Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

June 1, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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

500 Montgomery Square
Lawton, OK 73501

Office of the Comptroller of the Currency

8282 S Memorial Dr., Ste. 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.

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Overall CRA Rating

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

The lending test is rated: Satisfactory.
The community development test is rated: Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on The City National Bank and Trust Company of Lawton's (CNB or the bank) satisfactory lending performance within the states of Oklahoma and Kansas. During the evaluation period, the bank's loan-to-deposit (LTD) ratio was reasonable. A substantial majority of the bank's loans originated during the evaluation period were within the assessment area (AA).
- The Community Development (CD) Test rating is based on the bank's responsiveness to community development (CD) needs in the states of Oklahoma and Kansas. The bank exhibits adequate responsiveness to CD needs in the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio was reasonable. CNB's quarterly LTD ratio for this CRA performance evaluation averaged 83.8 percent. The LTD ratio has fluctuated somewhat since the prior CRA PE from a low of 79.0 percent in the third quarter of 2023 and a high of 90.96 percent in the fourth quarter of 2024. We compared the LTD ratio to five similarly situated banks (peer banks) in their respective market area. For peer banks, LTD ranged from an average low of 36.4 percent and a high of 99.96 percent.

Lending in Assessment Area

A substantial majority of the bank's loans were inside its AA(s).

The bank originated and purchased 84.4 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table 1: Lending Inside and Outside of the Assessment Area **2023-2025**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total $
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	183	94.33	11	5.67	194	17,121	89.88	1,928	10.12	19,049
Small Business	221	65.19	118	34.81	339	142,937	75.42	46,575	24.58	189,512
Small Farm	4	57.14	3	42.86	7	358	51.86	332	48.14	690
Consumer	1426	87.32	207	12.68	1633	21,858	86.10	3,530	13.90	25,388
Total	1834	84.40	339	15.60	2173	182,274	77.68	52,365	22.32	234,639

Source: 1/1/2023 - 12/31/2025 Bank Data.
Due to rounding, totals may not equal 100.0%

Description of Institution

CNB is a multistate community bank headquartered in Lawton, Oklahoma. It is a subsidiary of JRMB II, Inc. (JRMB), a two-bank holding company. Both JRMB and FSNB, NA, CNB's sister bank, are headquartered in Lawton, Oklahoma. Inter-bank transactions are limited. Each bank has a separate Board of Directors, although share some common Directors. CNB and FSNB focus on serving different clientele with some overlap in the city of Lawton. CNB has branches and deposit taking ATMs in Oklahoma and Kansas. Oklahoma branches are a mix of stand-alone branches and branches in Wal-Mart Supercenters or Wal-Mart Neighborhood Markets in Lawton, Oklahoma City, Tulsa, El Reno, Miami, Bartlesville, Ponca City, Broken Arrow, Shawnee, The Village, Enid, Chickasha, Del City, Edmond, Mustang, Glenpool, Sapulpa, Moore, and Muskogee. The Kansas branches are all Wal-Mart branches in Wichita. Branches are generally open from 9:30 am to 6:00 pm, Monday through Friday with some open 8:00 am to 6:00 pm. On Saturdays, branches are generally open from 9:30 am to 4:00 pm with some open 8:00 am to 1:00 pm.

CNB's primary focus is to serve the consumer, commercial, and agricultural needs of customers located in their AAs. The bank's focus and ability to meet these needs differs from the Lawton market to the other AAs as the bank is better able to identify and meet Lawton business needs at the main bank while the branch structure throughout the other AAs, including the Wal-Mart branches in Kansas, fulfill consumer needs. The bank's lending strategy focuses on commercial and residential real estate loans in the Lawton MSA Partial AA and out of their stand-alone branches and consumer lending in their Wal-Mart branches. CNB provides 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 offers Small Business Administration loans. CNB also offers asset management services through their trust department.

As of December 31, 2025, the bank's total assets were $435 million, total deposits were $362 million, and tier one capital was $60 million. Net loans and leases total $297 million, or 68.3 percent of total assets. By dollar volume, the loan portfolio consists of 92.3 percent of real estate loans, 3.7 percent commercial loans, 3.6 percent other loans, 2.4 percent individual, and less than one percent agricultural loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AAs. CNB's prior CRA Performance Evaluation was dated April 3, 2023, and resulted in a "Satisfactory" rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period includes all reported activity between January 1, 2023, and December 31, 2025. Consumer loans and home mortgages were evaluated for the Lawton MSA full-scope AA and the OKC MSA limited-scope AA. Only consumer loans were evaluated for the Wichita MSA full-scope AA. The Lawton MSA, OKC MSA, Enid MSA, Tulsa MSA, OK Non-MSA, and Wichita MSA did not experience boundary changes during the evaluation period.

The OCC evaluated CNB using the intermediate small bank performance criteria, which includes a lending test and a community development (CD) test. The lending test evaluated the bank's record of meeting credit needs of its AAs through lending activities. The CD test includes CD lending,

investment, and service components. The CD test evaluates CNB's responsiveness to CD needs in its AAs.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were 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), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The State of Oklahoma rating was most heavily weighted in determining the overall conclusion. The majority of CNB's loans and deposits are in their AAs in the State of Oklahoma.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, 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[1]: Satisfactory
The Lending Test is rated: Satisfactory
The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- CNB exhibits a reasonable distribution of loans to individuals of different income levels.
- CNB exhibits a reasonable distribution of loans in geographies of different income levels.
- CNB exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services.

Description of Institution's Operations in Oklahoma

CNB delineated five AAs in the state of Oklahoma: Lawton MSA Partial, Tulsa MSA Partial, OKC MSA Partial, OK Non-MSA, and the Enid MSA AAs. The Lawton MSA comprises all geographies in Comanche County. The Tulsa MSA Partial comprises all geographies in Tulsa, Wagoner, and Creek Counties. The OKC MSA Partial comprises all geographies in Canadian, Cleveland, Grady, and Oklahoma Counties. The OK Non-MSA comprises all geographies in Kay, Stephens, Ottawa, Muskogee, Pottawatomie, and Washington Counties. The Enid MSA comprises all geographies in Garfield County.

According to the June 30, 2025, FDIC Summary of Deposits report, CNB branches in Oklahoma account for 98.6 percent of total CNB deposits. CNB operates 37 of 40 branches in the state. Competition in the state of Oklahoma is strong. Several large, nation-wide and regional banks have presence in Oklahoma as well as several large state banks. According to the Summary of Deposits report, the bank has $368.2 million in deposits with a deposit market share of 0.26 percent, ranking 64th out of 199 banks in the state.

We referenced one community contact during the evaluation period for the Lawton MSA AA. The local housing and community development agency supports public service organizations, developing and maintaining public parks and streets, and provides housing opportunities to low- and moderate-income families in the city of Lawton. The demographic of the area is lower income that has stabilized over recent years, but there is a lack of desirable housing in the city.

Lawton MSA AA

The following table provides a summary of demographics, including housing and business information for the Lawton MSA during the evaluation period.

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

Lawton MSA Partial

Assessment Area(s) - Lawton MSA Partial						
						2023 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	38	7.89	26.32	39.47	18.42	7.89
Population by Geography	121,125	6.20	22.66	44.07	23.27	3.80
Housing Units by Geography	51,665	8.43	24.97	42.35	21.83	2.42
Owner-Occupied Housing by Geography	23,075	5.37	15.60	46.04	31.93	1.06
Occupied Rental Units by Geography	20,166	10.21	34.70	38.69	12.73	3.66
Vacant Units by Geography	8,424	12.58	27.31	41.01	15.94	3.15
Businesses by Geography	2,861	6.92	33.38	33.10	23.77	2.83
Farms by Geography	159	2.52	12.58	38.99	45.91	0.00
Family Distribution by Income Level	27,941	22.11	17.51	18.78	41.59	0.00
Household Distribution by Income Level	43,241	23.30	15.79	18.72	42.19	0.00
Unemployment rate (%)	5.82	16.75	6.20	5.51	4.02	3.40
Households Below Poverty Level (%)	14.98	27.12	21.54	12.05	7.16	37.64
Median Family Income (Oklahoma)		$65,335			Median Housing Value	$104,800
Median Family Income (Oklahoma) for 2024		$74,900			Median Gross Rent	$778
					Families Below Poverty Level	11.84
FFIEC File - 2020 Census FFIEC File - 2024 Census 2025 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0%						

The Lawton MSA Partial AA is in southwest Oklahoma and includes the entirety of Comanche County. The bank operates six branches, including their main branch and 19 ATMs, with four of those also taking deposits. According to the June 30, 2025, FDIC market share report, CNB is ranked fourth out of 10 banks in the AA with 11.8 percent of deposit market share.

Scope of Evaluation in Oklahoma

The Lawton MSA Partial AA is the full-scope AA for the evaluation in Oklahoma due to the number of loans originated and share of bank deposits in the AA. Approximately 25 percent of all loans originated in Oklahoma and 64 percent of bank deposits were in the full-scope AA. Additionally, the bank is headquartered in Lawton. Loan products reviewed in the full-scope AA were HMDA loans and a sample of consumer loans originated in the AA in 2023, 2024, and 2025. The OKC MSA Partial AA received a limited-scope review. Please refer to appendix A in this performance evaluation for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Oklahoma is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 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.

The percentage of home mortgage loans originated or purchased in low-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans originated or purchased in moderate-income geographies exceeded both the percentage of owner-occupied housing units and the aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table 13 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 percentage of consumer loans originated in low-income geographies was below the percentage of low-income households in the AA. The percentage of consumer loans originated in moderate-income geographies was below the percentage of moderate-income households in the AA.

Lending Gap Analysis

We performed a lending gap analysis which included a review of sampled loans compared to AA maps and location of branches. We did not identify any unexplained, conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibited a reasonable distribution of loans to individuals of different income levels.

Home Mortgage Loans

Refer to Table 8 in the state of Oklahoma section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to low-income families was significantly below the percentage of low-income families but exceeded the aggregate percentage of all reporting lenders. CNB originated 10.5 percent of their home mortgage loans in the AA to low-income families compared to 22.1 percent of low-income families. However, CNB's performance exceeded all other lenders at 3.7 percent, indicating that low-income families have difficulty qualifying for a home mortgage in the AA. The distribution of home mortgage loans to moderate-income families was below the percentage of moderate-income families but exceeded the aggregate percentage of all reporting lenders.

Consumer Loans

Refer to Table 14 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 distribution of consumer loans to low-income borrowers was below the percentage of low-income households. The distribution of consumer loans to moderate-income borrowers exceeded the percentage of moderate-income households.

Responses to Complaints

The bank did not receive any CRA related complaints during the evaluation period.

Conclusions for Areas Receiving Limited Scope Reviews

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

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Number and Amount of Community Development Loans

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

Table 3: Community Development Loans

Assessment Area	Total			
	#	% of Total #	$(000's)	% of Total $
Lawton MSA Partial AA	22	47.83	7,574	45.96
OKC MSA Partial AA	13	28.26	6,873	41.70
Tulsa MSA Partial AA	6	13.04	932	5.65
OK Non-MSA AA	5	10.87	1,101	6.68
Total	**46**	**100.00**	**16,480**	**100.00**

During the evaluation period, CNB made 22 loans totaling $7.57 million in the full scope AA consisting of economic development ($4.7 million), community service ($1.5 million), affordable housing ($1.4 million), and revitalize/stabilize ($247 thousand).

The following are examples of CD loans the bank originated or purchased in this AA:

- The bank originated a $2.6 million loan to an entity for economic development.
- The bank originated a $1.1 million loan to further community services.
- The bank originated a $361 thousand loan to finance affordable housing.

Number and Amount of Qualified Investments

The Qualified Investment Table, shown below, set forth the information and data used to evaluate the bank's level of qualified investments. These tables include all qualified investments, including grants and donation, including prior period investments that remain outstanding as of the end of the evaluation period.

Table 4: Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$	#	$	#	% of Total #	$	% of Total $	#	$
Lawton MSA Partial AA	0	0	1	266	1	10.00	266	7.33	0	0
OKC MSA Partial	1	43	4	2,757	5	50.00	2,800	77.05	0	0
Tulsa MSA Partial	1	273	0	0	1	10.00	273	7.52	0	0
Enid MSA	1	0	0	0	1	10.00	0	0.00	0	0
OK Non-MSA	1	41	1	253	2	20.00	294	8.10	0	0
Total	4	357	6	3,276	10	100.00	3,633	100.00	0	0

The investment in the Lawton MSA Partial AA was a municipal bond to a local development authority for acquisition, construction, renovation, and improvements for various capital projects.

Extent to Which the Bank Provides Community Development Services

During the three-year evaluation period, employees provided 490.25 service hours; for the Lawton MSA (318 hours), Oklahoma City MSA (5 hours), Tulsa MSA (86 hours), and Oklahoma non-MSA (82 hours). The majority of services hours were employees serving as board members or committee members for different nonprofits focused on community improvement, financial literacy education to LMI people and students, and elder abuse awareness seminars.

Conclusions for Areas Receiving Limited Scope Reviews

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

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

State Rating

State of Kansas

CRA rating for the State of Kansas[2]: Satisfactory
The Lending Test is rated: Outstanding
The Community Development Test is rated: Needs to Improve

The major factors that support this rating include:

- CNB exhibits excellent distribution of consumer loans to individuals of different income levels
- CNB exhibits excellent distribution of consumer loans to geographies of different income levels
- CNB exhibits poor responsiveness to community development needs in the state through qualified investments, and community development services

Description of Institution's Operations in Kansas

CNB delineated one AA in the state of Kansas, the Wichita MSA Partial AA. The Wichita MSA Partial is comprised of all geographies in Sedgwick County.

According to the June 30, 2025, FDIC Summary of Deposits report, CNB branches in Kansas totaled 1.4 percent of total deposits. CNB operates three branches in Kansas. Competition in Kansas is strong. CNB ranks 239th out of 241 banks in the state. According to the Summary Deposits report, CNB has $5.1 million in deposits in the state with a deposit market share of less than 0.01 percent.

We referred to one community contact during the evaluation period. The contact noted that the city of Wichita and surrounding areas are heavily influenced by the business cycles of the aerospace industries, but efforts have been made to diversify employment and economic activity. The contact noted that some smaller cybersecurity firms and a computer chip manufacturing facility have moved or announced projects in the area bringing high skill and high paying jobs. The contact noted that Wichita is consistently named as one of the most affordable places to live in the country and is one of the most affordable places for first-time home buyers. This diversification of employers is bringing more people to the area as well as providing more entry-level employment opportunities to Wichita to retain more area college graduates that would otherwise leave. The contact stated they felt that local financial institutions, particularly community banks, were very responsive to business and consumer credit needs with flexibility in loan terms.

Wichita MSA Partial

The following table provides a summary of demographics, including housing and business information for the Wichita MSA during the evaluation period.

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

Assessment Area(s) - Wichita MSA Partial						
						2023 - 2025
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	135	5.93	31.11	36.30	25.19	1.48
Population by Geography	523,824	3.82	27.73	36.22	31.56	0.67
Housing Units by Geography	220,638	4.70	30.86	36.00	27.31	1.13
Owner-Occupied Housing by Geography	124,213	2.08	21.57	40.20	35.95	0.21
Occupied Rental Units by Geography	75,107	7.52	42.38	31.90	15.90	2.30
Vacant Units by Geography	21,318	10.03	44.42	26.00	17.14	2.41
Businesses by Geography	15,012	2.80	24.05	32.25	38.30	2.59
Farms by Geography	613	1.31	16.15	34.26	47.15	1.14
Family Distribution by Income Level	126,223	20.28	18.57	21.01	40.14	0.00
Household Distribution by Income Level	199,320	23.57	17.63	17.73	41.07	0.00
Unemployment rate (%)	5.14	10.66	7.03	4.49	3.59	6.36
Households Below Poverty Level (%)	13.08	36.66	20.54	10.18	4.73	41.44
Median Family Income (48620 - Wichita, KS MSA)		$74,120			Median Housing Value	$130,000
Median Family Income (48620 - Wichita, KS MSA) for 2025		$93,500			Median Gross Rent	$850
					Families Below Poverty Level	9.16

FFIEC File - 2020 Census
FFIEC File - 2024 Census
2025 Dun & Bradstreet SBSF Demographics
Due to rounding, totals may not equal 100.0%

CNB operates three branches and three ATMs in the AA. According to the June 30, 2025, FDIC Market Share Report, CNB ranked 37th out of 38 banks in the AA with a deposit market share of 0.03 percent.

Scope of Evaluation in Kansas

Examiners conducted a full-scope review of the Wichita MSA Partial AA, the only AA in the state of Kansas. The AA represents 1.4 percent of CNB's deposits and less than 1 percent of all loans originated during the evaluation period. There were not enough HMDA loans or loans of another type to conduct a meaningful analysis of a second loan type. Please refer to the table in Appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Kansas was reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in the state.

Consumer Loans

Refer to Table 13 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.

The percentage of consumer loans originated in low-income geographies was below the percentage of low-income households in the AA. The percentage of consumer loans originated in moderate-income geographies exceeded the percentage of moderate-income households in the AA.

Lending Gap Analysis

We performed a lending gap analysis which included a review of sampled loans compared to AA maps and location of branches. We did not identify any unexplained, conspicuous gaps in lending.

Distribution of Loans by Income Level of the Borrower

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

Consumer Loans

Refer to Table 14 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.

The distribution of consumer loans to low-income borrowers exceeded the percentage of low-income households in the AA. The distribution of loans to moderate-income borrowers exceeded the percentage of moderate-income households in the AA.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Kansas is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited poor responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA(s).

Number and Amount of Community Development Loans

CNB did not make any qualifying CD loans during the evaluation period. CNB's primary lending product in the AA is consumer lending. The bank faces strong competition from 37 other financial institutions in the AA. All branches are located inside Walmart stores. CNB has 1.4 percent deposit market share in the AA.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	$	#	$	#	% of Total #	$	% of Total $	#	$
Wichita MSA Partial	2	455,990	0	0	2	100	455,990	100	0	0

The Qualified Investments Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified investments. The table includes all qualified investments, including prior period investment that remain outstanding as of the end of the evaluation period.

During a prior evaluation period, CNB purchased two mortgage loan pools comprised of loans made to moderate-income borrowers in Sedgwick County.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, employees provided 14 service hours for the Wichita MSA. The service hours were employees volunteering to teach financial literacy at an area middle school.

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

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:	1/1/2023 to 12/31/2025	
Bank Products Reviewed:	Home mortgage, consumer loans Community development loans, qualified investments, community development services	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
None reviewed		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
MMSA(s)		
Oklahoma		
Lawton MSA Partial	Full-scope	
OKC MSA Partial	Limited-scope	
Tulsa MSA Partial	Limited-scope	
Enid MSA	Limited-scope	
OK Non-MSA	Limited-scope	
Kansas		
Wichita MSA Partial	Full-scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
The City National Bank and Trust Company of Lawton, OK	Satisfactory	Satisfactory	Satisfactory
State:			
Oklahoma	Satisfactory	Satisfactory	Satisfactory
Kansas	Outstanding	Needs to Improve	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 the 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 low- and moderate-income 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): 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 CD loans and qualified investments, branch distribution, and CD services).

Low-Income: Individual income that is at 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 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**.**

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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 multistate 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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/AA. 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 7. **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 8. **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/AA. The table also presents aggregate peer data for the years the data is available.

Table 13. **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 14. **Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

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

State of Oklahoma

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2023 - 2025
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Tracts**			**Moderate-Income Tracts**			**Middle-Income Tracts**			**Upper-Income Tracts**			**Not Available-Income Tracts**		
	#	**$**	**% of Total Number**	**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 MSA Partial	1	62	1.19	2,417	3.22	--	1.61	7.68	--	5.75	54.33	100.00	53.08	34.77	--	39.55	--	--	--
Lawton MSA Partial	38	5,754	45.24	5,529	5.37	13.16	4.00	15.60	23.68	14.47	46.04	34.21	49.94	31.93	28.95	30.39	1.06	--	1.19
OK Non-MSA	7	494	8.33	12,835	1.01	--	0.96	12.11	28.57	11.83	59.40	57.14	57.30	27.48	14.29	29.90	--	--	--
OKC MSA Partial	25	3,775	29.76	66,350	3.80	4.00	3.31	18.28	40.00	16.44	39.21	32.00	36.65	37.75	24.00	42.93	0.95	--	0.65
Tulsa MSA Partial	13	7,727	15.48	38,686	2.81	--	1.87	22.85	38.46	20.44	32.47	15.38	30.58	41.82	46.15	47.02	0.05	--	0.05
Total	**84**	**17,813**	**100.00**	**125,817**	**3.16**	**7.14**	**2.63**	**18.53**	**30.95**	**16.91**	**40.42**	**33.33**	**37.79**	**37.37**	**28.57**	**42.24**	**0.52**	**--**	**0.41**
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2023 - 2025
Assessment Area:	**Total Home Mortgage Loans**				**Low-Income Borrowers**			**Moderate-Income Borrowers**			**Middle-Income Borrowers**			**Upper-Income Borrowers**			**Not Available-Income Borrowers**		
	#	**$**	**% of Total Number**	**Overall Market**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**	**% Families**	**% Bank Loans**	**% Aggregate**
Enid MSA Partial	1	62	1.19	2,417	21.99	--	7.99	14.96	100.00	16.76	21.27	--	20.27	41.78	--	31.77	--	--	23.21
Lawton MSA Partial	38	5,754	45.24	5,529	22.11	10.53	3.69	17.51	13.16	10.87	18.78	5.26	19.46	41.59	39.47	36.25	--	31.58	29.73
OK Non-MSA	7	494	8.33	12,835	20.32	--	5.37	17.70	57.14	15.04	20.01	28.57	19.00	41.97	14.29	34.80	--	--	25.79
OKC MSA Partial	25	3,775	29.76	66,350	21.14	8.00	6.06	17.76	28.00	16.15	20.43	20.00	18.90	40.67	28.00	31.62	--	16.00	27.26
Tulsa MSA Partial	13	7,727	15.48	38,686	21.31	--	5.60	17.43	7.69	16.19	19.32	15.38	20.06	41.94	30.77	33.34	--	46.15	24.81
Total	**84**	**17,813**	**100.00**	**125,817**	**21.15**	**7.14**	**5.78**	**17.57**	**21.43**	**15.83**	**19.97**	**13.10**	**19.32**	**41.31**	**32.14**	**32.68**	**--**	**26.19**	**26.39**
Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2023 - 2025
Assessment Area:	**Total Consumer Loans**			**Low-Income Tracts**		**Moderate-Income Tracts**		**Middle-Income Tracts**		**Upper-Income Tracts**		**Not Available-Income Tracts**	
	#	**$**	**% of Total**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**
Enid MSA Partial	30	266	2.38	6.12	6.67	9.93	13.33	54.09	43.33	29.86	36.67	--	0.00
Lawton MSA Partial	291	3,036	23.13	7.62	6.87	24.51	22.34	42.61	41.58	22.98	26.46	2.27	2.75
OK Non-MSA	219	1,288	17.41	2.09	1.83	15.67	31.51	58.87	48.86	23.36	17.81	--	0.00
OKC MSA Partial	436	3,045	34.66	6.06	8.72	24.12	32.11	38.59	36.47	29.77	21.10	1.46	0.00
Tulsa MSA Partial	282	1,577	22.42	5.41	6.03	29.29	37.59	31.43	32.62	33.57	23.76	0.29	0.00
Total	**1258**	**9,213**	**100.00**	**23.72**	**26.55**	**16.46**	**25.62**	**18.01**	**24.83**	**41.81**	**15.73**	**--**	**7.27**

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2025 Bank Data.
Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2023 - 2025
Assessment Area:	**Total Consumer Loans**			**Low-Income Borrowers**		**Moderate-Income Borrowers**		**Middle-Income Borrowers**		**Upper-Income Borrowers**		**Not Available-Income Borrowers**	
	#	**$**	**% of Total Number**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**	**% of Households**	**% Bank Loans**
Enid MSA Partial	30	266,285	2.38	25.12	50.00	14.58	6.67	20.25	16.67	40.06	20.00	--	6.67
Lawton MSA Partial	291	3,035,906	23.13	23.30	19.24	15.79	21.31	18.72	23.71	42.19	19.24	--	16.49
OK Non-MSA	219	1,287,889	17.41	23.35	29.68	16.23	28.31	16.83	28.77	43.58	8.68	--	4.57
OKC MSA Partial	436	3,045,462	34.66	23.70	43.12	16.74	30.05	18.49	12.39	41.07	3.44	--	11.01
Tulsa MSA Partial	282	1,577,423	22.42	23.84	34.04	16.34	35.11	17.44	15.96	42.37	10.64	--	4.26
Total	**1258**	**9,213**	**100.00**	**23.72**	**26.55**	**16.46**	**25.62**	**18.01**	**24.83**	**41.81**	**15.73**	**--**	**7.27**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Kansas

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	$	% of Total Number	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
Wichita MSA Partial	1	32	100.00	25	2.08	--	1.90	21.57	100.00	21.72	40.20	--	39.26	35.95	--	36.88
Total	**1**	**32**	**100.00**	**25**	**2.08**	**--**	**1.90**	**21.57**	**100.00**	**21.72**	**40.20**	**--**	**39.26**	**35.95**	**--**	**36.88**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2023 - 2025**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Wichita MSA Partial	1	32	100.00	25	20.28	--	8.10	18.57	--	18.65	21.01	100.00	20.15	40.14	--	28.60	--	--	24.50
Total	**1**	**32**	**100.00**	**25**	**20.28**	**--**	**8.10**	**18.57**	**--**	**18.65**	**21.01**	**100.00**	**20.15**	**40.14**	**--**	**28.60**	**--**	**--**	**24.50**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, 2023, 2024 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography **2023 - 2025**

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	62	207	100.00	4.13	3.23	29.41	48.39	37.07	37.10	28.40	8.06	1.00	3.23
Total	**62**	**207**	**100.00**	**4.13**	**3.23**	**29.41**	**48.39**	**37.07**	**37.10**	**28.40**	**8.06**	**1.00**	**3.23**

Source: FFIEC File - 2020 Census; 1/1/2023 - 12/31/2025 Bank Data.
Due to rounding, totals may not equal 100.0%

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower **2023 - 2025**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Wichita MSA Partial	62	207	100.00	23.57	48.39	17.63	33.87	17.73	9.68	41.07	3.23	--	4.84
Total	**62**	**207**	**100.00**	**23.57**	**48.39**	**17.63**	**33.87**	**17.73**	**9.68**	**41.07**	**3.23**	**--**	**4.84**

Source: FFIEC File - 2020, 2024 Census; 1/1/2023 - 12/31/2025 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%