



PUBLIC DISCLOSURE

February 24, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Community National Bank & Trust
Charter Number 21389

14 North Lincoln
Chanute, KS 66720

Office of the Comptroller of the Currency

2959 N. Rock Road, Suite 510
Wichita, KS 67226

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 Outstanding.

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

- Community National Bank and Trust's (CNB) average loan-to-deposit ratio reflects more than reasonable responsiveness to the credit needs of its assessment areas (AAs).
- CNB extended the majority of its primary loan product to businesses in the AAs. The loan sample indicates that 85 percent of the number and 78 percent of the dollar volume of commercial loans were granted within the AAs.
- CNB demonstrated excellent penetration to businesses of different sizes in the AAs. The loan samples indicate the bank's lending to businesses with annual gross revenues less than or equal to \$1 million was at or above the census demographics for the AA.
- CNB demonstrated excellent dispersion to businesses in moderate-income census tracts. The loan samples indicate the bank's lending to businesses located in moderate-income census tracts was at or above the census demographics for the AA.
- CNB demonstrated excellent responsiveness to community development needs. CNB's level of community development lending is excellent and represents 37 percent of Tier One Capital.

Scope of Examination

We evaluated CNB using Intermediate/Small Bank examination procedures, which include a lending test and a community development test. Two of the bank's AAs were selected for a full-scope review, the Butler/Harvey County AA and the Rural Kansas AA. Cowley County will receive a limited-scope review for 2011. There is insufficient data to evaluate the 2011 Marion County AA.

The 2013 Rural Kansas AA is the bank's primary assessment area and will be the primary consideration in the bank's overall CRA rating. The 2013 Rural Kansas AA contains 91 percent of the bank's deposits and 85 percent of the bank's branches. Banking locations in the Rural Kansas AA originated 87 percent of the bank's total loans extended during 2011, 2012, and 2013.

CNB's primary lending focus is on business loans. They comprise 61 percent of all loans originated in 2011, 2012, and 2013. The evaluation periods for loans originated by CNB were January 1, 2011 to December 31, 2011, and January 1, 2012 through December 31, 2013. The 2000 U. S. Census demographics will be used to evaluate 2011 lending performance while demographics from the 2010 U. S. Census will be used to evaluate 2012/2013 lending performance.

The evaluation of lending products was performed using a numerical sample of twenty business loans originated in each of the bank's AAs for the year 2011, with the exception of Marion County where agriculture loans were the primary lending product. A numerical sample of twenty business loans was also selected from each AA for the 2012/2013 evaluation period.

The community development test included a review of community development loans, qualified investments and donations, and community development services. The evaluation period for community development activities was February 9, 2010 through March 10, 2014.

Description of Institution

CNB is an \$839 million financial institution headquartered in Chanute, Kansas. CNB is a wholly owned subsidiary of Community Bancorp, Incorporated, a one-bank holding company with \$75 million in assets as of December 31, 2013.

CNB is a full-service financial institution offering a variety of loan and deposit products. As of December 31, 2013, CNB's \$532 million loan portfolio consists of 67 percent real estate loans; 15 percent commercial and industrial loans; seven percent agricultural loans; four percent municipal loans; four percent consumer loans; two percent lease financing receivables; and one percent other loans. CNB's Tier One Capital totals \$66 million as of December 31, 2013.

CNB operates 26 branches (including the main branch) and 29 ATMs in several institutions throughout southeastern and south central Kansas. One branch is in a low-income census tract and three are in moderate-income tracts. Similarly, one ATM is located in a low-income census tract and three are in moderate-income tracts. Since the last CRA examination, CNB opened new branches in Arkansas City, Arma, and Newton, Kansas. As of December 31, 2013, the bank has eight of its 26 branches, or 31 percent, located in agency designated distressed or underserved nonmetropolitan middle-income tracts.

No legal, financial, or other matters impede CNB's ability to meet the credit needs of its AAs. The Office of the Comptroller of the Currency last evaluated CNB's CRA performance on February 10, 2010. CNB received an overall rating of "Satisfactory" under the Intermediate/Small Bank Performance Standards.

Description of Assessment Areas

Rural Kansas AA

The 2013 Rural Kansas AA is comprised of 14 contiguous counties in south central and southeast Kansas. The AA is located in a rural non-Metropolitan Statistical Area. The following counties constitute the bank's 2013 Rural Kansas AA: Allen, Anderson, Chase, Chautauqua, Cowley, Crawford, Elk, Greenwood, Labette, Marion, Montgomery, Neosho, Wilson, and Woodson. The 2013 AA contains one low-income, 10 moderate-income, 56 middle-income, and four high-income tracts. Three counties in the 2013 AA are identified as nonmetropolitan middle-income distressed or underserved counties. These counties are Allen, Wilson, and Woodson.

During 2011, the AA consisted of only nine counties. The AA did not include Chase, Chautauqua, or Elk Counties. Cowley and Marion Counties were considered two separate assessment areas, as they were not adjoining the nine contiguous counties. At the beginning of 2012, Chase, Chautauqua, and Elk Counties were added to the bank's service area, creating a contiguous fourteen county assessment area that also encompassed Cowley and Marion Counties.

The tables below depict various demographic fluctuations in the bank's Rural Kansas AA, with the 2000 Census reflecting nine counties and the 2010 Census reflecting 14 counties.

Demographic Information for Full Scope Area: Rural Kansas AA – 2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	53	0.00	15.09	83.02	1.89	0.00
Population by Geography	158,614	0.00	10.57	85.22	4.21	0.00
Owner-Occupied Housing by Geography	46,365	0.00	9.49	87.78	2.73	0.00
Business by Geography	15,754	0.00	10.31	86.32	3.37	0.00
Farms by Geography	1,397	0.00	8.80	89.70	1.50	0.00
Family Distribution by Income Level	42,744	21.23	21.70	25.35	31.72	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	18,350	0.00	13.56	84.17	2.27	0.00
Median Family Income		\$38,804	Median Housing Value			\$49,126
HUD Adjusted Median Family Income for 2011		\$53,700	Households Below Poverty Level			14.18%

(* The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Rural Kansas AA – 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	71	1.41	14.08	78.88	5.63	0.00
Population by Geography	211,916	0.60	12.09	78.89	8.42	0.00
Owner-Occupied Housing by Geography	62,793	0.56	10.05	81.62	7.77	0.00
Business by Geography	15,636	0.74	13.85	78.23	7.18	0.00
Farms by Geography	2,567	0.04	7.17	88.31	4.48	0.00
Family Distribution by Income Level	56,347	19.94	19.78	23.39	36.89	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	22,384	1.03	15.44	78.44	5.09	0.00
Median Family Income		\$50,652	Median Housing Value			\$71,729
HUD Adjusted Median Family Income for 2013		\$55,200	Households Below Poverty Level			14.85%

(* The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

As with many rural areas, southeast Kansas faces economic challenges; however, the October 2013 economic analysis for Kansas prepared by Moody’s Analytics indicates the Kansas economy will continue to expand through 2013 and beyond. While much of the bank’s AA is reliant upon farming and cattle operations, agricultural operators in the bank’s AA have fared better than operators in western counties of Kansas, which experienced extreme drought conditions. Governments, education and health services,

professional services, and retail establishments provide the AA with other significant employment opportunities.

As of December 2013, the unemployment rate for the various counties in the AA range from 2.9 percent for Chase County to 6.6 percent for Labette and Wilson Counties. Most of the counties in the AA had unemployment rates below the national rate of 6.5 percent. The State of Kansas unemployment rate for the same period was 4.6 percent.

December 2013 Unemployment Rates for Rural Kansas Assessment Area

<u>County</u>	<u>Rate</u>	<u>County</u>	<u>Rate</u>	<u>County</u>	<u>Rate</u>
Allen	4.4%	Crawford	4.7%	Montgomery	5.5%
Anderson	4.9%	Elk	4.4%	Neosho	6.2%
Chase	2.9%	Greenwood	4.4%	Wilson	6.6%
Chautauqua	5.0%	Labette	6.6%	Woodson	5.2%
Cowley	4.9%	Marion	3.8%		

Source: Labor Market Information Services, Kansas Dept. of Labor in cooperation with BLS, U.S. Dept. of Labor

CNB operates 22 branches and 26 ATMs in the Rural Kansas AA. There are approximately 50 other FDIC insured financial institutions with 137 offices represented in the AA, providing strong competition. A review of the FDIC’s June 30, 2013 Summary of Deposits Market Share Report shows that CNB ranks first with a deposit-market share of 15 percent. The institution with second largest deposit market share has six percent and operates eight branches in the AA.

Butler/Harvey County AA

The 2013 Butler/Harvey County AA consists of Butler and Harvey Counties. For the 2011 evaluation period, Butler County was the only county comprising the AA. Harvey County is included in the 2012/ 2013 analysis as CNB opened a branch in Newton in December 2012. Butler and Harvey County are both part of the Wichita Metropolitan Statistical Area (MSA). The 2013 AA consists of four moderate-income, eleven middle-income, and four high-income census tracts. There are no low-income census tracts within this AA.

While Harvey County consists entirely of middle-income census tracts, the 2010 U.S. Census increased Butler County’s number of moderate-income tracts increased by three. There are no low-income census tracts within this AA. Other examples of demographic fluctuations can be identified by comparing the tables below.

Demographic Information for Full Scope Area: Butler County AA – 2000 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	13	0.00	7.69	61.54	30.77	0.00
Population by Geography	59,482	0.00	4.43	66.61	28.96	0.00
Owner-Occupied Housing by Geography	16,724	0.00	3.33	67.17	29.50	0.00
Business by Geography	6,366	0.00	7.56	57.54	34.90	0.00
Farms by Geography	403	0.00	1.24	72.95	25.81	0.00
Family Distribution by Income Level	16,218	16.72	18.56	23.84	40.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	5,722	0.000	6.62	72.71	20.67	0.00
Median Family Income		\$54,254	Median Housing Value			\$82,572
HUD Adjusted Median Family Income for 2011		\$64,100	Households Below Poverty Level			7.51%

(* The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

Demographic Information for Full Scope Area: Butler/Harvey County AA – 2010 Census						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0.00	21.05	57.90	21.05	0.00
Population by Geography	100,564	0.00	15.03	62.98	21.99	0.00
Owner-Occupied Housing by Geography	28,475	0.00	13.57	63.50	22.93	0.00
Business by Geography	7,093	0.00	16.81	60.31	22.88	0.00
Farms by Geography	805	0.00	2.36	84.72	12.92	0.00
Family Distribution by Income Level	26,959	16.23	19.76	22.57	41.44	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	9,702	0.00	23.34	62.88	13.78	0.00
Median Family Income		\$64,507	Median Housing Value			\$112,999
HUD Adjusted Median Family Income for 2013		\$63,200	Households Below Poverty Level			7.94%

(* The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2013 HUD updated MFI

The Butler/Harvey AA is a mix of urban and rural communities. The largest cities in the AA include Newton, El Dorado, Andover, and Augusta. These cities are located within a reasonable commuting distance to Wichita, less than thirty-five miles. Due to proximity, the AA's economy is closely linked to Wichita's economy. The October 2013 economic analysis for Wichita prepared by Moody's Analytics indicates the Wichita economy is recovering slowly from the recent depression. Much of the recovery will depend on the

unpredictable growth of the aerospace industry, and the state's largest industry, healthcare. On a positive note, housing permits are rising and affordability will attract more first-time buyers.

Significant employers in Wichita include Cessna Aircraft Company, Spirit Aerosystems, Incorporated, Hawker Beechcraft, Via Christi Regional Medical Center, McConnell Air Force Base, Bombardier Aerospace, and Koch Industries. Each of these employers provides from 2,000 to 11,000 full-time jobs. Companies such as AGCO Corporation, Johnsons Controls (York International), Cox Communications, and Cargill Meat Solutions (each employing over 800 individuals) provide some business diversity.

The December 2013 unemployment rate for Butler and Harvey Counties was 5.0 percent and 4.3 percent, respectively. These levels were consistent with levels for the State of Kansas at 4.6 percent, but lower than the national rate of 6.5 percent.

CNB operates four branches and three ATMs in the Butler/Harvey AA. As of June 30, 2013, there were approximately 23 other FDIC insured financial institutions with 51 offices in the AA. Competition in this AA is very strong. The institution with the largest share had 12 percent of deposits in the AA, while the market shares for the top ten institutions aggregated to 76 percent. As of June 30, 2013, CNB had the eleventh largest market share of deposits in the AA with four percent of deposits.

Based on community contacts with local organizations in both of CNB's AAs, the primary credit needs are loans for small/start-up businesses and affordable housing programs. Contacts generally feel the local banks are all active in meeting these credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Performance for CNB under the Lending Test is rated Outstanding.

Loan-to-Deposit Ratio

CNB's level of lending is more than reasonable. The bank's average quarterly loan to deposit ratio since the last CRA examination is 75 percent compared to 66 percent for the bank's primary competitors. The average quarterly loan to deposit ratio for competitor banks ranges from 39 percent in a small one-branch community bank, to 100 percent for a multi-regional competitor.

Lending in Assessment Area

CNB extended the majority of commercial loan products to businesses inside the AA. The sample included 20 commercial loans originated or purchased from January 1, 2011 through December 31, 2013. The loan sample indicates that CNB granted 85 percent of the number and 78 percent of the dollar volume of loans within the AA. CNB has several branches lying in close proximity to the Kansas/Oklahoma border. Of the three loans granted outside CNB's AAs, two of them were granted to borrowers in the bank's Oklahoma service area.

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

CNB's overall lending performance reflects excellent penetration to businesses of different sizes.

Lending to Businesses of Different Size in the Rural Kansas AA

During the evaluation period of 2011, CNB's commercial lending performance reflects reasonable penetration to businesses of different sizes in the Rural Kansas AA. The loan sample indicates that CNB originated 70 percent of the number of loans to businesses with gross revenues of less than or equal to \$1 million. This level of lending is very near the demographic data, which reflect that the number of businesses with gross revenues less than or equal to \$1 million represents 71 percent of all businesses in the AA.

2011 Borrower Distribution to Businesses in Rural Kansas AA				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	71%	2%	27%	100%
% of Bank Loans in AA by #	70%	15%	15%	100%

During the 2012/2013 evaluation period, CNB's lending performance reflects excellent penetration to businesses of different sizes in the Rural Kansas AA. The loan sample indicates that CNB originated 75 percent of the number of loans in the Rural Kansas AA to businesses with gross revenues of less than or equal to \$1 million. This exceeds the demographic data, as the number of businesses with gross revenues less than or equal to \$1 million represents 72 percent of all businesses in the AA.

2012/2013 Borrower Distribution to Businesses in Rural Kansas AA				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	72%	4%	24%	100%
% of Bank Loans in AA by #	75%	20%	5%	100%

Lending to Businesses of Different Size in the Butler/Harvey AA

The AA consisted of a single county during 2011, Butler County. CNB’s lending in 2011 demonstrates excellent penetration. The loan sample indicates that CNB originated 80 percent of the number of loans in the Butler County AA to businesses with revenues of less than or equal to \$1 million. This exceeds the demographic data, as the number of businesses with gross revenues of less than or equal to \$1 million represents 72 percent of all businesses in the AA.

2011 Borrower Distribution to Businesses in the Butler County AA				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	72%	2%	26%	100%
% of Bank Loans in AA by #	80%	10%	10%	100%

During 2012/2013, the AA consisted of two counties, Butler and Harvey. CNB’s lending in the Butler/Harvey County AA demonstrates reasonable penetration. The loan sample indicates that CNB originated 65 percent of the number of loans in the AA to businesses with gross revenues of less than or equal to \$1 million. This is near the demographic data, as the number of businesses with gross revenues less than or equal to \$1 million represents 74 percent of all businesses in the AA.

2012/2013 Borrower Distribution to Businesses in Butler/Harvey County AA				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	74%	3%	23%	100%
% of Bank Loans in AA by #	65%	25%	10%	100%

Based on a limited-scope review, 2011 performance in the Cowley County AA is not inconsistent with performance in the AAs receiving full-scope reviews. There was insufficient data to conclude on the 2011 performance of the Marion County AA.

Geographic Distribution of Loans

CNB’s overall lending performance reflects excellent dispersion to businesses located in low- and moderate-income census tracts.

Geographic Distribution of Loans in the Rural Kansas AA

For the evaluation period of 2011, CNB’s lending dispersion to businesses in low- and moderate-income census tracts is reasonable. CNB extended five percent of the number of loans to businesses located in moderate-income census tracts. This is lower than the demographic data of 10 percent; however, positive consideration is afforded the bank since the sample only covers a one-year time period. The standard evaluation period is three years and the bank’s performance improves significantly in the

2012/2013 evaluation period. As of the 2000 U.S. Census, the Rural Kansas AA contained no low-income census tracts.

2011 Geographic Distribution of Commercial Loans in the Rural Kansas AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% 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
% of Total	0%	0%	10%	5%	86%	95%	4%	0%

For the evaluation period 2012/2013, CNB’s lending dispersion to businesses in low- and moderate-income census tracts is excellent. CNB extended 20 percent of the number of loans to businesses located in moderate-income census tracts. This exceeds the demographic data of 14 percent. CNB’s lending opportunities in the one low-income census tract are minimal. A railroad bisects the census tract and much of the tract is undeveloped.

2012/2013 Geographic Distribution of Commercial Loans in the Rural Kansas AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% 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
% of Total	1%	0%	14%	20%	79%	75%	7%	5%

Geographic Distribution of Loans in the Butler County AA

For the evaluation period 2011, CNB’s lending dispersion to businesses in the one moderate-income census tract is reasonable. CNB extended five percent of the number of loans to businesses located in the moderate-income census tract. This is near the demographic of eight percent. As of the 2000 U.S. Census, there were no low-income census tracts in the Butler County AA.

2011 Geographic Distribution of Commercial Loans in the Butler County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% 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
% of Total	0%	0%	8%	5%	57%	70%	35%	25%

For the 2012/2013 evaluation period, CNB’s lending dispersion to businesses in moderate-income census tracts in the Butler/Harvey AA is excellent. CNB extended 25 percent of the number of loans to businesses located in moderate-income census tracts. This significantly exceeds the demographic data of 17 percent. The bank’s performance in this period is commendable since the number of moderate-income tracts increased by three subsequent to the 2010 U.S. Census.

2012/2013 Geographic Distribution of Commercial Loans in the Butler/Harvey County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% 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
% of Total	0%	0%	17%	25%	60%	55%	23%	20%

Responses to Complaints

CNB has not received any CRA-related complaints since the last CRA examination.

COMMUNITY DEVELOPMENT TEST

Performance for CNB under the community development test is rated Outstanding.

Rural Kansas AA

Community Development Loans

CNB's volume and quality of community development loans demonstrated excellent responsiveness to the community development needs in the bank's Rural Kansas AA.

During the evaluation period, CNB originated 55 community development loans totaling \$24.5 million. This level of community development lending represents approximately 37 percent of the bank's December 31, 2013 Tier One Capital. The primary purpose of CNB's community development loans was to support affordable housing, support providers of affordable health care for LMI individuals, or to support employment for LMI individuals by lending to businesses meeting the definition of small businesses.

Significant qualified loans originated within the AA during the evaluation period are listed below:

- \$3.3 million to provide affordable housing for LMI individuals in Winfield, Kansas
- \$2.3 million to provide affordable housing in Pittsburg, Kansas
- \$1.6 million to a small business in Montgomery County, Kansas to support LMI employment
- \$1.4 million to support a water development project located in moderate-income and distressed or underserved middle-income tracts in southeast Kansas
- \$1 million to support a medical facility with a majority of patients under the federal poverty income threshold

Qualified Investments

CNB's volume and quality of community development investments demonstrated satisfactory responsiveness to the community development needs in the bank's Rural Kansas AA.

During the evaluation period, CNB initiated three community development investments totaling \$435 thousand. The bank retains \$120 thousand on its books from prior evaluation periods, for total investments of \$555 thousand. CNB also had qualifying charitable contributions of \$19 thousand. These investments and contributions represent approximately one percent of the bank's December 31, 2013 Tier One Capital. The primary purpose of CNB's community development investments was to support the availability of medical services in Allen County, a distressed and underserved nonmetropolitan middle-income geography.

Significant qualified donations occurring within the AA during the evaluation period are listed below:

- Donation of \$5 thousand to an education foundation supporting LMI students.
- Donation of \$5 thousand to a foundation supporting economic revitalization in a distressed and underserved nonmetropolitan middle-income county.
- Donation of \$1 thousand to a southeast Kansas food bank.

Community Development Services

CNB provided an excellent level of community development services to the Rural Kansas AA during the evaluation period.

CNB provided approximately 1,900 hours of service to support approximately twenty community service organizations that have various mission statements. Senior officers from CNB provided financial knowledge and services to community organizations that have community development purposes. The following are examples that demonstrate how bank associates used their financial expertise to assist these organizations:

- Bank employees serve on the financial and homeowner financial training committees for a low-income housing organization.
- Bank employees serve on the executive committee for an organization that promotes economic development.
- Bank employee serves on a housing Board reviewing low-income housing grant applications.
- Numerous bank employees provided financial education to youths from LMI families, including an innovative Bank at School program with mobile banking equipment.
- Bank employee serves as advisory board member for small business start-up fund.

Butler County AA

The bank's performance for community development activities in this AA is rated Needs To Improve.

CNB documented very limited community development activity in the Butler/Harvey AA. The AA represents a minor portion of the bank's wide geographic coverage. The bank has a limited presence in the Butler/Harvey AA. Additionally, there are significantly fewer needs and opportunities in the Butler/Harvey AA than in the bank's primary AA. CNB provided \$200 in charitable contributions and sixty hours of community development service on the board for Tri-County CASA, Inc. This organization provides trained court appointed volunteer counselors for abused LMI children in Butler, Elk, and Greenwood Counties.

Responsiveness to Community Development Needs

CNB's volume and quality of community development activities demonstrated excellent responsiveness to the community development needs in the bank's AAs.

Management identified the bank's primary AA as having the greatest community development needs; thus, a significant majority of the bank's activities was concentrated in these rural Kansas counties. CNB's management has a good understanding of the types of activities that meet the definition of community development.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any AA by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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