.0	0.0

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Tulsa MSA Partial	22	57,632	77.3	7.7	13.6	27.1	31.8	32.4	45.5	32.8	9.1	0.0	0.0
OKC MSA Partial	25	46,009	83.3	6.1	4.0	26.0	44.0	38.8	40.0	28.9	12.0	0.3	0.0
Enid MSA	25	60,276	83.3	0.0	0.0	28.7	52.0	43.4	44.0	27.8	4.0	0.0	0.0
OK Rural Non-MSA	25	71,320	83.3	2.1	0.0	14.6	24.0	59.3	14.0	24.0	20.0	0.0	0.0
Total	97	235,237	80.8	6.0	3.3	25.1	30.8	39.3	37.5	29.5	9.2	0.1	0.0

Source: 2015 Updated ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2016	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Tulsa MSA Partial	20	49,475	66.7	24.0	10.5	17.0	57.9	17.7	15.8	41.3	15.8	0.0	5.3
OKC MSA Partial	24	45,490	80.0	23.7	45.8	16.6	33.3	18.1	16.7	41.7	4.2	0.0	0.0
OK Rural Non-MSA	27	81,255	90.0	21.9	19.2	15.8	34.6	17.5	23.1	44.9	23.1	0.0	3.9
Total	71	176,220	78.0	23.4	20.0	16.6	31.1	17.9	14.4	42.0	11.1	0.0	2.2

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

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Tulsa MSA Partial	22	57,632	77.3	24.4	35.0	16.5	25.0	17.7	30.0	41.5	10.0	0.0	10.0
OKC MSA Partial	25	46,009	83.3	23.5	32.0	16.7	44.0	18.0	20.0	41.9	4.0	0.0	0.0
Enid MSA	25	60,276	83.3	21.8	32.0	17.0	32.0	20.1	20.0	41.2	16.0	0.0	0.0
OK Rural Non-MSA	25	71,320	83.3	22.7	24.0	16.1	28.0	16.9	20.0	44.3	28.0	0.0	0.0
Total	97	235,237	80.8	23.6	24.2	16.5	25.8	17.8	17.5	42.0	11.7	0.0	1.7

Source: 2015 Updated ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0

STATE OF KANSAS

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Wichita MSA Partial	28	25,433	93.3	9.9	28.6	25.1	21.4	33.3	32.1	31.7	17.9	0.0	0.0
Total	28	25,433	93.3	9.9	28.6	25.1	21.4	33.3	32.1	31.7	17.9	0.0	0.0

Source: 2015 updated ACS Census; 01/01/2017 - 12/31/2018 Bank Data.
Due to rounding, totals may not equal 100.0

Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower												2017-2018	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Wichita MSA Partial	28	25,433	93.3	21.7	66.7	17.7	25.0	20.9	8.3	39.8	0.0	0.0	16.7
Total	28	25,433	93.3	21.7	66.7	17.7	25.0	20.9	8.3	39.8	0.0	0.0	16.7

Source: 2015 Updated ACS Census; 01/01/2017 - 12/31/2018 Bank Data.
Due to rounding, totals may not equal 100.0