

City  
BANK & TRUST COMPANY

---

November 30, 2017

To Whom It May Concern:

Pursuant to the notice from the Oklahoma State Banking Department regarding the Appraiser Waiver Request Process, we are requesting a temporary waiver of the appraiser certification and licensing requirements.

Our bank is located in Guymon, Oklahoma, in the center of the Oklahoma Panhandle. Guymon is located in Texas County. The other two (2) counties in the panhandle are Beaver County to the East and Cimarron County to the West. In comparison to the rest of the state we have a relatively sparse population. Our lending and trust management pertaining to real estate is primarily conducted in Texas County and to a lesser degree in the other two (2) panhandle counties.

There are presently six (6) licensed appraisers (see attached) in the Oklahoma panhandle. Of the six one is a trainee, two are certified general, and the other three are listed as State Licensed or Certified Residential appraisers. Of the two Certified General appraisers, the one we consider competent to do acceptable work has taken up to 8 months to produce appraisals for our trust properties and is not useful to us when considering commercial loan requests due to the length of time to produce an appraisal. This individual often declines appraisal requests. We are uncomfortable with the presentation and results of the other general appraiser. As a result we then have to obtain commercial appraisals from appraisers in Liberal, Kansas or Amarillo, Texas both well out of our area, and therefore unfamiliar with our area market. In both instances the cost is excessive and delays in obtaining the appraisals are similar to the other Oklahoma appraisers.

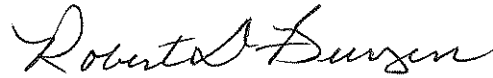
Our bank has on staff an individual who has maintained a Certified Residential Appraiser license until April 2017. This individual has provided acceptable appraisals and evaluations for the past 20 + years. He determined to allow his license to expire due to the rather burdensome CE requirements and the distance to and from approved courses within the state.

With the educational requirements, training process, number of hours required by the state, there is very little incentive for an individual to pursue obtaining an appraisal license. Most people cannot afford the time it takes to become licensed. Additionally, it is more difficult to find people in the Oklahoma Panhandle desiring to spend the time and effort to conduct appraisals in this sparsely populated part of the state.

Speaking for our bank in particular, we believe we have staff in the bank with lengthy experience in knowing our community. They have a good understanding of our local market, develop and document values and trends on an ongoing basis and are competent to produce evaluations and appraisals sufficient in nature to assure reliable valuations of real properties.

Therefore, we respectfully request that we be considered for a temporary waiver pertaining to the certification and licensing requirements.

Sincerely,

A handwritten signature in cursive script that reads "Robert D. Burgess". The signature is written in black ink and is positioned below the word "Sincerely,".

Robert D. Burgess, VP