



**SMALL BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **PUBLIC DISCLOSURE**

**April 23, 2012**

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

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

500 Montgomery Square, 5th Street and D Avenue  
Lawton, OK 73501-0000

Office of the Comptroller of the Currency

ADC-OKLAHOMA CITY Field Office  
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, nor should it 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.

## ***INSTITUTION'S CRA RATING:***

**This institution is rated Satisfactory.**

The major factors supporting the institution's rating include the following;

- A substantial majority of the bank's loans were originated within the bank's assessment areas (AAs);
- The loan-to-deposit 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; and,
- The geographic distribution of loans reflects a reasonable dispersion throughout the AAs and meets the standard for satisfactory performance.

### ***SCOPE OF EXAMINATION***

To assess City National Bank's (CNB's) performance under the Community Reinvestment Act (CRA) regulations, we analyze the bank's activities in and around its declared assessment area (AA). We divided CNB's AA into four distinct areas for review. The Lawton Metropolitan Statistical Area (MSA) received a full scope review and the other AAs receiving a limited scope review. 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 contains 94 percent of the bank's loans and 84 percent of the bank's deposits. Limited scope reviews are targeted to specific products over a defined portion of the AA.

The full scope review of the Lawton MSA included a review of Home Mortgage Disclosure Act (HMDA) reportable loans (home purchase, home refinance, and home improvement loans) originated in 2009, 2010, and 2011, and small business loans and vehicle loans originated in 2010 and 2011. These are the major loan products for the bank. The three limited-scope AAs consist almost entirely of Wal-Mart branches in which the majority of lending is consumer loans. Lending performance in the three limited-scope AAs was evaluated by sampling vehicle loans originated in 2010 and 2011.

A Data Integrity examination was conducted in February 2012 to evaluate the bank's process to accurately collect and report HMDA data. We found 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.

## **DESCRIPTION OF INSTITUTION**

CNB is headquartered in Lawton, Oklahoma. J. R. Montgomery Bancorporation, a two-bank holding company, owns 100 percent of CNB and 100 percent of Fort Sill National Bank (FSNB). 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.

The main bank and drive-through facility is located at 500 Montgomery Square, 5<sup>th</sup> Street at D Avenue, Lawton, Oklahoma. Full-service branches with drive-through facilities are also located at 4113 W Gore Boulevard and at the Country Mart East grocery store, 4510 SE Lee Boulevard, both in Lawton, Oklahoma. Three additional locations in the Lawton community include branches located inside the Wal-Mart store at 1002 N Sheridan Road, inside the Country Mart West grocery store at 6734 W Cache Road and inside the Wal-Mart Super Center at 6301 NW Quanah Parker Trailway.

Three stand-alone branches with drive-through facilities are located at 5801 E 41<sup>st</sup> 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 twenty-six additional Wal-Mart Super Center or Wal-Mart Neighborhood Market branches located throughout the state of Oklahoma. Since the previous CRA evaluation, a few changes have taken place. The stand-alone branches on Santa Fe in Edmond and on Lewis Avenue in Tulsa were opened and a branch in Wal-Mart on Hillside in Broken Arrow was opened. The Wal-Mart branch at 1101 NW 164<sup>th</sup> was closed in January 2012. The table below depicts the Wal-Mart branch locations.

<b>City National Bank Wal-Mart Branch Locations</b>	
4000 Green Country Road	Bartlesville
10938 S Memorial Drive	Bixby
6310 S Elm Place	Broken Arrow
3900 E Hillside Drive	Broken Arrow
2001 S 1st Street	Chickasha
5401 Tinker Diagonal Street	Del City
1845 N Highway 81	Duncan
1225 W I-35 Frontage Road	Edmond
2400 S Country Club Road	El Reno
5505 W Owen K Garriott	Enid
12200 S Waco	Glenpool
1608 S Division	Guthrie
2415 N Main Street	Miami
9011 NE 23 <sup>rd</sup>	Midwest City
951 E State Hwy 152	Mustang

<b>City National Bank Wal-Mart Branch Locations (continued)</b>	
1500 SW 59th Street	Oklahoma City
2000 W Memorial Road	Oklahoma City
100 E I-240 Service Road	Oklahoma City
4420 S Western Avenue	Oklahoma City
9320 N Pennsylvania Avenue	Oklahoma City
1101 E Prospect Avenue	Ponca City
196 E Shawnee Mall Drive	Shawnee
3116 S Garnett Road	Tulsa
9411 S Delaware Avenue	Tulsa
6606 E 81st Street	Tulsa
6625 S Memorial Drive	Tulsa

CNB has forty-seven automated teller machines (ATMs) and seven leased ATMs dispersed at their branches, as well as other independent locations throughout the AAs. The only deposit taking ATM is located at the main bank location. Also available to CNB customers are eighteen fee-free FSNB ATMs located in Lawton and on the Fort Sill Army Base.

CNB's primary focus is to serve the commercial, consumer, 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, 2011, CNB's total assets equaled \$288 million, of which \$173 million or 60 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:

<b>Loan Category</b>	<b>\$ (000)</b>	<b>%</b>
Commercial Real Estate	\$69,815	40.36%
Residential Real Estate	\$68,157	39.40%
Commercial and Industrial	\$20,512	11.86%
Individual	\$11,073	6.40%
Agricultural	\$3,422	1.98%
<b>Total</b>	<b>\$172,979</b>	<b>100.00</b>

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 Community Reinvestment Act evaluation dated January 12, 2009.

## **DESCRIPTION OF ASSESSMENT AREAS**

Four AAs were considered in evaluating CNB’s CRA performance. These AAs are defined as the Lawton MSA, the Oklahoma City Partial MSA, the Tulsa Partial MSA, and CNB’s Non-MSA.

The full-scope Lawton MSA is comprised of Comanche County. Comanche County is the only county in the MSA. This AA encompasses 29 contiguous census tracts in southwestern Oklahoma. Based on 2000 data, the United States Census Bureau identifies 2 census tracts as low-income, 9 tracts as moderate-income, 13 tracts as middle-income, and 5 tracts as upper-income. The total population of the AA is 115 thousand. Additionally, there are 29 thousand families and 40 thousand households. The 29 thousand families statistically break into low; moderate; middle and upper incomes at 21 percent, 17 percent, 22 percent, and 40 percent, respectively. The AA contains 45 thousand housing units with 24 thousand or 53 percent being owner occupied. There is also a large volume of rental occupied units in the AA. Rental occupied units total 16 thousand and represent 35 percent of the available housing type. Households below the poverty level are 15 percent and households that receive public assistance total 6 percent. The main bank is located in a low-income census tract, the Country Mart West branch is in an upper-income census tract, and the other four Lawton branches are located in middle-income census tracts. The majority of the census tracts in the Lawton MSA AA are moderate- and middle-income census tracts. The following table describes major demographic and economic characteristics of the Lawton MSA AA, based on 2000 U.S. Census data.

<b>DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS OF LAWTON MSA AA</b>	
<b>Population</b>	
Number of Families	29,090
Number of Households	39,930
<b>Geographies</b>	
Number of Census Tracts	29
% Low-Income Census Tracts	6.90%
% Moderate-Income Census Tracts	31.03%
% Middle-Income Census Tracts	44.83%
% Upper-Income Census Tracts	17.24%
<b>Median Family Income (MFI)</b>	
2000 MFI for AA	\$40,049
2011 HUD-Adjusted MFI	\$51,900
<b>Economic Indicators</b>	
Unemployment Rate	3.31%
2000 Median Housing Value	\$68,895
% Of Households Below Poverty Level	15.39%

The local economy of Comanche County is stable. Growth and employment have been flat and real estate markets had slowed considerably in 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 Base, oil and gas and agricultural industries. The major employers in the Lawton MSA consist of Fort Sill Army Base, 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.

A community contact was conducted during this review to help ascertain the credit needs of the Lawton MSA AA. The contact felt that the local economy is stable. The local economy continues to benefit from some of the larger employers in the area, like Fort Sill Army Base 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 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 Partial MSA, the Tulsa Partial MSA, and CNB's 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 when the main bank location is closed. 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 Partial MSA AA includes four of the seven counties in the Oklahoma City MSA consisting of Oklahoma, Grady, Canadian, and Logan Counties. This AA encompasses 270 contiguous census tracts in central Oklahoma. Based on 2000 data, the United States Census Bureau identifies 22 census tracts as low-income, 91 tracts as moderate-income, 90 tracts as middle-income, 63 tracts as upper-income, and 4 tracts as not applicable.

The Tulsa Partial MSA AA includes two of the seven counties in the Tulsa MSA consisting of Tulsa and Wagoner Counties. This AA encompasses 191 contiguous census tracts in northeastern Oklahoma. Based on 2000 data, the United States Census Bureau identifies 7 census tracts as low-income, 45 tracts as moderate-income, 70 tracts as middle-income, and 69 tracts as upper-income. The total population of the AA is 621 thousand.

CNB's Non-MSA AA includes 6 non-contiguous counties within the state of Oklahoma. These include Stephens, Ottawa, Washington, Kay, Pottawatomie, and Garfield Counties. This AA encompasses 70 census tracts throughout Oklahoma. Based on 2000 data, the United States Census Bureau identifies no census tracts as low-income, 11 tracts as moderate-income, 44 tracts as middle-income, and 15 tracts as upper-income.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA**

This Performance Evaluation assesses CNB’s performance focusing primarily on five performance criteria: the loan-to-deposit ratio; lending in the assessment area; lending to borrowers of different incomes and to businesses of different sizes; geographic distribution of loans; and responses to CRA related complaints.

To evaluate CNB’s lending performance, the major loan products offered by the bank were evaluated. A random sample of 25 commercial loans and 122 vehicle loans that were originated in 2010 and 2011 were selected. All HMDA residential real estate loans originated in 2009, 2010 and 2011 were reviewed and analyzed. Based on the analysis and consistent with available resources and capabilities, CNB is meeting the credit needs of the assessment area in a satisfactory manner.

### **LOAN-TO-DEPOSIT RATIO**

CNB’s loan-to-deposit (LTD) ratio is reasonable and meets the standard for satisfactory performance. CNB’s LTD ratio at December 31, 2011 was 69 percent. CNB’s average quarterly LTD ratio from December 31, 2008 through December 31, 2011 is 72 percent. This average was compared to the average of four similar banks located in or near CNB’s AAs with total assets between \$200 million and \$600 million, for the same time period. These average LTD ratios are listed in the following table:

<b>Loan-To-Deposit Ratios</b>		
<b>Institution</b>	<b>Total Assets as of 12/31/11 (\$000’s)</b>	<b>Average LTD Ratio</b>
The First National Bank and Trust Co., Chickasha, OK	\$386,817	77.63%
<i>City National Bank &amp; Trust Company of Lawton, OK</i>	<i>\$287,660</i>	<i>71.75%</i>
The Citizens Bank of Edmond, OK	\$261,533	70.06%
Liberty National Bank, Lawton, OK	\$215,519	64.10%
First National Bank & Trust Company, Shawnee, OK	\$215,689	50.48%

*Source: Institution Reports of Condition from December 31, 2008 to December 31, 2011.*

### **LENDING IN ASSESSMENT AREA**

CNB’s lending in its AAs exceeds the standard for satisfactory performance. A substantial majority of the number and dollar amount of home mortgage, small business, and vehicle loans were originated within the bank’s AAs. This conclusion is based on the 564 HMDA residential real estate loans, 25 commercial loans, and the 122 vehicle loans as depicted in the following table.

<b>Lending in Assessment Areas</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	303	96.81%	10	3.19%	313	\$31,469	97.39%	\$843	2.61%	\$32,312
Home Improvement	112	87.50%	16	12.50%	128	\$1,591	87.18%	\$234	12.82%	\$1,825
Refinance	113	91.87%	10	8.13%	123	\$12,601	93.20%	\$919	6.80%	\$13,520
Small Business	24	96.00%	1	4.00%	25	\$2,596	98.72%	\$34	1.28%	\$2,630
Vehicle	104	85.25%	18	14.75%	122	\$1,370,576	87.56%	\$194,636	12.44%	\$1,565,212
<b>Totals</b>	656	92.26%	55	7.74%	711	\$1,418,833	87.83%	\$196,666	12.17%	\$1,615,449

Source: Data reported under HMDA; Loan Samples.

### **LENDING TO BORROWERS OF DIFFERENT INCOMES AND TO BUSINESSES OF DIFFERENT SIZES**

The overall borrower distribution of loans in the bank's AAs is reasonable and meets the standard for satisfactory performance. CNB's borrower distribution of small business loans, home mortgage loans and vehicle loans in the Lawton MSA AA is reasonable. A significant majority of the weight is given to lending performance in the Lawton MSA AA, as it represents 94 percent of the bank's lending. Consumer lending performance is illustrated in the following tables for the three limited-scope AAs to illustrate that the bank is meeting the consumer lending needs of low- to moderate-income borrowers in those communities

#### **Lawton MSA AA (Full-Scope AA)**

CNB's borrower distribution to businesses with revenues of \$1 million or less is reasonable. The percentage of bank loans by dollar and number exceeded the percentage of reporting businesses with revenues of \$1 million or less in the AA. However, our source data noted 36 percent of the businesses in the AA did not report income data.

<b>Borrower Distribution of Loans to Businesses in CNB's Lawton MSA AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	62.06%	2.17%	35.77%	100%
% of Bank Loans in AA by #	87.50%	12.50%	0.00%	100%
% of Bank Loans in AA by \$	81.24%	18.76%	0.00%	100%

Source: Loan sample; Dunn and Bradstreet data.



The bank's distribution of home mortgage loans is reasonable. While the percentage of home purchase and home refinance loans to low- and moderate-income borrowers is less than the percentage of low- and moderate-income families in the AA, this performance is not unreasonable in light of the fact that low- and moderate-income families have a difficult time qualifying for conventional home mortgage products. The distribution of home improvement loans to low-income borrowers is reasonable and the distribution to moderate-income borrowers is excellent and exceeds the percentage of moderate-income families in the AA.

<b>Borrower Distribution of Residential Real Estate Loans in CNB's Lawton MSA AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	20.53%	5.73%	17.07%	7.49%	22.19%	11.89%	40.21%	74.89%
Home Improvement	20.53%	13.46%	17.07%	26.92%	22.19%	23.08%	40.21%	36.54%
Home Refinance	20.53%	11.63%	17.07%	8.14%	22.19%	20.93%	40.21%	59.30%

Source: Data reported under HMDA; U.S. Census data.

CNB's distribution of vehicle loans is reasonable. The distribution of vehicle loans to low- and moderate-income borrowers exceeds the percentage of low- and moderate-income households in the AA.

<b>Borrower Distribution of Consumer Loans in CNB's Lawton MSA AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Vehicle	23.38%	29.03%	15.70%	29.03%	20.51%	32.36%	40.40%	9.68%

Source: Loan sample; U.S. Census data.

### **Oklahoma City Partial MSA AA, Tulsa Partial MSA AA & Non-MSA AA (Limited-Scope AAs)**

The bank's borrower distribution of vehicle loans is excellent. The percentage of vehicle loans to low- and moderate-income borrowers significantly exceeds the percentage of low- and moderate-income households in all three of the limited-scope AAs with the exception of vehicle loans to low-income borrowers in the Non-MSA AA. Please refer to the following tables for details.

<b>Borrower Distribution of Consumer Loans in CNB's Oklahoma City Partial MSA AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Vehicle	23.00%	43.75%	16.99%	31.25%	19.49%	21.88%	40.52%	3.13%

Source: Loan sample; U.S. Census data.

<b>Borrower Distribution of Consumer Loans in CNB's Tulsa Partial MSA AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Vehicle	22.27%	25.00%	16.48%	55.00%	19.48%	15.00%	41.41%	5.00%

Source: Loan sample; U.S. Census data.

<b>Borrower Distribution of Consumer Loans in CNB's Non-MSA AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Vehicle	22.49%	19.05%	16.55%	38.10%	19.09%	23.81%	41.87%	19.05%

Source: Loan sample; U.S. Census data.

## **GEOGRAPHIC DISTRIBUTION OF LOANS**

The overall geographic distribution of loans is reasonable and meets the standard for satisfactory performance. CNB's geographic distribution of small business, home mortgage, and vehicle loans in CNB's Lawton MSA AA is reasonable. CNB's geographic distribution of vehicle loans in the limited-scope AAs is provided in the following tables to illustrate that the bank is meeting the needs in low- and moderate-income geographies in those communities, although lending performance in the limited-scope AAs provides minimal weight in determining the bank's overall performance.

### **Lawton MSA AA (Full-Scope AA)**

The geographic distribution of small business loans is reasonable. The distribution of business loans located in low- and moderate-income census tracts is less than the percentage of small businesses located in those tracts, but considered near the ratio.

<b>Geographic Distribution of Loans to Businesses in CNB's Lawton MSA AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Small Business	8.46%	4.17%	21.17%	16.67%	54.86%	54.16%	15.51%	25.00%

Source: Loan sample; Dunn and Bradstreet data.

The geographic distribution of home mortgage loans in low-income tracts is not reasonable with no home improvement loans originated in low-income tracts. However, this is mitigated by the fact that owner occupied housing in low-income tracts is extremely low at 1.57 percent, making opportunities to extend home mortgage products limited in the two low-income tracts in the Lawton MSA. The geographic distribution of home mortgage loans in moderate-income tracts is more than reasonable as the percentage of loans originated exceeded the percentage of owner occupied housing in those tracts for all mortgage products.

<b>Geographic Distribution of Residential Real Estate Loans in CNB's Lawton MSA AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	1.57%	0.36%	15.78%	20.80%	64.80%	62.77%	17.85%	16.06%
Home Improvement	1.57%	0.00%	15.78%	26.79%	64.80%	57.14%	17.85%	16.07%
Home Refinance	1.57%	0.98%	15.78%	17.65%	64.80%	53.92%	17.85%	27.45%

Source: Data reported under HMDA; U.S. Census data.

The geographic distribution of vehicle loans in low-income tracts is not reasonable with no loans originated in low-income tracts. The distribution of vehicle loans in moderate-income tracts is reasonable as the percentage of loans made in moderate-income tracts exceeds the percentage of households in those tracts.

<b>Geographic Distribution of Consumer Loans in CNB's Lawton MSA AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Vehicle	2.48%	00.0%	21.31%	32.26%	61.46%	54.84%	14.75%	12.90%

Source: Loan sample; U.S. Census data.

**Oklahoma City Partial MSA, Tulsa Partial MSA & Non-MSA (Limited-Scope AAs)**

The bank’s geographic distribution of vehicle loans is reasonable for the limited scope AAs. The percentage of vehicle loans in low-income tracts is less than the percentage of households in those tracts for the Oklahoma City Partial and Tulsa Partial MSA AAs. There are no low-income tracts in the Non-MSA AA. The low-income tracts in the Oklahoma City and Tulsa MSA AAs are not in close proximity to the branch locations. The percentage of vehicle loans in moderate-income tracts exceeds the percentage of households in the Oklahoma City Partial and Non-MSA AAs. The percentage of vehicle loans in moderate-income tracts is less than the percentage of households in those tracts for the Tulsa Partial MSA AA. Please see the following tables for details.

<b>Geographic Distribution of Consumer Loans in CNB’s Oklahoma City Partial MSA AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Vehicle	3.73%	3.13%	32.01%	50.00%	36.21%	25.00%	28.00%	21.88%

*Source: Loan sample; U.S. Census data.*

<b>Geographic Distribution of Consumer Loans in CNB’s Tulsa Partial MSA AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Vehicle	2.43%	0.00%	21.98%	10.00%	42.01%	55.00%	33.58%	35.00%

*Source: Loan sample; U.S. Census data.*

<b>Geographic Distribution of Consumer Loans in CNB’s Non-MSA AA</b>								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Vehicle	0.00%	0.00%	12.72%	19.05%	60.13%	66.67%	27.15%	14.29%

*Source: Loan sample; U.S. Census data.*

**Responses to Complaints**

There have been no consumer complaints regarding the CNB’s Community Reinvestment Act performance during the evaluation period.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.