



PUBLIC DISCLOSURE

MARCH 31, 2014

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**COMMERCE BANK
RSSD# 601050**

**1000 WALNUT STREET
KANSAS CITY, MISSOURI 64106**

**Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198**

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.

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INSTITUTION COMMUNITY REINVESTMENT ACT RATING

Community Reinvestment Act (CRA) RATING: Commerce Bank is rated "**Outstanding**"

The following table indicates the performance level of Commerce Bank (the bank) with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	X
High Satisfactory	X		
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			
* The lending test is weighted more heavily than the investment and service tests in determining the overall rating.			

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors supporting the institution's rating include:

- The bank is a leader in community development lending in most areas served.
- The bank's level of qualified community development investments is excellent.
- The bank is a leader in providing community development services in most areas served.
- A high percentage of loans were originated within the bank's designated AAs.
- The geographic distribution of home mortgage, business, and farm loans is considered adequate or good in most AAs.
- The distribution of loans among individuals of different income levels and businesses and farms of different revenue sizes is considered adequate.
- Delivery systems are accessible to geographies and individuals of different income levels.
- Products, services, and hours do not vary significantly by branch location and do not hinder access in any geographies or by individuals of different income levels.

DESCRIPTION OF INSTITUTION

The bank is a full-service interstate financial institution offering a wide variety of commercial and retail products and services. The bank became a Federal Reserve member bank on June 29, 2011. The bank is a wholly-owned subsidiary of Commerce Bancshares, Inc. (CBI). Both have their headquarters in Kansas City, Missouri. In addition to its head office, the bank had 200 branches in five states as of December 31, 2013, and total assets equaled \$22.9 billion. The last examination was conducted by the Federal Reserve Bank of Kansas City (Reserve Bank) on January 9, 2012.

Affiliated companies included in this evaluation include Capital for Business, Inc. (CFB), and Commerce Mortgage Corporation (CMC). CFB is a venture capital subsidiary of CBI that owns two Small Business Investment Companies (SBICs) that partner with other investors to provide financing to small businesses for expansion and operating expenses. CMC, a wholly-owned subsidiary of the bank, is a mortgage loan originator and servicer. Community development investments and residential mortgage loans held by these affiliates are included in the analysis of the bank's CRA performance.

The bank's loan mix as of December 31, 2013, is provided in Table 1. Commercial loans constitute the largest percentage of the bank's loan portfolio. Residential real estate loans constitute the second largest loan product, and the figure below is somewhat understated, as the majority of residential mortgage loans are sold into the secondary market.

TABLE 1 LOAN PORTFOLIO DECEMBER 31, 2013		
Loan Type	Amount \$(000)	Percent of Total
Commercial	4,930,277	44.9
Residential Real Estate	2,492,564	22.8
Consumer	2,023,964	18.5
Other	1,232,556	11.3
Agricultural	278,293	2.5
Gross Loans	10,957,654	100.0

The bank had 27 defined AAs at the last evaluation. Since the last examination, one AA has been added – the Oklahoma City Metropolitan Statistical Area (MSA) AA. However, this new AA was not subject to review at this examination since it was part of the bank for only one calendar quarter during the review period.

In 2013, the Office of Management and Budget (OMB) defined additional Combined Statistical Areas (CSAs) nationwide. As a result, seven of the bank's AAs were combined to form three CSAs. The Kansas City, Missouri-Kansas MSA, the Lawrence, Kansas MSA, and the St. Joseph, Missouri MSA were combined to form the Kansas City, Missouri-Kansas CSA. The

Columbia, Missouri MSA was combined with the adjacent Mexico/Moberly nonmetropolitan area and the Springfield, Missouri MSA was combined with the adjacent nonmetropolitan Branson area.

Due to the combining of CSA AAs, the number of current bank AAs equals 24, with 23 subject to review at this evaluation. The bank's AAs are located in Missouri, Kansas, Illinois, Colorado, and Oklahoma. In addition to the multistate Kansas City CSA and St. Louis MSA AAs, there were 12 other MSAs subject to this review, which included five in Missouri (Cape Girardeau, Columbia, Jefferson City, Joplin, and Springfield), two in Kansas (Manhattan and Wichita), three in Illinois (Bloomington, Champaign, and Peoria), and the Denver, Colorado MSA and the Tulsa, Oklahoma MSA. There are nine nonmetropolitan AAs, with five in Missouri and four in Kansas.

As of June 30, 2013, 68.2 percent of the bank's total deposits were attributed to the multistate Kansas City CSA and St. Louis MSA AAs. The rest of the state of Missouri and Kansas, outside the multistate CSA/MSA areas, constituted the next biggest market areas for the bank, with 14.9 percent and 9.6 percent of total deposits, respectively. Illinois is next with 5.5 percent, and the Denver and Tulsa markets each have less than 1.0 percent of total bank deposits. In determining the overall examination rating, the AAs were weighted accordingly.

**TABLE 2
BRANCH OPENINGS AND CLOSINGS**

As of 12/31/2013 Assessment Area	# of Bank Branches	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp			Low	Mod	Mid	Upp
Kansas City MO-KS CSA	56	4	13	17	22	2	1		-1	-1	1
St. Louis MO-IL MSA	51	4	5	15	27	1	2				-1 / +2
Springfield MO CSA	13	1	3	7	2	1				-1	
Columbia MO CSA	13	2	4	4	3	1	2		-1	2	
MO MSA Lmt'd Rev AAs	9	0	1	7	1	1				-1	
Rural MO Lmt'd Rev AAs	12	0	1	10	1						
Wichita KS MSA	12	3	3	1	5						
KS MSA Lmt'd Rev AA	3	0	1	2	0						
Rural KS Lmt'd Rev AAs	12	0	1	7	4	2	1			-2 / +1	
Peoria IL MSA	7	1	1	3	2	1				-1	
IL MSA Lmt'd Rev AAs	7	1	0	5	1						
Denver CO MSA	2	1	1	0	0		1		1		
Tulsa OK MSA	3	0	0	0	3		1				1
OK City MSA (no review)	1	0	0	1	0		1			1	
Totals	201	17	34	79	71	9	9		-1	-2	3

Since the last evaluation, the bank has added nine branches and closed nine branches, several of which were relocations. The branch openings and closings did not significantly

impact any specific AA or low- or moderate-income (LMI) tracts. Table 2 illustrates the branch changes.

There are no legal or financial constraints impeding the bank's ability to help meet the credit needs in its AAs.

SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the lending, investment, and service tests, as defined under the Federal Financial Institutions Examination Council's Interagency CRA Procedures for Large Institutions. Loan products evaluated included all residential mortgage loans reported on the Home Mortgage Disclosure Act (HMDA) Loan/Application Register (LAR); small business (SB) and small farm (SF) loans reported on the CRA LAR, which includes all business loans in amounts less than \$1 million and all farm loans in amounts less than \$500,000, and all loans qualifying as community development loans, per CRA guidelines. The bank's primary lending focus is commercial lending, with significant focus also in residential real estate lending and consumer lending. For the lending test, the greatest emphasis is placed on the bank's business lending, as these loans comprise nearly half of the bank's loan portfolio. Significant weight is also placed on residential real estate lending.

The evaluation period for HMDA and CRA LAR loans, as well as all community development activities, was January 1, 2011 through December 31, 2013. The number of reported loans in several AAs for multifamily home mortgage loans and farm loans was insufficient to conduct a meaningful analysis, and are thus not given much weight in the overall evaluation.

The geographic distribution analysis was based on the bank's penetration within different geographic income categories. The borrower distribution analysis was based on the bank's penetration to individuals of different income categories, and to businesses and farms of different sizes, particularly those with gross annual revenues under \$1 million.

For 2011 loans, geography income classifications were based on 2000 Census data. For 2012 and 2013 loans, income classifications were based on 2006-2010 American Community Survey (ACS) data. For all years reviewed, the 2013 OMB CSA designations are utilized.

For the evaluation of borrower characteristics, borrower income classifications were based on the applicable year's estimated median family income (MFI) from the U.S. Department of Housing and Urban Development for the applicable MSA or statewide nonMSA area.

For evaluative purposes, the bank's performance was compared with applicable area demographic data based on 2000 Census data for 2011 loans, 2006-2010 ACS data for 2012/2013 loans, and the applicable year's Dun & Bradstreet (D&B) business and farm data. Comparisons were also made with 2011 and 2012 aggregate lending data reported by all HMDA and CRA reporters with loan originations within the bank's AAs. (Note: 2013 aggregate data was not yet available at the time of the examination.)

Under the CRA, a financial institution's performance is evaluated within the context of each delineated AA and within each state in which it operates. Each multistate CSA/MSA and each state must be assigned an individual rating, and an overall rating is assigned for the bank. This review covers 23 AAs, listed in Appendix A, which are discussed separately throughout this Performance Evaluation. The bank's two multistate CSA/MSA AAs and at least one MSA AA in each state were evaluated using full review examination procedures. Other MSA AAs and all nonmetropolitan AAs in Missouri and Kansas were evaluated using limited scope examination procedures.

Interviews with members of the communities within the bank's AAs were utilized to ascertain the credit needs of the communities, the responsiveness of area banks to those credit needs, the availability of community development opportunities, and local economic conditions.

PERFORMANCE TEST CONCLUSIONS

The bank's overall rating and conclusions were based on its performance in each individual AA, with the greatest weight placed on the Kansas City and St. Louis multistate CSA/MSA AAs, followed by the overall state of Missouri and the overall state of Kansas. Business loans were generally given greater weight, followed by residential mortgage loans, with farm loans given far less weight and were not applicable in some AAs. The bank's performance for 2012 is discussed more in depth within each AA analysis in this Performance Evaluation, and includes figures to demonstrate the bank's lending performance as well as comparison with aggregate figures and demographic data. The bank's lending distribution performances for 2011 and 2013 were considered, but will not be discussed in depth, except for outlier situations. All applicable figures for 2013 are provided in the tables in Appendix D.

LENDING TEST

The bank's overall record of meeting its AAs' credit needs through its lending activities is rated "high satisfactory". Overall, the bank is a leader in community development lending. The excellent level of community development lending enhanced the bank's overall lending performance rating.

The borrower distribution analysis reflected adequate performance in the Kansas City CSA and St. Louis MSA AAs. This test was considered good in the Wichita and Peoria MSA AAs, and adequate in the other four full review MSA AAs. The distribution performances in the limited scope AAs in Kansas and Illinois were generally below the full review areas, but still considered adequate. The distribution performances in the limited scope AAs in Missouri were generally consistent with the full review areas.

The bank's geographic distribution was adequate in the Kansas City CSA and St. Louis MSA AAs, excellent in the Denver market, generally adequate or good in most other AAs, but poor in the Champaign, Illinois market and poor in the Tulsa, Oklahoma, market.

Lending Activity:

Based on a review of loan products, mix, and volume, the bank's residential home mortgage and commercial lending activities reflected adequate responsiveness to AA credit needs and limited use of innovative and flexible lending practices. The bank's overall loan volume, as reflected by the loan-to-deposit (LTD) ratio, has held steady since the last review, and is in line with the average for large banks in Missouri and Kansas.

TABLE 3 SUMMARY OF LOANS REVIEWED 2011, 2012, 2013				
Loan Type	#	%	\$(000s)	%
Home Purchase	2,994	22.5 (a)	557,506	24.9 (a)
Home Refinance	8,329	62.7 (a)	1,209,764	54.1 (a)
Home Improvement	1,730	13.0 (a)	69,097	3.1 (a)
Multifamily	242	1.8 (a)	399,470	17.9 (a)
Total HMDA LAR Loans	13,295	38.7 (b)	2,235,837	44.3 (b)
Total CRA LAR SB Loans	16,355	47.7 (b)	2,391,180	47.3 (b)
Total CRA LAR SF Loans	4,670	13.6 (b)	426,276	8.4 (b)
TOTAL LOANS	34,320	100.0	5,053,293	100.0
(a) Percent of Total HMDA Loans; (b) Percent of Total Loans				

The bank's HMDA LAR volume in its two largest markets indicates that the bank is not a dominant home mortgage lender. In Kansas City and St. Louis, the bank was ranked 25th in each market among all 2012 HMDA loan originators, with less than a 1.0 percent share in total AA originations (out of 567 and 583 total reporters in each market, respectively). The top lender in these two markets had a 19.6 percent and 14.7 percent share of total HMDA originations, respectively.

The bank's CRA LAR volume in these two markets showed a slightly higher share, with a 2.4 percent share in the Kansas City CSA AA and a 2.2 percent share in the St. Louis MSA AA. The bank is ranked ninth in Kansas City and 12th in St. Louis (out of 125 and 118 total reporters, respectively). The top lender has a 24.0 percent share of originations in Kansas City and 17.0 percent share of originations in St. Louis.

The bank made use of some innovative and flexible lending practices during the review period, including Federal Housing Act (FHA), Veterans Administration (VA), and Small Business Administration (SBA) guaranteed loans, Missouri Linked Deposit Loans, a secured credit card program, other affordable housing down payment assistance programs, and municipal and nonprofit lease/purchase agreements, which offer more affordable financing options than bond issuances. The bank's use of the flexible lending programs for home mortgages was minimal.

The bank is considered a leader in the Missouri Linked Deposit Program. This program was developed by the state of Missouri to create and retain jobs, expand the economy, and strengthen communities statewide by providing below market rate business loans with up to five-year fixed rate terms. Participating banks obtain state funds at reduced deposit rates and in turn make reduced-rate loans to businesses with fewer than 100 employees.

The bank also utilizes lease/purchase agreements with municipalities and nonprofits, which provide for flexible lending arrangements that avoid higher bond issuance costs.

The bank is a certified SBA lender, using various SBA programs, including SBA 504 and SBA 7(a) loan programs. For our review period, the bank originated 273 SBA loans totaling nearly \$116.6 million.

The bank's HMDA LARs for the three-year review period shows only 123 FHA loans, averaging \$115,000 per loan. The volume by number represented only 4.1 percent of total bank HMDA originations. The HMDA LARs also showed 26 VA loans, averaging \$157,000 per loan. This volume represented only 0.9 percent of total bank HMDA originations.

The bank has a special secured credit card product that is offered as a means to help customers establish or re-establish credit. The credit cards come with a low interest rate, but must be secured by Certificates of Deposit. The bank originated seventy cards under this program during the review period, with the majority to LMI borrowers.

Assessment Area Concentration:

As demonstrated in Table 4, the bank originated a high percentage of its loans within its delineated AAs. Only loans within the bank's AAs are considered for the remaining loan distribution tests discussed within this Performance Evaluation. Furthermore, all analyses place more weight on the percentage by number of originations, as opposed to dollar volume, as this better represents the number of affected applicants.

TABLE 4 LENDING INSIDE AND OUTSIDE THE BANK'S AAs								
Bank Loans	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Total HMDA Loans	12,195	1,974,706	91.7	88.3	1,100	261,131	8.3	11.7
SB Loans	13,277	2,087,908	81.2	87.3	3,078	303,272	18.8	12.7
SF Loans	3,702	324,449	79.3	76.1	968	101,827	20.7	23.9
Total Loans	29,174	4,387,063	85.0	86.8	5,146	666,230	15.0	13.2

Geographic and Borrower Distribution:

The bank's overall geographic distribution is adequate. Throughout the bank's AAs, the geographic distribution of residential mortgage, business, and farm loans ranged from poor to excellent, with only two AAs rated as poor.

The overall distribution of HMDA lending among borrowers of different income levels and to businesses of different revenue sizes was adequate. The bank's lending performance to SBs, defined for CRA purposes as those with gross annual revenues less than \$1 million, was typically well below demographic figures in most AAs, though above aggregate figures. A more detailed analysis of the geographic distribution and borrower income distribution is provided with the analysis of each AA.

A recent survey and study by the National Federation of Independent Business (NFIB) found that approximately 24 percent of SBs use credit cards to meet funding needs. In addition, only 48 percent of very small businesses (those with less than 10 employees) applied for bank credit. The study stated that poor or weak sales was the primary hindrance to obtaining credit, rather than access to credit. This provides some context to explain the lower levels of lending to SBs by all CRA filers nationwide.

Community Development Lending:

Overall, the bank is considered a leader in community development lending, with excellent levels throughout most AAs. The high level of activity had a positive impact on the lending test rating. The bank originated 573 community development loans that totaled \$1.9 billion for the review period, up from \$670 million at the prior evaluation. The last examination covered a two-year period, while this review period covered three years. However, even when annualized and considered over a two-year period, the volume at this examination nearly doubled in volume over the last review period. Appendix C details total community development activities.

The majority of community development loans (55.3 percent, by dollar amount) were for economic development, originated to SBs per SBA guidelines that either predominantly employed LMI individuals or were located in LMI tracts or enterprise zones. The next largest dollar volume of community development loans was for revitalization and stabilization (40.8 percent). These loans were generally to businesses located in LMI tracts that were part of state-designated enterprise zones or neighborhood revitalization plans. These business loans were for dollar amounts greater than \$1 million, so they were not reportable on the bank's CRA LAR. Loans to third-party entities that provided such services were more noteworthy by the name of the organization, such as the Economic Development Council of Bloomington-Normal. The relevance of the direct business loans is that they are consistent with stated revitalization plans and enterprise zones, and provide economic development by providing employment within LMI tracts or to LMI individuals. The bank has a good process for capturing this business loan activity that qualifies for community development consideration, including a database of all tracts in enterprise zones and SBA industry sector size guidelines.

The bank also had \$49 million in community development loans for affordable housing, and \$27 million to organizations that provide community services to LMI individuals. Most of the affordable housing loans were direct loans to developers or investors providing rental units below fair market value.

INVESTMENT TEST

The bank had an excellent level of community development investments and its overall investment test rating is considered "outstanding". The total number of qualified investments was 500, with prior period investments totaling \$73.2 million, current period investments totaling \$224.0 million, and 2,630 qualified donations totaling \$5.2 million. The bank's \$302.4 million in investments, grants, and donations during the three-year evaluation period surpassed the \$180 million noted in the prior CRA examination, which covered a two-year evaluation period.

The bank presented 4,109 donations totaling \$6.4 million for consideration during the review period. Due to the high volume with small dollar amounts, our review did not include 100 percent of the bank's donations. However, the overall large volume of donations does speak to the bank's community involvement within its designated AAs.

Examples of the bank's qualified community development investments include the following:

- 38 bonds totaling \$66.9 million, with \$32.9 million carrying over from the prior review period, with current period investments including:
 - \$11.1 million in Colorado School Bonds
 - \$10.7 million in Denver Airport Bonds (plus \$3 million from prior period)
 - \$8.7 million in Missouri Regional Convention Bonds
 - 17 for affordable housing totaling \$19.7 million, but only one for \$3 million from the current period
- 128 Housing Equity Funds, totaling \$11.8 million, with \$10.1 million in current period funding in 13 AAs plus Kansas statewide, all providing affordable housing
- 18 Private Placement Bonds, totaling \$106.0 million, with \$78.8 million in current period funding in six AAs plus Missouri statewide, primarily for economic development and revitalization/stabilization
- 21 investments in nine SBICs totaling \$20.6 million, funding economic development
- 295 tax credits, with 285 for revitalization/stabilization

The bank's investments reflected good responsiveness to credit and community development needs throughout the bank's AAs. The types of investments for the bank include bonds, Housing Equity Funds, tax credits, SBIC bonds, and private placement bonds. The bank makes occasional use of complex and innovative investments to support community development initiatives. The SBIC bonds are considered innovative, as they were underwritten by the affiliate CFB, and would otherwise not have been an available financing option in the area. Similarly, the private placement bonds, which provide a lower-cost form of financing than

traditional bond placements, are utilized by the bank to help nonprofits and SBs organize their debt in a more beneficial, cost-effective manner.

Further details of qualified investments and donations will be provided for each individual full review AA.

SERVICE TEST

The bank's overall rating for the service test is outstanding. The bank has established CRA Market Contact Representatives for the Kansas City and St. Louis markets. Their duties primarily involve meeting with community organizations that target LMI areas and individuals. The contacts promote bank products and services within these communities. Certain bank products are specifically targeted to LMI or unbanked populations, with presentations to large employers of LMI or unbanked individuals. CRA contacts also exist in the bank's other markets, though these individuals maintain other bank duties as well. The bank's mortgage department also has two individuals, one in Kansas City and one in St. Louis, who specifically target home loan products to LMI individuals.

The bank has a Small Business Group, which focuses on developing loan and deposit relationships with SB customers. The group provides deposit packages to SBs, offers reduced pricing on loan products, and provides SBA loans, bankcards, and other small dollar business loans.

The bank has a Public Assistance Payment Program, which allows the use of automated teller machines (ATMs) and debit cards for customers to access their public assistance payments. These programs are targeted to LMI individuals through various outreach opportunities by the CRA Market Contacts.

Bank brochures and disclosures are available in Spanish, and the bank has an internal program to increase the number of bilingual tellers and banking representatives located in various branch offices. These programs are used heavily in offices located in LMI tracts with high Hispanic populations and are promoted by the CRA Market Contacts during outreach opportunities that target LMI individuals or the unbanked population.

As of our review, the bank had 201 total banking offices, of which 17 were located in low-income tracts (up from eight at the previous review), 34 in moderate-income (down from 40), 79 in middle-income (down from 84), and 71 in upper-income tracts (up from 69). Since the previous review, the bank has had one branch opening in a middle-income tract, and there have been several relocations, resulting in a net effect of minus one branch in moderate-income tracts, minus two branches in middle-income tracts, and plus three branches in upper-income tracts. The remaining changes from the previous review were a result of new census tract categories per the 2010 Census, with the largest shift contributing to the decline of branch locations in moderate-income tracts and the increase in low-income tracts (refer to Table 2).

Overall, the bank's branch distribution is considered accessible to residents of LMI tracts. Of the total combined AA tracts, 35.5 percent were LMI, containing 31.0 percent of total households and 28.1 percent of total businesses, as of 2006-2010 ACS data. Overall, 25.4 percent of bank branches are located in LMI tracts. The bank also had 91 full-service and 29 cash-dispensing-only ATMs in LMI tracts (67 of which were stand-alone). Of the full review AAs reviewed, the branch distribution in LMI tracts was readily accessible in Springfield, Missouri; Columbia, Missouri; Wichita, Kansas, and Denver, Colorado; adequate in Kansas City, Missouri, and Bloomington, Illinois; low in St. Louis, Missouri; and poor in Tulsa, Oklahoma, where the bank's three branches are located in upper-income tracts.

The bank is a leader in the provision of community development services within most of its designated AAs, particularly the Kansas City CSA and St. Louis MSA AAs, as well as the other medium to larger sized MSAs. In smaller MSA and rural AAs, the bank provides a level of community services commensurate with the bank's presence in the area. Overall, the bank provided 1,634 community development services during the review period, to approximately 483 different organizations.

A majority of the qualified services were in the category of community services targeted to LMI individuals. Examples of service activities included providing financial expertise through board, advisory, or Audit Committee participation, and providing financial educational sessions for LMI school children as part of Teach Children to Save, and Money Smart programs sponsored by the Federal Reserve and the Federal Deposit Insurance Corporation (FDIC), as well as through Junior Achievement.

Other agencies that the bank provided its services to included those that target at-risk, inner-city youth (Champaign, Columbia, Kansas City, Springfield, and St. Louis); affordable housing (Joplin, Kansas City, Manhattan, and Springfield); organizations that provide income tax preparation and financial counseling for LMI individuals; a nonprofit organization serving senior and low-income persons/families and providing housing and supportive services to help homeless men, women, youth, and families move toward independence and self-sufficiency (Kansas City); and several food banks and economic development corporations.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB primary supervisory authority over insured depository institutions and their affiliates with total assets of more than \$10 billion when assessing compliance with the requirements of federal consumer compliance laws. The Federal Reserve, however, retains authority to enforce compliance with the bank's CRA and certain other consumer compliance laws and regulations. During the review period of this evaluation, the Reserve Bank did not cite violations involving discriminatory or other illegal credit practices that adversely affected the evaluation of the bank's CRA performance. As of the date of this report, the Reserve Bank is

unaware of any violations of Equal Credit Opportunity Act, Regulation B, or any unfair, deceptive, or abusive acts or practices identified by the CFPB.

**KANSAS CITY / LAWRENCE / ST. JOSEPH, MISSOURI-KANSAS
MULTISTATE COMBINED STATISTICAL AREA**

CRA RATING FOR KANSAS CITY MULTISTATE CSA¹:	<u>"Outstanding"</u>
<i>The lending test is rated:</i>	<i>"High Satisfactory"</i>
<i>The investment test is rated:</i>	<i>"Outstanding"</i>
<i>The service test is rated:</i>	<i>"Outstanding"</i>

Major factors supporting the rating include:

- The bank is a leader in community development lending in the AA.
- The level of qualified community development investments in the AA is excellent.
- The bank is a leader in providing community development services in the AA.
- The geographic distribution of HMDA lending is considered adequate.
- The geographic distribution of business and farm loans is considered adequate.
- The distribution of HMDA loans among individuals of different income levels is considered adequate.
- The distribution of loans to businesses and farms of different revenue sizes is considered adequate.
- Delivery systems are accessible to geographies and individuals of different income levels within the AA.
- Products, services, and hours do not vary significantly by branch location and do not hinder access in any geographies or by individuals of different income levels within the AA.

SCOPE OF EXAMINATION

Each multistate CSA/MSA AA with branches in more than one state is required to have a full review. The scope of the Kansas City CSA AA was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. Due to the significant bank presence, the two multistate CSA/MSA AAs received the greatest weight in the overall rating.

Eight prior community contacts conducted within the CSA during the previous two years were referenced for the evaluation.

¹ This rating reflects performance within the multistate CSA. The statewide Missouri and Kansas evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate CSA.

DESCRIPTION OF BANK'S OPERATIONS IN THE KANSAS CITY CSA AA

The Kansas City CSA is one of the bank's primary market areas, housing the bank's headquarters and 55 branch locations (as of December 31, 2013). In the Kansas City MSA only, the bank had a deposit market share of 13.1 percent, which ranked second of 135 total financial institutions in the MSA. In the St. Joseph MSA, the bank ranked second of 23 total financial institutions; and in the Lawrence MSA the bank ranked fourth of 23 total financial institutions. (Market share information from the FDIC Market Share Report, June 30, 2013)

The majority of the bank's branches in this CSA are located in the Kansas City MSA (86 percent), with most located in Jackson County, Missouri (35 percent) and Johnson County, Kansas (28 percent).

DESCRIPTION OF THE KANSAS CITY CSA AA

The bank's Kansas City CSA AA includes seven of 14 counties in the Kansas City MSA, including Johnson, Leavenworth, and Wyandotte Counties in Kansas, and Cass, Clay, Jackson, and Platte Counties in Missouri. The St. Joseph MSA portion of the CSA includes Andrew and Buchanan Counties in Missouri, which are two of the four counties in the MSA. The Lawrence portion of the CSA includes Douglas County, Kansas, which is the only county in the Lawrence MSA. Characteristics of the AA are discussed in the following sections.

Economic and Employment Characteristics. The largest industry sectors in the Kansas City MSA are professional and business services (15.7 percent), government (14.9 percent), educational and health services (13.4 percent), and retail trade (10.6 percent). The St. Joseph MSA was led by government (18.1 percent), manufacturing (16.4 percent), educational and health services (15.6 percent), and retail trade (11.5 percent). The government industry dominated in the Lawrence MSA, with 31.0 percent of total employment. Other significant segments in Lawrence included leisure and hospitality services (13.0 percent), education and health services (11.4 percent), and retail trade (11.0 percent). (Source: FDIC Regional Economics (RECON)/ Moody's Analytics & BLS, 2012)

Several health-related companies were in the top 20 CSA employers, including HCA Midwest Health System (8,632 employees), Saint Luke's Health System (6,891), Cerner Corporation (6,615), Children's Mercy Hospital and Clinics (5,151), Truman Medical Center (4,258), Carondelet Health Systems (3,150), Heartland Health (3,866), and Lawrence Memorial (1,322).

Other large CSA employers include The University of Kansas (9,881), Sprint Corporation (7,000), DST Systems, Inc. (5,000), General Motors Corp (4,100), Ford Motor Company (4,000), Hallmark Cards (3,700), Black & Veatch, LLP (3,600), United Parcel Service, Inc. (3,500), Farmers Insurance (3,200), Home Depot (3,153), and ATK Small Caliber Systems (3,000). (Source: FDIC RECON/Kansas City Business Journal Book of Lists 2013, Lawrence Chamber of Commerce 2013, St. Joseph Chamber of Commerce 2011)

Table 5 shows income, housing, and general demographic characteristics of the combined Kansas City CSA AA.

TABLE 5 KANSAS CITY MO-KS CSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	69	12.5	36,353	6.9	11,270	31.0	105,727	20.1
Moderate-income	127	23.1	103,950	19.8	15,083	14.5	91,763	17.5
Middle-income	186	33.8	203,340	38.7	11,176	5.5	112,607	21.4
Upper-income	152	27.6	181,661	34.6	4,597	2.5	215,207	41.0
Unknown Income	16	2.9	0	0.0	0	0.0	0	0.0
Total AA	550	100.0	525,304	100.0	42,126	8.0	525,304	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	85,109	27,592	5.1	32.4	39,787	46.7	17,730	20.8
Moderate-income	208,970	97,981	18.0	46.9	83,641	40.0	27,348	13.1
Middle-income	333,327	215,812	39.7	64.7	92,765	27.8	24,750	7.4
Upper-income	262,057	201,679	37.1	77.0	46,175	17.6	14,203	5.4
Unknown Income	10	0	0.0	0.0	10	100.0	0	0.0
Total AA	889,473	543,064	100.0	61.1	262,378	29.5	84,031	9.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	7,228	7.1	6,158	6.7	728	10.0	342	9.1
Moderate-income	19,896	19.4	17,321	18.9	1,799	24.7	776	20.7
Middle-income	36,331	35.4	32,955	36.0	2,038	28.0	1,338	35.7
Upper-income	37,715	36.8	34,257	37.4	2,224	30.6	1,234	33.0
Unknown Income	1,339	1.3	803	0.9	483	6.6	53	1.4
Total AA	102,509	100.0	91,494	100.0	7,272	100.0	3,743	100.0
Percentage of Total Businesses:				89.3		7.1		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	31	1.3	30	1.3	1	4.8	0	0.0
Moderate-income	115	4.9	113	4.8	2	9.5	0	0.0
Middle-income	1,418	60.0	1,410	60.3	7	33.3	1	25.0
Upper-income	794	33.6	782	33.5	10	47.6	2	50.0
Unknown Income	4	0.2	2	0.1	1	4.8	1	25.0
Total AA	2,362	100.0	2,337	100.0	21	100.0	4	100.0
Percentage of Total Farms:				98.9		0.9		0.2
Based on 2006-2010 ACS data and 2012 D&B business and farm demographic data.								
NOTE: Percentages may not total 100 percent due to rounding differences.								

The Kansas City MSA has been in modest recovery mode since 2010, with growth in health care, education, and construction. These gains have helped offset declines in financial services. Manufacturing, particularly automobile manufacturing, has seen significant growth over the past year. Overall, industrial production in the MSA is up 3 percent in the past year. Google Fiber has introduced its first ultra-high-speed internet network in Kansas City, which has helped attract tech firms and laid the foundation for high-tech growth over the next several years. This will provide the MSA with a competitive advantage for attracting data centers and other bandwidth-hungry tech companies. Households also have access to the high-speed service, adding to the MSA's appeal to potential residents. Its benefit has been magnified by public-private partnerships organized to market the service and provide financing for tech start-ups and expansions. Coupled with the geographic location and a highly skilled workforce, the technology sector has seen expansion of existing companies and has attracted new firms to the MSA. Consequently, home prices are expected to rise in the short term as the market is undersupplied. Similarly, rising prices will lead to growth in the residential construction industry. (Source: FDIC RECON/Moody's Economy.com, June 2010, June 2011, October 2013)

St. Joseph MSA meat production employers have benefitted from lower corn and soybean prices. Substantial employers in the MSA, Triumph Foods and Hillshire Brands, have seen demand increase in pork products, particularly from Japan, Hong Kong, and Mexico. To keep pace with orders, Triumph Foods has announced an expansion in its facilities and increase in the labor force. Wiechman Pig Company, a supplier of pigs to Triumph Foods, has announced similar expansion plans. Another important manufacturer in the area, Boehringer Ingelheim Vetmedica (manufacturer of veterinary medicine), has expanded its production facilities and has added administrative staff to account for the increased demand in treatments for pets. Despite the relative affordability of housing in the St. Joseph MSA, the area has seen very little appreciation in housing prices. The MSA has a higher population over the age of 65, which continues to drag on housing demand as the older population tends to be more stable and less likely to purchase new homes. (Source: FDIC RECON/Moody's Economy.com, October 2013)

In the Lawrence MSA, the stability of the AA's largest employer, the University of Kansas (KU), has helped to insulate the MSA from fluctuations in the economy. Despite the stability, higher education cuts at the state level have led to a reduction of 4 percent or \$5.5 million from its budget over the next two years. Similar to the state cuts, KU has lost nearly \$13 million in funding over the prior fiscal year and expects future funding awards to be decreased as well. The university has attempted to counter the impact of some of the cuts with an increase of 4.4 percent in tuition and fees for new students. While the cuts to the university will impact the MSA, employment in retail and leisure and hospitality industries have increased in the last year. Similar positive figures have been seen in a decline in personal bankruptcies, and improved household finances should help hold consumer spending steady in the near term. (Source: FDIC RECON/Moody's Economy.com, June 2013)

Five area community contacts had similar comments regarding the need for SB lending in the area, especially for start-up businesses, and that banks have tightened credit standards. One contact in Olathe, Kansas, indicated that available funding sources for start-up businesses are

limited, based on more conservative underwriting by local banks. The contact also felt there was an over-correction by banks involved in lending to real estate developers. The contact indicated that despite brisk sales of newly built homes, residential developers are experiencing difficulties in securing funding from banks, and have sought funding from private equity groups. Another contact in Liberty, Missouri, indicated that SBs had limited access to credit during the recent recession, although credit availability has improved significantly over the past two years.

A contact in Independence, Missouri, indicated that area credit needs include SB financing and access to capital for development projects. The contact stated that access to funds for start-up businesses was difficult to obtain, and felt financial counseling for small start-ups might prepare potential business owners with the criteria necessary to qualify for funding.

A contact in Platte City indicated that some local businesses had experienced difficulty in obtaining working capital and funds for expansion, and he felt this was due partially to increased regulatory scrutiny.

One community contact in St. Joseph indicated that the primary credit needs are for commercial loans and loans to rehabilitate the older downtown areas. He noted there is a need to finance start-up businesses, but he felt this type of financing is difficult to obtain due to regulatory constraints.

A Federal Reserve Bank of Kansas City (Reserve Bank) survey of 10th District LMI service organizations showed that persistent unemployment, diminished credit standing, and rising costs for basic needs were noted as impediments to financial recovery in the LMI community. Several contacts lamented reductions in government funds available to assist LMI families to buy homes. Tighter mortgage lending standards and potentially higher down payment requirements were thought to be additional impediments to affordable homeownership for LMI families. Survey respondents noted that poor credit histories, along with tighter lending standards and less favorable loan terms, have put borrowing out of reach for most LMI consumers. (LMI Survey, Community Affairs Department of the Reserve Bank, 2Q2011)

A more recent survey continued to note insufficient affordable housing as a substantial concern. Most contacts suggested the stock of affordable housing is inadequate. Difficulties in securing funding for homeownership were mentioned by several survey respondents. Some contacts noted funding for rehabilitation of single-family homes had declined, due largely to the expiration or elimination of dedicated programs. Many survey respondents indicated there is substantial need for financial literacy training and credit counseling.

Long-term unemployment was mentioned as an important factor affecting the overall assessment of financial conditions. Other concerns expressed by survey respondents included a lack of funds for affordable housing; meeting the borrowing needs of low-wealth households, including business credit; the need for training; low wages; and healthcare. (LMI Survey, Community Affairs Department of the Reserve Bank, 4Q2013)

Unemployment figures for all three AA MSAs have been below U.S. figures the last three years. The Kansas City MSA has generally mirrored the state of Missouri unemployment figures, while Lawrence and St. Joseph have experienced more favorable unemployment figures. (Source: FDIC RECON, Bureau of Labor Statistics)

TABLE 6 UNEMPLOYMENT RATES¹			
Area	2011	2012	3Q'13
Kansas City MSA	8.0	6.7	6.8
St. Joseph MSA	7.2	5.6	5.6
Lawrence MSA	5.9	5.3	5.7
State of Missouri	8.4	6.9	6.8
State of Kansas	6.5	5.7	5.8
U.S.	8.9	8.1	7.3
¹ Source: FDIC RECON			

Population Trends and Characteristics. The AA consists of 7 of 14 Kansas City MSA counties, two of four St. Joseph MSA counties, and the sole county for the Lawrence MSA. The 2010 population of the AA was 2,080,126. The population of the Kansas City MSA AA counties equaled 1,862,808, or 89.6 percent of the entire AA. The population of the AA counties located in the St. Joseph MSA equaled 106,492 (5.1 percent) and the Lawrence MSA population equaled 110,826 (5.3 percent).

Douglas County, in the Lawrence MSA, is home to KU. This county's population has a large percentage of persons aged 18 to 24. Conversely, the St. Joseph MSA counties have seen an out-migration of individuals under the age of 64, leading to a higher concentration of the population over age 65. Since the majority of the AA comprises such a high percentage of the Kansas City MSA population, overall AA demographics such as the concentration of families and age distribution did not differ significantly from overall Kansas City MSA figures beyond the anomalies found in the Lawrence MSA and St. Joseph MSA.

Income Characteristics. The percentage of families in the AA that are considered low- (20.1 percent), moderate- (17.5 percent), middle- (21.4 percent), and upper-income (41.0 percent) mirror overall Kansas City MSA figures, and generally mirror the overall state figures for Missouri and Kansas. However, these figures vary widely by county within the AA. Wyandotte (34.8 percent) and Jackson (27.8 percent) have the highest concentrations of low-income families in the AA, based on 2010 data. Johnson County (10.8 percent) has the lowest concentration. Total LMI families combined equal 57.6 percent for Wyandotte and 46.9 percent for Jackson, compared to only 24.1 for Johnson County.

The percentage of AA families below the poverty level (8.0 percent) also mirrored the Kansas City MSA, as of 2010 data. Wyandotte (16.5 percent) and Jackson (11.9 percent) were the highest in the AA, while Johnson County was the lowest (3.6 percent). Overall, income characteristics in the AA may result in a more favorable suburban lending environment than urban, as Wyandotte and Jackson Counties have lower income levels, more LMI families, and more families below the poverty level.

Housing Characteristics. As of 2010 Census data, the concentration of owner-occupied housing units is lowest in Douglas County (49.9 percent), Wyandotte County (54.1 percent), and Jackson County (55.0 percent), below the AA average of 61.1 percent. As mentioned previously, Douglas County is the home to KU, which has a large concentration of rental properties for students. Wyandotte and Jackson County are where most AA LMI tracts are

located. Owner-occupied units have the highest concentrations in Andrew County (72.0 percent), Cass County (74.1 percent), Clay County (68.1 percent), and Johnson County (68.1 percent). The majority of the bank's AA branches are in Jackson County and Johnson County. Given the higher concentration of owner-occupied housing units in Johnson County, there will likely be more owner-occupied residential real estate loans there. There is a higher concentration of rental units in Jackson County, which may lead to higher levels of nonowner-occupied rental and rehab/resell type residential real estate loans in this county.

Mobile homes are much more prevalent in Andrew County, equaling 12.2 percent of housing units compared to only 1.8 percent for the entire AA. The median age of housing units is higher in Buchanan County (50 years), Jackson County (44 years) and Wyandotte County (51 years), versus 37 years for the overall AA and only 24 years in Cass County. This may indicate a greater demand for home improvement loans in Buchanan, Jackson, and Wyandotte Counties.

The 2010 median housing value equaled \$97,600 in Wyandotte County, \$107,800 in Buchanan County, \$125,500 in Andrew County, and \$129,900 in Jackson County, compared to \$209,900 in Johnson County. Johnson County contains relatively wealthy middle- and upper-income neighborhoods. The median household income is higher in Johnson County, but housing is less affordable due to the higher housing prices. The housing affordability ratio² in Johnson County equaled 35.1 percent, the second lowest in the AA, with the lowest in Douglas County (26.0 percent). The most affordable county in the AA was Andrew County, with an affordability ratio of 42.0 percent and Wyandotte County at 39.5 percent. The overall AA housing affordability ratio equaled 34.5 percent as of 2010 Census data, well below the Kansas statewide ratio of 40.3 percent and just above the Missouri figure of 33.6 percent.

Three area community contacts cited limited availability of high-quality affordable housing in the area; as well as the need for flexible credit products for first-time home buyers and LMI borrowers. One felt that regulatory constraints have played a significant role in tightened area credit availability due to more stringent underwriting standards.

Census Tract Income Levels/Characteristics. The AA has 69 low-, 127 moderate-, 186 middle-, 152 upper-, and 16 unknown-income tracts. The majority of LMI tracts are in Jackson County, Missouri and Wyandotte County, Kansas, primarily in the core of Kansas City, Missouri and Kansas City, Kansas. The LMI tracts contain much larger concentrations of families below the poverty level, equaling 31.0 percent of families in the low-income tracts and 14.5 percent in the moderate-income tracts; well above the 5.5 percent figure in the middle-income tracts and 2.5 percent in the upper-income tracts. The LMI tracts also contain more rental units; equaling 46.7 percent in the low- and 40.0 percent in the moderate-income tracts, compared to 29.5 percent for the AA overall.

The median age of housing stock is considerably older in the LMI tracts, equaling 58 years in the low-income tracts and 49 years in the moderate-income tracts; compared to 36 years in middle-income tracts and 22 years in the upper-income tracts.

² The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Of the bank's 56 CSA branch locations, 4 are located in low-, 13 are in moderate-, 17 are in middle-, and 22 are in upper-income tracts. The bank's headquarters is located in downtown Kansas City, Missouri, in a low-income tract.

PERFORMANCE TEST CONCLUSIONS IN THE KANSAS CITY CSA AA

LENDING TEST

The bank's performance with respect to the lending test in the Kansas City CSA AA is rated "high satisfactory". The bank is a leader in community development lending in the AA, which enhanced the overall lending performance rating. Responsiveness to area credit needs, AA lending volumes, and borrower and geographic distributions were all considered adequate. A more in-depth discussion of performance in the AA follows.

Lending Activity:

See the discussion in the overall institution section for information regarding lending products and services offered by the bank and use of innovative products. The bank's lending activity and responsiveness to AA credit needs were considered adequate in the Kansas City CSA AA. The bank is not a market leader in HMDA or SB/SF lending within the AA, but has reported an average of approximately 1,100 loan originations on both the HMDA LAR and CRA LAR each year for the three-year period reviewed. For the review period, the bank originated 75 SBA loans totaling \$22.8 million in the Kansas City CSA.

Per the bank's internal analysis as of December 31, 2013, the percent of bank lending in the AA equaled approximately 22 percent of total bank lending, while the deposits in the AA equaled approximately 29 percent of total bank deposits. This resulted in an approximate LTD ratio in this market of 54.3 percent. All lending activity parameters reviewed represented adequate lending levels for the AA.

Geographic Distribution:

As shown in Tables 7 and 8, the bank's geographic distribution of residential mortgage loans and business and farm loans in 2012 reflected an adequate penetration among geographies of different income levels. Each HMDA loan product was generally consistent with aggregate data for LMI tracts, but below demographic figures. The performance was weaker in the low-income tracts, and stronger in the moderate-income tracts. The bank's performance levels for 2011 and 2013 were generally consistent with 2012. Data by loan product for 2012 will primarily be discussed below, with 2011 and 2013 outliers noted for additional context.

One primary factor affecting the bank's geographic distribution of HMDA lending is that the AA's LMI tracts contain more rental units, equaling 46.7 percent in the low- and 40.0 percent in the moderate-income tracts, compared to 29.5 percent for the AA overall. This would create a

larger market for nonowner-occupied residential loans in the LMI tracts; however, this is not a significant product for the bank in this market, especially in the Kansas City portion of the CSA. In the entire CSA, 83.0 percent of the bank's HMDA originations are on housing units that are owner-occupied.

In the Kansas City MSA, Johnson County, Kansas, has the highest concentration of owner-occupied housing units, and also a higher concentration of middle- and upper-income census tracts. This county is one of ten in the AA, but contains 28 percent of the AA HMDA loans for 2012, for which 88.0 percent are owner-occupied. The higher owner-occupancy rate and the higher rate of new home construction has led to higher HMDA originations in Johnson County, and similarly, in the other AA middle- and upper-income census tracts.

In the Lawrence MSA, the concentration of rental units equaled 43.4 percent of total MSA housing units, while the Kansas City and St. Joseph rental concentrations equaled 27 percent to 29 percent. The bank's level of nonowner-occupied HMDA loans in Lawrence equaled 36.7 percent in 2012, compared to 11.3 percent in Kansas City. Therefore, the bank's penetration in the LMI tracts in Lawrence was much stronger than the performance in the CSA overall.

Home Purchase Loans

The bank's performance regarding home purchase loans reflected an adequate geographic distribution throughout the AA, including within LMI tracts. The bank's performance in LMI geographies was generally below area demographics but was near aggregate figures. The bank's performance included zero loans in low-income geographies for 2012, but this was not very far behind the aggregate data, and the performance in 2013 improved and exceeded aggregate data. Home purchase loans in the middle-income tracts were slightly below demographics and aggregate, while lending levels in upper-income tracts were above aggregate and well above demographic figures.

For the home purchase product, many lenders typically have lending levels below demographics as a result of economic factors. The majority of the AA's LMI tracts are in Jackson County, Missouri, primarily in the core of the city. The LMI tracts contain much larger concentrations of families below the poverty level, equaling 31.0 percent of families in the low-income tracts and 14.5 percent in the moderate-income tracts, well above the 5.5 percent figure in the middle-income tracts and 2.5 percent in the upper-income tracts. Families below the poverty level may have difficulty qualifying for residential purchase loans. Therefore, the high poverty rate coupled with the high rental unit concentration in the LMI tracts would make lending on owner-occupied housing units in these tracts difficult, as reflected in the aggregate data. Also, as noted above, three area community contacts cited limited availability of decent-quality affordable housing in the area. The limited levels of quality stock may also hamper home loan demand in the LMI tracts.

TABLE 7 DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES KANSAS CITY MO-KS CSA AA							
Census Tract Income Level ¹	Bank Loans				Aggregate HMDA Data ²		% of Owner Occupied Units ³
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	13	1,800	1.0	1.0	1.5	1.0	5.1
Moderate	132	10,511	10.5	5.7	10.5	6.6	18.0
Middle	444	48,653	35.4	26.3	36.3	29.5	39.7
Upper	667	123,747	53.1	67.0	51.7	62.9	37.1
Home Purchase Loans							
Low	0	0	0.0	0.0	1.7	1.0	5.1
Moderate	27	2,696	10.5	5.2	12.3	7.3	18.0
Middle	91	13,305	35.3	25.5	39.0	30.8	39.7
Upper	140	36,080	54.3	69.3	47.0	60.9	37.1
Home Refinance Loans							
Low	12	1,770	1.5	1.5	1.3	0.8	5.1
Moderate	73	6,234	9.2	5.2	9.6	5.9	18.0
Middle	275	31,663	34.5	26.3	34.9	28.6	39.7
Upper	436	80,612	54.8	67.0	54.1	64.6	37.1
Home Improvement Loans							
Low	1	30	0.5	0.4	2.1	1.0	5.1
Moderate	29	638	14.9	8.0	12.6	6.6	18.0
Middle	77	2,953	39.5	37.2	37.5	26.8	39.7
Upper	88	4,315	45.1	54.4	47.6	65.4	37.1
Multifamily Loans							% of Multifamily Units ³
Low	0	0	0.0	0.0	14.8	4.4	15.8
Moderate	3	943	42.9	21.4	31.7	14.8	29.5
Middle	1	732	14.3	16.6	38.1	37.5	31.8
Upper	3	2,740	42.9	62.1	15.3	43.3	22.9
¹ Low-income census tracts are those geographies with MFI less than 50 percent of the MSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent - 80 percent; middle-income is 80 percent - 120 percent; and upper-income is greater than 120 percent.							
² Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
³ Percentage of owner-occupied and multifamily housing units by tract based on 2006-2010 ACS data.							
NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Refinance Loans

Refinance lending across geographies of different income levels was also adequate. The bank's performance in LMI geographies was consistent with aggregate data, but well below area demographics. The bank's performance is consistent with aggregate data and reflects an adequate penetration in LMI tracts. Refinance loans in the middle-income tracts were slightly

below demographics and consistent with aggregate, while lending levels in upper-income tracts were consistent with aggregate and well above demographic figures.

Home Improvement Loans

The geographic distribution of home improvement lending also reflected an adequate penetration across geographies of different income levels. The bank's 2012 performance in low-income tracts was below aggregate and area demographics, but the performance in moderate-income tracts exceeded aggregate data and was only slightly below demographics. Home improvement loans in the middle-income tracts were in line with demographics and aggregate, while lending levels in upper-income tracts were in line with aggregate and above demographic figures.

The median age of housing stock is considerably older in the LMI tracts, equaling 58 years in the low-income tracts and 49 years in the moderate-income tracts; compared to 36 years in middle-income tracts and 22 years in the upper-income tracts. This would suggest a greater need for home improvement loans in LMI tracts. However, the bank's emphasis on this product has declined over the past two years.

TABLE 8 DISTRIBUTION OF 2012 SMALL SB AND SF LOANS BY INCOME LEVEL OF GEOGRAPHIES KANSAS CITY MO-KS CSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data ¹		% of Businesses/ Farms ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	22	5,968	2.2	3.5	5.1	5.4	7.1
Moderate	222	44,870	21.9	26.4	18.4	22.6	19.4
Middle	334	51,836	32.9	30.5	31.8	28.4	35.4
Upper	406	60,846	40.0	35.8	39.0	39.1	36.8
Unknown	31	6,386	3.1	3.8	2.2	3.9	0.0
SF Loans							
Low	0	0	0.0	0.0	0.4	1.0	1.3
Moderate	2	106	3.5	2.1	4.1	3.4	4.9
Middle	41	3,888	71.9	76.9	62.2	63.5	60.0
Upper	14	1,064	24.6	21.0	32.7	32.1	33.6
¹ Aggregate loan data reflects all originations in the bank's AA reported by all CRA filers. ² Percentage of businesses and farms by tract based on 2006-2010 ACS data. NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Multifamily Loans

The volume of multifamily loans in the AA was minimal, with only seven in 2012 and seven in 2013. Although the volume was low, the penetration in total combined LMI tracts for 2012 mirrored aggregate and demographic figures, and in 2013, the bank exceeded the comparator

figures in these tracts. This performance was considered good.

Business Loans

The geographic distribution of business loans in the AA was below aggregate and demographic figures in the low-income tracts, but slightly above both comparators in the moderate-income tracts. The bank's penetration levels in all tract categories except low-income were relatively similar to demographic figures. This performance was considered adequate.

Farm Loans

Farm loans in the CSA AA were relatively low, with only 57 total loans. There were no farm loans in low-income tracts, and only two in the moderate-income tracts, but the performance was considered adequate. Above demographic levels of lending in the middle-income tracts was offset by lower levels in the upper-income tracts. Little weight was given to farm loans in this evaluation due to the small number of bank originations and farms located within the AA.

Distribution by Borrower Income and Business Revenue Size:

As shown in Tables 9 and 10, the borrower distribution of the bank's lending reflected adequate distribution among individuals of different income levels and among businesses and farms of different revenue sizes. Both HMDA and CRA business and farm loans were below the demographic figures for LMI families and SBs and SFs, but HMDA data was generally consistent with aggregate data, while CRA LAR data typically exceeded aggregate data.

Home Purchase Loans

Overall, the bank's performance regarding home purchase loans was considered adequate. The distribution of low-income borrowers for 2012 was well below area demographics, similar to aggregate data. The distribution to moderate-income borrowers was closer to area demographics, but was well below aggregate data, as the aggregate had a very strong performance to moderate-income borrowers. Aggregate lending declined somewhat in 2013, but was still above the demographic, and the bank was still well below aggregate data. The conclusions regarding the bank's 2011 and 2013 levels to LMI borrowers were consistent with 2012. Home purchase loans to middle-income borrowers was below demographics and aggregate, while lending levels to upper-income borrowers was above demographic figures and well above aggregate.

One community contact indicated that many lower-income residents typically have credit history issues that may preclude them from obtaining home purchase loans; however, the relatively low cost of housing in the Kansas City market does enable some families at the upper end of the LMI range to obtain a home loan. This was supported by the higher level of aggregate HMDA lending to moderate-income families for home purchase loans. However, the bank continues to lag behind this aggregate figure.

TABLE 9 DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS KANSAS CITY MO-KS CSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans ³							
Low	100	5,660	8.0	3.1	7.5	3.9	20.1
Moderate	167	12,851	13.3	7.0	16.3	11.3	17.5
Middle	214	20,940	17.0	11.3	19.9	17.3	21.4
Upper	669	124,107	53.3	67.2	35.8	45.4	41.0
Unknown	106	21,153	8.4	11.5	20.6	22.2	0.0
Home Purchase Loans							
Low	29	2,395	11.2	4.6	11.7	6.2	20.1
Moderate	34	3,756	13.2	7.2	22.2	16.6	17.5
Middle	34	4,464	13.2	8.6	20.4	20.0	21.4
Upper	137	37,386	53.1	71.8	29.0	42.2	41.0
Unknown	24	4,080	9.3	7.8	16.8	15.0	0.0
Home Refinance Loans							
Low	58	2,989	7.3	2.5	5.5	3.0	20.1
Moderate	99	8,349	12.4	6.9	13.5	9.3	17.5
Middle	138	15,077	17.3	12.5	19.5	16.7	21.4
Upper	435	82,303	54.6	68.4	38.8	48.4	41.0
Unknown	66	11,561	8.3	9.6	22.7	22.6	0.0
Home Improvement Loans							
Low	13	276	6.7	3.5	8.9	4.1	20.1
Moderate	34	746	17.4	9.4	16.8	10.7	17.5
Middle	42	1,399	21.5	17.6	23.6	19.0	21.4
Upper	97	4,418	49.7	55.7	43.6	58.6	41.0
Unknown	9	1,097	4.6	13.8	7.1	7.6	0.0

¹ Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.
² Percentage of families based on 2006-2010 ACS data.
³ Total HMDA loans will not foot, as multi-family loans are not considered in the borrower distribution.
NOTE: Percentages may not total 100 percent due to rounding differences.

Refinance Loans

The bank's performance regarding home refinance loans was considered adequate. The overall aggregate level of HMDA lending for refinance loans typically lag well behind the demographic figure in all markets. This holds true for the bank and the aggregate in the Kansas City CSA AA. The bank was in line with aggregate lending data to LMI families, but significantly below the demographic data for low-income families, and somewhat below demographic for moderate-income families. Refinance loans to middle-income borrowers was just below demographics and aggregate, while lending levels to upper-income borrowers was above demographic and aggregate figures.

Home Improvement Loans

The bank's performance regarding home improvement loans was considered adequate. The distribution to low-income borrowers compared unfavorably with area demographics but was similar to the aggregate figure. The distribution to moderate-income borrowers equaled the area demographic and slightly exceeded the aggregate. It was also slightly stronger in 2013. Home improvement loans to middle-income borrowers were consistent with demographics and aggregate, while lending levels to upper-income borrowers were above demographic and aggregate figures.

Home improvement lending was identified as a need for LMI borrowers by community contacts and in the Reserve Bank's LMI Survey, as the age of affordable housing stock is typically older and in need of repair, and LMI homeowners do not typically have excess cash flow to maintain their properties without borrowing. However, the bank's emphasis on its home improvement lending program has diminished over the past two years.

Business Loans

The bank's record of lending to SBs, those with gross annual revenues of \$1 million or less, was considered adequate. The bank's penetration was well below the demographic figure of SBs in the AA. It is noted that the bank originated a much higher percentage of loans than the aggregate. Aggregate data includes all SB and SF loan originations reported in the AA by all CRA data reporters. The bank's performance, based on number of loans, equaled approximately 22 percentage points above the aggregate data.

The independent study by NFIB, mentioned in the overall institution section, provides some context to explain the lower levels of lending to SB by all CRA filers nationwide; primarily, the use of credit cards by approximately 24 percent of SBs for their funding needs. This would lower the demographic figure for SBs seeking bank funding.

**TABLE 10
DISTRIBUTION OF 2012 SB AND SF LOANS¹
BY REVENUE SIZE OF BUSINESS
KANSAS CITY MO-KS CSA AA**

Business/Farm Size by Revenue ²	Bank Loans				Aggregate CRA Data ³		% of AA Businesses/Farms ⁴
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	579	64,651	57.0	38.1	35.4	35.6	89.3
Over \$1MM	368	94,578	36.3	55.7	Not Reported		7.1
Not Known	68	10,677	6.7	6.3			3.7
SF Loans							
\$1MM or less	49	4,783	86.0	94.6	56.8	76.1	98.9
Over \$1MM	1	85	1.8	1.7	Not Reported		0.9
Not Known	7	190	12.3	3.8			0.2

¹ The CRA disclosure statement reports only business loans in amounts of \$1 million or less and farm loans in amounts of \$500m or less.

² This analysis focuses on the bank's lending to "small businesses" and "small farms" as defined by the CRA, which are those businesses and farms with gross annual revenues of \$1 million or less.

³ Aggregate loan data reflects all SB and SF loan originations in the bank's AA reported by all CRA data filers.

⁴ Percentage of businesses and farms in the AA based on 2012 D&B data.

NOTE: Percentages may not total 100 percent due to rounding differences.

Farm Loans

The distribution of loans to farms of different sizes was good. The bank's lending performance to SFs was below area demographics, but well above aggregate data. Only one loan with known revenues was to a large farm in the AA; however, there were also several loans to farms with unreported revenues. Low weight was given to farm loans in the evaluation due to the small numbers of bank originations and farms within the Kansas City CSA AA.

Community Development Loans:

The bank is considered a leader in providing community development loans in the Kansas City CSA AA, where it originated 163 loans for \$688 million during the evaluation period. The distribution of community development lending included five for affordable housing, 19 for community services targeted to LMI families or individuals, 92 for economic development, and 47 for revitalization or stabilization of LMI geographies. Most of the loans for economic development and revitalization or stabilization were loans greater than \$1 million, where the activity was located in an enterprise zone. Those for economic development also were to entities that met the SBA size requirements. As noted in the overall institution section, these are direct loans to a myriad of SBs from various industry sectors located throughout the AA. Other examples of community development lending within the AA included:

- A \$2.4 million loan to an organization offering advocacy and housing services for foster families
- A \$1.2 million loan to the Salvation Army

- Two loans totaling \$700,000 to Big Brothers Big Sisters of Greater Kansas City

INVESTMENT TEST

The bank had an excellent level of qualified community development investments and donations in the Kansas City CSA AA, resulting in an “outstanding” rating for this AA. Investments in the area totaled \$98.4 million and included 148 investments in bonds, SBICs, housing equity funds, private placement bonds, and tax credits. Most of the qualified investments were current period investments, with only 12 prior period investments totaling \$3.6 million remaining on the books. Examples of qualified investments included:

- A \$33.9 million private placement bond for a hospital located in a moderate-income tract and abutting a Kansas City enterprise zone, providing revitalization/stabilization to the area.
- A \$10.0 million private placement bond for a local university located in a low-income tract in a Kansas City enterprise zone, providing revitalization/stabilization to the area.
- 123 tax credits totaling \$45.4 million, providing economic development or revitalization/stabilization of LMI tracts, including:
 - Missouri and Kansas Historic Preservation tax credits for qualified property rehabilitation expenses in LMI tracts.
 - Brownfield Remediation tax credits for the redevelopment of commercial/industrial sites contaminated with hazardous substances and abandoned or underutilized for at least three years.
 - Neighborhood Preservation Act tax credits for the rehabilitation or construction of owner-occupied homes in LMI areas.
 - New and Expanded Business Facility tax credits for investment in job creating facilities in certain census tracts as designated by the state of Missouri.
 - Rebuilding Communities Tax Credit Program to stimulate business by providing tax credits to eligible businesses that locate, relocate, or expand their business within a distressed community in Missouri.
- Three new SBIC issuances to one entity for economic development totaling \$3.0 million, and two prior period issuances to another entity totaling \$1.2 million.

The bank has shown good responsiveness to area community development needs through its donation activities. The bank had 726 qualified donations within the AA during the review period totaling \$1.6 million, which represented 27.6 percent of the bank's total qualified donations by number and 30.1 percent of the total qualified dollars.

SERVICE TEST

The bank's performance under the service test in the Kansas City CSA AA is rated "outstanding" based on the adequate accessibility of delivery systems and the high level of community development services. Kansas City is one of two markets where Commerce Bank has established a full-time CRA Market Contact whose primary duties involve meeting with community organizations that target LMI areas and individuals. The contacts promote products and services within these areas, and products targeted to LMI and unbanked individuals.

Retail Services:

Retail services were discussed under the overall bank review and do not vary by market. The branch penetration within LMI tracts in the AA is adequate. Four of the bank's 56 Kansas City CSA AA branches are located in low-income tracts and 13 are in moderate-income tracts. This represents 30.4 percent of AA branches located in LMI tracts, compared to 35.6 percent of total AA tracts that are LMI. Twelve additional branches are located near LMI tracts. Since the last examination, the bank closed two branch locations and opened one new branch office. Banking offices are accessible to LMI geographies and the wide array of services offered by the bank does not vary from branch to branch in a way that inconveniences portions of the AA, particularly LMI individuals.

Community Development Services:

The bank is a leader in the provision of community development services in the Kansas City CSA AA, with 528 qualified services provided during the review period, including multiple credits for ongoing services provided in 2011, 2012, and 2013. Examples include providing financial educational sessions for school children as part of Junior Achievement (101 instances over the three years, by 43 different employees), efforts to reach the unbanked population through Bank On/Save Up KC, and one-on-one financial planning sessions for LMI individuals through Money Smart programs (6 instances).

One community contact indicated a need for more involvement from local financial institutions in providing training on credit counseling/credit repair, financial literacy, budgeting, money management, and developing SB plans. Another community contact indicated that local banks could better serve the community by providing financial expertise and investment support, including assistance to SBs in understanding how banks evaluate and underwrite risks associated with commercial lending.

The bank's efforts with financial literacy programs are responsive to this stated need for financial literacy for LMI individuals in the Kansas City area.

ST. LOUIS, MISSOURI-ILLINOIS
MULTISTATE METROPOLITAN STATISTICAL AREA

CRA RATING FOR ST. LOUIS MULTISTATE MSA³ :	<i>“Outstanding”</i>
<i>The lending test is rated:</i>	<i>“High Satisfactory”</i>
<i>The investment test is rated:</i>	<i>“Outstanding”</i>
<i>The service test is rated:</i>	<i>“Outstanding”</i>

Major factors supporting the rating include:

- The bank is a leader in community development lending in the AA.
- The level of qualified community development investments in the AA is excellent.
- The bank is a leader in providing community development services in the AA.
- The geographic distribution of HMDA lending is considered adequate.
- The geographic distribution of business loans is considered good.
- The distribution of HMDA loans among individuals of different income levels is considered adequate.
- The distribution of loans to businesses of different revenue sizes is considered adequate.
- Delivery systems are accessible to geographies and individuals of different income levels within the AA.
- Products, services, and hours do not vary significantly by branch location and do not hinder access in any geographies or by individuals of different income levels within the AA.

SCOPE OF EXAMINATION

Each multistate CSA/MSA AA with branches in more than one state is required to have a full review. The scope of the St. Louis MSA AA was consistent with the overall scope for the institution, including evaluations under the lending, investment, and service tests. Due to the significant bank presence, the two multistate CSA/MSA AAs received the greatest weight in the overall rating.

Six prior community contacts conducted within the MSA during the previous two years were referenced for the evaluation.

³ This rating reflects performance within the multistate MSA. The statewide Missouri and Illinois evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate MSA.

DESCRIPTION OF BANK'S OPERATIONS IN THE ST. LOUIS MSA AA

The St. Louis MSA is the bank's second primary market area, with 51 locations (as of December 31, 2013) and a deposit market share of 6.5 percent, which ranked fourth of 137 total financial institutions in the MSA. (FDIC Market Share Report, June 30, 2013)

The majority of bank branches in this AA are located in St. Louis County (57.6 percent), an affluent suburban county of the MSA.

DESCRIPTION OF THE ST. LOUIS MSA AA

The bank's St. Louis MSA AA includes all of the City of St. Louis, plus 6 of 15 counties in the MSA: Madison, Monroe, and St. Clair Counties in Illinois, and Jefferson, St. Charles, and St. Louis Counties in Missouri.

Economic and Employment Characteristics. The largest industry sectors in the St. Louis MSA are educational and health services (17.9 percent), professional and business services (14.6 percent), government (12.6 percent), retail trade (10.8 percent), and leisure and hospitality (10.6 percent). (Source: FDIC RECON/Moody's Analytics & BLS, 2012; BEA, 2011)

The MSA's largest employers are BJC Healthcare (25,374 employees), Boeing Integrated Defense Systems (14,730), Washington University in St. Louis (13,677 – up from 10,300 in 2009), Scott Air Force Base (13,020), SSM Health Care System (11,312), Archdiocese of St. Louis (11,207), Schnuck Markets, Inc. (10,553), St. John's Mercy Health Care (10,247), McDonald's Corporation (9,500), St. Louis University (7,495), and AT&T (7,100). (Source: FDIC RECON/Moody's Analytics & St. Louis Business Journal, 2012)

The MSA's housing market continues to be undersupplied and undervalued. Increased hiring in healthcare and manufacturing is expected to enhance the housing market in the near term. Foreclosure inventories will continue to slowly decline, which should lead to a rise in housing prices. As demand increases, residential construction is expected to increase as well.

The St. Louis MSA economy has seen improvements recently, particularly in aerospace manufacturing and healthcare. Boeing Defense and Space & Security have secured additional government contracts that have helped to preserve the employment levels at their respective factories. The relatively large numbers of hospitals and healthcare companies in St. Louis have expanded their operations concurrently with demands from an aging population. Growth, particularly in the manufacturing and healthcare sectors, has led to a decrease in the unemployment rate from 9.9 percent in 2009 to 7.6 percent in 2012. (Source: FDIC RECON/Moody's Economy.com, October 2013)

TABLE 11 UNEMPLOYMENT RATES ¹			
Area	2011	2012	3Q'13
St. Louis MSA	8.8	7.6	7.3
State of Missouri	8.4	6.9	6.8
U.S.	8.9	8.1	7.3
¹ Source: FDIC RECON			

Table 12 shows income, housing, and general demographic characteristics of the St. Louis MSA AA.

TABLE 12								
2012 ST. LOUIS, MO-IL MSA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	76	13.7	49,068	7.7	16,732	34.1	132,896	20.9
Moderate-income	108	19.5	112,177	17.6	17,938	16.0	106,680	16.8
Middle-income	204	36.9	251,246	39.5	14,770	5.9	132,353	20.8
Upper-income	163	29.5	224,069	35.2	5,750	2.6	264,643	41.6
Unknown-Income	2	0.4	12	0.0	0	0.0	0	0.0
Total AA	553	100.0	636,572	100.0	55,190	8.7	636,572	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	107,628	35,094	5.1	32.6	48,825	45.4	23,709	22.0
Moderate-income	218,395	114,410	16.5	52.4	74,901	34.3	29,084	13.3
Middle-income	421,836	287,974	41.5	68.3	101,687	24.1	32,175	7.6
Upper-income	334,054	256,253	36.9	76.7	59,070	17.7	18,731	5.6
Unknown-Income	600	7	0.0	1.2	393	65.5	200	33.3
Total AA	1,082,513	693,738	100.0	64.1	284,876	26.3	103,899	9.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	7,811	6.4	6,701	6.2	707	8.1	403	8.9
Moderate-income	20,062	16.5	17,407	16.1	1,801	20.7	854	18.9
Middle-income	44,187	36.4	39,679	36.7	2,833	32.6	1,675	37.1
Upper-income	49,225	40.5	44,335	41.0	3,318	38.1	1,572	34.8
Unknown-Income	111	0.1	62	0.1	39	0.4	10	0.2
Total AA	121,396	100.0	108,184	100.0	8,698	100.0	4,514	100.0
Percentage of Total Businesses:				89.1		7.2		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	12	0.6	9	0.4	3	15.8	0	0.0
Moderate-income	103	4.8	102	4.8	1	5.3	0	0.0
Middle-income	1,045	48.8	1,038	48.9	6	31.6	1	100.0
Upper-income	982	45.8	973	45.8	9	47.4	0	0.0
Unknown-Income	1	0.0	1	0.0	0	0.0	0	0.0
Total AA	2,143	100.0	2,123	100.0	19	100.0	1	100.0
Percentage of Total Farms:				99.1		0.9		0.0
Based on 2006-2010 ACS data and 2012 D&B business and farm demographic data.								
NOTE: Percentages may not total 100 percent due to rounding differences.								

One community contact stated that the St. Louis economy did not suffer during the recession as much as other areas of the country. However, the downturn in the St. Louis region was still quite significant, with increases in unemployment, low-income housing needs, vacancies, and inability to pay rent. She noted that the area economy is improving, as year-end 2012 figures were much better than 2011. Occupancies and the ability to collect rent have improved, but there is a growing demand for developments of housing for low-income people. Businesses that downsize or leave the area seem to be offset by new or expanding businesses. She recently heard Charter (cable company) was planning to hire over 400 new people, and those will likely be jobs for LMI people. Most of the growth and employment opportunities seem to be in the suburban areas, with little employment growth in the LMI city center areas.

One community contact indicated that currently there is low loan demand because businesses are not sure of the condition of the economy and they are concerned about another recession. He stated that businesses have cash reserves but are waiting to see what will happen with the economy over the next three to four years. He also believes entrepreneurs in the area are exhibiting growth right now. Because of the abundance of new businesses, he feels one of the biggest needs is funding these start-up companies.

Another community contact indicated that underwriting has become tougher over the last few years. He stated that required ratios have become more conservative and it has gotten harder for banks to do deals, especially for smaller nonprofits. There are less sources of subordinate financing given the reduction in Low-income Housing Tax Credits (LIHTCs) and HOME funds. Obtaining refinancing for expiring LIHTC projects is also very difficult. Many banks are unfamiliar with refinancing these deals and are not interested in learning. Mortgage products through traditional banks/thrifts are also harder to obtain, given the requirement of high credit scores and higher down-payments.

The contact indicated that the opportunities for participation by local financial institutions are numerous, particularly for the more sophisticated larger financial institutions that utilize income tax credits and/or tax-exempt bond financing. Other opportunities for area banks to fill community needs include mortgage products for LMI borrowers, long-term or permanent financing for nonprofit housing developers, general operating support, and technical assistance for smaller nonprofits.

Population Trends and Characteristics. The AA consists of the City of St. Louis, plus 6 of 15 counties in the MSA (Note: St. Louis City is not in a county). The 2010 AA population equaled 2,469,761, or 87.8 percent of the entire MSA population of 2,812,896. Since the AA comprises such a high percentage of the total MSA population, AA demographics, such as the concentration of families and age distribution, mirror MSA figures. Demographic characteristics do vary by county. St. Louis County, where the majority of the bank's branches are located, has a relatively high level of elderly residents (greater than age 65), while St. Charles County and Jefferson County have the lowest concentrations of elderly and higher concentrations of working age adults (25 to 64). St. Louis County had 40.4 percent of the total AA population, as of 2010 Census data.

Income Characteristics. The percentage of families in the AA that are considered low- (20.9 percent), moderate- (16.8 percent), middle- (20.8 percent), and upper-income (41.5) are very similar to the overall MSA figures, and generally mirror the overall state figures for Missouri and Illinois. However, these figures vary widely by county within the AA. St. Louis County, where the majority of the bank's branches are located, has a relatively low level of LMI families (combined LMI, 34.1 percent, vs. the AA figure of 37.6 percent). St. Louis City has a very high level of LMI families (60.5 percent), as does St. Clair County, Illinois (43.8 percent). The county with the lowest level is St. Charles County (25.7 percent).

The percentage of AA families below the poverty level (8.7 percent) also mirrored the entire MSA, as of 2010 data. St. Louis City (21.4 percent) and St. Clair County, Illinois (12.3 percent) were again the highest in the AA, while Monroe County, Illinois (3.5 percent) and St. Charles County, Missouri (3.3 percent) were the lowest. Overall, income characteristics in the AA may result in a more favorable suburban lending environment than urban, as the urban areas have lower income levels, more LMI families, and more families below the poverty level.

Housing Characteristics. As of 2010 Census data, the concentration of owner-occupied housing units was lowest in St. Louis City (37.6 percent) and St. Clair County, Illinois (60.7 percent), where most AA LMI tracts are located. This is below the AA average of 64.1 percent, which mirrors the overall MSA. Owner-occupied units have the highest concentrations in St. Charles County, Missouri (78.1 percent), Jefferson County, Missouri (77.6 percent), and Monroe County, Illinois (77.0 percent). The majority of the bank's AA branches are in St. Louis County, which has 35.6 percent of total AA housing units, of which 67.1 percent are owner-occupied. There will likely be more owner-occupied residential real estate loan opportunities in St. Louis County. There is a higher concentration of rental units in St. Louis City (42.1 percent of total housing units), which may lead to higher levels of nonowner-occupied rental and rehab type residential real estate loans in this area. However, this is not a significant product for the bank, as the 2012 HMDA data shows 84.0 percent of total originations to be owner-occupied.

Mobile homes are much more prevalent in Jefferson County, Missouri, equaling 13.2 percent of housing units compared to only 2.7 percent for the entire AA. The median age of housing units is highest in St. Louis City (71 years) versus 43 years for the overall AA and only 20 years in St. Charles County. This may indicate a greater demand for home improvement loans in St. Louis City. The bank's 2012 HMDA data showed that a majority of originations were for home purchase and refinance; with only 15.2 percent for home improvement. Therefore, this may be a market not served as fully by the bank as the suburban markets, where new home construction has been more prevalent.

The AA's 2010 housing affordability ratio (32.8 percent) mirrored the entire MSA (33.3 percent), and was higher (more affordable) than the state of Illinois (27.5 percent) and slightly lower (less affordable) than the state of Missouri (33.6 percent). Median housing values were highest in St. Louis County (\$179,300), St. Charles County (\$197,300), and Monroe County, Illinois (\$197,400). Since St. Louis County is the most populous county, and

St. Charles County has the highest rate of owner-occupied housing, these counties may have the highest residential loan demand.

St. Louis City had a low 2010 median housing value (\$122,200); however, it had a low median household income (\$41,395). Therefore, the affordability ratio was lower, at 27.5 percent.

Census Tract Income Levels/Characteristics. The AA has 76 low-, 108 moderate-, 204 middle-, 163 upper-, and 2 unknown-income tracts. The majority of LMI tracts are in St. Louis City, with several in St. Louis County and St. Clair and Madison Counties in Illinois as well. The LMI tracts contain much larger concentrations of families below the poverty level, equaling 34.1 percent of families in the low-income tracts and 16.0 percent in the moderate-income tracts, well above the 5.9 percent figure in the middle-income tracts and 2.6 percent in the upper-income tracts. The LMI tracts also contain a higher percentage of rental units, equaling 45.4 percent in the low- and 34.3 percent in the moderate-income tracts, compared to 26.3 percent for the AA overall.

The median age of housing stock is considerably older in the LMI tracts, equaling 61 years in the low-income tracts and 57 years in the moderate-income tracts, compared to 40 years in middle-income tracts and 30 years in the upper-income tracts.

Of the bank's 51 MSA branches, 4 are located in low-, 5 are in moderate-, 15 are in middle-, and 27 are in upper-income tracts.

One community contact from the North City/North County area, which is predominantly LMI, indicated that the area suffered job losses due to the closure of the Chrysler and Ford plants. The closing of these plants has led to an increase in foreclosures for area residents.

PERFORMANCE TEST CONCLUSIONS IN THE ST. LOUIS MSA AA

LENDING TEST

The bank's performance with respect to the lending test in the St. Louis MSA AA is rated "high satisfactory". The bank is a leader in community development lending in the AA, which enhanced the overall lending performance rating. Responsiveness to area credit needs, AA lending volumes, and borrower and geographic distributions are all considered adequate. A more in-depth discussion of performance in the AA follows.

Lending Activity:

See the discussion in the overall institution section for information regarding lending products and services offered by the bank and use of innovative products. The bank's lending activity and responsiveness to AA credit needs were considered adequate in the St. Louis MSA AA. The bank is not a market leader in HMDA or SB/SF lending within the AA, but has reported an

average of approximately 1,050 loan originations on both the HMDA LAR and CRA LAR each year for the three-year period reviewed. For the review period, the bank originated 79 SBA loans totaling \$30.3 million in the St. Louis MSA.

According to the bank's internal analysis as of December 31, 2013, the percent of total bank lending in the AA equaled approximately 26 percent, while the deposits in the AA equaled approximately 31 percent of total bank deposits. This resulted in an approximate LTD ratio in this market of 60.8 percent. All lending activity parameters reviewed represented adequate lending levels for the AA.

Geographic Distribution:

As shown in Tables 13 and 14, the distribution among geographies of different income levels of the bank's residential mortgage loans was adequate and the business loan distribution was good. The bank had a minimal level of farm loans in the AA during the review period, too few for a meaningful analysis.

Each HMDA loan product was generally consistent with aggregate data regarding lending within LMI tracts, with the exception of home purchase loans in moderate-income tracts, which are below the aggregate figure. All categories generally showed improvement in 2013. However, most were well below demographic figures, except multifamily loans, though that universe was quite small. Data by loan product for 2012 will primarily be discussed in the following sections. The bank's performance in 2011 and 2013 was generally consistent with the findings for 2012, with outliers noted for additional context.

One primary factor affecting the bank's HMDA lending levels is that the AA's LMI tracts contain higher concentrations of rental units, equaling 45.4 percent in the low- and 34.3 percent in the moderate-income tracts, compared to 26.3 percent for the AA overall. This creates a larger market for nonowner-occupied residential loans in the LMI tracts; however, this is not a significant product for the bank in this market. In the entire MSA, 93 percent of the bank's HMDA originations are loans secured by owner-occupied housing units.

The higher owner-occupancy rate and the higher rate of new home construction has led to higher HMDA originations in the more affluent suburban counties, which more predominantly contain middle- and upper-income census tracts. Conversely, there are lower levels of HMDA originations in the LMI areas, which have lower owner-occupancy rates.

In the St. Louis MSA, the more affluent suburban counties of St. Louis County, St. Charles County, and Jefferson County, Missouri, had the highest concentration of the bank's HMDA loan originations. These three counties included 76.6 percent of the bank's total MSA HMDA originations (St. Louis County was highest, with 46.1 percent), and 95.3 percent of these loans were on owner-occupied housing units. These counties also had higher concentrations of middle- and upper-income census tracts.

LMI areas of the AA with low levels of HMDA loans, based on mapping of loan originations, appear to be north St. Louis County, north St. Louis city, and the core city of East St. Louis, Illinois. However, south St. Louis city and Belleville, Illinois, which has two nearby branches, appear to be LMI areas with higher HMDA loan penetrations.

TABLE 13 DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES ST. LOUIS, MO-IL MSA							
Census Tract Income Level ¹	Bank Loans				Aggregate HMDA Data ²		% of Owner Occupied Units ³
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	24	1,467	1.9	0.9	1.4	1.0	5.1
Moderate	116	7,460	9.3	4.5	8.4	5.2	16.5
Middle	467	40,152	37.4	24.5	38.6	30.5	41.5
Upper	640	114,934	51.3	70.1	51.7	63.3	36.9
Home Purchase Loans							
Low	3	235	2.0	0.7	1.9	1.1	5.1
Moderate	9	998	6.0	2.9	10.6	6.0	16.5
Middle	50	8,139	33.6	23.5	43.4	35.0	41.5
Upper	87	25,252	58.4	72.9	44.1	57.9	36.9
Home Refinance Loans							
Low	12	744	1.3	0.6	1.1	0.7	5.1
Moderate	88	5,760	9.7	4.9	7.4	4.6	16.5
Middle	348	27,458	38.2	23.4	36.8	29.0	41.5
Upper	463	83,620	50.8	71.1	54.7	65.7	36.9
Home Improvement Loans							
Low	7	101	3.9	1.3	3.5	1.0	5.1
Moderate	19	702	10.7	8.9	15.0	8.2	16.5
Middle	65	2,356	36.5	29.9	42.6	34.4	41.5
Upper	87	4,720	48.9	59.9	39.0	56.4	36.9
Multifamily Loans							% of Multifamily Units ³
Low	2	387	22.2	9.9	11.3	11.6	13.4
Moderate	0	0	0.0	0.0	27.8	21.3	19.5
Middle	4	2,199	44.4	56.0	37.0	31.7	37.7
Upper	3	1,342	33.3	34.2	23.9	35.5	29.1

¹ Low-income census tracts are those geographies with MFI less than 50 percent of the MSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent - 80 percent; middle-income is 80 percent - 120 percent; and upper-income is greater than 120 percent.

² Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.

³ Percentage of owner-occupied and multifamily housing units by tract based on 2006-2010 ACS data. NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.

Home Purchase Loans

The bank's geographic distribution of home purchase loans in LMI tracts was low, but considered adequate. The bank's performance in low-income geographies was below area demographics, but was near aggregate figures. This penetration included only three home purchase loans in the low-income tracts. In the moderate-income tracts, the bank's performance was well below the demographic figure and lagged behind aggregate data. The bank had a relatively low level of lending in the middle-income tracts but far exceeded aggregate and demographic figures in the upper-income tracts. The findings for 2011 and 2013 were consistent with 2012, though there was improvement in the bank's performance in LMI tracts in 2013.

Area economic factors contribute to lower lending levels in LMI tracts by all lenders. The LMI tracts contain much larger concentrations of families below the poverty level, equaling 34.1 percent of families in the low-income tracts and 16.0 percent in the moderate-income tracts; well above the 5.9 percent figure in the middle-income tracts and 2.6 percent in the upper-income tracts. Families below the poverty level may have difficulty qualifying for residential purchase loans. The higher poverty rate and higher rental unit concentrations in LMI tracts, the lower housing affordability ratio in St. Louis city, and lower new home construction in areas of the core city versus the suburbs, make lending on owner-occupied housing units in these tracts more difficult, as reflected in the aggregate data. The fact that the bank's LMI tract lending numbers ranked near aggregate figures, especially with the slight improvement shown in 2013, coupled with the economic barriers in making owner-occupied home purchase loans in the LMI tracts, led to the adequate rating.

Refinance Loans

Refinance lending across geographies of different income levels was considered adequate. The bank's performance in LMI geographies was consistent with or slightly above aggregate data, but well below area demographics. As noted previously, refinance loans are typically lowest in LMI tracts and to LMI borrowers due to several reasons, including lack of financial education, lack of closing costs, potential use of special programs originally used to purchase the home, and less incentive to refinance due to lower home values. Conversely, refinance loans in the upper-income tracts had the highest volume for the bank and the aggregate, as the higher home values in upper-income tracts would yield the greatest benefit of refinancing.

Home Improvement Loans

The geographic distribution of home improvement lending reflected an adequate penetration across geographies of different income levels. The bank's lending in low-, moderate-, and middle-income tracts was relatively similar to aggregate and demographic figures. The bank had a much higher level of lending in the upper-income tracts of the AA. This somewhat belies the potential need for home improvement activity in the LMI tracts, given the older age of housing stock; but homeowners in these tracts may not have the financial capacity to borrow

for such projects, as indicated by community contacts. Also, the bank's emphasis on this product has declined over the past two years.

Multifamily Loans

The volume of multifamily loans in the AA was minimal compared to other HMDA products, though relatively strong for lending on multifamily units, with eight in 2011, nine in 2012, and 14 in 2013. The penetration in LMI tracts was considered good, especially in 2013, where the bank's penetration in moderate-income tracts slightly exceeded demographic, and in low-income tracts was well above the demographic figure (35.7 percent vs. 13.4 percent).

TABLE 14 DISTRIBUTION OF 2012 SB AND SF LOANS BY INCOME LEVEL OF GEOGRAPHIES ST. LOUIS, MO-IL MSA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data ¹		% of Businesses/ Farms ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	71	21,988	7.2	12.4	5.5	6.6	6.4
Moderate	186	40,817	18.9	23.1	14.8	16.5	16.5
Middle	321	51,451	32.6	29.1	34.3	32.2	36.4
Upper	408	62,383	41.4	35.3	43.2	44.1	40.5
SF Loans							
Low	0	0	0.0	0.0	0.4	0.1	0.6
Moderate	0	0	0.0	0.0	5.5	3.3	4.8
Middle	2	35	50.0	11.2	55.4	52.4	48.8
Upper	2	277	50.0	88.8	38.7	44.2	45.8
¹ Aggregate loan data reflects all originations in the bank's AA reported by all CRA filers. ² Percentage of businesses and farms by tract based on 2006-2010 ACS data. NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Business Loans

The geographic distribution of business loans in the AA was considered good. The penetration levels in both the low- and the moderate-income tract categories were slightly above aggregate and demographic figures. All four income categories were relatively consistent with expectations based on demographic and aggregate figures. The 2013 performance in LMI tracts was slightly lower, though the findings were consistent with 2012. The bank's level of lending was adequate for 2011.

Farm Loans

The volume of farm loans in the MSA AA was insufficient for a meaningful analysis, with only four originations in 2012 and eleven in 2013.

Distribution by Borrower Income and Business Revenue Size:

As shown in Tables 15 and 16, the borrower distribution of the bank's lending reflected adequate distribution among individuals of different income levels and businesses and farms of different revenue sizes. The bank's HMDA distribution figures for each product were well below demographic figures in the low-income category, but mirrored demographics in the moderate-income category. The bank's figures are generally consistent with aggregate figures; except the bank's level of lending was only half the aggregate for home purchase loans to low-income borrowers, and double the aggregate for home refinance loans to low-income borrowers.

CRA LAR SB and SF loans were below the demographic figures for businesses and farms that are small, though SF loans were closer to demographics, and both typically exceeded aggregate data. The volume of farm loans was minimal for the review period and will not be discussed further.

TABLE 15 DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS ST. LOUIS, MO-IL MSA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans ³							
Low	128	6,303	10.3	3.8	7.6	3.7	20.9
Moderate	208	13,776	16.7	8.4	15.3	10.1	16.8
Middle	281	22,243	22.5	13.6	18.7	15.5	20.8
Upper	572	106,273	45.9	64.8	39.1	50.3	41.6
Unknown	58	15,418	4.7	9.4	19.3	20.4	0.0
Home Purchase Loans							
Low	11	811	7.4	2.3	13.1	6.8	20.9
Moderate	26	3,104	17.4	9.0	21.9	16.3	16.8
Middle	25	3,291	16.8	9.5	18.9	18.3	20.8
Upper	82	26,572	55.0	76.7	29.8	44.0	41.6
Unknown	5	846	3.4	2.4	16.3	14.5	0.0
Home Refinance Loans							
Low	97	4,972	10.6	4.2	5.6	2.8	20.9
Moderate	153	9,858	16.8	8.4	13.0	8.4	16.8
Middle	218	17,685	23.9	15.0	18.7	15.0	20.8
Upper	400	74,494	43.9	63.4	42.3	53.3	41.6
Unknown	43	10,573	4.7	9.0	20.4	20.5	0.0
Home Improvement Loans							
Low	20	520	11.2	6.6	10.9	4.8	20.9
Moderate	29	814	16.3	10.3	18.3	12.7	16.8
Middle	38	1,267	21.3	16.1	20.1	16.8	20.8
Upper	90	5,207	50.6	66.1	42.2	57.7	41.6
Unknown	1	71	0.6	0.9	8.4	8.1	0.0

¹ Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.

² Percentage of families based on 2006-2010 ACS data.

³ Total HMDA loans will not foot, as multifamily loans are not considered in the borrower distribution.

NOTE: Percentages may not total 100 percent due to rounding differences.

Home Purchase Loans

Overall, the bank's performance regarding home purchase loans was considered adequate. The distribution to low-income borrowers was well below area demographics and aggregate data. However, the distribution to moderate-income borrowers slightly exceeded area demographics and was near aggregate data (aggregate data showed a strong performance to moderate-income borrowers). Home purchase loans to middle-income borrowers were below demographics and aggregate, while lending levels to upper-income borrowers were well above demographic and aggregate figures.

As in the Kansas City market, the relatively low cost of housing enables some families at the upper end of the LMI range to obtain home loans, evidenced by the higher level of aggregate

HMDA lending to moderate-income families for home purchase loans. The low-income borrower category faces more obstacles to home ownership; however, the bank lags well behind the aggregate figure for this category.

Refinance Loans

The bank's performance regarding home refinance loans was considered good. As mentioned in the geographic distribution above, refinance loan volumes are typically much lower to LMI borrowers and in LMI tracts. This holds true for the bank and the aggregate in penetrations to low-income families in this AA, though the bank's performance was nearly double the aggregate figure (10.6 percent vs. 5.6 percent). The bank also exceeded aggregate lending data to moderate-income families, and mirrored the demographic data. Refinance loans to middle- and upper-income borrowers were just above demographic and aggregate figures. Given the constraints for refinance loans to LMI families and the bank's lending levels, the bank's performance was considered good for this product.

Home Improvement Loans

The bank's performance regarding home improvement loans was considered adequate. The distribution to low-income borrowers compared unfavorably with area demographics but was slightly above aggregate. The distribution to moderate-income borrowers equaled the area demographic and was slightly below the aggregate. Home improvement loans to middle-income borrowers were in line with demographics and aggregate, while lending levels to upper-income borrowers were above demographic and aggregate figures.

Home improvement lending was identified as a need for LMI borrowers in the Reserve Bank's LMI Survey, as the age of affordable housing stock is typically older and in need of repair, and LMI homeowners do not typically have excess cash flow to maintain properties without borrowing. However, the bank's emphasis on home improvement lending has diminished over the past two years.

TABLE 16 DISTRIBUTION OF 2012 SB AND SF LOANS ¹ BY REVENUE SIZE OF BUSINESS ST. LOUIS, MO-IL MSA							
Business/Farm Size by Revenue ²	Bank Loans				Aggregate CRA Data ³		% of AA Businesses/ Farms ⁴
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	503	50,133	51.0	28.4	38.2	34.1	89.1
Over \$1MM	430	123,666	43.6	70.0	Not Reported		7.2
Not Known	53	2,840	5.4	1.6			3.7
SF Loans							
\$1MM or less	3	112	75.0	35.9	59.6	72.3	99.1
Over \$1MM	1	200	25.0	64.1	Not Reported		0.9
Not Known	0	0	0.0	0.0			0.0
¹ The CRA disclosure statement reports only business loans in amounts of \$1 million or less and farm loans in amounts of \$500M or less. ² This analysis focuses on the bank's lending to "small businesses" and "small farms" as defined by the CRA, which are those businesses and farms with gross annual revenues of \$1 million or less. ³ Aggregate loan data reflects all SB and SF loan originations in the bank's AA reported by all CRA data filers. ⁴ Percentage of businesses and farms in the AA based on 2012 D&B data. NOTE: Percentages may not total 100 percent due to rounding differences.							

Business Loans

The bank's record of lending to SBs was considered adequate. The bank's penetration was well below the demographic figure of SBs in the AA, but above the aggregate figure. Again, the independent study by NFIB provides some context to the lower levels of lending to SB by all CRA filers nationwide.

Farm Loans

The distribution of loans to farms of different sizes is adequate. The bank's lending performance to SFs was below area demographics, but well above aggregate data. However, the volume of farm loans in the AA was minimal, so very little weight was given to farm loans in the evaluation.

Community Development Loans:

The bank is considered a leader in providing community development loans in the St. Louis MSA AA, where it originated 153 loans for \$484 million during the evaluation period. The distribution of community development lending included 13 for affordable housing, 31 for community services targeted to LMI families or individuals, 93 for economic development, and 16 for revitalization or stabilization of LMI geographies. Again, the loans for economic development and revitalization/stabilization were generally greater than \$1 million, located in an enterprise zone, meeting SBA size requirements, and made to a myriad of SBs from various industry sectors located throughout the AA. Other examples of community development lending within the AA included:

- Three loans totaling \$3 million to a local food bank (primarily a \$1.5 million loan renewed in 2011 and 2012)
- Three loans totaling \$3.6 million to a community organization that targets LMI individuals (a \$1.2 million loan renewed in 2011, 2012, and 2013)
- A \$500,000 loan to a family health care center
- A \$400,000 loan to a food pantry

One community contact indicated that in early 2012, many local banks combined to form a CRA Association. The group meets regularly and discusses opportunities for CRA and community development. This has provided a great opportunity to spread information quickly to many institutions. One project is the North Side Regeneration Project, which is a large project to revitalize the north side of town. This project has been in the works for several years, but so far has only purchased land. Most banks involved in this project seem to be smaller, out-of-state banks, but does include Commerce. There appears to be opportunities for increased involvement by local banks in projects such as this.

The contact indicated that there has been significant focus on affordable housing in the area in response to a great area need, but feels the LMI areas also need more comprehensive community development plans incorporating affordable housing, infrastructure, roads, education, childcare, etc. She feels there is more coordination and collaboration among local institutions to meet community development needs. She cited the bank as one of the leaders in the area when it comes to CRA and community development and being in tune with community needs.

INVESTMENT TEST

The bank had an excellent level of qualified community development investments and donations in the St. Louis MSA AA, resulting in an “outstanding” rating for the AA. Investments in the area totaled \$65.8 million and included 149 investments in bonds, housing equity funds, private placement bonds, and tax credits. Most of the qualified investments were current period investments, with only 24 prior period investments totaling \$21.1 million remaining on the books. Examples of qualified investments included:

- One current period private placement bond totaling \$7.5 million to a plant science research organization located in a state designated redevelopment area, in addition to seven prior period private placement bonds totaling \$14.4 million.
- 114 tax credits totaling \$20.6 million, providing revitalization/stabilization of LMI tracts or affordable housing, including:
 - Missouri Historic Preservation tax credits for qualified property rehabilitation expenses in LMI tracts (with one project in a middle-income tract, but adjacent to LMI tracts).
 - Brownfield Remediation tax credits for the redevelopment of commercial/industrial sites contaminated with hazardous substances and abandoned or underutilized for at least three years.

- Neighborhood Preservation Act tax credits for the rehabilitation or construction of owner-occupied homes in LMI areas of the state (with one developer specifically building affordable homes, regardless of tract category).
- Affordable Housing Assistance Program tax credits for affordable housing production.
- Rebuilding Communities Tax Credit Program to stimulate business by providing tax credits to eligible businesses that locate, relocate, or expand their business within a distressed community in Missouri.
- Three new SBIC issuances to one entity for economic development totaling \$3.2 million, and four prior period issuances to two other entities totaling \$5.7 million.
- Housing equity funds totaling \$4.1 million for the current review period, plus \$500,000 prior period, for various affordable housing projects in the St. Louis MSA.

The bank has shown good responsiveness to area community development needs through its donation activities. The bank had 661 qualified donations within the AA during the review period totaling \$1.8 million, which represented 25.1 percent of the bank's total qualified donations by number and 34.2 percent of the total qualified dollars.

SERVICE TEST

The bank's performance under the service test in the St. Louis MSA AA is rated "outstanding" based on the accessibility of delivery systems and the bank is a leader in providing community development services. St. Louis is one of two markets where the bank has established a full-time CRA Market Contact whose primary duties involve meeting with community organizations that target LMI areas and LMI individuals. The contact promotes bank products and services within these areas with certain products specifically targeted to LMI and unbanked individuals.

Retail Services:

Retail services were discussed under the overall bank review and do not vary by market. The bank operates 51 branch locations in the St. Louis MSA AA, four of which are located in low-, five in moderate-, 15 in middle-, and 27 in upper-income tracts. This represents only 17.6 percent of AA branches located in LMI tracts, compared to 33.2 percent of total AA tracts that are LMI. However, five additional branches are located near LMI tracts. Since the last examination, the bank closed one branch and opened two, all in upper-income tracts. Banking offices are accessible to LMI geographies and the wide array of services offered by the bank does not vary in a way that inconveniences its AA, particularly LMI geographies and individuals.

Community Development Services:

The bank is a leader in providing community development services in the St. Louis MSA AA, with 320 qualified services during the review period, primarily to organizations offering community services targeted to LMI individuals. Examples include providing financial

educational sessions for school children as part of Junior Achievement (99 qualified sessions by 55 employees), as well as services provided to other organizations that provide economic development, affordable housing, and community services.

One community contact indicated that there are significant opportunities for financial institutions to participate in community development. Specific needs for the area include attracting more businesses to the area that would create jobs and programs to help re-train area residents for new jobs. There are opportunities where banks can help provide their financial expertise by participating on boards and providing financial expertise, or providing resources for financial education programs to help educate LMI residents on ways to improve credit to achieve long-term goals. Programs that would be especially beneficial to LMI communities are general financial education and first time home buyer counseling, as well as SB workshops and counseling services. Another contact seconded the need to assist SBs in the development of business or marketing plans, in order to better prepare them to seek funding.

One community contact from the high-minority, low-income areas of North City and North County indicated that, in general, a high percentage of residents in these areas are unbanked and predominantly rely upon check cashing facilities for banking needs. Many individuals use payday lenders and grocery stores because of convenience. The contact stated that there is a lack of traditional banking facilities in these areas. Many individuals also use payday lenders due to poor experiences they have had with traditional banks in the past. A significant need in the area is to provide financial education to LMI residents, especially as more government payment systems, such as social security, will soon transition to direct deposit payments. The bank does have two branches in the north area, in Florissant and Spanish Lake.

Another contact that serves all of St. Louis County, and a large percentage of the North County area, also believes that St. Louis has one of the largest concentrations of unbanked minorities in the nation, who rely more on payday lenders than traditional banks. He also indicated that financial education is one of the most important credit needs so that LMI families can make more informed decisions regarding important issues such as buying a house and asset building.

STATE OF MISSOURI

CRA RATING FOR MISSOURI⁴ :	<u>"Satisfactory"</u>
<i>The lending test is rated:</i>	<i>"High Satisfactory"</i>
<i>The investment test is rated:</i>	<i>"High Satisfactory"</i>
<i>The service test is rated:</i>	<i>"Outstanding"</i>

Major factors supporting the rating include:

- The bank is a leader in community development lending in the state.
- The level of qualified community development investments is significant.
- The bank is a leader in providing community development services in the state.
- The geographic distribution of HMDA lending is considered adequate in the Springfield CSA AA and good in the Columbia CSA AA, due to a high volume of lending on investment properties in LMI tracts.
- The geographic distribution of business and farm loans is considered good.
- The distribution of HMDA loans among individuals of different income levels is considered adequate in the Springfield and Columbia AAs; though the level of home purchase loans to LMI individuals in the Columbia AA is poor - again, due to the high volume of lending on investment properties.
- The distribution of loans to businesses and farms of different revenue sizes is considered adequate to good.
- Delivery systems are accessible to geographies and individuals of different income levels within the AAs of the state.
- Products, services, and hours do not vary significantly by branch location and do not hinder access in any geographies or by individuals of different income levels within the AAs of the state.

SCOPE OF EXAMINATION

The scope of the review for the state of Missouri was consistent with the overall scope for the entire institution, including evaluations under the lending, investment, and service tests. The two AAs chosen for full reviews were the Springfield CSA AA and the Columbia CSA AA. Together, these two AAs had a majority of the bank's deposits, branches, population, LMI tracts, owner-occupied housing units, and business establishments of all of the state AAs. Accordingly, the state of Missouri rating was based predominantly on the bank's performance within these two AAs. The other eight Missouri AAs (three MSAs and five nonmetropolitan areas) were assessed using limited review procedures.

⁴ The bank has branches in two or more states in a multistate MSA. This statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate Kansas City or St. Louis CSA/MSA AAs. Refer to the multistate CSA/MSA ratings and discussions for the evaluation of the institution's performance in those areas.

Three prior community contacts conducted during the previous two years within the Columbia CSA were referenced, and three prior Springfield CSA contacts were also reviewed.

The review did not include multi-family home loans for Jefferson City, Cape Girardeau, nonMSA Barry/Lawrence County, or nonMSA Lebanon, as well as farm loans for nonMSA St. Francois, due to little or no volume.

DESCRIPTION OF BANK'S OPERATIONS IN MISSOURI

Excluding the two multistate CSA/MSAs, which were assessed independently, the remainder of the state of Missouri is a significant market area for the bank, with 48 branches, 14.9 percent of total bank deposits (as of June 30, 2013), and significant deposit market shares in several MSAs.

Within the state, the greatest deposit concentration was in the Springfield CSA AA, which accounted for 6.7 percent of total bank deposits, followed by the Columbia CSA with 3.5 percent. The bank's presence in the Springfield MSA (MSA only) ranked first out of 41 banks, and in the Columbia MSA it ranked third out of 31 banks. In the adjacent Mexico/Moberly area, part of the Columbia CSA, the bank ranked first of 12 banks. The bank's deposit market share rankings in the other MSAs equaled fourth of 15 in the Joplin MSA, eighth of 17 in the Cape Girardeau MSA, and eleventh of 24 in the Jefferson City MSA, where the bank's two branches are in the more rural MSA county, not Jefferson City proper. In the nonmetropolitan assessment areas, the bank's market share rankings ranged from fourth to tenth.

The Springfield and Columbia CSA AAs each had 13 branches (as of December 31, 2013), and the other eight AAs each had only two to four branches.

HMDA LAR originations within the AAs in the state of Missouri represented 28.8 percent of total HMDA originations within all bank AAs, while CRA loan originations equaled 38.6 percent. Within the state, the Springfield CSA AA had 26.3 percent of statewide AA HMDA loans and 23.3 percent of CRA LAR loans. The Columbia CSA AA had 35.5 percent of HMDA loans and 29.9 percent of CRA LAR loans. The other eight AAs in the state ranged from 2.4 percent to 7.8 percent of total state HMDA loans and 0.7 percent to 14.5 percent of total state CRA LAR loans.

PERFORMANCE TEST CONCLUSIONS IN MISSOURI

LENDING TEST

The bank's performance with respect to the lending test in the state is rated "high satisfactory". The bank is a leader in community development lending, which enhanced the overall lending

performance rating. Overall responsiveness to area credit needs is considered good and the bank's lending level was relatively high within the state. The borrower and geographic distribution analyses reflected adequate performance. A more in-depth discussion of the state's performance follows.

Lending Activity:

See the discussion in the overall institution section for information regarding lending products and services offered by the bank and use of innovative products. The bank's lending activity and responsiveness to AA credit needs were considered good in the state of Missouri. According to the bank's internal analysis as of December 31, 2013, the LTD ratio for the state (outside of the multistate CSA/MSA) equaled approximately 94 percent. The bank is not a market leader in HMDA or SB/SF lending within the state, but has reported an average of approximately 1,170 loan originations on the HMDA LAR and 2,190 CRA loan originations each year for the three-year period reviewed.

Geographic and Borrower Distribution:

Overall, the bank's distribution tests for the state of Missouri were considered adequate. The bank's geographic distributions within the Missouri AAs were generally stronger than the borrower distributions. In the bank's two full review AAs in the state, the geographic distribution of residential mortgage loans was adequate in Springfield and good in Columbia. The geographic distribution of SB loans was excellent in Springfield and good in Columbia. And the geographic distribution of SF loans was excellent in both AAs.

The overall distribution of HMDA lending among borrowers of different income levels was adequate. However, this test was considered poor in the Columbia AA.

The overall statewide distribution of lending to businesses of different revenue sizes was adequate, while the distribution to SFs was considered good in the two full review AAs. The bank's lending performance to SBs was typically well below demographic figures, though above aggregate figures. SF lending approached the demographic figure. More detailed analyses of the geographic and borrower distribution tests are provided in the following sections for each full review AA within the state.

Community Development Loans:

For the overall state of Missouri (only considering those areas outside of the two multistate CSA/MSA AAs), the bank is considered a leader in originating community development loans, with excellent levels of community development lending in the full review AAs, and generally adequate levels in the limited review AAs. However, some of the rural AAs had low levels of community development loans, including the Barry/Lawrence and Lebanon nonMSA AAs, and the Jefferson City MSA AA (which includes only the rural county of the MSA). The high level of activity in the two full review AAs enhanced the lending test rating for those two AAs and for

the state overall. Community development loans for the state totaled \$316.8 million for the review period. Appendix C details total community development activities.

The majority of community development loans were for revitalization and stabilization of LMI tracts (63.4 percent), made to business entities consistent with stated revitalization plans or enterprise zones. The next largest dollar volume of community development loans was for economic development (26.2 percent), originated to SBs (per SBA guidelines) that either employed LMI individuals or were located in LMI tracts or enterprise zones.

INVESTMENT TEST

The state of Missouri investment test rating is "high satisfactory," as the bank had a significant level of community development investments within the state. The statewide volume totaled \$20.5 million, representing 6.8 percent of the bank's total investment and donation volume. While the community development investment level in the Columbia CSA AA was considered somewhat weaker than the statewide level, it was still considered adequate. The Missouri rating was bolstered by the excellent investment activity in the Springfield CSA AA. The performances in the limited review AAs in the state were below the overall state performance; however, they did not change the state rating. The state volume of investments was also bolstered by seven statewide affordable housing equity investments totaling \$4.1 million.

The report sections covering the full review AAs will discuss more detail regarding investments and donations made within the specific AAs. Also, please see Appendix C for tables regarding the bank's community development activities by AA.

SERVICE TEST

The bank's performance under the service test is rated "outstanding" for the state of Missouri. The rating is based on the bank's good performance in the Springfield CSA AA and the excellent performance in the Columbia CSA AA. The limited review AAs were consistent with the overall outstanding rating for the state. The overall state conclusion was based on the accessibility of delivery systems, the effect of branch openings and closings, and the level of qualified community development services. Twelve of the bank's 47 banking offices (25.5 percent) in the state are located in LMI geographies. Banking offices are reasonably accessible to all portions of the AAs. The array of services offered and branch business hours do not vary in a way that inconveniences its AAs or LMI individuals or geographies.

The bank is considered a leader in providing community development services in the Columbia CSA AA and provided a relatively high level of services in the Springfield CSA AA. The level of services provided in the limited review AAs was consistent with the overall outstanding rating of the state. Specific details of the bank's community development services are provided under the sections for each full review AA.

**SPRINGFIELD/BRANSON, MISSOURI
COMBINED STATISTICAL AREA**
(Full Review)

DESCRIPTION OF BANK'S OPERATIONS IN THE SPRINGFIELD CSA AA

The Springfield CSA AA includes 13 locations (as of December 31, 2013). The deposit market share in the Springfield MSA (14.7 percent) ranked first of 41 financial institutions in the MSA. (MSA only, not CSA; FDIC Market Share Report, June 30, 2013)

DESCRIPTION OF THE SPRINGFIELD CSA AA

The bank's Springfield CSA AA includes four of five counties in the MSA, Christian, Dallas, Greene, and Polk; and the adjacent rural Taney County, which includes the city of Branson. Characteristics of the AA are discussed in the following sections.

Economic and Employment Characteristics. The largest industry sectors in the Springfield MSA are educational and health services (18.3 percent), government (14.6 percent), retail trade (12.5 percent), and professional and business services (11.5 percent). (Source: FDIC RECON/Moody's Analytics & Bureau of Labor Statistics [BLS], 2012; Bureau of Economic Analysis [BEA], 2011)

The MSA's largest nongovernment employers are Mercy Health Springfield Community (9,036 employees), Cox Health Systems (7,560), Wal-Mart Stores, Inc. (4,000), Bass Pro Shops (2,363), Missouri State University (MSU) (2,149), O'Reilly Auto Parts (1,673) and Citizens Memorial Hospital (1,600). (Source: FDIC RECON/Springfield Business & Development Corporation, February 2013)

Between 2007 and 2010, the metropolitan area lost nearly one-third of its manufacturing employment, with machinery, metal, and furniture manufacturing leading declines that spanned every manufacturing industry. Economic recovery in the Springfield MSA has been slow, but as of June 2013, the metropolitan area has regained almost all of its recession job losses. Most of the jobs added have been in the lower-skilled professional services, such as call centers. Both Chase Card Services and Expedia have expanded their call center operations in the metropolitan area. The manufacturing industry continues to provide little growth for the area and one major manufacturer shut down production, costing the area at least 300 jobs. It is unlikely that the sector will add jobs in the near future. The metropolitan

**TABLE 17
UNEMPLOYMENT RATES¹
MISSOURI MSAs**

Area	2011	2012	3Q'13
Cape Girardeau MSA	7.7	6.4	6.7
Columbia MSA	5.9	4.7	4.8
Jefferson City MSA	6.8	5.6	5.7
Joplin MSA	7.7	6.0	6.2
Springfield MSA	7.7	6.1	5.8
State of Missouri	8.4	6.9	6.8
U.S.	8.9	8.1	7.3

¹ Source: FDIC RECON

area's healthcare industry and MSU provide stability in the MSA's employment prospects and consumer spending. (Source: FDIC RECON/Moody's Economy.com, June 2011, June 2013)

One community contact indicated that the Springfield MSA economy continues to recover slowly led by improvement in business/professional services and the education/health care industries. Average household income is barely keeping up with inflation.

Another community contact indicated that ample opportunities exist for local financial institutions to make both residential and commercial loans, and the local lending environment is competitive. He indicated that the greater Springfield MSA represents the third largest metropolitan area in the state, and is a regional center for manufacturing, trade, education, and finance.

Population Trends and Characteristics. The bank's Springfield CSA AA includes four of five counties in the Springfield MSA, plus the adjacent nonMSA Taney County. Taney County includes the city of Branson, which is home to a large tourism industry. The Taney County 2010 population was 51,675, which is larger than the populations of Dallas and Polk Counties, which are part of the Springfield MSA. The combined AA 2010 population equaled 452,185. Greene County contains the core city of Springfield, and its 2010 population represented 63.0 percent of the total Springfield MSA population and 60.8 percent of the total CSA population. Greene County also houses nine of the bank's 13 AA branches.

Due to MSU, Greene County has a slightly higher population of residents aged 18 to 24 than the other counties in the AA, and slightly fewer residents aged 17 and younger. Therefore, the residents that are most likely to create loan demand, age 25 and up, are similar to the other AA counties. For the entire AA, the concentration of residents living in college dormitories equaled 1.9 percent, compared to the overall statewide figure of 0.9 percent.

Income Characteristics. The percentage of families that are considered low-, moderate-, middle-, and upper-income in the AA, the overall CSA, and Greene County generally mirror the overall state figures for Missouri. Of the five AA counties, Dallas County and Polk County have relatively high levels of LMI families (combined LMI of 45.3 percent and 42.8 percent, respectively, vs. the AA figure of 37.2 percent). These two counties are more rural in nature and have very low populations. Dallas County has three moderate-income census tracts that are some distance from the bank's branches; while Polk County has one moderate-income census tract, near the bank's Bolivar branch.

The percentage of AA families below the poverty level (10.9 percent, as of 2010 Census data) was slightly lower than the overall Springfield MSA and higher than the state of Missouri. Dallas County and Polk County were again relatively high, equaling 12.6 percent and 16.2 percent, respectively.

Table 18 shows income, housing, and general demographic characteristics of the combined Springfield CSA AA.

TABLE 18 2012 SPRINGFIELD/BRANSON MO CSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	3	3.2	1,015	0.9	437	43.1	22,500	19.2
Moderate-income	20	21.5	16,169	13.8	3,567	22.1	21,013	17.9
Middle-income	54	58.1	76,535	65.3	7,508	9.8	26,215	22.4
Upper-income	16	17.2	23,432	20.0	1,218	5.2	47,423	40.5
Total AA	93	100.0	117,151	100.0	12,730	10.9	117,151	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,308	563	0.5	13.1	3,003	69.7	742	17.2
Moderate-income	34,532	15,798	13.3	45.7	15,038	43.5	3,696	10.7
Middle-income	126,609	76,689	64.6	60.6	35,310	27.9	14,610	11.5
Upper-income	35,722	25,696	21.6	71.9	7,724	21.6	2,302	6.4
Total AA	201,171	118,746	100.0	59.0	61,075	30.4	21,350	10.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	156	0.6	139	0.6	7	0.5	10	1.1
Moderate-income	4,960	19.6	4,216	18.4	539	36.6	205	21.6
Middle-income	15,601	61.7	14,284	62.5	728	49.5	589	62.2
Upper-income	4,564	18.1	4,224	18.5	197	13.4	143	15.1
Total AA	25,281	100.0	22,863	100.0	1,471	100.0	947	100.0
Percentage of Total Businesses:				90.4		5.8		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3	0.3	3	0.3	0	0.0	0	0.0
Moderate-income	81	7.0	80	6.9	1	25.0	0	0.0
Middle-income	958	82.3	955	82.3	3	75.0	0	0.0
Upper-income	122	10.5	122	10.5	0	0.0	0	0.0
Total AA	1,164	100.0	1,160	100.0	4	100.0	0	0.0
Percentage of Total Farms:				99.7		0.3		0.0
Based on 2006-2010 ACS data and 2012 D&B business and farm demographic data. NOTE: Percentages may not total 100 percent due to rounding differences.								

Housing Economy and Characteristics. The housing affordability ratio in the bank's Springfield CSA AA equaled 32.6 percent as of the 2010 Census, slightly less affordable than the statewide figure of 33.6 percent. The low affordability ratio in the AA is driven primarily by low-income, rather than high housing prices. One community contact indicated that the area's primary need is affordable single-family homes for LMI borrowers, noting that the average home price in the area was beyond the reach of many individuals with income constraints.

The AA's concentration of rental housing units is above the overall state figure, primarily due to

the concentration of rental units in Greene County (35.2 percent of total housing units), where MSU is located. The concentration of owner-occupied homes in Taney County equaled only 50.4 percent (compared to the statewide figure of 61.1 percent); this below average rate of owner-occupied housing units is due partially to the number of second homes in the county, which are reflected in the vacancy rate of 25.5 percent. The concentration of mobile homes is high in Polk (16.3 percent), Dallas (20.9 percent), and Taney (16.1 percent) Counties, providing more affordable housing in those lower-income counties. These mobile home figures are well above the overall AA figure of 7.2 percent.

One community contact indicated that a significant community need is to increase home ownership, particularly LMI homeownership, in the Springfield area. The homeownership rate of 60.8 percent is lower than the Missouri homeownership rate of 69.5 percent.

Residential construction has been stagnant, resulting in a shortage of single-family homes. The decline in the single-family housing market did not affect the Springfield MSA as much as the rest of the U.S., and the number of homes in foreclosure is less than the U.S. rate.

One community contact indicated that 16 of the 32 banks in Greene County are participating in the Missouri Housing Finance Commission's (MHDC) First Place first-time home buyer homeownership program. He indicated that there is opportunity for additional bank participation in this program, which can assist LMI families financing their first home by providing financial assistance with down payments and closing costs. The contact stated that there is a significant need for financial literacy training and credit repair to help potential first time home buyers qualify for loans. There are also opportunities for banks to finance multifamily housing and rental housing for developers participating in MHDC's Rental Production program. This program leverages developer's capital, other sources of financing, and low-income housing tax credits to provide affordable rental housing throughout Missouri. MHDC issues single-family mortgage revenue bonds, which provide a significant community development investment opportunity for banks. The bonds have a minimum investment requirement of \$1 million, which may not be realistic for some smaller investors.

Another community contact feels that Christian County, the county located between Springfield proper and Branson, has lagged behind the national trend in residential real estate sales activity. He indicated that home sales in the bedroom communities of Nixa and Ozark, Missouri, have only slightly increased during the prior twelve months. He mentioned that the U. S. Department of Agriculture (USDA) Rural Housing Loan Program is utilized by some banks for individuals seeking mortgage credit, although some areas of Christian County are not eligible due to the higher relative income level. This program is utilized more in the rural portions of southwest Missouri. The contact indicated that local financial institutions are doing an adequate job in meeting the mortgage loan needs of area residents, including LMI individuals. Demand has been generally stable for homes offered at \$160,000 or lower, which is generally consistent with the income levels of the local population.

Census Tract Income Levels/Characteristics. The AA has only 3 low-income tracts, 20 moderate-income tracts, 54 middle-income tracts, and 16 upper-income tracts. All three low-income tracts and 19 of the 20 moderate-income tracts are located in Greene County, in the core city of Springfield. Two low-income tracts contain the MSU campus and the other low-income tract is located immediately to the west of the campus.

The LMI tracts contain larger concentrations of families below the poverty level, equaling 43.1 percent of families in the low-income tracts and 22.1 percent in the moderate-income tracts; well above the 9.8 percent figure in the middle-income tracts and 5.2 percent in the upper-income tracts. The LMI tracts also contain more rental units; equaling 69.7 percent of total housing units in the low-income tracts, again due to the university, and 43.5 percent in the moderate-income tracts; compared to 30.4 percent for the AA overall.

The median age of housing stock is somewhat older in the LMI tracts, equaling 55 years in the low-income tracts and 46 years in the moderate-income tracts, compared to 23 years in middle-income tracts and 25 years in the upper-income tracts. The relatively older age of housing stock throughout the AA may indicate a need for home improvement loans.

Of the bank's 13 AA branches, one is located in a low-income tract, three are in moderate-income tracts, seven are in middle-income tracts, and two are in upper-income tracts.

PERFORMANCE TEST CONCLUSIONS IN THE SPRINGFIELD CSA AA

LENDING TEST

The bank's performance with respect to the lending test in the Springfield CSA AA is considered good. The bank is a leader in community development lending in the AA, which enhanced the lending performance rating. Overall responsiveness to area credit needs was adequate. Borrower and geographic distributions reflected adequate performance in the CSA. A more in-depth discussion of the bank's performance in the AA follows.

Lending Activity:

The lending activity in the AA is good. The Springfield CSA AA contained 26.3 percent of all HMDA loans within the statewide Missouri AAs, and 23.3 percent of CRA LAR loans. For the review period, the bank originated 26 SBA loans totaling \$14.9 million in the Springfield CSA AA.

Geographic Distribution:

As shown in Tables 19 and 20, the distribution among geographies of different income levels of the bank's residential mortgage loans was adequate, while the business and farm loan distributions were excellent.

TABLE 19 DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES SPRINGFIELD/BRANSON MO CSA AA							
Census Tract Income Level ¹	Bank Loans				Aggregate HMDA Data ²		% of Owner Occupied Units ³
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	3	561	0.9	0.5	0.5	0.5	0.5
Moderate	36	37,405	10.6	36.1	8.5	7.7	13.3
Middle	201	41,531	59.3	40.1	60.7	55.9	64.6
Upper	99	24,021	29.2	23.2	30.3	35.8	21.6
Home Purchase Loans							
Low	0	0	0.0	0.0	0.6	0.4	0.5
Moderate	12	795	16.9	10.4	10.2	10.3	13.3
Middle	38	4,493	53.5	58.7	62.3	57.0	64.6
Upper	21	2,367	29.6	30.9	26.9	32.3	21.6
Home Refinance Loans							
Low	3	561	1.4	1.9	0.3	0.2	0.5
Moderate	15	954	6.8	3.2	7.4	4.1	13.3
Middle	139	18,540	62.6	61.6	59.7	56.2	64.6
Upper	65	10,041	29.3	33.4	32.5	39.5	21.6
Home Improvement Loans							
Low	0	0	0.0	0.0	0.2	0.4	0.5
Moderate	2	36	7.1	5.7	12.6	8.5	13.3
Middle	18	502	64.3	79.8	64.9	57.4	64.6
Upper	8	91	28.6	14.5	22.4	33.6	21.6
Multifamily Loans							% of Multifamily Units ³
Low	0	0	0.0	0.0	18.3	4.6	6.3
Moderate	7	35,620	38.9	54.7	17.1	35.5	22.3
Middle	6	17,996	33.3	27.6	48.8	47.0	58.0
Upper	5	11,522	27.8	17.7	15.9	12.9	13.4
¹ Low-income census tracts are those geographies with MFI less than 50 percent of the MSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent – 80 percent; middle-income is 80 percent – 120 percent; and upper-income is greater than 120 percent.							
² Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
³ Percentage of owner-occupied and multifamily housing units by tract based on 2006-2010 ACS data. NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Home Purchase Loans

The geographic distribution of home purchase loans reflected adequate penetration throughout the AA, including LMI geographies. The bank had no loans in the low-income tracts for the review period; however, the demographic figure for this tract category was minimal. The bank's performance in moderate-income tracts was good for two of the three years, but low in 2013. By volume of originations, the bank made the majority of its purchase

loans in the middle-income tracts, although it was a low level relative to the comparators. The bank had a higher concentration in upper-income tracts in relation to expectations.

Given typical economic factors in LMI tracts in all markets, such as larger concentrations of families below the poverty level, higher rental unit concentrations, and lower new home construction, the bank's performance appears good. However, the bank had a larger level of lending on investment-type properties in this market. The percentage of HMDA loans secured by nonowner-occupied units for 2012 equaled 30 percent. Therefore, the demographic comparison to owner-occupied units in each tract category is not the best comparator. The demographic of total 1- to 4-family housing units is a better comparator, and in the moderate-income tracts equaled 16.3 percent. Therefore, the bank's distribution of purchase loans in these tracts mirrored this demographic comparator for 2012, and lagged behind this comparator for 2011.

Refinance Loans

The distribution of refinance loans within geographies of different income levels was considered adequate. The bank's performance in LMI geographies was consistent with aggregate data, but well below area demographics in the moderate-income tract category. As noted previously, refinance loans are typically lowest in LMI tracts and to LMI borrowers. Conversely, refinance loans in the upper-income tracts had the highest volume for the bank and the aggregate data.

Home Improvement Loans

The geographic distribution of home improvement loans was adequate. Each year during the review period, the bank's volume of home improvement loans in the AA and the penetration in LMI tracts increased. In 2011, the universe was only 19, with no loans in LMI tracts. In 2012, the universe increased to 28, and the penetration in moderate-income tracts equaled 7.1 percent (vs. 12.6 percent for the aggregate). In 2013, the universe increased to 40, and the penetration in moderate-income tracts equaled 12.5 percent. Most of the bank's loans were in middle-income tracts, where the bank was in line with demographics. The bank exceeded the demographic figure in the upper-income tracts.

Multifamily Loans

The bank had 14 to 18 multifamily loans per year in the AA, and the geographic distribution was considered good. The penetration in moderate-income tracts was excellent in two of three years, but equaled zero in the LMI tracts in 2011.

Business Loans

The geographic distribution of business loans in the AA was considered excellent. The demographics in the low-income tracts were minimal, and the bank's performance there was adequate. In the moderate-income tracts, the bank's performance far exceeded the aggregate

and demographic figures. There was a slight decline in 2013, but the findings were consistent. The level of lending in the moderate-income tracts above the demographic figure was offset by lending in the middle-income tracts below the demographic figure.

TABLE 20 DISTRIBUTION OF 2012 SB AND SF LOANS BY INCOME LEVEL OF GEOGRAPHIES SPRINGFIELD/BRANSON MO CSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data ¹		% of Businesses/F arms ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	1	200	0.3	0.3	0.5	0.4	0.6
Moderate	106	28,289	31.5	41.3	21.6	31.2	19.6
Middle	178	31,984	53.0	46.7	54.8	52.1	61.7
Upper	51	7,965	15.2	11.6	19.8	15.8	18.1
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.3
Moderate	22	1,311	12.4	10.4	8.6	9.0	7.0
Middle	149	10,681	84.2	84.7	84.3	83.7	82.3
Upper	6	615	3.4	4.9	5.3	6.0	10.5
¹ Aggregate loan data reflects all originations in the bank's AA reported by all CRA filers. ² Percentage of businesses and farms by tract based on 2006-2010 ACS data. NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Farm Loans

The geographic distribution of farm loans in the AA was also excellent. Again, the demographics in the low-income tracts were minimal, and the bank's performance was adequate. In the moderate-income tracts, the bank's performance exceeded the aggregate and demographic figures. There was a slight decline in 2013, but the findings were consistent. The penetration in the middle-income tracts was consistent with the market. The stronger performance in the moderate-income tracts was offset by lending in the upper-income tracts that was below the demographic figure.

Distribution by Borrower Income and Business Revenue Size:

As shown in Table 21 and Table 22, the borrower distribution of the bank's lending reflected adequate distribution among individuals of different income levels and among businesses and farms of different revenue sizes. HMDA loans were below the demographic figures in the low-income category, but generally consistent with aggregate data; and in the moderate-income category, the bank was generally similar to demographic figures. Loans to SBs were well below the demographic figure, but consistent with aggregate data; and the distribution of farm loans to SFs was similar to the demographic figure.

TABLE 21 DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS SPRINGFIELD/BRANSON MO CSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans ³							
Low	22	1,060	6.5	1.0	7.0	3.4	19.2
Moderate	51	3,525	15.0	3.4	16.1	10.3	17.9
Middle	60	5,344	17.7	5.2	17.7	13.9	22.4
Upper	123	16,785	36.3	16.2	34.4	41.0	40.5
Unknown	83	76,804	24.5	74.2	24.8	31.4	0.0
Home Purchase Loans							
Low	4	225	5.6	2.9	9.8	5.3	19.2
Moderate	15	1,297	21.1	16.9	21.1	15.4	17.9
Middle	13	1,394	18.3	18.2	17.7	16.3	22.4
Upper	27	3,593	38.0	46.9	28.5	36.0	40.5
Unknown	12	1,146	16.9	15.0	22.9	27.0	0.0
Home Refinance Loans							
Low	15	762	6.8	2.5	5.3	2.8	19.2
Moderate	30	2,083	13.5	6.9	13.5	8.7	17.9
Middle	43	3,874	19.4	12.9	17.6	13.9	22.4
Upper	81	12,857	36.5	42.7	37.6	46.8	40.5
Unknown	53	10,520	23.9	35.0	26.0	27.8	0.0
Home Improvement Loans							
Low	3	73	10.7	11.6	13.6	6.5	19.2
Moderate	6	145	21.4	23.1	21.1	12.6	17.9
Middle	4	76	14.3	12.1	22.6	20.0	22.4
Upper	15	335	53.6	53.3	37.4	48.6	40.5
Unknown	0	0	0.0	0.0	5.2	12.3	0.0
¹ Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
² Percentage of families based on 2006-2010 ACS data.							
³ Total HMDA loans will not foot, as multifamily loans are not considered in the borrower distribution.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Home Purchase Loans

The bank's performance regarding home purchase loans was considered adequate. The distribution to low-income borrowers was well below area demographics, and somewhat below aggregate data. However, the distribution to moderate-income borrowers exceeded area demographics and mirrored aggregate data, reflecting a good performance for this category.

Again, as in the Kansas City and St. Louis markets, there was a somewhat higher level of aggregate HMDA lending to moderate-income families for home purchase loans. The bank's (and the aggregate) level of lending to moderate-income borrowers partially meets a stated need by at least one community contact of providing residential purchase loans to LMI families. Lending to middle- and upper-income families was in line with the market and similar to both demographic and aggregate figures in this market for 2012.

Refinance Loans

The bank's performance regarding home refinance loans was considered adequate. The bank's performance was in line with or slightly above the aggregate figures. The bank's refinance lending to middle- and upper-income families was in line with the market and similar to both demographic and aggregate figures in this market for 2012.

Home Improvement Loans

The bank's performance regarding home improvement loans was considered adequate. The distribution to low-income borrowers compared unfavorably with area demographics and was slightly below the aggregate. The distribution to moderate-income borrowers exceeded the area demographic and mirrored the aggregate. The lending to middle-income borrowers was below both demographic and aggregate borrowers, while the bank's level of lending to upper-income borrowers was much higher and exceeded area demographic and aggregate figures for 2012.

Business Loans

The bank's record of lending to SBs was considered adequate. Again, the bank's penetration was well below the demographic figure of SBs in the AA, but above the aggregate figure.

Farm Loans

The distribution of loans to farms of different revenue size was good. The bank's lending performance to SFs was near area demographics and above aggregate data. The bank's 2011 and 2013 lending levels were consistent with 2012. The volume of farm loans in this AA was much higher than in the multistate CSA/MSA AAs; but overall, lower weight was given to farm loans in the evaluation.

**TABLE 22
DISTRIBUTION OF 2012 SB AND SF LOANS¹ BY REVENUE SIZE OF BUSINESS
SPRINGFIELD/BRANSON MO CSA AA**

Business/Farm Size by Revenue ²	Bank Loans				Aggregate CRA Data ³		% of AA Businesses/ Farms ⁴
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	189	31,020	56.3	45.3	46.0	50.5	90.4
Over \$1MM	112	31,276	33.3	45.7	Not Reported		5.8
Not Known	35	6,142	10.4	9.0			3.7
SF Loans							
\$1MM or less	169	11,791	95.5	93.5	81.8	92.1	99.7
Over \$1MM	2	150	1.1	1.2	Not Reported		0.3
Not Known	6	666	3.4	5.3			0.0
¹ The CRA disclosure statements report only business loans in amounts of \$1M or less and farm loans in amounts of \$500M or less.							
² This analysis focuses on the bank's lending to "small businesses" and "small farms" as defined by the CRA, which are those businesses and farms with gross annual revenues of \$1M or less.							
³ Aggregate loan data reflects all SB and SF loan originations in the bank's AA reported by all CRA data filers.							
⁴ Percentage of businesses and farms in the AA based on 2012 D&B data.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Community Development Lending:

The bank is considered a leader in providing community development loans in the Springfield CSA AA, where it originated 70 loans for \$216.6 million during the evaluation period. Examples of agencies funded include Developmental Center of the Ozarks, Advocates for a Healthy Community, Inc., and Developmental Connections. The distribution of community development lending is displayed in the table below.

TABLE 23 COMMUNITY DEVELOPMENT LOANS		
	#	\$ (000)
Affordable Housing	18	22,298
Community Services	4	855
Economic Development	16	50,417
Revitalization/Stabilization	32	142,997

INVESTMENT TEST

The bank had an excellent level of qualified community development investments and donations in the Springfield CSA AA. Investments in the area totaled \$13.0 million and included 15 investments in Small Business Investment Companies (SBIC), housing equity funds, private placement bonds, and tax credits. Most of the qualified investments were current period investments, with only two prior period investments totaling \$7.6 million still on the books.

Examples of qualified investments included:

- Two private placement bonds totaling \$7.6 million, both prior period investments, providing economic development and revitalization/stabilization of LMI tracts.
- 10 tax credits totaling \$2.0 million, providing revitalization/stabilization of LMI tracts, including:
 - Missouri Historic Preservation tax credits for qualified property rehabilitation expenses in LMI tracts.
 - Rebuilding Communities Tax Credit Program to stimulate business by providing tax credits to eligible businesses that locate, relocate, or expand their business within a distressed community in Missouri.
- Two SBIC issuances to one entity for economic development totaling \$3.0 million.

The bank has shown good responsiveness to area community development needs through its donation activities. The bank had 138 qualified donations within the AA during the review period totaling \$211,000.

SERVICE TEST

The bank's performance under the service test in the AA is good based on the accessibility of delivery systems and the relatively high level of community development services.

Retail Services:

Retail services were discussed under the overall bank review and do not vary by market. The bank operates 13 branch locations in the Springfield AA, with one in a low-income tract, three in moderate-, seven in middle-, and two in upper-income tracts. This represents 30.8 percent of AA branches located in LMI tracts, compared to 24.7 percent of total AA tracts that are LMI. Since the last examination, the bank closed one branch in a middle-income tract. Banking offices are accessible to LMI geographies and the wide array of services offered by the bank does not vary in a way that inconveniences portions of the AA or LMI individuals.

Community Development Services:

The bank provided a relatively high level of community development services in the Springfield CSA AA, with 57 qualified services provided during the review period to 22 organizations. All but four organizations provided community services targeted to LMI individuals.

COLUMBIA/MEXICO/MOBERLY, MISSOURI COMBINED STATISTICAL AREA
(Full Review)

DESCRIPTION OF BANK'S OPERATIONS IN THE COLUMBIA CSA AA

The Columbia CSA AA includes 13 locations (as of December 31, 2013), with ten in Columbia, two in Mexico, and one in Moberly. The deposit market share in the Columbia MSA (14.4 percent) ranked third of 31 financial institutions in the MSA. (MSA only, not CSA; FDIC Market Share Report, June 30, 2013)

DESCRIPTION OF THE COLUMBIA CSA AA

The bank's Columbia CSA AA includes Boone County, one of two counties in the Columbia MSA, and the adjacent nonMSA counties of Audrain and Randolph, which include the towns of Mexico and Moberly. Characteristics of the AA are discussed in the following sections.

Economic and Employment Characteristics. The largest industry sectors in the Columbia MSA are government (32.8 percent), educational and health services (12.9 percent), retail trade (11.7 percent), leisure and hospitality (10.6 percent), and professional and business services (10.6 percent). (Source: FDIC RECON/Moody's Analytics and BLS, 2012; BEA, 2011)

The MSA's largest employers are University of Missouri-Columbia (8,608), University Hospital and Clinics (4,468), Boone Hospital Center (1,655), U.S. Department of Veteran Affairs (1,278), MBS Textbook Exchange, Inc. (1,239), Shelter Insurance Companies (1,078), and State Farm Insurance Company (1,063). (Source: FDIC RECON/Regional Economic Development, Inc., April 2012)

High educational attainment in the Columbia MSA continues to be a key advantage and helps insulate the MSA from recession. The percentage of local residents with a bachelor's degree or higher was approximately 48 percent in 2012. High education levels are the main reason for the metropolitan area's structurally low unemployment. Because the jobless rate is lower among educated workers, the MSA's unemployment rate has historically stood about 3 points below the national average.

Increased enrollment at the University of Missouri has led to an influx of students and increased demand for consumer products and services. While the corresponding employment demand created is generally in low-wage positions, it helps keep the unemployment figures low. Similarly, the increased enrollment has led to expansion at the university and an increase in construction and development, which is expanding the construction industry. It is expected that as the expansion at the university slows, residential real estate construction will increase, creating longer term growth expectations for the industry. (Source: FDIC RECON/Moody's Economy.com, Inc., June 2011, June 2013)

One community contact described the local economy in Columbia as strong in comparison to other communities in Missouri. She stated that Columbia has low unemployment and high enrollment at the University of Missouri, which is positive for the local economy. Another contact indicated that SB loans were needed in the area, although many of the local businesses seeking financing were start-ups in the beginning stages of development, which find it harder to obtain financing. The contact also indicated that few banks in the area offered guaranteed loans such as SBA and USDA-backed loans.

Population Trends and Characteristics. The bank's Columbia CSA AA includes one of two counties in the MSA, Boone County. It also contains two contiguous nonMSA counties, Audrain and Randolph Counties. The entire AA 2010 population was 213,585. Boone County's population of 162,642 represented 76.1 percent of the AA population and 94.1 percent of the Columbia MSA population. Boone County contains the core city of Columbia. The AA demographics will generally be reflective of the Columbia MSA demographic figures.

Due to the University of Missouri, Boone County has a much higher population of residents aged 18 to 24 than the overall State of Missouri (20.9 percent vs. 9.8 percent). The AA concentration of residents living in college dormitories equaled 3.6 percent, compared to the overall statewide figure of 0.9 percent.

Income Characteristics. The percentage of families that are considered low-, moderate-, middle-, and upper-income in the AA generally mirror the overall state figures for Missouri. The percentage of AA families below the poverty level also mirrors the Missouri figure (10.5 percent vs. 10.0 percent, as of 2010 Census data).

Housing Economy and Characteristics. The housing affordability ratio for Boone County equaled 29.8 percent as of the 2010 Census, less affordable than the statewide figure of 33.6 percent. The lower affordability ratio in the county is driven by both low median household income as well as relatively higher housing prices. Unlike Boone County, Audrain and Randolph Counties feature more affordable housing, with ratios of 48.3 percent and 45.0 percent, respectively. The affordability rates of Audrain and Randolph Counties are driven by low median housing prices, rather than higher incomes.

The AA's percentage of rental housing units is above the overall state figure (34.9 percent of total housing units vs. 26.2 percent), primarily due to University of Missouri (MU) as well as two smaller colleges. Conversely, owner-occupied units, particularly in Boone County, are below the state figure (53.2 percent vs. 61.2 percent). Audrain County has a high level of owner-occupied housing at 66.9 percent, while Randolph County has a significant level of vacant properties at 15.8 percent (compared to the state figure of 12.6 percent).

One community contact stated that the student population in Columbia has been growing rapidly in recent years, thereby increasing the demand for rental housing. Although several apartment buildings were constructed to meet the demand, students have to go farther away from the town's three secondary education institutions to find rental housing. Many of the 1- to 4-family residences surrounding the colleges in Columbia are investment properties being

rented to students. Local contractors have been focused on student housing over single-family housing, which is creating a need for affordable housing in the community.

Table 24 shows income, housing, and general demographic characteristics of the Columbia CSA AA.

TABLE 24								
2012 COLUMBIA MO CSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	9.5	1,099	2.2	458	41.7	9,896	20.2
Moderate-income	9	21.4	8,330	17.0	1,543	18.5	8,421	17.2
Middle-income	19	45.2	25,201	51.4	2,029	8.1	10,832	22.1
Upper-income	10	23.8	14,377	29.3	1,113	7.7	19,858	40.5
Total AA	42	100.0	49,007	100.0	5,143	10.5	49,007	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	4,731	547	1.1	11.6	3,541	74.8	643	13.6
Moderate-income	19,585	7,915	15.7	40.4	9,558	48.8	2,112	10.8
Middle-income	42,233	27,084	53.6	64.1	11,310	26.8	3,839	9.1
Upper-income	23,720	14,937	29.6	63.0	7,130	30.1	1,653	7.0
Total AA	90,269	50,483	100.0	55.9	31,539	34.9	8,247	9.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,249	12.7	1,065	12.0	108	19.3	76	18.2
Moderate-income	1,913	19.5	1,697	19.2	138	24.7	78	18.7
Middle-income	4,213	42.9	3,836	43.4	224	40.1	153	36.7
Upper-income	2,446	24.9	2,247	25.4	89	15.9	110	26.4
Total AA	9,821	100.0	8,845	100.0	559	100.0	417	100.0
Percentage of Total Businesses:				90.1		5.7		4.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.1	1	0.1	0	0.0	0	0.0
Moderate-income	56	6.7	56	6.7	0	0.0	0	0.0
Middle-income	644	77.4	643	77.4	1	100.0	0	0.0
Upper-income	131	15.7	131	15.8	0	0.0	0	0.0
Total AA	832	100.0	831	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.9		0.1		0.0
Based on 2006-2010 ACS data and 2012 D&B business and farm demographic data. NOTE: Percentages may not total 100 percent due to rounding differences.								

Census Tract Income Levels/Characteristics. The AA has 4 low-income tracts, 9 moderate-income tracts, 19 middle-income tracts, and 10 upper-income tracts. Much of the MU campus

is situated within two low-income tracts. The low-income tracts also include downtown Columbia and the I-70 business loop.

The LMI tracts contain larger concentrations of families below the poverty level, equaling 41.7 percent of families in the low-income tracts and 18.5 percent in the moderate-income tracts; well above the 10.5 percent figure for the overall AA. The LMI tracts also contain more rental units; equaling 74.8 percent of total housing units in the low-income tracts and 48.9 percent in the moderate-income tracts; compared to 34.9 percent for the AA overall.

The median age of housing stock is somewhat older in the LMI tracts, equaling 48 years in the low-income tracts and 34 years in the moderate-income tracts; compared to 30 years in middle-income tracts and 26 years in the upper-income tracts.

Of the bank's 13 AA branches, two are located in low-income tracts, four are in moderate-income tracts, four are in middle-income tracts, and three are in upper-income tracts.

PERFORMANCE TEST CONCLUSIONS IN THE COLUMBIA CSA AA

LENDING TEST

The bank's performance with respect to the lending test in the Columbia CSA AA is considered good. The bank is a leader in community development lending in the AA, which enhanced the lending performance rating. Overall responsiveness to area credit needs was adequate. The borrower and geographic distribution analysis reflected an adequate performance in the CSA. A more in-depth discussion of the bank's performance in the AA follows.

Lending Activity:

The lending activity at the AA level is good. The Columbia CSA AA contained 35.5 percent of all HMDA loans within the statewide Missouri AAs, and 29.9 percent of statewide CRA LAR loans. For the review period, the bank originated 11 SBA loans totaling \$5.2 million in the Columbia CSA AA.

Geographic Distribution:

As shown in Tables 25 and 26, the distribution among geographies of different income levels of the bank's residential mortgage loans, business loans, and farm loans was good.

TABLE 25 DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES COLUMBIA, MO CSA AA							
Census Tract Income Level ¹	Bank Loans				Aggregate HMDA Data ²		% of Owner Occupied Units ³
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	11	9,331	2.4	12.7	0.9	1.9	1.1
Moderate	81	7,599	17.9	10.3	12.2	10.5	15.7
Middle	210	24,521	46.5	33.3	50.0	45.5	53.6
Upper	150	32,106	33.2	43.6	36.8	42.0	29.6
Home Purchase Loans							
Low	1	71	0.8	0.4	1.0	1.2	1.1
Moderate	26	1,645	21.1	10.1	15.0	11.7	15.7
Middle	49	6,820	39.8	41.9	50.3	47.3	53.6
Upper	47	7,758	38.2	47.6	33.5	39.8	29.6
Home Refinance Loans							
Low	7	2,247	2.3	5.6	0.6	0.7	1.1
Moderate	51	4,494	17.0	11.1	10.4	7.9	15.7
Middle	151	16,985	50.3	42.0	49.9	46.5	53.6
Upper	91	16,750	30.3	41.4	38.9	44.8	29.6
Home Improvement Loans							
Low	1	28	5.0	2.1	1.1	1.1	1.1
Moderate	1	245	5.0	18.6	11.0	8.9	15.7
Middle	7	243	35.0	18.5	50.1	44.7	53.6
Upper	11	798	55.0	60.7	37.8	45.3	29.6
Multifamily Loans							% of Multifamily Units ³
Low	2	6,985	22.2	45.1	24.3	27.5	18.8
Moderate	3	1,215	33.3	7.9	35.1	40.6	31.4
Middle	3	473	33.3	3.1	27.0	14.5	20.1
Upper	1	6,800	11.1	43.9	13.5	17.3	29.7
¹ Low-income census tracts are those geographies with MFI less than 50 percent of the MSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent - 80 percent; middle-income is 80 percent - 120 percent; and upper-income is greater than 120 percent.							
² Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
³ Percentage of owner-occupied and multifamily housing units by tract based on 2006-2010 ACS data.							
NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Home Purchase Loans

The geographic distribution of home purchase loans reflected good penetration in the AA's LMI geographies. The volume in low-income tracts was low, but the demographics were also very low in these tracts. The volume in moderate-income tracts exceeded the demographic of owner-occupied housing units and exceeded aggregate. By volume of originations, the bank made most of its purchase loans in the middle- and upper-income tracts; however, the level of

lending in the middle-income tracts was low relative to the demographics, while the bank's concentration in upper-income tracts was high in relation to expectations.

Like the Springfield CSA AA, the bank had a larger level of lending on investment-type properties in this market, which typically leads to higher penetration within LMI tracts. The percentage of loans secured by nonowner-occupied units for 2012 equaled 40 percent. Therefore, the demographic comparison to owner-occupied housing units in each tract category is not the best comparator. The demographic of total 1- to 4-family housing units is a better comparator, and this equaled 20.3 percent in the moderate-income tracts. Therefore, the bank's distribution of purchase loans in these tracts mirrored this demographic comparator.

Refinance Loans

The bank's distribution of refinance loans within geographies of different income levels was considered good, with the bank's performance in all geographic income categories consistent with area demographics, while exceeding aggregate in the LMI tracts.

Home Improvement Loans

The geographic distribution of home improvement loans was adequate. The bank's volume of home improvement loans in the AA was low, and the bank's distribution within LMI tracts for 2012 appeared to be strong in low-income tracts and poor in moderate-income tracts; however, there was only one loan originated in each tract category. The distribution in 2013 included a much improved penetration in moderate-income tracts, but zero in low-income tracts. Most of the bank's loans were in middle- and upper-income tracts.

Multifamily Loans

The bank had six to ten multifamily loans per year in the AA, and the geographic distribution was considered adequate.

Business Loans

The geographic distribution of business loans in the AA was considered good. The performance in the low-income tracts was somewhat below demographic and aggregate figures; while in the moderate-income tracts, the bank's performance far exceeded aggregate and demographic figures. There was a slight decline in 2013, but the findings were consistent. The penetration in the middle-income tracts was consistent with expectations. So, the stronger performance in the moderate-income tracts was primarily offset by lending in the upper-income tracts below the demographic figure.

TABLE 26 DISTRIBUTION OF 2012 SB AND SF LOANS BY INCOME LEVEL OF GEOGRAPHIES COLUMBIA MO CSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data ¹		% of Businesses/ Farms ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	42	7,065	8.7	14.5	11.0	16.3	12.7
Moderate	132	8,840	27.2	18.2	18.6	21.3	19.5
Middle	217	19,692	44.7	40.4	42.0	37.2	42.9
Upper	94	13,097	19.4	26.9	24.9	24.6	24.9
SF Loans							
Low	0	0	0.0	0.0	0.7	0.7	0.1
Moderate	25	2,139	13.2	17.2	8.1	8.6	6.7
Middle	117	7,069	61.6	56.8	75.0	73.6	77.4
Upper	48	3,233	25.3	26.0	15.9	17.1	15.7
1	Aggregate loan data reflects all originations in the bank's AA reported by all CRA filers.						
2	Percentage of businesses and farms by tract based on 2006-2010 ACS data.						
	NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.						

Farm Loans

The geographic distribution of farm loans in the AA was also considered good. The demographics in the low-income tracts were minimal, so analysis of the bank's performance there was not meaningful. In the moderate-income tracts, the bank's performance exceeded aggregate and demographic figures. There was a slight decline in 2013, but the findings were consistent. Above-demographic levels of lending in the moderate- and upper-income tracts, was offset by lending in the middle-income tracts well below the demographic figure.

Distribution by Borrower Income and Business Revenue Size:

As shown in Tables 27 and 28, the bank's borrower distribution of HMDA lending reflected poor distribution among individuals of different income levels in the LMI categories, while the distribution was adequate for loans to SBs and good for loans to SFs. HMDA loans were well below the demographic figures and generally below aggregate data. CRA business loans were well below the demographic figure for SBs, but exceeded aggregate data; and CRA farm loan distributions were very near the demographic figure for SFs, and above aggregate.

Home Purchase Loans

The bank's performance regarding home purchase loans was considered poor. The distribution to LMI borrowers was well below area demographics and aggregate data for these two income categories. Again, as in the other Missouri markets, there was a higher level of aggregate HMDA lending than expected to moderate-income families for home purchase loans; but in this AA, the bank's level of lending falls well below the aggregate. One reason for

the lower level of lending to LMI individuals would seem to be the higher concentration of loans for investment properties, which led to 21.1 percent of all CSA AA home mortgage purchase loans to have 'NA' as the reported income, as well as a higher concentration to middle- and upper-income individuals. However, even after considering only owner-occupied loans, approximately 66 percent of the home purchase loans were to upper-income individuals within the AA, and only 18.5 percent were to LMI borrowers, well below the 37.4 percent combined LMI demographic figure.

TABLE 27 DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS COLUMBIA MO CSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans ³							
Low	18	1,029	4.0	1.4	7.1	3.8	20.2
Moderate	53	3,899	11.7	5.3	17.7	12.4	17.2
Middle	62	7,573	13.7	10.3	23.2	20.2	22.1
Upper	203	32,671	44.9	44.4	38.1	45.2	40.5
Unknown	116	28,385	25.7	38.6	13.9	18.3	0.0
Home Purchase Loans							
Low	5	413	4.1	2.5	9.9	6.0	20.2
Moderate	13	1,110	10.6	6.8	23.8	18.5	17.2
Middle	18	2,551	14.6	15.7	25.2	25.2	22.1
Upper	61	10,220	49.6	62.7	30.5	39.2	40.5
Unknown	26	2,000	21.1	12.3	10.6	11.0	0.0
Home Refinance Loans							
Low	10	562	3.3	1.4	5.4	2.9	20.2
Moderate	39	2,779	13.0	6.9	14.1	9.5	17.2
Middle	40	4,716	13.3	11.7	22.0	18.6	22.1
Upper	133	21,887	44.3	54.1	42.8	51.8	40.5
Unknown	78	10,532	26.0	26.0	15.7	17.2	0.0
Home Improvement Loans							
Low	3	54	15.0	4.1	7.8	2.3	20.2
Moderate	1	10	5.0	0.8	17.4	12.0	17.2
Middle	4	306	20.0	23.3	23.6	20.3	22.1
Upper	9	564	45.0	42.9	42.4	48.6	40.5
Unknown	3	380	15.0	28.9	8.8	16.8	0.0
¹ Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
² Percentage of families based on 2006-2010 ACS data.							
³ Total HMDA loans will not foot, as multifamily loans are not considered in the borrower distribution.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Refinance Loans

The bank's performance regarding home refinance loans to LMI borrowers was also low, but was closer to aggregate figures of lending to LMI families in the AA than purchase loans. Both the bank and aggregate were well below demographic figures in the low-income category, and

somewhat below in the moderate-income category. The majority of the bank's refinance lending was to upper-income borrowers or those with no reported incomes.

Home Improvement Loans

The bank's performance regarding home improvement loans to LMI borrowers was also low. Again, the majority of the bank's lending was to upper-income borrowers or those with no reported incomes. However, the level of lending to low-income borrowers was well above the aggregate figure.

TABLE 28 DISTRIBUTION OF 2012 SB AND SF LOANS ¹ BY REVENUE SIZE OF BUSINESS COLUMBIA MO CSA AA							
Business/Farm Size by Revenue ²	Bank Loans				Aggregate CRA Data ³		% of AA Businesses/ Farms ⁴
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	349	25,914	72.0	53.2	47.6	50.3	90.1
Over \$1MM	114	20,813	23.5	42.7	Not Reported		5.7
Not Known	22	1,967	4.5	4.0			4.2
SF Loans							
\$1MM or less	178	11,209	93.7	90.1	79.3	78.2	99.9
Over \$1MM	5	789	2.6	6.3	Not Reported		0.1
Not Known	7	443	3.7	3.6			0.0
¹ The CRA disclosure statements report only business loans in amounts of \$1M or less and farm loans in amounts of \$500M or less.							
² This analysis focuses on the bank's lending to "small businesses" and "small farms" as defined by the CRA, which are those businesses and farms with gross annual revenues of \$1M or less.							
³ Aggregate loan data reflects all SB and SF loan originations in the bank's AA reported by all CRA data filers.							
⁴ Percentage of businesses and farms in the AA based on 2012 D&B data.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Business Loans

The bank's record of lending to SBs is considered adequate. Again, the bank's penetration was well below the demographic figure of SBs in the AA, but above the aggregate figure.

Farm Loans

The distribution of loans to farms of different sizes was good. The bank's lending performance to SFs was near area demographics and above aggregate data. The bank's 2011 and 2013 lending levels were lower, but the findings were consistent with 2012. The volume of farm loans in this AA was much higher than in the multistate CSA/MSA AAs; but overall, lower weight was given to farm loans in the evaluation.

Community Development Lending:

The bank is considered a leader in providing community development loans in the Columbia MSA AA, where it originated 25 loans for \$70.5 million during the evaluation period. Examples of agencies funded include The Food Bank for Central and Northeast Missouri, First Chance for Children, and Homecare of Mid-Missouri, Inc. The distribution of community development lending is displayed in table 29.

TABLE 29 COMMUNITY DEVELOPMENT LOANS		
	#	\$ (000)
Affordable Housing	6	3,136
Community Services	2	1,525
Economic Development	7	13,962
Revitalization/Stabilization	10	51,829

INVESTMENT TEST

The bank had an adequate level of qualified community development investments and donations in the Columbia CSA AA. Investments in the area totaled \$1.4 million and consisted of five current period tax credits, including four issuances of Brownfield Remediation tax credits in Mexico, Missouri, in the rural portion of the CSA, and one Missouri Historic Preservation tax credit in Columbia. The bank also made 158 qualified donations within the AA during the review period, totaling \$287,000.

SERVICE TEST

The bank's performance under the service test in the Columbia CSA AA is excellent based on the accessibility of delivery systems and the high level of community development services.

Retail Services:

Retail services were discussed under the overall bank review and do not vary by market. The bank operates 13 branch locations in the Columbia CSA AA, of which two are located in low-income tracts, four are in moderate-income, four are in middle-income, and three are in upper-income tracts. This represents 46.2 percent of AA branches located in LMI tracts, compared to 30.9 percent of total AA tracts that are LMI. Additionally, four more branches are on the tract boundary separating LMI tracts from middle- and upper-income tracts.

Since the last examination, the bank closed one office that was located in a moderate-income geography, and opened two branches in middle-income tracts. The closed branch was located in Moberly, Missouri, and was within one mile of the other local branch office. Banking offices are very accessible to LMI geographies and the wide array of services offered by the bank

does not vary in a way that inconveniences its AA, particularly LMI individuals and geographies.

Community Development Services:

The bank is a leader in providing community development services in the Columbia CSA AA, with 83 qualified services provided during the review period to 25 organizations. Examples include services provided to organizations that provide affordable housing, economic development and community services targeted to LMI individuals.

OTHER MISSOURI METROPOLITAN STATISTICAL AREAS
(Limited Reviews)

DESCRIPTION OF BANK'S OPERATIONS IN THE LIMITED REVIEW MISSOURI MSA AAs

Cape Girardeau, MO MSA AA

The bank's Cape Girardeau MSA AA includes one of three counties in the MSA, located on the Missouri side of the state line of this multistate MSA. This AA has four branches and 4.3 percent of the bank's total state deposits as of June 30, 2013. HMDA loans within this AA equaled 5.6 percent of total HMDA loans within the AAs of the state, and CRA LAR business and farm loans in the AA equaled 7.0 percent of total state CRA LAR loans.

Jefferson City, MO MSA AA

The bank's Jefferson City MSA AA includes one of four counties in the MSA, and does not include the city proper of Jefferson City, but rather a more rural adjacent county. This AA has two branches and 2.9 percent of the bank's total state deposits as of June 30, 2013. HMDA loans within this AA equaled 3.8 percent of total HMDA loans within the AAs of the state, and CRA LAR business and farm loans in the AA equaled 8.2 percent of total state CRA LAR loans.

Joplin MO, MSA AA

The bank's Joplin MSA AA includes both of the two counties that comprise the MSA. This AA has four branches and 8.0 percent of the bank's total state deposits as of June 30, 2013. HMDA loans within this AA equaled 6.0 percent of total HMDA loans within the AAs of the state, and CRA LAR business and farm loans in the AA equaled 4.8 percent of total state CRA LAR loans.

TABLE 30 MARKET SHARE FDIC SUMMARY OF DEPOSITS (JUNE 30, 2013)			
Area	MSA	Market Share	Market Rank
Missouri	Cape Girardeau-Jackson, Missouri-Illinois	6.4	8/17
	Jefferson City, Missouri	1.9	11/24
	Joplin, Missouri	8.2	4/15

PERFORMANCE TEST CONCLUSIONS IN THE LIMITED REVIEW MISSOURI MSA AAs

Under the lending test, the bank's performance for each limited review AA regarding borrower distribution and geographic distribution was evaluated based on a review of similar relevant facts and data as discussed previously for those AAs with full reviews, including bank performance figures, aggregate comparisons, and demographic information. The tables used for this review for 2012 and 2013 are displayed in Appendix D. Tables for 2011 were reviewed, but are not included in this Performance Evaluation.

The following table indicates whether the performance levels for each test for the limited review AAs were considered to be consistent with, exceeding, or below the performance of the overall full review AAs in the state. Although some areas were assessed as "below" the performance of the overall full review AAs in the state, this did not change the state rating.

Assessment Area	Lending Test	Investment Test	Service Test
Cape Girardeau MSA	Consistent	Below	Consistent
Jefferson City MSA	Consistent	Below	Consistent
Joplin MSA	Consistent	Below	Consistent

MISSOURI NONMETROPOLITAN STATEWIDE AREAS
(Limited Reviews)**DESCRIPTION OF BANK'S OPERATIONS IN THE MISSOURI NONMETROPOLITAN AAs**

This evaluation considered five nonmetropolitan AAs in the state of Missouri, referred to as the Hannibal AA, Lebanon AA, Poplar Bluff AA, Barry/Lawrence AA, and the St. Francois AA. The bank's product offerings in these markets mirror the overall institution, with primary lending products including commercial loans and residential real estate loans; however, there is a higher volume of farm loans.

Combined, these nonmetropolitan AAs comprised only 2.4 percent of total bank deposits as of June 30, 2013. These combined nonmetropolitan AAs held 16.2 percent of the bank's statewide deposits (excluding the multistate MSAs) and accounted for 22.8 percent of statewide AA HMDA originations and 26.7 percent of statewide AA CRA LAR originations.

The bank's deposit market shares in the nonMSA markets ranked from fourth to tenth of all financial institutions in the respective counties. Each market had from 9 to 16 total financial institutions. The bank has two or three bank branches located in each market.

PERFORMANCE TEST CONCLUSIONS IN THE MISSOURI NONMETROPOLITAN AAs

Under the lending test, the bank's performance for each limited review AA regarding borrower distribution and geographic distribution was evaluated based on a review of similar relevant facts and data as discussed previously for those AAs with full reviews, including bank performance figures, aggregate comparisons, and demographic information. The tables used for this review for 2012 and 2013 are displayed in Appendix D. Tables for 2011 were reviewed, but are not included in this Performance Evaluation.

The following table indicates whether the performance levels for each test for the limited review AAs were considered to be consistent with, exceeding, or below the performance of the overall full review AAs in the state. Although some areas were assessed as "below" the performance of the overall full review AAs in the state, this did not change the state rating.

Assessment Area NonMSA	Lending Test	Investment Test	Service Test
Hannibal	Consistent	Below	Consistent
Lebanon	Consistent	Below	Consistent
Poplar Bluff	Consistent	Below	Below
Barry/Lawrence	Below	Below	Consistent
St. Francois	Below	Below	Below

STATE OF KANSAS

CRA RATING FOR KANSAS⁵ :	<u>"Outstanding"</u>
<i>The lending test is rated:</i>	<i>"High Satisfactory"</i>
<i>The investment test is rated:</i>	<i>"Outstanding"</i>
<i>The service test is rated:</i>	<i>"Outstanding"</i>

Major factors supporting the rating include:

- The bank is a leader in community development lending in the state.
- The level of qualified community development investments is excellent.
- The bank is a leader in providing community development services in the state.
- The geographic distribution of HMDA lending is considered adequate in the full review AA.
- The geographic distribution of business and farm loans is considered good in the full review AA.
- The distribution of HMDA loans among individuals of different income levels is considered adequate in the full review AA.
- The distribution of loans to businesses and farms of different revenue sizes is considered good in the full review AA.
- Delivery systems are accessible to geographies and individuals of different income levels within the AAs of the state.
- Products, services, and hours do not vary significantly by branch location and do not hinder access in any geographies or by individuals of different income levels within the AAs of the state.

SCOPE OF EXAMINATION

The scope of the review for the state of Kansas was consistent with the overall scope for the entire institution, including evaluations under the lending, investment, and service tests. The only AA in the state chosen for full review was the Wichita MSA AA, which had the greatest deposit concentration, accounting for 4.3 percent of total bank deposits but 44.9 percent of the bank's total statewide deposits. The only other MSA AA in the state, the Manhattan MSA AA, had 1.6 percent of total bank deposits and 16.1 percent of the bank's total statewide deposits. The bank's presence in the Wichita MSA ranked fifth out of 57 banks, and in the Manhattan MSA the bank ranked second out of 22 financial institutions. The Wichita MSA AA had 12 of 28 statewide branches, the highest population of all of the state's AAs, and 58 of 71 statewide LMI tracts. Accordingly, the rating for the state of Kansas was based predominantly on the bank's performance within this AA.

⁵ The bank has branches in two or more states in a multistate CSA. This statewide evaluation is adjusted and does not reflect performance in the part of the state contained within the multistate Kansas City CSA AA. Refer to the multistate CSA rating and discussion for the evaluation of the institution's performance in that area.

Three prior community contacts conducted during the previous two years within the Wichita MSA were referenced.

The Manhattan MSA AA was assessed using the limited review procedures. The four nonmetropolitan AAs were also assessed using limited review procedures.

The review did not include multifamily home loans for Wichita, nonMSA Hays, or nonMSA Hutchinson, due to little or no volume.

DESCRIPTION OF BANK'S OPERATIONS IN KANSAS

Excluding the multistate CSA, the remainder of the state of Kansas is the fourth most significant market area for the bank, though the level of significance is relatively low. The bank has 28 branches in the statewide AAs, 9.6 percent of total bank deposits (as of June 30, 2013), and fairly significant deposit market shares in all six AAs.

Within the state, the greatest deposit concentration was in the Wichita MSA AA, which accounted for 4.3 percent of total bank deposits. The other five AAs ranged from 0.4 percent to 1.6 percent. The bank's market presence in the Wichita MSA ranked fifth out of 57 banks, and in the Manhattan MSA the bank ranked second out of 22 banks. The bank's deposit market shares in the nonmetropolitan AAs in the state ranked first through fourth.

The Wichita MSA AA had 12 branches (as of December 31, 2013), and the other five AAs each had one to five branches.

HMDA LAR originations within the AAs in the state of Kansas represented only 8.4 percent of total HMDA originations within all bank AAs, while CRA LAR originations equaled 14.7 percent. Within the state, the Wichita MSA AA had 36.0 percent of statewide AA HMDA loans and 26.4 percent of CRA LAR loans. The most significant nonmetropolitan AA was the southeast Kansas AA, with five branches and 28.2 percent of statewide AA HMDA loans and 20.2 percent of CRA LAR loans.

PERFORMANCE TEST CONCLUSIONS IN KANSAS

LENDING TEST

The bank's performance with respect to the lending test in the state is rated "high satisfactory". The bank is a leader in community development lending, which enhanced the overall lending performance rating. Overall responsiveness to area credit needs and lending levels were considered adequate. The borrower and geographic distribution analyses generally reflected adequate performance, though the performance in the Wichita MSA AA was considered good. A more in-depth discussion of the state's performance follows.

Lending Activity:

See the discussion in the overall institution section for information regarding lending products and services offered by the bank and use of innovative products. The bank's lending activity and responsiveness to AA credit needs were considered adequate in the state of Kansas. According to the bank's internal analysis as of December 31, 2013, the LTD ratio for the state (outside of the multi-state CSA) equaled approximately 53 percent. The bank is not a market leader in HMDA or SB/SF lending within the state, but has reported an average of approximately 340 loan originations on the HMDA LAR and 830 CRA LAR originations each year for the three-year period reviewed.

Geographic and Borrower Distribution:

The bank's distribution tests for the full review AA in the state of Kansas were considered good. The limited review AAs were generally considered to be below the full review, but were considered adequate. The bank's statewide geographic distribution was generally stronger than the borrower distribution. In the bank's full review Wichita MSA AA, the geographic distribution of residential mortgage loans was adequate, while the geographic distribution of SB and SF loans was excellent.

The overall distribution of HMDA lending among borrowers of different income levels, with emphasis on the distribution to LMI borrowers, was adequate.

The distribution of lending to businesses and farms of different revenue sizes was considered good in the full review AA, and adequate in almost all limited review AAs. The bank's lending performance to SBs was typically below demographic figures, though above aggregate figures. SF lending was typically closer to the demographic figure. More detailed analyses of the geographic and borrower distribution tests are provided in the following sections for the full review AA.

Community Development Loans:

For the overall state of Kansas (only considering those areas outside of the multistate CSA AA), the bank is considered a leader in originating community development loans, with excellent levels of community development lending in the full review AA, and in the Manhattan MSA AA and the Garden City nonMSA AA. Two of the other three limited review AAs (Hays and southeast Kansas) had lower levels of community development loans, but were adequate, while the Hutchinson nonMSA AA had no qualified community development loans.

The three AAs with high levels of community development lending activity enhanced the lending test rating for those AAs and for the state overall. Community development loans for the state totaled \$294.2 million for the review period. Appendix C details total community development activities.

The majority of community development loans were for revitalization and stabilization of LMI tracts (71.9 percent), and made to business entities consistent with stated revitalization plans or enterprise zones. The next largest dollar volume of community development loans was for economic development (27.5 percent), originated to SBs (per SBA guidelines) that either employed LMI individuals or were located in LMI tracts or enterprise zones.

INVESTMENT TEST

The state of Kansas investment test rating is "outstanding", as the bank had an excellent level of community development investments within the state. The statewide volume totaled \$53.3 million, representing 17.6 percent of the bank's total investment and donation volume. While the community development investment level in the limited-scope Manhattan MSA AA was considered somewhat weaker than the statewide level, it was still considered adequate and did not change the overall state rating. The Kansas rating was bolstered by the excellent investment activity in the Wichita MSA AA. The performances in the limited review nonmetropolitan AAs in the state were consistent with the overall state performance. The state volume of investments was also bolstered by 13 statewide tax credits and 24 statewide housing equity funds, totaling \$7.7 million.

The report sections covering the full review AA will discuss more detail regarding investments and donations made within the Wichita MSA AA. Also, please see Appendix C for tables regarding the bank's community development activities by AA.

SERVICE TEST

The bank's performance under the service test is rated "outstanding" for the state of Kansas. The rating is based on the bank's excellent performance in the Wichita MSA AA, as well as the limited review AAs, which were consistent with the overall outstanding rating of the state. This conclusion was based on the accessibility of delivery systems, the effect of branch openings and closings, and the level of qualified community development services. Eight of the bank's 27 banking offices (29.6 percent) in the state are located in LMI geographies. Banking offices are reasonably accessible to all portions of the AAs. The array of services offered by the bank and business hours do not vary in a way that inconveniences certain portions of the AAs or LMI individuals.

The bank is considered a leader in providing community development services in the Wichita MSA AA. The level of services provided in the limited review AAs was consistent with the overall outstanding rating of the state. Specific details of the bank's community development services are provided under the section for the full review AA.

**WICHITA, KANSAS
METROPOLITAN STATISTICAL AREA
(Full Review)**

DESCRIPTION OF BANK'S OPERATIONS IN THE WICHITA MSA AA

The Wichita MSA AA contains 12 banking offices (as of December 31, 2013), and the bank's deposit market share (5.8 percent) ranked fifth of 57 financial institutions in the MSA. (FDIC Market Share Report, June 30, 2013)

DESCRIPTION OF THE WICHITA MSA AA

The bank's Wichita MSA AA includes two of four counties in the MSA: Butler and Sedgwick. Characteristics of the AA are discussed in the following sections.

Economic and Employment Characteristics. The largest industry sectors in the Wichita MSA are manufacturing (18.5 percent), educational and health services (15.2 percent), government (14.2 percent), retail trade (11.0 percent), and professional and business services (10.5 percent). (Source: FDIC RECON/Moody's Analytics & BLS, 2012; BEA, 2011)

The MSA's largest employers are Spirit Aerosystems, Inc. (11,000), Via Christi Regional Medical Center (8,048 – increased from 5,276 in 2010), Hawker Beechcraft (5,000), Cessna Aircraft Company (5,000 – down from 6,193 in 2010), Bombardier Aerospace (3,286), Koch Industries, Inc. (2,800), McConnell Air Force Base (2,777), Wichita State University (2,486), Wesley Medical Center (2,115), and Boeing Integrated Defense Systems (1,800). (Source: FDIC RECON/Military Installation Guide, 2011; Wichita Business Journal, September 2011)

The Wichita MSA economy relies heavily on the aerospace industry as its catalyst. The industry has seen strengthening in the past year, as Boeing is on track to complete record high numbers of planes for commercial delivery. Boeing has received large orders from international airlines, which should help to maintain a steady manufacturing base in the Wichita MSA for the next five years. With the growing orders from Boeing, Spirit Aerosystems, the largest employer in Wichita as a parts supplier for Boeing and Airbus, will continue to expand operations. Spirit Aerosystems has also been awarded defense contracts that will help diversify its portfolio for longer term stability. Similarly, large aerospace employer Beechcraft has landed a major defense contract, which should improve its long-term viability. Not all aerospace companies have fared as well in the recent term though, as Cessna has announced a \$23 million dollar loss in the third quarter 2013. As the area continues as a major location for aerospace engineering, high-level jobs should continue to be added in the MSA.

Table 31 shows income, housing, and general demographic characteristics of the Wichita MSA AA.

TABLE 31								
2012 Wichita KS MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	13	9.5	7,769	5.4	2,611	33.6	29,515	20.6
Moderate-income	45	32.8	39,068	27.3	6,969	17.8	26,338	18.4
Middle-income	39	28.5	45,555	31.9	2,759	6.1	30,128	21.1
Upper-income	40	29.2	50,563	35.4	1,645	3.3	56,974	39.9
Total AA	137	100.0	142,955	100.0	13,984	9.8	142,955	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	18,521	5,123	3.5	27.7	9,622	52.0	3,776	20.4
Moderate-income	75,082	36,591	25.0	48.7	29,895	39.8	8,596	11.4
Middle-income	72,807	48,893	33.4	67.2	19,537	26.8	4,377	6.0
Upper-income	68,131	55,773	38.1	81.9	9,385	13.8	2,973	4.4
Total AA	234,541	146,380	100.0	62.4	68,439	29.2	19,722	8.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,715	10.6	2,266	10.0	357	19.4	92	9.6
Moderate-income	6,209	24.3	5,419	23.8	531	28.9	259	27.1
Middle-income	7,809	30.6	7,015	30.9	471	25.7	323	33.9
Upper-income	8,793	34.4	8,036	35.3	477	26.0	280	29.4
Total AA	25,526	100.0	22,736	100.0	1,836	100.0	954	100.0
Percentage of Total Businesses:				89.1		7.2		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	6	0.7	5	0.6	1	14.3	0	0.0
Moderate-income	38	4.4	38	4.4	0	0.0	0	0.0
Middle-income	417	47.8	413	47.7	4	57.1	0	0.0
Upper-income	412	47.2	410	47.3	2	28.6	0	0.0
Total AA	873	100.0	866	100.0	7	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0
Based on 2006-2010 ACS data and 2012 D&B business and farm demographic data.								
NOTE: Percentages may not total 100 percent due to rounding differences.								

The MSA lacks industrial diversity, which makes their economy heavily reliant on the aerospace industry and creates high employment volatility. Difficulties with the industry during the recession led to a net population loss since 2010. As the industry improves, the relatively low cost of living and high housing affordability should see the population meet pre-recession levels and return wage growth. Wage growth should lead to increased spending in consumer areas such as retail and housing, which should strengthen the housing industry and stabilize the area's economy. (Source: FDIC RECON/Moody's Economy.com, Inc., June 2011/June 2013/October 2013)

TABLE 32 UNEMPLOYMENT RATES¹ KANSAS MSAs			
Area	2011	2012	3Q'13
Manhattan MSA	5.7	5.1	5.7
Wichita KS MSA	7.9	6.8	6.7
State of Kansas	6.5	5.7	5.8
U.S.	8.9	8.1	7.3
¹ Source: FDIC RECON			

One community contact indicated that area economic conditions are improving. Unemployment has decreased and job opportunities with airline industry subcontractors have increased. Another community contact indicated that the greater Wichita area is in a stable period regarding economic growth and employment. Wichita has not experienced the drastic fluctuations in the economy that has occurred elsewhere in the country. The contact stated that the major employers in the area continue to be the aircraft companies and the businesses in the surrounding area that support the aircraft companies, as well as Koch Industries and Cargill.

A third community contact believes the Wichita economy is still doing fairly well, with continued reliance on the aircraft industry, which experienced a downturn recently. She also felt that surrounding rural communities, which had previously seen decreasing populations, have recently begun experiencing growth as a result of oil production in the area.

Population Trends and Characteristics. The bank's Wichita MSA AA includes two of four counties in the MSA, Butler and Sedgwick. The MSA AA saw an increase in population from 2000 to 2010 of just over 10 percent. The population growth in each AA county mirrored that of the AA overall. The population of the AA makes up over 90 percent of the population of the MSA, so the population characteristics of the AA will reflect those of the MSA. Much of the population center is in Sedgwick County, which had a population of 498,365 as of the 2010 Census. This was significantly higher than the population of Butler County, which had a population of 65,880 in 2010.

In regards to age of population, makeup of families and households, and institutionalized persons, there were no significant anomalies between AA characteristics and total statewide figures that would provide a contextual basis for lending patterns outside the expected normal.

Income Characteristics. The percentage of families in the AA that are considered low-, moderate-, middle-, and upper-income generally mirror statewide figures. The percentage of families below the poverty level for the AA and the entire MSA also mirror statewide figures.

Housing Economy and Characteristics. The housing affordability ratio in the bank's Wichita MSA AA equaled 41.3 percent as of the 2010 Census, only slightly more affordable than the overall statewide figure of 40.3 percent. The AA's percentage of owner-occupied housing units (62.4 percent) mirrors the total statewide figure (62.9 percent). Both the percentage of housing stock that is for multifamily housing and the percentage of mobile homes in the AA mirror the statewide figures as well.

One community contact indicated that the housing market has been picking up and sales have increased. Lower interest rates have helped make owning a home affordable. However, another contact indicated that he believes it has been more difficult to obtain home loans due to the increased regulatory burden over the past couple of years. Another contact felt that the local banks are generally meeting the community's banking needs. And a third feels the ability to obtain financing remains tight, but easier than it was during the recession.

Affordable housing is becoming harder to find due to immigration as individuals move to the area for work. A significant community need is for development of low-income housing available for purchase. The Wichita area is growing, and affordable housing is getting harder to find. The contact stated that rental properties are commanding higher prices because there is limited supply, and the quality does not have to be as high because the supply is low.

Another community contact indicated that currently there is five months inventory of housing on the market, which is a very average inventory level. He also stated that the major credit needs in the community are residential lending and commercial lending.

This contact indicated that some local banks were participating in residential lending programs through rural development programs, which has helped residential development in areas that qualify, though they are primarily outside the city of Wichita. He also mentioned developers have taken advantage of Section 42 affordable housing development programs, specifically for the development of senior citizen housing.

Census Tract Income Levels/Characteristics. The AA contains 137 tracts, including 13 low-income, 45 moderate-income, 39 middle-income, and 40 upper-income tracts. The percentage of rental units is more pronounced within the LMI tracts of the AA. In low-income tracts, only 27.7 percent of housing units are owner-occupied, and 52.0 percent are rentals; and in the moderate-income tracts 48.7 percent are owner-occupied and 39.8 percent are rentals. These factors may somewhat impact the bank's ability to make owner-occupied home purchase or refinance loans within the AA's LMI tracts. However, there may be increased opportunities for lending for rental/investment properties.

Economic characteristics also vary by tract income category. In the low-income tracts, 33.6 percent of families are below the poverty level. This figure is 17.8 percent in the moderate-income tracts. However, in the middle- and upper-income tracts, this figure drops to 6.1 percent and 3.3 percent, respectively. Similarly, the unemployment rate in 2010 in the low-income tracts was at 18.0 percent, and 10.8 percent in the moderate-income tracts, compared

to 6.1 percent in the middle-income tracts and 4.0 percent in the upper-income tracts. This may hinder the ability for residents in the LMI tracts to afford home purchases.

One community contact indicated that the middle of downtown Wichita, a low-income area, has very little housing available. The areas outside of downtown Wichita, which contain more moderate-, middle-, and upper-income tracts, are growing the most.

PERFORMANCE TEST CONCLUSIONS IN THE WICHITA MSA AA

LENDING TEST

The bank's performance with respect to the lending test in the Wichita MSA AA is considered good. The bank is a leader in community development lending in the AA. Overall responsiveness to area credit needs was adequate. The borrower and geographic distribution analysis reflected a good performance in the MSA. A more in-depth discussion of the bank's performance in the AA follows.

Lending Activity:

The lending activity at the AA level is adequate. The Wichita MSA AA contained 36.0 percent of all HMDA loans within the statewide Kansas AAs, and 26.4 percent of CRA LAR loans. For the review period, the bank originated six SBA loans totaling \$625,000 in the Wichita MSA.

Geographic Distribution:

As shown in Table 33 and Table 34, the distribution among geographies of different income levels of the bank's residential mortgage loans was adequate, the business loan distribution was excellent, and the farm loan distribution was good. The bank had a minimal level of multifamily residential loans in the AA during the review period, too few for a meaningful analysis.

Home Purchase Loans

The geographic distribution of home purchase loans reflected adequate penetration in the AA's LMI geographies. Volume was relatively low, with only 37 originations in 2012. The penetration in low-income tracts was above aggregate and only slightly below the demographic of owner-occupied housing units, though this comprised only one loan. The volume in moderate-income tracts mirrored aggregate, but was below the demographic. In 2013, the penetration in moderate-income tracts dropped significantly, to 5.7 percent. However, the penetration in 2011 was strong, at 21.4 percent versus aggregate lenders at 12.2 percent and a demographic figure, based on 2000 Census data, of 20.2 percent. Most of the bank's activity in home purchase loans was in the middle- and upper-income tracts, with 29 of the 37 loans

in 2012 and 49 of 53 in 2013 located in these tracts. The bank had only a moderate level of lending on investment-type properties in this market, with 17.2 percent nonowner-occupied.

TABLE 33 DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES WICHITA KS MSA AA							
Census Tract Income Level ¹	Bank Loans				Aggregate HMDA Data ²		% of Owner Occupied Units ³
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	6	258	4.5	1.7	1.5	0.9	3.5
Moderate	29	1,746	21.8	11.4	16.2	10.6	25.0
Middle	32	3,479	24.1	22.7	32.0	28.9	33.4
Upper	66	9,843	49.6	64.2	50.3	59.6	38.1
Home Purchase Loans							
Low	1	172	2.7	3.4	1.8	1.1	3.5
Moderate	7	456	18.9	9.1	19.2	10.5	25.0
Middle	14	2,136	37.8	42.8	33.4	30.1	33.4
Upper	15	2,226	40.5	44.6	45.5	58.3	38.1
Home Refinance Loans							
Low	2	46	3.0	0.5	1.0	0.6	3.5
Moderate	16	1,125	23.9	12.0	13.7	8.0	25.0
Middle	11	1,193	16.4	12.7	30.8	26.6	33.4
Upper	38	7,049	56.7	74.9	54.4	64.8	38.1
Home Improvement Loans							
Low	3	40	10.3	4.3	2.7	1.2	3.5
Moderate	6	165	20.7	17.9	18.2	10.4	25.0
Middle	7	150	24.1	16.3	33.7	30.0	33.4
Upper	13	568	44.8	61.5	45.4	58.4	38.1
¹ Low-income census tracts are those geographies with MFI less than 50 percent of the MSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent – 80 percent; middle-income is 80 percent – 120 percent; and upper-income is greater than 120 percent.							
² Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
³ Percentage of owner-occupied and multifamily housing units by tract based on 2006-2010 ACS data.							
NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Refinance Loans

The bank's distribution of refinance loans within geographies of different income levels was considered good, with the bank's performance in LMI tracts consistent with area demographics, while exceeding aggregate lenders. The bank had a low level of lending in the middle-income tracts, and a very high level in the upper-income tracts. The home refinance product represented half of the bank's 2012 HMDA loans in this market, with 67 of 133 total originations.

Home Improvement Loans

The geographic distribution of home improvement loans was good. Again, the bank's volume was low, with only 29 in the AA in 2012. The bank's distribution within LMI tracts for 2012 demonstrated a strong performance in low-income tracts and a good performance in moderate-income tracts, but this comprised only three and six loans, respectively. The distribution in 2011 was weak, but 2013 was excellent. The bank's penetration in middle-income tracts was well below aggregate and demographics, while loans in upper-income tracts mirrored aggregate and exceeded demographics.

TABLE 34 DISTRIBUTION OF 2012 SB AND SF LOANS BY INCOME LEVEL OF GEOGRAPHIES WICHITA KS MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data ¹		% of Businesses/ Farms ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	20	6,013	11.7	17.9	11.1	14.0	10.6
Moderate	53	9,583	31.0	28.5	24.0	26.0	24.3
Middle	39	6,291	22.8	18.7	27.6	24.7	30.6
Upper	59	11,755	34.5	34.9	33.8	34.6	34.4
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.7
Moderate	2	75	6.7	2.5	3.8	1.5	4.4
Middle	21	2,110	70.0	69.6	69.5	80.3	47.8
Upper	7	845	23.3	27.9	26.3	18.1	47.2
¹ Aggregate loan data reflects all originations in the bank's AA reported by all CRA filers.							
² Percentage of businesses and farms by tract based on 2006-2010 ACS data.							
NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Business Loans

The geographic distribution of business loans in the AA was considered excellent. The performance in the low-income tracts was slightly above demographic and aggregate figures; while in the moderate-income tracts the bank's performance far exceeded aggregate and demographic figures. There was a slight decline in 2013, but the findings were still considered good. The penetration in the upper-income tracts was consistent with expectations. The stronger performance in the moderate-income tracts was primarily offset by lending in the middle-income tracts below the demographic figure.

Farm Loans

The geographic distribution of farm loans in the AA was considered good. The demographics in the low-income tracts are minimal, so analysis of the bank's performance there was not meaningful. In the moderate-income tracts, the bank's performance exceeded aggregate and

demographic figures, but there were only two loans from the universe in the moderate-income tracts. There was a decline to zero loans in 2013, but the findings were adequate since only one or two loans would have met or exceeded expectations. Above-demographic levels of lending in the moderate-income tracts was offset by lending in the upper-income tracts that was well below the demographic figure. Most bank loans were in the middle-income tracts, far exceeding the demographic figure, though consistent with aggregate.

Distribution by Borrower Income and Business Revenue Size:

As shown in Table 35 and Table 36, the bank's borrower distribution of HMDA lending reflected adequate distribution to borrowers in the LMI categories. The distribution was also adequate for loans to SBs and good for loans to SFs. HMDA loans were generally well below the demographic figures and below aggregate data, except refinance loans to low-income borrowers exceeded aggregate and home improvement loan distributions were excellent when compared to aggregate and far exceeded the combined LMI demographic figure.

CRA business loans were well below the demographic figure for SB, but exceeded aggregate data. The CRA farm loan distribution equaled the demographic for SFs and was well above aggregate.

Home Purchase Loans

The bank's performance regarding home purchase loans was considered poor, with zero purchase loans to low-income borrowers in 2012, while the distribution to moderate-income borrowers was well below area demographics and aggregate data. The distribution to LMI borrowers in 2011 was adequate and 2013 loans showed improvement to low-income but a drop to moderate-income borrowers. Lending to middle-income families was in line with expectations, while the bank had a very high level of lending to upper-income families for home purchase loans in this market in 2012. This was due partially to investment property loans to borrowers with higher incomes.

Refinance Loans

The bank's performance regarding home refinance loans to low-income borrowers was good in 2012, as it was well above aggregate figures. However, the penetration to moderate-income borrowers was poor, lagging well behind aggregate and demographics. The majority of the bank's refinance lending was to upper-income borrowers, while middle-income figures were in line with expectations. The penetration to moderate-income families improved in 2013 to exceed aggregate and mirror demographics. 2011 figures were considered adequate. Overall, the bank's performance for refinance loans in the AA for the entire review period was considered adequate.

TABLE 35 DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS WICHITA KS MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans ³							
Low	15	539	11.3	3.5	8.6	4.3	20.6
Moderate	17	1,013	12.8	6.6	16.9	11.6	18.4
Middle	30	2,702	22.6	17.6	21.8	18.4	21.1
Upper	64	10,351	48.1	67.5	35.4	43.4	39.9
Unknown	7	721	5.3	4.7	17.3	22.3	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	12.4	6.8	20.6
Moderate	4	451	10.8	9.0	21.8	17.0	18.4
Middle	9	837	24.3	16.8	22.2	21.9	21.1
Upper	23	3,617	62.2	72.5	28.2	39.8	39.9
Unknown	1	85	2.7	1.7	15.3	14.5	0.0
Home Refinance Loans							
Low	10	472	14.9	5.0	5.8	3.0	20.6
Moderate	4	394	6.0	4.2	13.5	8.9	18.4
Middle	15	1,493	22.4	15.9	21.0	17.3	21.1
Upper	33	6,478	49.3	68.8	40.0	48.7	39.9
Unknown	5	576	7.5	6.1	19.8	22.1	0.0
Home Improvement Loans							
Low	5	67	17.2	7.3	9.7	3.9	20.6
Moderate	9	168	31.0	18.2	17.7	11.8	18.4
Middle	6	372	20.7	40.3	26.7	24.4	21.1
Upper	8	256	27.6	27.7	42.4	53.2	39.9
Unknown	1	60	3.4	6.5	3.5	6.6	0.0
¹ Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
² Percentage of families based on 2006-2010 ACS data.							
³ Total HMDA loans will not foot, as multifamily loans are not considered in the borrower distribution.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Home Improvement Loans

The bank's performance regarding home improvement loans to LMI borrowers was excellent in 2012, and adequate in the other two years of the review period. The volume was relatively low, and decreased in 2013 (from 29 to 17). The highest penetration in 2012 was to moderate-income borrowers, but in 2013 that shifted to upper-income (52.9 percent).

**TABLE 36
DISTRIBUTION OF 2012 SB AND SF LOANS¹ BY REVENUE SIZE OF BUSINESS
WICHITA KS MSA AA**

Business/Farm Size by Revenue ²	Bank Loans				Aggregate CRA Data ³		% of AA Businesses/ Farms ⁴
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	105	16,859	61.4	50.1	32.1	34.0	89.1
Over \$1MM	61	16,646	35.7	49.5	Not Reported		7.2
Not Known	5	137	2.9	0.4			3.7
SF Loans							
\$1MM or less	30	3,030	100.0	100.0	70.6	79.9	99.2
Over \$1MM	0	0	0.0	0.0	Not Reported		0.8
Not Known	0	0	0.0	0.0			0.0
¹ The CRA disclosure statements report only business loans in amounts of \$1M or less and farm loans in amounts of \$500M or less.							
² This analysis focuses on the bank's lending to "small businesses" and "small farms" as defined by the CRA, which are those businesses and farms with gross annual revenues of \$1M or less.							
³ Aggregate loan data reflects all SB and SF loan originations in the bank's AA reported by all CRA data filers.							
⁴ Percentage of businesses and farms in the AA based on 2012 D&B data.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Business Loans

The bank's record of lending to SBs was considered adequate. Again, the bank's penetration was well below the demographic figure of SBs in the AA, but above the aggregate figure.

Farm Loans

The distribution of loans to farms of different sizes was good. The bank's lending performance to SFs equaled area demographics and was well above aggregate lenders. The volume of farm loans in this AA was relatively low, and low weight was given to farm loans in the evaluation.

Community Development Lending:

The bank is considered a leader in providing community development loans in the Wichita MSA AA, where it originated 61 loans for \$275 million during the evaluation period. The distribution of community development lending is displayed in Table 37.

TABLE 37 COMMUNITY DEVELOPMENT LOANS		
	#	\$ (000)
Affordable Housing	0	0
Community Services	0	0
Economic Development	27	73,519
Revitalization/Stabilization	34	201,265

INVESTMENT TEST

The bank had an excellent level of qualified community development investments and donations in the Wichita MSA AA. Investments in the area totaled \$38.9 million and included 22 investments in housing equity funds, private placement bonds, and tax credits. Most of the qualified investments were current period investments, with nine prior period investments totaling \$3.5 million still on the books. Examples of qualified investments included:

- Two private placement bonds totaling \$25.2 million for a hospital and a YMCA located in moderate-income tracts, one of which was located in a metropolitan county enterprise zone; with both providing revitalization/stabilization of LMI tracts.
- Nine Kansas State Rehabilitation Tax Credits totaling \$9.6 million, providing revitalization/stabilization of LMI tracts.
- Six prior period and two current period housing equity funds, providing affordable housing to LMI families.
- 116 qualified donations totaling \$441,000.

SERVICE TEST

The bank's performance under the service test in the Wichita MSA AA is excellent based on the accessibility of delivery systems and the high level of community development services provided.

Retail Services:

Retail services were discussed under the overall bank review and do not vary by market. The branch penetration within LMI tracts in the AA is good. Six of the bank's 12 AA branches are located in LMI tracts, while 42.3 percent of total AA tracts are LMI. Since the last examination, the bank has not opened or closed any offices in the AA. Banking offices are accessible to LMI geographies and the wide array of services offered by the bank does not vary in a way that inconveniences certain portions of the AA, particularly LMI individuals.

Community Development Services:

The bank is considered a leader in providing community development services in the Wichita MSA AA, with 82 qualified services provided during the review period to 31 organizations. One community contact felt that many local banks do a good job in contributing to and sponsoring local events and programs.

**MANHATTAN, KANSAS
METROPOLITAN STATISTICAL AREA**
(Limited Review)

DESCRIPTION OF BANK'S OPERATIONS IN THE MANHATTAN MSA AA

The bank's Manhattan MSA AA includes two of three counties in the MSA, omitting Geary County, which includes Junction City. This AA has three branches and 1.6 percent of total bank deposits and 16.1 percent of the bank's total state deposits as of June 30, 2013. HMDA loans within this AA equaled 17.9 percent of total HMDA loans within the AAs of the state, and CRA LAR business and farm loans in the AA equaled 9.7 percent of total statewide AA CRA LAR loans. The bank's deposit market share (12.8 percent) ranked second of 22 financial institutions in the MSA. (FDIC Market Share Report, June 30, 2013)

PERFORMANCE TEST CONCLUSIONS IN THE MANHATTAN MSA AA

Under the lending test, the bank's performance for each limited review AA regarding borrower distribution and geographic distribution was evaluated based on a review of similar relevant facts and data as discussed previously for those AAs with full reviews, including bank performance figures, aggregate comparisons, and demographic information. The tables used for this review for 2012 and 2013 are displayed in Appendix D. Tables for 2011 were reviewed, but are not included in this Performance Evaluation.

The lending and investment tests for the limited review MSA AA were considered to be below the performance of the overall full review AA in the state; however, this did not change the state rating. The service test was considered to be consistent with the performance of the overall full review AA in the state.

KANSAS NONMETROPOLITAN STATEWIDE AREAS
(Limited Reviews)**DESCRIPTION OF BANK'S OPERATIONS IN THE KANSAS NONMETROPOLITAN AAs**

This evaluation considered four nonmetropolitan AAs in the state of Kansas, referred to as the Garden City AA, Hays AA, Hutchinson AA, and the southeast Kansas AA. The bank's product offerings in these markets mirror the overall institution, with primary lending products including commercial loans and residential real estate loans; and three of four nonmetropolitan AAs had higher volumes of farm loans than the full review AA.

Combined, these nonmetropolitan AAs comprised only 3.7 percent of total bank deposits as of June 30, 2013, though they accounted for 38.9 percent of the bank's statewide deposits (excluding the multistate MSA) and accounted for 46.2 percent of statewide AA HMDA originations and 63.9 percent of statewide AA CRA LAR originations.

The bank's deposit market shares in the nonMSA markets ranked from first to fourth of all financial institutions in the respective counties. Each market had from nine to 21 total financial institutions. Each AA had one to five bank branches located in the market.

PERFORMANCE TEST CONCLUSIONS IN THE KANSAS NONMETROPOLITAN AAs

Under the lending test, the bank's performance for each limited review AA regarding borrower distribution and geographic distribution was evaluated based on a review of similar relevant facts and data as discussed previously for those AAs with full reviews, including bank performance figures, aggregate comparisons, and demographic information. The tables used for this review for 2012 and 2013 are displayed in Appendix D. Tables for 2011 were reviewed, but are not included in this Performance Evaluation.

The following table indicates whether the performance levels for each test for the limited review AAs were considered to be consistent with, exceeding, or below the performance of the full review AA in the state. Although some areas were assessed as "below" the performance of the full review AA in the state, this did not change the state rating.

Assessment Area NonMSA	Lending Test	Investment Test	Service Test
Garden City	Consistent	Below	Consistent
Hays	Below	Below	Consistent
Hutchinson	Below	Below	Below
Southeast Kansas	Below	Consistent	Consistent

STATE OF ILLINOIS

CRA RATING FOR ILLINOIS⁶ :	<u>"Satisfactory"</u>
<i>The lending test is rated:</i>	<i>"High Satisfactory"</i>
<i>The investment test is rated:</i>	<i>"High Satisfactory"</i>
<i>The service test is rated:</i>	<i>"Outstanding"</i>

Major factors supporting the rating include:

- The bank is a leader in community development lending in the state.
- The level of qualified community development investments is significant.
- The bank is a leader in providing community development services in the state.
- The geographic distribution of HMDA lending is considered good in the full review AA.
- The geographic distribution of business loans is considered excellent in the full review AA, and adequate for farm loans.
- The distribution of HMDA loans among individuals of different income levels is considered adequate in the full review AA.
- In the full review AA, the distribution of loans to businesses of different revenue sizes is considered adequate, while the distribution of farm loans based on revenue size is good.
- Delivery systems are accessible to geographies and individuals of different income levels within the AAs of the state.
- Products, services, and hours do not vary significantly by branch location and do not hinder access in any geographies or by individuals of different income levels within the AAs of the state.

SCOPE OF EXAMINATION

The scope of the review for the state of Illinois was consistent with the overall scope for the entire institution, including evaluations under the lending, investment, and service tests.

The AA chosen for a full review was the Peoria MSA AA, which contained the second greatest deposit concentration within the state, equaling 2.4 percent of total bank deposits, just behind Bloomington, with 3.1 percent. The Peoria MSA has more LMI tracts than the other two Illinois AAs. Furthermore, the Peoria MSA AA did not receive a full review at the prior evaluation.

The Bloomington and Champaign MSA AAs were assessed using limited review procedures. The Illinois rating did not weigh heavily into the overall bank rating.

⁶ The bank has branches in two or more states in a multistate MSA. This statewide evaluation is adjusted and does not reflect performance in the part of the state contained within the multistate St. Louis MSA AA. Refer to the multistate MSA rating and discussion for the evaluation of the institution's performance in that area.

One prior community contact conducted during the previous two years was referenced.

The review did not include multifamily home loans for Peoria or farm loans for Champaign, due to little or no volume.

DESCRIPTION OF BANK'S OPERATIONS IN ILLINOIS

The bank has a minimal presence in the state of Illinois, with total state deposits equaling only 5.7 percent of total bank deposits, as of June 30, 2013.

The Peoria MSA AA has seven bank branches (as of December 31, 2013), but had eight as of June 30, 2013. The bank had an MSA deposit market share of 6.4 percent, which ranked fifth of 42 financial institutions in the MSA. (FDIC Market Share Reports, June 30, 2013)

The Bloomington MSA AA has six bank branches (as of December 31, 2013), and an MSA deposit market share of 4.3 percent, which ranked third of 42 financial institutions in the MSA. (FDIC Market Share Reports, June 30, 2013)

The Champaign MSA AA has only one bank branch (as of December 31, 2013), and an MSA deposit market share of 0.6 percent, which ranked 28th of 36 financial institutions in the MSA. (FDIC Market Share Reports, June 30, 2013)

HMDA and CRA loans in the state were minimal, with 5.8 percent of total HMDA originations and 5.7 percent of total CRA LAR originations reviewed within all AAs for this evaluation.

PERFORMANCE TEST CONCLUSIONS IN ILLINOIS

LENDING TEST

The bank's performance with respect to the lending test in the state is rated "high satisfactory". The bank is a leader in community development lending, which enhanced the overall lending performance rating. Overall responsiveness to area credit needs and lending levels were considered adequate. The borrower and geographic distribution analyses were considered good in the full review AA, while they reflected adequate performance in the two limited review AAs. A more in-depth discussion of the state's performance follows.

Lending Activity:

See the discussion in the overall institution section for information regarding lending products and services offered by the bank and use of innovative products. The bank's lending activity and responsiveness to AA credit needs were considered adequate in the state of Illinois. Per the bank's internal analysis as of December 31, 2013, the LTD ratio for the state (outside of the

multistate MSA) equaled approximately 56 percent. The bank is not a market leader in HMDA or SB/SF lending within the state, but has reported an average of approximately 240 loan originations on the HMDA LAR and 320 CRA LAR originations each year for the three-year period reviewed. For the review period, the bank originated two SBA loans totaling \$1.8 million in the state. All lending activity parameters reviewed represented adequate lending levels for the state.

Geographic and Borrower Distribution:

The bank's distribution tests for the full review AA in the state of Illinois were considered good. The limited review AAs were generally considered "below" the full review performance, but were considered adequate. In the bank's full review Peoria MSA AA, the geographic distribution of residential mortgage loans was good, the distribution of SB loans was excellent, and the distribution of SF loans was adequate.

The distribution of HMDA lending among borrowers of different income levels, with emphasis on the distribution to LMI borrowers, was adequate.

The distribution of lending to businesses of different revenue sizes was adequate in the state. The bank's lending performance to SBs was typically below demographic figures, though above aggregate figures. SF lending was closer to the demographic figure in the full review AA, and was considered good. More detailed analyses of the geographic and borrower distribution tests are provided in the following sections for the full review AA.

Community Development Loans:

For the overall state of Illinois (only considering those areas outside of the multistate MSA AA), the bank is considered a leader in originating community development loans, with excellent levels of community development lending in all three AAs. The high levels of community development lending activity enhanced the lending test rating for each AA and for the state overall. Community development loans for the state totaled \$117.4 million for the review period. Appendix C details total community development activities.

The majority of community development loans were for economic development (70.4 percent), originated to SBs (per SBA guidelines) that either employed LMI individuals or were located in LMI tracts or enterprise zones. The next largest dollar volume of community development loans was for revitalization and stabilization of LMI tracts (26.7 percent), made to business entities consistent with stated revitalization plans or enterprise zones.

INVESTMENT TEST

The state of Illinois investment test rating is "high satisfactory", as the bank had a significant level of community development investments within the state. The statewide volume totaled \$5.5 million, representing 1.8 percent of the bank's total investment and donation volume.

While the community development investment level in the full review Peoria MSA AA was considered poor, the overall level of investments for the state was still considered significant due to the excellent investment activity in the two limited review MSA AAs.

The report sections covering the full review AA will discuss more detail regarding investments and donations made within the Peoria MSA AA. Also, please see Appendix C for tables regarding the bank's community development activities by AA.

SERVICE TEST

The bank's performance under the service test is rated "outstanding" for the state of Illinois. The rating is based on the bank's excellent performance in the Peoria MSA, as well as the limited review AAs, which were consistent with the overall outstanding rating of the state. This conclusion was based on the accessibility of delivery systems, the effect of branch openings and closings, and the level of qualified community development services. Three of the bank's 14 banking offices (21.4 percent) in the state are located in LMI geographies. Banking offices are reasonably accessible to all portions of the AAs. The array of services offered by the bank and business hours do not vary in a way that inconveniences certain portions of the AAs or LMI individuals.

The bank is considered a leader in providing community development services in the Peoria MSA AA. The level of services provided in the limited review AAs was consistent with the overall outstanding rating of the state. Specific details of the bank's community development services are provided under the section for the full review AA.

PEORIA, ILLINOIS
METROPOLITAN STATISTICAL AREA
(Full Review)

DESCRIPTION OF BANK'S OPERATIONS IN THE PEORIA MSA AA

The bank's Peoria MSA AA includes seven of 14 branches and 42.5 percent of the bank's total statewide deposits as of June 30, 2013. HMDA loans within this AA equaled 51.8 percent of total HMDA loans within the state, and CRA LAR loans in the AA equaled 40.5 percent of total statewide CRA LAR loans. The bank's deposit market share (6.4 percent) ranked fifth of 42 financial institutions in the MSA. (FDIC Market Share Report, June 30, 2013)

DESCRIPTION OF THE PEORIA MSA AA

The bank's Peoria MSA AA includes three of five counties in the MSA: Peoria, Tazewell, and Woodford. Characteristics of the AA are discussed in the following sections.

Economic and Employment Characteristics. The largest industry sectors in the MSA are education and health services (17.9 percent), manufacturing (15.7 percent), professional and business services (12.7 percent), government (11.4 percent), and retail trade (9.7 percent). (Source: Moody's Economy.com/Moody's Analytics & BLS, 2012; BEA, 2011)

The MSA's largest nongovernment employers are Caterpillar, Inc. (16,000), OSF Saint Francis Medical Center (6,081), Methodist Medical Center (3,755), G&D Integrated (2,485), Bradley University (1,680), Wal-Mart Stores (1,500), Advanced Technology Services (1,500), SC2 (Superior Consolidated Industries; 1,500), and Proctor Community Hospital (1,174) (Source: Moody's Economy.com/Moody's Analytics, DCEO Illinois Department of Commerce and Economic Development, October 2013)

The heavy equipment industry has been struggling, which has taken a toll on the MSA's leading employer, Caterpillar. The company has seen weaker sales and has taken cost cutting measures such as temporary and permanent layoffs. Many employers in the MSA are engrained in the supply chain for Caterpillar, so weaker sales filter throughout the MSA as a whole. With the entire manufacturing sector struggling, the MSA's economy has seen limited job creation in recent months. Despite the slowdown in the economy, household balance sheets remain

strong, which has limited some of the impact. The MSA did not have the large number of foreclosures during the recession, so slowdowns in housing and residential construction have been primarily due to slowing demand. As Caterpillar and the MSA's economy as a whole recover and expand, it is expected that housing prices should rise and residential construction

TABLE 38 UNEMPLOYMENT RATES ¹ ILLINOIS MSAs			
Area	2011	2012	3Q'13
Bloomington MSA	7.8	7.3	7.3
Champaign MSA	8.4	8.0	8.2
Peoria MSA	8.7	7.9	8.9
State of Illinois	9.7	8.9	8.9
U.S.	8.9	8.1	7.3
¹ Source: FDIC RECON			

should pick up. (Source: FDIC RECON/Moody's Economy.com, Inc., October 2013)

Table 39 shows income, housing, and general demographic characteristics of the Peoria MSA AA.

TABLE 39 2012 PEORIA IL MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	10.3	4,198	4.4	1,786	42.5	18,591	19.7
Moderate-income	15	17.2	13,658	14.5	2,034	14.9	17,273	18.3
Middle-income	47	54.0	54,026	57.2	3,204	5.9	21,012	22.2
Upper-income	16	18.4	22,628	23.9	648	2.9	37,634	39.8
Total AA	87	100.0	94,510	100.0	7,672	8.1	94,510	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	9,270	2,623	2.5	28.3	4,997	53.9	1,650	17.8
Moderate-income	25,903	14,752	14.1	57.0	8,512	32.9	2,639	10.2
Middle-income	85,843	61,928	59.1	72.1	18,570	21.6	5,345	6.2
Upper-income	33,567	25,520	24.3	76.0	6,028	18.0	2,019	6.0
Total AA	154,583	104,823	100.0	67.8	38,107	24.7	11,653	7.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1,117	7.3	907	6.7	153	13.9	57	8.8
Moderate-income	2,344	15.3	2,083	15.3	172	15.6	89	13.7
Middle-income	8,237	53.7	7,349	54.1	525	47.6	363	55.8
Upper-income	3,651	23.8	3,255	23.9	254	23.0	142	21.8
Total AA	15,349	100.0	13,594	100.0	1,104	100.0	651	100.0
Percentage of Total Businesses:				88.6		7.2		4.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	3	0.2	3	0.2	0	0.0	0	0.0
Moderate-income	18	1.4	18	1.4	0	0.0	0	0.0
Middle-income	962	72.4	955	72.3	5	83.3	2	100.0
Upper-income	346	26.0	345	26.1	1	16.7	0	0.0
Total AA	1,329	100.0	1,321	100.0	6	100.0	2	100.0
Percentage of Total Farms:				99.4		0.5		0.2
Based on 2006-2010 ACS data and 2012 D&B business and farm demographic data. NOTE: Percentages may not total 100 percent due to rounding differences.								

Population Trends and Characteristics. The AA's 2010 population equaled 360,522. The population of the three AA counties combined for 95.1 percent of the total MSA population. Therefore, the AA demographics will be reflective of the total MSA demographics.

In regards to age of population, makeup of families and households, and institutionalized persons, there were no significant anomalies between AA characteristics and total statewide figures that would provide a contextual basis for lending patterns outside the expected norm.

Income Characteristics. The percentage of families that are low-, moderate-, middle-, and upper-income in the AA generally mirror the overall state figures for Illinois, with the exception of approximately 2 percentage points fewer of low-income families, and 2 percentage points more of middle-income families. The percentage of AA families below the poverty level is lower than the state figure (8.1 percent vs. 9.2 percent, as of 2010 data). The figures were significantly lower in Tazewell and Woodford Counties at 6.4 percent and 6.9 percent, respectively. The percentage of AA families below poverty in Peoria County was higher, at 10.3 percent. These income characteristics may be slightly favorable for better loan demand in the MSA than the overall state.

Housing Economy and Characteristics. The housing affordability ratio for the MSA equaled 42.1 percent as of the 2010 Census, more affordable than the statewide figure of 27.5 percent. The median age of housing stock at 47 years is comparable to the statewide age of housing stock at 44 years.

The AA percentage of total housing stock is concentrated in owner-occupied units (67.8 percent), which was higher than the statewide figure of 62.7 percent. In Woodford County this figure was substantially higher at 78.9 percent. Peoria County has larger concentrations of rental units and vacant units at 28.9 percent and 9.2 percent, compared to the AA composite figures of 24.7 percent and 7.5 percent, respectively. With relatively affordable housing and a higher concentration in owner-occupied housing, demographics suggest that the area should have above average demand for home purchase and refinance loans.

Census Tract Income Levels/Characteristics. The AA has 9 low-income tracts, 15 moderate-income tracts, 47 middle-income tracts, and 16 upper-income tracts. Of the bank's seven AA branches, one is in a low-income tract, one is in a moderate-income tract, three are in middle-income tracts, and two are in upper-income tracts. The low-income tracts contain only 6.0 percent of the total housing units in the AA, only 7.3 percent of businesses, and 0.2 percent of farms. The LMI tracts contain larger concentrations of families below the poverty level, equaling 42.5 percent of families in the low-income tract and 14.9 percent in the moderate-income tracts; well above the 8.1 percent figure for the overall AA. The low-income tract category has an owner-occupancy rate of only 28.3 percent, while 53.9 percent of housing units in the category are rental units. The median age of housing stock was the same in the LMI tracts, equaling 61 years; compared to 48 years in the middle-income tracts and 34 years in the upper-income tracts. Based on the demographics, the bank is unlikely to have significant penetration into the low-income tracts for residential real estate lending. However, the relative age of all of the housing units in the MSA could lend itself to home improvement loans.

PERFORMANCE TEST CONCLUSIONS IN THE PEORIA MSA AA

LENDING TEST

The bank's performance with respect to the lending test in the Peoria MSA AA is considered excellent. The bank is a leader in community development lending in the AA. Overall responsiveness to area credit needs was adequate. The borrower and geographic distribution analyses reflected good performance in the MSA. A more in-depth discussion of the bank's performance in the AA follows.

Lending Activity:

The lending activity at the AA level was adequate. The Peoria MSA AA contained 51.8 percent of all HMDA loans within the statewide Illinois AAs, and 40.5 percent of CRA LAR loans.

Geographic Distribution:

As shown in Table 40 and Table 41, the distribution among geographies of different income levels of the bank's residential mortgage loans was good, the business loan distribution was excellent, and the farm loan distribution was adequate. The bank had a minimal level of multifamily residential loans in the AA during the review period, too few for a meaningful analysis.

Home Purchase Loans

The geographic distribution of home purchase loans reflected adequate penetration in the AA's LMI geographies. Volume was low, with only 18, 31, and 24 originations in each respective year of the review period. The penetration in low-income tracts was zero in 2012, but demographics and aggregate were low in these geographies, so only one loan would have exceeded expectations. The volume in moderate-income tracts was similar to aggregate. In 2013, the penetration in all LMI tracts dropped to zero. However, the penetration in 2011 was excellent in the low-income tracts and adequate overall. Most of the bank's activity in home purchase loans was in the middle- and upper-income tracts.

Refinance Loans

The bank's distribution of refinance loans within geographies of different income levels was considered excellent. Although the bank had zero refinance loans within the low-income tracts in 2011 and 2012, and only one in 2013, demographic and aggregate figures were low in these tracts and the bank's performance was not significantly behind expectations. The strength was in the moderate-income tracts, with an excellent penetration in 2012, and an even stronger performance in 2013. The bank had a low level of lending in the middle-income tracts, and a high level in the upper-income tracts. The home refinance product was the largest of the HMDA loan products and carried the most weight in the evaluation.

TABLE 40 DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES PEORIA IL MSA AA							
Census Tract Income Level ¹	Bank Loans				Aggregate HMDA Data ²		% of Owner Occupied Units ³
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.7	0.4	2.5
Moderate	27	1,374	18.6	9.0	9.1	5.2	14.1
Middle	67	5,503	46.2	35.9	56.9	49.6	59.1
Upper	51	8,466	35.2	55.2	33.3	44.9	24.3
Home Purchase Loans							
Low	0	0	0.0	0.0	0.9	0.5	2.5
Moderate	3	102	9.7	2.3	10.9	6.2	14.1
Middle	17	2,142	54.8	49.2	57.2	49.8	59.1
Upper	11	2,106	35.5	48.4	31.0	43.5	24.3
Home Refinance Loans							
Low	0	0	0.0	0.0	0.5	0.3	2.5
Moderate	22	1,204	22.9	11.5	7.7	4.3	14.1
Middle	39	3,110	40.6	29.7	56.1	48.9	59.1
Upper	35	6,147	36.5	58.8	35.7	46.4	24.3
Home Improvement Loans							
Low	0	0	0.0	0.0	2.0	0.3	2.5
Moderate	2	68	11.1	12.8	10.8	5.8	14.1
Middle	11	251	61.1	47.2	65.1	59.0	59.1
Upper	5	213	27.8	40.0	22.2	34.9	24.3
¹ Low-income census tracts are those geographies with MFI less than 50 percent of the MSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent – 80 percent; middle-income is 80 percent – 120 percent; and upper-income is greater than 120 percent.							
² Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
³ Percentage of owner-occupied and multifamily housing units by tract based on 2006-2010 ACS data. NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Home Improvement Loans

The geographic distribution of home improvement loans was adequate. Again, the bank's volume was low, and the bank's distribution within LMI tracts was consistent with aggregate and only slightly behind demographics. The majority of loans were in middle-income tracts (11 of 18 loans in 2012; 16 of 26 in 2013). Penetrations in all four tract categories were generally consistent with aggregate and demographic figures.

TABLE 41 DISTRIBUTION OF 2012 SB AND SF LOANS BY INCOME LEVEL OF GEOGRAPHIES PEORIA IL MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data ¹		% of Businesses/ Farms ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	19	4,821	20.9	23.8	6.3	9.6	7.3
Moderate	15	2,593	16.5	12.8	11.6	11.2	15.3
Middle	42	8,611	46.2	42.6	51.5	52.1	53.7
Upper	15	4,193	16.5	20.7	24.8	26.0	23.8
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.2
Moderate	0	0	0.0	0.0	0.4	0.0	1.4
Middle	40	4,298	93.0	90.1	86.0	85.4	72.4
Upper	3	470	7.0	9.9	13.4	14.6	26.0
¹ Aggregate loan data reflects all originations in the bank's AA reported by all CRA filers.							
² Percentage of businesses and farms by tract based on 2006-2010 ACS data.							
NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Business Loans

The geographic distribution of business loans in the AA was considered excellent. The performance in the low-income tracts was well above demographic and aggregate figures; while in the moderate-income tracts the bank's performance slightly exceeded aggregate and demographic figures. There was a slight decline in 2013 in the moderate-income tracts, but the penetration in the low-income tracts remained very strong. The strong performance in the low-income tracts was offset by lending in the middle- and upper-income tracts below the demographic figures.

Farm Loans

Although no farm loans were made in the LMI tracts in the AA, the performance was considered adequate since the demographics are so low in these tracts and the bank's level of farm lending in this AA was relatively low.

Distribution by Borrower Income and Business Revenue Size:

As shown in Table 42 and Table 43, the bank's borrower distribution of HMDA lending reflected adequate distributions to LMI borrowers; the distribution was also adequate for loans to SBs and good for loans to SFs. HMDA loans were generally well below the demographic figures, but consistent with aggregate data in the low-income category, except for home purchase loans. And in the moderate-income category, the bank compared favorably to aggregate and demographic data.

CRA LAR business loans were well below the demographic figure for SBs, but exceeded aggregate data; and the farm loan distribution nearly equaled the demographic figure for SFs and was well above aggregate.

TABLE 42 DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS PEORIA IL MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans ³							
Low	15	562	10.3	3.7	9.1	4.5	19.7
Moderate	34	2,024	23.4	13.2	18.1	12.1	18.3
Middle	21	1,497	14.5	9.8	21.3	18.3	22.2
Upper	65	10,257	44.8	66.9	38.5	51.3	39.8
Unknown	10	1,003	6.9	6.5	13.0	13.9	0.0
Home Purchase Loans							
Low	1	68	3.2	1.6	12.7	6.7	19.7
Moderate	7	507	22.6	11.7	21.2	15.6	18.3
Middle	1	138	3.2	3.2	19.9	19.2	22.2
Upper	22	3,637	71.0	83.6	30.8	44.9	39.8
Unknown	0	0	0.0	0.0	15.5	13.6	0.0
Home Refinance Loans							
Low	11	449	11.5	4.3	6.6	3.3	19.7
Moderate	22	1,234	22.9	11.8	16.0	10.2	18.3
Middle	15	1,256	15.6	12.0	21.8	18.1	22.2
Upper	38	6,519	39.6	62.3	43.9	56.5	39.8
Unknown	10	1,003	10.4	9.6	11.6	11.8	0.0
Home Improvement Loans							
Low	3	45	16.7	8.5	14.1	6.3	19.7
Moderate	5	283	27.8	53.2	22.3	14.9	18.3
Middle	5	103	27.8	19.4	27.6	24.6	22.2
Upper	5	101	27.8	19.0	33.1	51.5	39.8
Unknown	0	0	0.0	0.0	3.0	2.6	0.0
¹ Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
² Percentage of families based on 2006-2010 ACS data.							
³ Total HMDA loans will not foot, as multifamily loans are not considered in the borrower distribution.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Home Purchase Loans

The bank's performance regarding home purchase loans was considered adequate. Volume was low in this market for home purchase loans. The penetration to low-income borrowers was poor, but in 2012, the distribution to moderate-income borrowers was good compared to area demographics and aggregate data. Lending to middle-income families was very low, while the bank had a very high level of lending to upper-income families for home purchase loans in this market.

Refinance Loans

The bank's performance regarding the borrower distribution of home refinance loans was considered adequate. Refinance loans to low-income borrowers exceeded aggregate figures, but lagged behind demographics. The penetration to moderate-income borrowers in 2012 was excellent, exceeding aggregate and demographics. The performance to moderate-income borrowers dropped back down to an adequate level in 2013. The majority of the bank's refinance lending was to upper-income borrowers, but the distribution was not excessive, as it was in line with demographics.

Home Improvement Loans

The bank's performance regarding home improvement loans to LMI borrowers was considered good. The volume was relatively low, so this product did not receive significant weighting. The distribution between each of the four income categories was fairly uniform.

TABLE 43 DISTRIBUTION OF 2012 SB AND SF LOANS ¹ BY REVENUE SIZE OF BUSINESS PEORIA IL MSA AA							
Business/Farm Size by Revenue ²	Bank Loans				Aggregate CRA Data ³		% of AA Businesses/ Farms ⁴
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	49	8,723	53.8	43.1	29.2	38.2	88.6
Over \$1MM	41	11,470	45.1	56.7	Not Reported		7.2
Not Known	1	25	1.1	0.1			4.2
SF Loans							
\$1MM or less	40	4,100	93.0	86.0	72.2	74.0	99.4
Over \$1MM	1	150	2.3	3.1	Not Reported		0.5
Not Known	2	518	4.7	10.9			0.2
¹ : The CRA disclosure statements report only business loans in amounts of \$1M or less and farm loans in amounts of \$500M or less.							
² This analysis focuses on the bank's lending to "small businesses" and "small farms" as defined by the CRA, which are those businesses and farms with gross annual revenues of \$1M or less.							
³ Aggregate loan data reflects all SB and SF loan originations in the bank's AA reported by all CRA data filers.							
⁴ Percentage of businesses and farms in the AA based on 2012 D&B data.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Business Loans

The bank's record of lending to SBs was considered adequate. Again, the bank's penetration was well below the demographic figure of SBs in the AA, but well above the aggregate figure.

Farm Loans

The distribution of loans to farms of different sizes was considered good. The bank's lending

performance to SFs was near area demographics and above aggregate data.

Community Development Lending:

The bank is considered a leader in providing community development loans in the Peoria MSA AA, where it originated 15 loans for \$34.8 million during the evaluation period. The distribution of community development lending is displayed in the table below.

TABLE 44 COMMUNITY DEVELOPMENT LOANS		
	#	\$ (000)
Affordable Housing	3	1,353
Community Services	0	0
Economic Development	10	30,235
Revitalization/Stabilization	2	3,209

INVESTMENT TEST

The bank had a poor level of qualified community development investments and donations in the Peoria MSA AA. There were no qualified investments for this AA, but there were 92 donations totaling \$162,000, primarily to organizations providing community services to LMI individuals.

SERVICE TEST

The bank's performance under the service test in the Peoria MSA AA was excellent based on the accessibility of delivery systems and the high level of community development services.

Retail Services:

Retail services were discussed under the overall bank review and do not vary by market. The branch penetration within LMI tracts in the AA is good. Two of the bank's seven AA branches, 28.6 percent, are located in LMI tracts, while 27.5 percent of total AA tracts are LMI. Since the last examination, the bank closed one office in a middle-income tract. Banking offices are accessible to LMI geographies and the array of services offered by the bank does not vary in a way that inconveniences certain portions of the AA, particularly LMI individuals.

Community Development Services:

The bank was a leader in providing community development services in the Peoria MSA AA, with 134 qualified services provided during the review period to 39 different organizations. Examples include organizations that provide affordable housing, economic development and community services targeted to LMI individuals.

OTHER ILLINOIS METROPOLITAN STATISTICAL AREAS
(Limited Reviews)**DESCRIPTION OF BANK'S OPERATIONS IN THE LIMITED REVIEW ILLINOIS MSA AAs**

The bank's Bloomington MSA AA operations within the state are similar to Peoria. However, since it was given a full review at the prior examination, only a limited review was conducted at this examination. The bank's Bloomington MSA AA includes six of 14 branches located in the state, and 54.6 percent of total statewide deposits, as of June 30, 2013. HMDA loans within this AA equaled 41.0 percent of total HMDA loans originated within the state's three AAs, and CRA LAR loans in the AA equaled 54.1 percent of total statewide AA CRA loans.

The bank's Champaign MSA AA includes only one of three counties in the MSA. This AA has only one branch and 2.8 percent of the bank's total statewide deposits as of June 30, 2013. HMDA loans within this AA equaled 7.2 percent of total HMDA loans originated within the state, and CRA LAR loans in the AA equaled 5.4 percent of total statewide CRA loans.

The bank's deposit market shares in the two limited review MSA AAs in Illinois equaled 4.3 percent in Bloomington, third of 32 financial institutions, and 0.6 percent in Champaign, ranking 27th of 36 financial institutions in the MSA. (FDIC Market Share Report, June 30, 2013)

PERFORMANCE TEST CONCLUSIONS IN THE LIMITED REVIEW ILLINOIS MSA AAs

Under the lending test, the bank's performance for each limited review AA regarding borrower distribution and geographic distribution was evaluated based on a review of similar relevant facts and data as discussed previously for the full review AA, including bank performance figures, aggregate comparisons, and demographic information. The tables used for this review for 2012 and 2013 are displayed in Appendix D. Tables for 2011 were reviewed, but are not included in this Performance Evaluation.

The following table indicates whether the performance levels for each test for the limited review AAs were considered to be consistent with, exceeding, or below the performance of the full review AA in the state. Although some areas were assessed as "below" the performance of the full review AA in the state, this did not change the state rating.

For the investment test, the limited review AAs exceeded the performance of the full review AA in the state. This did change the overall state rating for the investment test, as the full review AA had the weakest performance of the three AAs, and this test was bolstered by the level of community development investments in the two limited review AAs.

Assessment Area MSA AA	Lending Test	Investment Test	Service Test
Bloomington	Below	Exceeds	Consistent
Champaign	Below	Exceeds	Below

STATE OF COLORADO/
DENVER-AURORA-BROOMFIELD, COLORADO
METROPOLITAN STATISTICAL AREA
(Full Review)

CRA RATING FOR COLORADO:	<u>"Satisfactory"</u>
<i>The lending test is rated:</i>	<i>"Low Satisfactory"</i>
<i>The investment test is rated:</i>	<i>"Outstanding"</i>
<i>The service test is rated:</i>	<i>"High Satisfactory"</i>

Major factors supporting the rating include:

- The bank has a relatively high level of community development lending in the AA.
- The level of qualified community development investments is excellent.
- The bank has a relatively high level of community development services in the AA.
- The geographic distribution of HMDA lending is considered excellent, due to a high volume of investment properties in LMI tracts.
- The geographic distribution of business loans is considered excellent.
- The distribution of HMDA loans among individuals of different income levels is considered very poor, again, due to a high volume of investment properties (75.5 percent had unreported borrower income).
- The distribution of loans to businesses of different revenue sizes is considered adequate.
- Delivery systems are accessible to geographies and individuals of different income levels within the AA.
- Products, services, and hours do not vary significantly by branch location and do not hinder access in any geographies or by individuals of different income levels within the AA.

SCOPE OF EXAMINATION

For the state of Colorado, a full review of the bank's sole AA was conducted. Since there is only one AA, the statewide performance will be discussed concurrently with the Denver MSA AA. The scope of the review for the state of Colorado was consistent with the overall scope for the entire institution, including evaluations under the lending, investment, and service tests. Since the bank's presence in the Denver MSA is minimal, the Colorado rating did not weigh heavily into the overall bank CRA rating. The review did not include farm loans, due to little or no volume.

One prior community contact conducted during the previous two years within the Denver MSA was referenced for this evaluation.

DESCRIPTION OF BANK'S OPERATIONS IN THE DENVER MSA AA

The deposit concentration for the state of Colorado equaled only 0.8 percent of total bank deposits, as of June 30, 2013. The bank has a minimal presence in the Denver MSA AA, with only two bank branches (as of December 31, 2013) and a deposit market share of 0.2 percent, which ranked 32nd of 71 financial institutions in the MSA. (FDIC Market Share Report, June 30, 2013)

HMDA and CRA loans in the AA were minimal, with 2.3 percent of total HMDA originations and 1.5 percent of total CRA LAR originations reviewed within all AAs for this evaluation. The Denver branches have traditionally been more commercial oriented. This is reflected in the nature of the bank's HMDA lines, which are concentrated in business purpose, nonowner-occupied loans, such as for rental and rehabilitation projects.

DESCRIPTION OF THE DENVER MSA AA

The bank's Denver MSA AA consists of only three of ten counties in the MSA: Adams, Arapahoe, and Denver Counties. Characteristics of the AA are discussed in the following sections.

Employment and Economic Characteristics: Government and service industries are the MSA's largest employment sectors. As of 2012, the largest private employers included HealthONE (10,320 employees), Exempla Healthcare (7,710), Centura Health (7,140), Lockheed Martin (6,950), CenturyLink (6,800), Kaiser Permanente (6,030), Comcast Corporation (5,500), Denver Health and Hospital Authority (5,020), United Airlines (4,900), University of Colorado Hospital (4,890), Wells Fargo & Company (4,800), Children's Hospital (4,400), Dish Network (4,310), and IBM Corporation (4,200). (Source: FDIC RECON – Metro Denver EDC, January 2012)

Denver's economic recovery has transitioned into expansion mode with payrolls at a level over 2 percent higher than its pre-recession levels. The area has seen solid gains in business and professional services, as well as healthcare. These industries have combined for nearly half of the 100,000 jobs gained since the peak of unemployment in 2010. Housing prices have risen at levels surpassing the other areas of the state. Housing demand is strong and supply is thin due to the influx of residents to Denver based on the relatively strong growth in high-paying professions. SBs are adding employees at an above average rate, and Denver has a diverse employment base. Residential commercial builders are expanding operations and payrolls to support the housing growth and infrastructure projects needed to support the expanding population.

Table 45 shows income, housing, and general demographic characteristics of the Denver MSA AA.

TABLE 45								
2012 DENVER-AURORA-BROOMFIELD CO MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	66	17.0	57,598	15.5	16,888	29.3	101,567	27.4
Moderate-income	110	28.4	106,371	28.7	16,579	15.6	69,631	18.8
Middle-income	123	31.7	120,041	32.4	6,919	5.8	73,864	19.9
Upper-income	87	22.4	86,755	23.4	2,347	2.7	125,703	33.9
Unknown-Income	2	0.5	0	0.0	0	0.0	0	0.0
Total AA	388	100.0	370,765	100.0	42,733	11.5	370,765	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	115,568	40,131	10.6	34.7	62,790	54.3	12,647	10.9
Moderate-income	200,148	99,607	26.3	49.8	82,915	41.4	17,626	8.8
Middle-income	223,204	137,409	36.3	61.6	69,083	31.0	16,712	7.5
Upper-income	138,655	101,889	26.9	73.5	27,217	19.6	9,549	6.9
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	677,575	379,036	100.0	55.9	242,005	35.7	56,534	8.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	15,544	13.5	13,508	13.0	1,283	18.1	753	17.4
Moderate-income	29,418	25.6	26,041	25.1	2,224	31.5	1,153	26.7
Middle-income	34,303	29.8	31,701	30.6	1,418	20.1	1,184	27.4
Upper-income	35,331	30.7	32,124	31.0	1,997	28.3	1,210	28.0
Unknown-Income	479	0.4	312	0.3	147	2.1	20	0.5
Total AA	115,075	100.0	103,686	100.0	7,069	100.0	4,320	100.0
Percentage of Total Businesses:				90.1		6.1		3.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	56	6.7	56	6.8	0	0.0	0	0.0
Moderate-income	125	14.8	116	14.1	9	50.0	0	0.0
Middle-income	366	43.5	361	43.8	5	27.8	0	0.0
Upper-income	295	35.0	291	35.3	4	22.2	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	842	100.0	824	100.0	18	100.0	0	0.0
Percentage of Total Farms:				97.9		2.1		0.0
Based on 2006-2010 ACS data and 2012 D&B business and farm demographic data.								
NOTE: Percentages may not total 100 percent due to rounding differences.								

The unemployment rate has yet to reach pre-recession levels; however, the rate decreased to 6.5 percent by third quarter 2013, from a high of 9.3 percent in 2010. As mentioned previously, a pick-up in construction trends has led to a 10.1 percent growth in the industry in the Denver area over the prior three-month period. Since November 2012, the only industries that have not incurred job growth are manufacturing and government. Growth in most industries in the Denver area has led to improved consumer confidence. (Source: FDIC RECON - Moody's Economy.com, April 2013, August 2013)

TABLE 46 UNEMPLOYMENT RATES¹			
Area	2011	2012	3Q'13
Denver MSA	8.6	7.9	6.5
State of Colorado	8.6	8.0	7.1
U.S.	8.9	8.1	7.4
¹ Source: FDIC RECON			

Population Characteristics. The population of the entire Denver MSA equaled 2,543,196 as of the 2010 Census, constituting half the state's population. The bank's AA population equaled 1,613,764, or 63.4 percent of the entire MSA population. The AA population increased 16.0 percent from 2000 to 2010, which was on par with the statewide increase of 16.9 percent.

Income Characteristics. The breakdown of AA families by income category showed more LMI families than the overall MSA (27.4 percent low-income families in the AA vs. 21.9 percent for the overall MSA; and 18.8 percent moderate-income families vs. 17.2 percent) and a lower concentration of upper-income families (33.9 percent vs. 40.7 percent). The number of AA families below the poverty level (11.5 percent) was above the overall MSA figure (8.6 percent). Although these anomalies regarding family income demographics will not likely have a substantial impact on credit demand in the AA, these figures appear to be representative of the bank's AA as being more urban than suburban, including more LMI tracts and excluding the higher-income outlying areas of the Denver MSA.

Housing Characteristics. The AA 2010 vacancy rate of 8.3 percent was low compared to the 11.8 percent statewide vacancy rate. This is due to the higher number of seasonal/second homes in the rural mountainous areas, compared to a lack of such second homes in the MSA. The AA contained a higher concentration of multifamily units, equaling 31.1 percent of total housing units compared to 20.3 percent for the state and 25.9 percent for the entire MSA. Conversely, there is a slightly lower concentration of 1- to 4-family units. The AA has a small concentration of mobile homes. Of total area housing stock, mobile homes constituted 2.3 percent, versus the statewide figure of 4.6 percent.

The AA's median age of housing stock (35 years) is slightly older than the state (29 years) and MSA (21 years). As is typical, AA housing stock is much older in the low- (40 years) and moderate-income tracts (39 years), so there may be a need for more housing rehabilitation loans in LMI tracts.

The overall housing affordability rate in the State of Colorado is very low compared to other 10th District states. The AA, overall Denver MSA, and statewide affordability rates are all comparable (23.4 percent, 24.4 percent, and 23.9 percent, respectively). The least affordable

county in the AA is Denver County, at 18.9 percent. It may be difficult for LMI families to afford home ownership in the MSA AA, especially in Denver County.

One community contact indicated that the financial crisis led to more affordable home prices and lower interest rates. However, the local housing authority is struggling to place LMI residents into homes. Because of changing underwriting guidelines and uncertainty in the credit markets (FHA, FNMA, and other government financing), there is a current need for down payment assistance programs. He stated that another housing need is the build-out of condominium units that serve as a viable entry-level residence for first-time homebuyers. New construction and rehabilitation is extremely slow given new legislation proposed on construction defects and liabilities. The contact also noted that LMI individuals have had a difficult time obtaining affordable housing in the urban market, which has resulted in Section 8 voucher recipients seeking housing opportunities in the outlying suburbs. The contact indicated that rents in the area are extremely high and the lack of rental vacancies is at a critical level, indicating a need for more affordable rental housing. For example, during 2012 there were over 15,000 applicants in the Denver area for 1,000 available HUD-subsidized housing vouchers.

Census Tract Income Levels/Characteristics. The bank has two branches in the AA, one in a low-income tract and one in a moderate-income tract. Economic and housing characteristics in the LMI tracts may restrict mortgage lending to some degree within these tracts. The owner-occupancy rate in the LMI tracts equaled 34.7 percent and 49.8 percent, respectively, compared to the overall AA figure of 55.9 percent and the overall MSA figure of 61.2 percent. The percentage of rental units equaled 54.3 percent in low-income tracts and 41.4 percent in moderate-income tracts, above the overall AA figure of 35.7 percent. As of 2010 data, the family poverty rate in the low-income tracts was nearly three times the overall AA rate (29.3 percent vs 11.5 percent). This figure equaled 15.6 percent in the moderate-income tracts. Absent special credit programs, many residents in the LMI tracts may be unable to obtain substantial credit for home ownership.

PERFORMANCE TEST CONCLUSIONS IN THE DENVER MSA AA

LENDING TEST

The bank's performance with respect to the lending test in the state is rated "low satisfactory". The bank had a relatively high level of community development lending. Overall responsiveness to area credit needs and lending levels were considered adequate. The geographic distribution analyses for HMDA and SB loans reflected an excellent performance. However, the borrower distribution of HMDA loans was very poor, and the lending to SBs was only adequate. A more in-depth discussion of the performance for the state's sole AA follows.

Lending Activity:

See the discussion in the overall institution section for information regarding lending products and services offered by the bank and innovative products. The bank's lending activity and responsiveness to AA credit needs were considered adequate. Per the bank's internal analysis as of December 31, 2013, the LTD ratio for the state equaled approximately 196 percent. However, the bank originated a relatively low volume of loans, with approximately 90 HMDA LAR and CRA LAR originations each year for the three-year period reviewed. The bank is not a significant home mortgage lender in the market. For the review period, the bank originated 32 SBA loans totaling \$14.2 million in the state of Colorado. All lending activity parameters reviewed represented adequate lending levels for the AA.

Geographic Distribution:

As shown in Table 47 and Table 48, the geographic distribution of the bank's residential mortgage loans and business loans reflected an excellent penetration among geographies of different income levels. The bank had a minimal level of home improvement or multifamily residential loans in the Denver MSA AA during the review period, too few for a meaningful analysis, though the numbers are displayed in the tables.

The bank only has two branches in the AA, both in LMI tracts. This, plus the high volume of rental/rehabilitation investment properties reported on the HMDA LAR, enhanced the bank's lending in the LMI tracts, as the concentration of rental units is more pronounced in the LMI tracts.

Home Purchase Loans

The geographic distribution of home purchase loans reflected excellent penetration in the AA's LMI geographies, especially in the moderate-income tracts. The penetration in 2011 was zero in the low-income tracts, but 73.3 percent in the moderate-income tracts, compared to the demographic figures for the concentration of owner-occupied housing units (30.9 percent) and total 1- to 4-family housing units (33.6 percent). For 2012, the bank's activity in home purchase loans in the middle- and upper-income tracts was fairly consistent with demographics. The home purchase product was the largest of the HMDA loan products in this market, and carried the most weight.

Refinance Loans

The bank's distribution of refinance loans within geographies of different income levels was considered excellent. The bank's penetration within the LMI tracts exceeded aggregate and demographic figures by significant margins. The bank had a reasonable level of lending in the middle-income tracts, and a relatively low level in the upper-income tracts.

TABLE 47 DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES DENVER-AURORA-BROOMFIELD CO MSA AA							
Census Tract Income Level ¹	Bank Loans				Aggregate HMDA Data ²		% of Owner Occupied Units ³
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	11	1,204	10.8	2.8	7.0	5.8	10.6
Moderate	37	15,949	36.3	37.1	20.3	15.8	26.3
Middle	36	19,582	35.3	45.5	36.1	32.1	36.3
Upper	18	6,270	17.6	14.6	36.6	46.3	26.9
Home Purchase Loans							
Low	4	551	6.9	4.2	8.3	5.4	10.6
Moderate	19	3,346	32.8	25.3	23.1	17.1	26.3
Middle	22	4,284	37.9	32.4	36.4	33.3	36.3
Upper	13	5,026	22.4	38.1	32.3	44.1	26.9
Home Refinance Loans							
Low	7	653	18.9	9.8	6.3	4.3	10.6
Moderate	17	2,903	45.9	43.6	18.7	13.7	26.3
Middle	9	2,004	24.3	30.1	36.0	32.0	36.3
Upper	4	1,098	10.8	16.5	39.0	50.0	26.9
Home Improvement Loans							
Low	0	0	0.0	0.0	7.2	3.6	10.6
Moderate	0	0	0.0	0.0	23.4	14.4	26.3
Middle	2	466	66.7	76.1	33.7	28.4	36.3
Upper	1	146	33.3	23.9	35.6	53.6	26.9
Multifamily Loans							% of Multifamily Loans Units ³
Low	0	0	0.0	0.0	24.9	28.9	25.7
Moderate	1	9,700	25.0	43.1	27.8	34.0	32.5
Middle	3	12,828	75.0	56.9	40.1	26.3	29.5
Upper	0	0	0.0	0.0	7.3	10.8	12.4
¹ Low-income census tracts are those geographies with MFI less than 50 percent of the MSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent – 80 percent; middle-income is 80 percent – 120 percent; and upper-income is greater than 120 percent.							
² Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
³ Percentage of owner-occupied and multifamily housing units by tract based on 2006-2010 ACS data.							
NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Business Loans

The geographic distribution of business loans in the AA was excellent. The performance in the LMI tracts was well above demographic and aggregate figures. The 2013 LMI tract penetration remained strong. The strong performance in the LMI tracts was offset by lending in the middle- and upper-income tracts below the demographic figures. This market has a primary emphasis on business loans, and the bank's two area branches are located in LMI tracts.

TABLE 48 DISTRIBUTION OF 2012 SB LOANS BY INCOME LEVEL OF GEOGRAPHIES DENVER-AURORA-BROOMFIELD CO MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data ¹		% of Businesses ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Low	22	7,026	25.3	32.3	13.9	18.6	13.5
Moderate	29	4,894	33.3	22.5	24.9	29.0	25.6
Middle	19	5,151	21.8	23.7	26.8	20.0	29.8
Upper	14	3,543	16.1	16.3	32.1	30.3	30.7
Unknown	3	1,150	3.4	5.3	0.6	1.6	0.0
¹ Aggregate loan data reflects all originations in the bank's AA reported by all CRA filers. ² Percentage of businesses by tract based on 2006-2010 ACS data. NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Distribution by Borrower Income and Business Revenue Size:

As shown in Table 49 and Table 50, the bank's borrower distribution of HMDA lending reflected a very poor distribution to LMI individuals, and an adequate distribution for loans to SBs. HMDA loans were virtually nonexistent to LMI borrowers. This was due to the very high level of lending for investment type residential properties, where the income for business borrowers is reported as 'NA' on a majority of the bank's loans.

CRA LAR loans to SBs were well below the demographic figure for SBs in the AA, but in line with aggregate data.

Home Purchase Loans

The bank's performance regarding home purchase loans was considered very poor. The distribution to LMI borrowers was minimal, and well below area demographics and aggregate data. The reason for the lower level of lending to LMI families was the higher concentration of loans for investment properties, as 82.0 percent of total HMDA loans in 2012 were for nonowner-occupied properties, which led to 75.5 percent of all MSA home mortgage loans to have 'NA' as the reported income, as well as a higher concentration to upper-income individuals, who are more likely to purchase investment properties.

However, even after considering only owner-occupied loans, approximately 65 percent of total 2012 HMDA loans and five of seven home purchase loans were to upper-income individuals. Therefore, the higher concentration of investment property loans in this AA does not solely account for the poor distribution to LMI borrowers. Since this market is primarily focused on business lending, a majority of the HMDA loans on owner-occupied properties are accommodation loans made to the bank's business customers. These loans are more highly concentrated in the upper-income category. (Note: The volume was low, as there were only 14 owner-occupied home purchase loans in 2012, and nine in 2013.)

Refinance Loans

The bank's performance regarding home refinance loans to LMI borrowers was also very poor, but improved in 2013. The majority of the bank's refinance lending was to upper-income borrowers or those with no reported incomes. The volume with reported incomes was very low, with only nine total, all to middle- and upper-income borrowers.

TABLE 49 DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS DENVER-AURORA-BROOMFIELD CO MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans ³							
Low	0	0	0.0	0.0	9.2	4.8	27.4
Moderate	1	80	1.0	0.2	18.6	13.1	18.8
Middle	7	1,172	6.9	2.7	20.6	18.6	19.9
Upper	17	5,710	16.7	13.3	34.3	43.5	33.9
Unknown	77	36,043	75.5	83.8	17.2	19.9	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	13.9	7.6	27.4
Moderate	1	80	1.7	0.6	24.8	19.0	18.8
Middle	3	386	5.2	2.9	21.4	21.7	19.9
Upper	10	4,011	17.2	30.4	30.0	42.8	33.9
Unknown	44	8,730	75.9	66.1	9.8	8.9	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	6.8	3.8	27.4
Moderate	0	0	0.0	0.0	15.5	11.1	18.8
Middle	3	586	8.1	8.8	20.3	18.4	19.9
Upper	6	1,433	16.2	21.5	36.6	47.0	33.9
Unknown	28	4,639	75.7	69.7	20.9	19.7	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	12.3	4.4	27.4
Moderate	0	0	0.0	0.0	19.8	12.7	18.8
Middle	1	200	33.3	32.7	24.6	20.6	19.9
Upper	1	266	33.3	43.5	38.0	55.2	33.9
Unknown	1	146	33.3	23.9	5.3	7.2	0.0
¹ Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
² Percentage of families based on 2006-2010 ACS data.							
³ Total HMDA loans will not foot, as multifamily loans are not considered in the borrower distribution.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Business Loans

The bank's record of lending to SBs was considered adequate. The bank's penetration was well below the demographic figure of SBs in the AA, but mirrored the aggregate figure. Data for 2013 is misleading, as 91.5 percent of business loans had "NA" for reported revenues. Improvement was noted since the prior review in collecting reported revenues in 2012, but the

high level of "NA" for 2013 for this AA shows a digression in these efforts. For all AAs that showed improvement in the collection of business revenue data from 2010 to 2012, the improvement was notable in the category of lending to "small businesses".

**TABLE 50
DISTRIBUTION OF 2012 SB LOANS¹
BY REVENUE SIZE OF BUSINESS
DENVER-AURORA-BROOMFIELD CO MSA AA**

Business Size by Revenue ²	Bank Loans				Aggregate CRA Data ³		% of AA Businesses ⁴
	#	\$(000s)	# %	\$ %	# %	\$ %	
\$1MM or less	35	8,422	40.2	38.7	42.2	31.1	90.1
Over \$1MM	48	12,268	55.2	56.4	Not Reported		6.1
Not Known	4	1,074	4.6	4.9			3.8

¹ The CRA disclosure statements report only business loans in amounts of \$1M or less.

² This analysis focuses on the bank's lending to "small businesses" as defined by the CRA, which are those businesses with gross annual revenues of \$1M or less.

³ Aggregate loan data reflects all SB loan originations in the bank's AA reported by all CRA data filers.

⁴ Percentage of businesses in the AA based on 2012 D&B data.

NOTE: Percentages may not total 100 percent due to rounding differences.

Community Development Lending:

The bank has made a relatively high level of community development loans in the Denver MSA AA, with eight loans totaling \$10.0 million during the evaluation period. The distribution of community development lending is displayed in the table below. The two loans to organizations providing community services are to school districts with greater than 50 percent of the student population participating in the free or reduced lunch program. The other loans are business loans that either fit the definition of financing SBs that employ LMI individuals or are consistent with a revitalization/stabilization plan or enterprise zone.

**TABLE 51
COMMUNITY DEVELOPMENT LOANS**

	#	\$ (000)
Affordable Housing	0	0
Community Services	2	200
Economic Development	5	8,329
Revitalization/Stabilization	1	1,500

INVESTMENT TEST

The bank's performance under the investment test for the state of Colorado and the Denver MSA AA is rated "outstanding", with an excellent level of qualified community development investments and donations. Investments in the area totaled \$34.5 million and consisted of

eight current period (\$14.9 million) and six prior period bonds (\$19.6 million). The bank also made 21 qualified donations within the AA during the review period, totaling \$51,000.

SERVICE TEST

The bank's performance under the service test for the state of Colorado and the Denver MSA AA is rated "high satisfactory" based on the excellent accessibility of delivery systems and the adequate level of community development services.

Retail Services:

Retail services were discussed under the overall bank review and do not vary by market. The branch penetration within LMI tracts in the AA is excellent, given that bank's two branch locations are in LMI tracts, compared to 45.4 percent of total AA tracts that are LMI. Since the last examination, the bank opened one branch office in the AA, in a moderate-income tract. Banking offices are accessible to LMI geographies and services offered by the bank do not vary in a way that inconveniences certain portions of the AA, particularly LMI individuals.

Community Development Services:

The bank provided an adequate level of community development services in the Denver MSA AA, considering its minimal presence. The bank provided 18 qualified services during the review period to five different organizations that provide economic development and community services that target LMI individuals.

STATE OF OKLAHOMA /
TULSA, OKLAHOMA METROPOLITAN STATISTICAL AREA
(Full Review)

CRA RATING FOR OKLAHOMA:	<u>"Satisfactory"</u>
<i>The lending test is rated:</i>	<i>"Low Satisfactory"</i>
<i>The investment test is rated:</i>	<i>"High Satisfactory"</i>
<i>The service test is rated:</i>	<i>"Low Satisfactory"</i>

Major factors supporting the rating include:

- The bank is a leader in community development lending in the AA.
- The level of qualified community development investments in the state is significant.
- The bank has a relatively high level of community development services in the AA.
- The geographic distribution of HMDA lending is considered poor.
- The geographic distribution of business loans is considered adequate.
- The distribution of HMDA loans among individuals of different income levels is considered poor.
- The distribution of loans to businesses of different revenue sizes is considered adequate.
- Branch penetration within LMI tracts in the AA is poor; though banking offices are reasonably accessible to a few nearby LMI geographies.
- Products, services, and hours do not vary significantly by branch location and do not hinder access in any geographies or by individuals of different income levels within the AA.

SCOPE OF EXAMINATION

For the state of Oklahoma, a full review of the bank's Tulsa MSA AA was conducted. The bank added a branch in the Oklahoma City MSA late 2013, creating a second AA in the state. However, this AA was not subject to review at this examination, since it was only part of the bank for four months of the review period. Since only one AA was subject to review, the statewide performance will be discussed concurrently with the Tulsa MSA AA. The scope of the review for the state of Oklahoma was consistent with the overall scope for the entire institution, including evaluations under the lending, investment, and service tests. Since the bank's presence in the Tulsa MSA is minimal, the Oklahoma rating did not weigh heavily into the overall bank CRA rating.

The review did not include multifamily home loans, home improvement loans, or farm loans, due to little or no volume.

Three prior community contacts conducted during the previous two years within the Tulsa MSA were referenced for this evaluation.

DESCRIPTION OF BANK'S OPERATIONS IN THE TULSA MSA AA

The bank has a minimal presence in the state of Oklahoma, with total state deposits equaling only 0.7 percent of total bank deposits, as of June 30, 2013. The Tulsa MSA AA has three bank branches (as of December 31, 2013), and an MSA deposit market share of 0.6 percent, which ranked 28th of 61 financial institutions in the MSA. (FDIC Market Share Report, June 30, 2013)

HMDA and CRA LAR loans in the AA were minimal, with 1.8 percent of total HMDA originations and 2.0 percent of total CRA LAR originations within all AAs for this evaluation. The Tulsa branches were acquired in 2007 and have traditionally been more commercial oriented than the bank overall. This is reflected in the nature of the bank's HMDA lines, which have a slightly higher concentration in business purpose, nonowner-occupied loans.

DESCRIPTION OF THE TULSA MSA AA

The bank's Tulsa MSA AA includes only Tulsa County, one of seven counties in the MSA. Characteristics of the AA are discussed in the following sections.

Economic Characteristics. Although Tulsa continues to maintain strong ties to the energy industries (oil and mining), the MSA economy is diverse, with additional emphasis in the telecom, aerospace, and rental car industries. Oklahoma did not experience as severe a downturn as the rest of the country; however, Tulsa was hit a little harder than the rest of the state, due primarily to its higher reliance on manufacturing. With the merger of American Airlines and US Airways, the MSA's largest employer is poised to restructure and institute new technologies and continue a trend of job loss that started in 2012. Since 2012, the airline has shed 700 positions through buyouts and is expected to cut at least 400 additional jobs in 2014. Expectations in the manufacturing segment are much more positive, with employment and production exceeding the national pace. The relatively low cost of doing business has helped businesses expand, and some employers, such as Whirlpool, are expected to hire as many as 150 employees in 2014. (Source: Moody's Economy.com, July 2010; July 2011, November 2013)

As of 2012, service industries represented the largest sectors, with education and health services (15.7 percent) leading the way, followed by professional and business services (13.2 percent). The next largest industry sectors were government (13.3 percent), manufacturing (11.7 percent), and retail trade. (Source: Moody's Economy.com, Bureau of Labor Statistics, 2012)

Table 52 shows income, housing, and general demographic characteristics of the Tulsa MSA AA.

TABLE 52 2012 TULSA OK MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	19	10.9	12,018	8.0	4,647	38.7	31,569	21.0
Moderate-income	52	29.7	34,845	23.1	6,691	19.2	26,433	17.6
Middle-income	49	28.0	45,570	30.3	3,429	7.5	29,558	19.6
Upper-income	55	31.4	58,144	38.6	2,102	3.6	63,017	41.9
Total AA	175	100.0	150,577	100.0	16,869	11.2	150,577	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	25,646	7,934	5.4	30.9	13,062	50.9	4,650	18.1
Moderate-income	71,270	30,469	20.6	42.8	32,154	45.1	8,647	12.1
Middle-income	80,364	46,887	31.6	58.3	26,290	32.7	7,187	8.9
Upper-income	87,284	62,969	42.5	72.1	18,950	21.7	5,365	6.1
Total AA	264,564	148,259	100.0	56.0	90,456	34.2	25,849	9.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	2,816	7.1	2,341	6.6	375	12.6	100	7.2
Moderate-income	9,804	24.8	8,345	23.7	1,067	35.8	392	28.2
Middle-income	11,365	28.7	10,194	28.9	747	25.1	424	30.5
Upper-income	15,605	39.4	14,337	40.7	793	26.6	475	34.1
Total AA	39,590	100.0	35,217	100.0	2,982	100.0	1,391	100.0
Percentage of Total Businesses:				89.0		7.5		3.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	11	2.9	11	2.9	0	0.0	0	0.0
Moderate-income	43	11.2	43	11.4	0	0.0	0	0.0
Middle-income	141	36.8	139	36.9	2	33.3	0	0.0
Upper-income	188	49.1	184	48.8	4	66.7	0	0.0
Total AA	383	100.0	377	100.0	6	100.0	0	0.0
Percentage of Total Farms:				98.4		1.6		0.0
Based on 2006-2010 ACS data and 2012 D&B business and farm demographic data. NOTE: Percentages may not total 100 percent due to rounding differences.								

One community contact indicated that healthcare, oil and gas, and aviation are the major industry sectors in the MSA and all seem to be doing well. Another contact stated that the local economy did not see as deep a recession as other areas of the United States. This contact indicated that the area has endured some job loss in the aviation industry, but the overall economy in Tulsa has been propped up by the concentration of energy-related industries in the area.

Some of the MSA's largest employers include American Airlines, AT&T, Bank of Oklahoma, Cherokee Casino Resort, DirecTV, Hillcrest Healthcare System, Nordham Group, and St. Francis Health System. American Airlines employs 6,850 workers, and the remaining companies each employ more than 1,000 workers. Government jobs in 2012 totaled 4,669 for federal, 8,008 for state, and 43,415 for local government. (Tulsa Metropolitan Chamber of Commerce, 2013)

One community contact indicated that it has become very difficult to establish small, start-up businesses due to lack of funding, as banks are not lending to SBs as readily as in the past due to lower risk tolerances by most banks. Another community contact indicated that financial institutions could provide additional programs to assist with funding SBs; noting that there are some government programs in place to assist first time SB owners, but producing capital for SBs has been a challenge since the beginning of the recession. Banks are lending less, and people are not as willing to take capital/equity out of their homes to fund businesses due to the unstable economy.

Two community contacts indicated that the economy seems to be trending upward. However, one indicated that a lot of people in the area continue to struggle from paycheck to paycheck since being laid off or given reduced hours due to the recession.

Table 53 details unemployment rates for the Tulsa MSA, which have been above the state figures but below the national average.

TABLE 53 UNEMPLOYMENT RATES¹ OKLAHOMA MSAS			
Area	2011	2012	3Q'13
Tulsa MSA	6.6	5.6	5.3
Oklahoma	5.9	5.2	5.1
U.S.	8.9	8.1	7.3
¹ Source: FDIC RECON			

Population Trends and Characteristics. As of 2010 Census data, the population of the AA, Tulsa County, equaled 603,403, which was 64.3 percent of the entire MSA population of 937,478. Tulsa County's population increased 7.1 percent since 2000.

In regards to age of population, makeup of families and households, and institutionalized persons, there were no anomalies between AA characteristics and total MSA or statewide figures that would provide a significant contextual basis for lending patterns outside the expected normal.

Income Characteristics. The percentage of families in the AA that are considered low-, moderate-, middle-, and upper-income mirror statewide figures. The percentage of families below the poverty level for the entire Tulsa MSA equaled 10.8 percent, while the AA was just slightly higher at 11.2 percent.

Housing Economy and Characteristics. Although the MSA avoided the boom and bust of the housing prices during the recession, house prices in the MSA have fallen at a larger percentage than in the rest of the state. Similarly, the MSA contains a significant number of foreclosures, which has hindered the recovery of housing prices.

The housing affordability ratio in the bank's Tulsa MSA AA equaled 36.1 percent as of the 2010 Census, only slightly behind the overall MSA figure of 38.1 percent and the statewide figure of 41.2 percent. One community contact indicated that there appears to be sufficient housing supply for the area, including housing for varying family income levels.

The AA's percentage of owner-occupied housing units (56.0 percent) is slightly below the entire MSA figure (60.6 percent). Conversely, the percentage of rental units is above the MSA figure (34.2 percent vs. 29.2 percent).

One community contact indicated that there are plans underway to create 300 to 350 new residential units near downtown. Currently the downtown area has a 98 percent occupancy rate for available residential units. Construction has already begun downtown on eight to ten upper-income condos for owner-occupied units. Another community contact mentioned three housing developments being added in the downtown area, with one of them providing affordable units.

Census Tract Income Levels/Characteristics. The AA contains 175 tracts, including 19 low-income, 52 moderate-income, 49 middle-income, and 55 upper-income tracts. The bank has three AA branches, all of which are in upper-income tracts. The percentage of rental units is more pronounced within the LMI tracts of the AA. In low-income tracts, only 30.9 percent of housing units are owner-occupied, and 50.9 percent are rentals; and in the moderate-income tracts 42.8 percent are owner-occupied and 45.1 percent are rentals. These factors may impact the bank's ability to make owner-occupied home purchase or refinance loans in the AA, and especially within the LMI tracts. However, there may be opportunities for lending for rental/investment properties in the LMI tracts.

The economic characteristics also vary widely by tract income category. In the low-income tracts, 38.7 percent of families are below the poverty level. This figure is 19.2 percent in the moderate-income tracts. However, in the middle- and upper-income tracts, this indicator drops to 7.5 percent and 3.6 percent, respectively. This may hinder the ability for residents in the LMI tracts to afford home ownership.

One community contact indicated that there are several projects taking place in the downtown area. Hotels, two grocery stores, housing developments, and an arts complex are currently under construction in the downtown area. The contact also noted the construction of a new 13-unit strip mall in North Tulsa and a senior living complex with approximately 75 units in north Tulsa. Another community contact provided detailed information about specific community development projects currently underway in Tulsa, including developing a healthcare facility in north Tulsa's blighted neighborhood, revitalization of the northeast side of Tulsa's downtown, and several neighborhood stabilization efforts in LMI tracts near the University of Tulsa campus. These projects provide lending opportunities for local financial institutions in LMI tracts and to SBs.

One community contact believes the local financial institutions have played a major role in the redevelopment efforts currently under way in Tulsa. He mentioned that while Tulsa has

received some federal funding, the redevelopment programs have been funded largely by private local institutions.

PERFORMANCE TEST CONCLUSIONS IN THE TULSA MSA AA

LENDING TEST

The bank's performance with respect to the lending test in the state is rated "low satisfactory". The bank is a leader in community development lending, which enhanced the overall lending performance rating. Overall responsiveness to area credit needs and lending levels were considered adequate. The borrower and geographic distribution analyses reflected an adequate performance overall. However, the borrower and geographic distribution of HMDA loans was poor. More weight was given to the distribution of SB lending, given the market's emphasis on commercial lending. A more in-depth discussion of the performance in the state's sole AA follows.

Lending Activity:

See the discussion in the overall institution section for information regarding lending products and services offered by the bank and use of innovative products. The bank's lending activity and responsiveness to AA credit needs were considered adequate in the state of Oklahoma. According to the bank's internal analysis as of December 31, 2013, the LTD ratio for the state equaled approximately 167 percent. However, the bank originated a relatively low volume of loans, with approximately 72 HMDA LAR originations and 112 CRA LAR originations each year for the three-year period reviewed. For the review period, the bank originated four SBA loans totaling \$5.1 million in the Tulsa MSA. All lending activity parameters reviewed represented adequate lending levels for the AA.

Geographic Distribution:

As shown in Table 54 and Table 55, the geographic distribution of the bank's residential mortgage loans was poor, but the distribution of business loans reflected an adequate loan penetration among geographies of different income levels. The bank did not originate any home improvement or multifamily residential loans in the Tulsa MSA AA during 2012, and had only a minimal volume for the entire review period.

The bank only has three branches in the AA, all in upper-income tracts. Although one branch is near a moderate-income tract, this branch is primarily oriented towards commercial lending, so it did not help enhance residential lending in the LMI tracts. The concentration of rental units is more pronounced within the LMI tracts of the AA. In low-income tracts, only 30.9 percent of housing units are owner-occupied, and 50.9 percent are rentals; and in the moderate-income tracts 42.8 percent are owner-occupied and 45.1 percent are rentals. The economic characteristics also vary widely by tract income category. In the low-income tracts, 38.7 percent of families are below the poverty level, and this demographic figure equals

19.2 percent in the moderate-income tracts. In the middle- and upper-income tracts, this indicator drops to 7.5 percent and 3.6 percent, respectively. These factors may impact the bank's ability to make owner-occupied home purchase or refinance loans in the AA's LMI tracts.

TABLE 54 DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES TULSA OK MSA AA							
Census Tract Income Level ¹	Bank Loans				Aggregate HMDA Data ²		% of Owner Occupied Units ³
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	1.4	1.0	5.4
Moderate	3	376	5.9	2.6	10.9	5.9	20.6
Middle	7	638	13.7	4.3	29.7	23.1	31.6
Upper	41	13,655	80.4	93.1	58.0	69.9	42.5
Home Purchase Loans							
Low	0	0	0.0	0.0	1.4	0.8	5.4
Moderate	2	126	16.7	3.8	11.1	5.9	20.6
Middle	4	338	33.3	10.3	32.1	25.6	31.6
Upper	6	2,827	50.0	85.9	55.4	67.6	42.5
Home Refinance Loans							
Low	0	0	0.0	0.0	1.3	0.7	5.4
Moderate	1	250	2.6	2.2	10.2	5.3	20.6
Middle	3	300	7.7	2.6	27.3	20.2	31.6
Upper	35	10,828	89.7	95.2	61.2	73.8	42.5
¹ Low-income census tracts are those geographies with MFI less than 50 percent of the MSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent – 80 percent; middle-income is 80 percent – 120 percent; and upper-income is greater than 120 percent.							
² Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
³ Percentage of owner-occupied and multifamily housing units by tract based on 2006-2010 ACS data.							
NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Home Purchase Loans

The geographic distribution of home purchase loans reflected poor penetration in the AA's low-income geographies, but adequate in the moderate-income tracts. Most of the bank's activity in home purchase loans was in upper-income tracts. The home purchase product was minimal in this market in 2012. The volume increased in 2013, but primarily in upper-income tracts.

Refinance Loans

The bank's distribution of refinance loans within geographies of different income levels was considered poor in 2011 and 2012, but improved to adequate in 2013. The bank's level of refinance lending in upper-income tracts in 2012 was very high, but it was more in line with aggregate in 2013. The primary factors affecting the bank's lending performance for home

purchase and refinance lending in the AA was accommodation loans to business customers and the bank's branch locations being solely located in upper-income tracts. The moderately high level of loans on investment properties in the AA did not significantly enhance the geographic distribution.

TABLE 55 DISTRIBUTION OF 2012 SB LOANS BY INCOME LEVEL OF GEOGRAPHIES TULSA OK MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data ¹		% of Businesses ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Low	5	864	6.2	5.9	6.9	9.3	7.1
Moderate	9	1,235	11.1	8.4	22.9	27.8	24.8
Middle	16	3,170	19.8	21.6	24.5	22.4	28.7
Upper	51	9,415	63.0	64.1	42.8	39.9	39.4
¹ Aggregate loan data reflects all originations in the bank's AA reported by all CRA filers. ² Percentage of businesses by tract based on 2006-2010 ACS data. NOTE: Percentages may not total 100 percent due to rounding differences. Also, aggregate percentages have omitted loans with unknown census tract information.							

Business Loans

The geographic distribution of business loans in the AA was considered adequate. The performance in the low-income tracts was in line with demographic and aggregate figures, while the penetration in the moderate-income tracts was well below expectations. The 2013 penetration improved somewhat, to 17.3 percent in the moderate-income tracts. Most of the bank's business lending, 63.0 percent, was in the upper-income tracts, near the bank's three branch locations in the AA.

Distribution by Borrower Income and Business Revenue Size:

As shown in Table 56 and Table 57, the bank's borrower distribution of HMDA lending reflected a poor distribution among individuals of different income levels in the LMI categories, and an adequate distribution for loans to SBs. HMDA loans were virtually nonexistent to LMI borrowers. This is due to a moderately high level of lending for investment type residential properties, the location of the bank's branches in upper-income tracts, and accommodation loans to business customers since the market has a primary focus on business lending and not residential mortgage lending.

CRA business loans were well below the demographic figure for SBs, but consistent with aggregate data.

TABLE 56 DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS TULSA OK MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data ¹		% of Families ²
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans ³							
Low	0	0	0.0	0.0	6.7	3.2	21.0
Moderate	2	189	3.9	1.3	16.3	10.4	17.6
Middle	0	0	0.0	0.0	19.2	14.9	19.6
Upper	34	10,326	66.7	70.4	44.1	54.0	41.9
Unknown	15	4,154	29.4	28.3	13.6	17.4	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	8.3	4.5	21.0
Moderate	2	189	16.7	5.7	20.6	15.0	17.6
Middle	0	0	0.0	0.0	20.5	18.7	19.6
Upper	6	2,134	50.0	64.8	38.3	51.7	41.9
Unknown	4	968	33.3	29.4	12.2	10.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	5.3	2.4	21.0
Moderate	0	0	0.0	0.0	12.8	7.7	17.6
Middle	0	0	0.0	0.0	18.2	13.2	19.6
Upper	28	8,192	71.8	72.0	48.6	60.0	41.9
Unknown	11	3,186	28.2	28.0	15.1	16.6	0.0
¹ Aggregate loan data reflects all originations in the bank's AA reported by all HMDA filers.							
² Percentage of families based on 2006-2010 ACS data.							
³ Total HMDA loans will not foot, as multifamily loans are not considered in the borrower distribution.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Home Purchase Loans

The bank's performance regarding home purchase loans was considered poor to low-income borrowers, but adequate to moderate-income borrowers. As in the Denver market, this market is primarily focused on business lending. Therefore, one reason for the lower level of lending to LMI families was the higher concentration of loans for investment properties, as 27.0 percent of HMDA loans in 2012 were for nonowner-occupied properties, leading to more loans with 'NA' as the reported income code, as well as a higher concentration to upper-income individuals. A second reason is that most HMDA loans on owner-occupied properties were made only as accommodation loans to the bank's business customers. These loans are more highly concentrated in the upper-income category. (Note: The volume was low, as there were only 12 total home purchase loans in 2012, and only seven were owner-occupied.)

Refinance Loans

The bank's performance regarding home refinance loans to LMI was very poor in 2012, but was slightly better in 2011 and 2013. The majority of the bank's refinance lending was to upper-income borrowers or those with no reported incomes. Again, this is due to investment

properties and accommodation loans, as well as the bank's branch locations in only upper-income tracts.

TABLE 57 DISTRIBUTION OF 2012 SB LOANS ¹ BY REVENUE SIZE OF BUSINESS TULSA OK MSA AA							
Business Size by Revenue ²	Bank Loans				Aggregate CRA Data ³		% of AA Businesses ⁴
	#	\$(000s)	# %	\$ %	# %	\$ %	
\$1MM or less	52	7,399	64.2	50.4	39.9	36.6	89.0
Over \$1MM	22	6,715	27.2	45.7	Not Reported		7.5
Not Known	7	570	8.6	3.9			3.5
¹ . The CRA disclosure statements report only business loans in amounts of \$1M or less and farm loans in amounts of \$500M or less.							
² This analysis focuses on the bank's lending to "small businesses" and "small farms" as defined by the CRA, which are those businesses and farms with gross annual revenues of \$1M or less.							
³ Aggregate loan data reflects all SB and SF loan originations in the bank's AA reported by all CRA data filers.							
⁴ Percentage of businesses and farms in the AA based on 2012 D&B data.							
NOTE: Percentages may not total 100 percent due to rounding differences.							

Business Loans

The bank's record of lending to SBs was considered adequate. The bank's penetration was well below the demographic figure of SBs in the AA, but above the aggregate lenders.

Community Development Lending:

The bank is considered a leader in providing community development loans in the Tulsa MSA AA, where it originated 14 loans for \$36.7 million during the evaluation period. Examples of agencies funded include an organization that provides free health care to Native Americans with funding from grants, donations, and a substance abuse and addiction treatment center. The distribution of community development lending is displayed in the table below.

TABLE 58 COMMUNITY DEVELOPMENT LOANS		
	#	\$ (000)
Community Services	2	5,667
Economic Development	4	6,858
Revitalization/Stabilization	8	24,144

INVESTMENT TEST

The bank's performance under the investment test for the state of Oklahoma is rated "high satisfactory". The bank had an adequate level of qualified community development investments and donations in the Tulsa MSA AA. Investments in the AA totaled \$3.5 million and consisted of three FNMA pools and two housing equity funds for affordable housing, three SBIC issuances for economic development, and two Oklahoma Rehabilitation Tax Credits for revitalization/stabilization of LMI tracts. However, only four were current period investments (\$907,000), and six were prior period investments (\$2.6 million). The bank also made 45 qualified donations within the AA, totaling \$98,000. The overall state rating is bolstered to "high satisfactory" due to an additional 12 statewide investments, including ten housing equity funds for affordable housing within the state.

SERVICE TEST

The bank's performance under the service test for the state of Oklahoma and the Tulsa MSA AA is rated "low satisfactory" based on the poor accessibility of delivery systems, offset by the relatively high level of community development services.

Retail Services:

Retail services were discussed under the overall bank review and do not vary by market. The branch penetration within LMI tracts in the AA is poor, as the bank's three AA branches are located in upper-income tracts, while 40.6 percent of AA tracts are LMI. Since the last examination, the bank opened one branch office in the AA, in an upper-income tract. Banking offices are reasonably accessible to a few nearby LMI geographies, and services offered by the bank do not vary in a way that inconveniences certain portions of the AA, particularly LMI individuals.

Community Development Services:

The bank provided a relatively high level of community development services in the Tulsa MSA AA, considering its small presence. The bank provided 32 qualified services during the review period to 13 different organizations. The organizations provide affordable housing, economic development and community services that target LMI individuals. One community contact stated that he believed the community has a need for increased financial education. This may be an area of opportunity for additional community services.

CRA APPENDIX A

SCOPE OF EXAMINATION			
<u>FINANCIAL INSTITUTION</u> Commerce Bank Kansas City, Missouri		<u>PRODUCTS REVIEWED</u> HMDA LAR Loans: Home Purchase Loans, Home Refinance Loans, Home Improvement Loans, Multifamily Loans CRA LAR Loans: SB Loans, SF Loans Community Development Activities: Loans, Investments, Services	
<u>TIME PERIODS REVIEWED</u> <div>HMDA and CRA LAR Loans: January 1, 2011 to December 31, 2013</div> <div>Community Development Activities: January 1, 2011 to December 31, 2013</div>			
LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION			
AFFILIATES		AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
Commerce Mortgage Corporation		Subsidiary of Commerce Bank	Home Mortgage Loans
Capital For Business, Inc.		Subsidiary of Commerce Bancshares, Inc.	Qualified Investments
Small Business Investment Companies		Subsidiary of CFB	Qualified Investments
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA (Abbrev.)	TYPE OF EXAM	BRANCHES VISITED	COMMUNITY CONTACTS
<u>Multistate CSAs/MSAs</u> 312 Kansas City (28140)/ Lawrence (29940)/St. Joseph (41140), MO-KS Multistate CSA (Kansas City CSA AA) 41180 St. Louis, MO-IL Multistate MSA (St. Louis MSA AA)	Full Review Full Review	922 Walnut Street Kansas City, MO	8 prior 6 prior
<u>Missouri</u> 520 Springfield (44180)/Branson, MO CSA (Springfield CSA AA) 190 Columbia (17860)/Moberly/Mexico, MO CSA (Columbia CSA AA) 27620 Jefferson City, MO MSA 27900 Joplin, MO MSA 16020 Cape Girardeau-Jackson, MO-IL MSA NonMSA Barry/Lawrence Counties, MO NonMSA Hannibal, MO NonMSA Lebanon, MO NonMSA Poplar Bluff, MO NonMSA St. Francois County, MO	Full Review Full Review Limited Review Limited Review Limited Review Limited Review Limited Review Limited Review Limited Review		3 prior 3 prior

<u>Kansas</u> 48620 Wichita, KS MSA 31740 Manhattan, KS MSA NonMSA Garden City, KS NonMSA Hays, KS NonMSA Hutchinson, KS NonMSA Southeast Kansas	Full Review Limited Review Limited Review Limited Review Limited Review Limited Review		3 prior
<u>Illinois</u> 37900 Peoria, IL MSA 14060 Bloomington-Normal, IL MSA (Bloomington MSA AA) 16580 Champaign-Urbana, IL MSA (Champaign MSA AA)	Full Review Limited Review Limited Review		1 prior
<u>Colorado</u> 19740 Denver-Aurora-Broomfield, CO MSA (Denver MSA AA)	Full Review		1 prior
<u>Oklahoma</u> 46140 Tulsa, OK MSA	Full Review		3 prior

**CRA APPENDIX B
SUMMARY OF STATE AND MULTISTATE MSA RATINGS**

STATE OR MULTISTATE METROPOLITAN AREA	LENDING TEST RATING	INVESTMENT TEST RATING	SERVICE TEST RATING	OVERALL RATING
Kansas City, MO- K S CSA	High Satisfactory	Outstanding	Outstanding	Outstanding
St. Louis, MO-IL MSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Missouri	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Kansas	High Satisfactory	Outstanding	Outstanding	Outstanding
Illinois	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Colorado	Low Satisfactory	Outstanding	High Satisfactory	Satisfactory
Oklahoma	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

**CRA APPENDIX C
COMMUNITY DEVELOPMENT TABLES**

COMMUNITY DEVELOPMENT LENDING SUMMARY			
	#	\$(000s)	Conclusion
Commerce Bank Overall	579	1,947,315	Outstanding
Multistate MSAs			
Kansas City, MO-KS CSA	163	688,079	Outstanding
St. Louis, MO-IL MSA	153	484,054	Outstanding
Missouri			Outstanding
Springfield, MO MSA	70	216,567	Leader
Columbia, MO MSA	25	70,452	Leader
Limited Review MSA AAs	13	21,311	Consistent
Limited Review Rural AAs	10	8,471	Consistent
Kansas			Outstanding
Wichita, KS MSA	61	274,784	Leader
Limited Review MSA AAs	4	12,532	Consistent
Limited Review Rural AAs	13	6,918	Consistent
Illinois			Outstanding
Peoria, IL MSA	15	34,797	Leader
Limited Review MSA AAs	30	82,651	Consistent
Colorado – Denver, CO MSA	8	10,029	High Satisfactory
Oklahoma – Tulsa, OK MSA	14	36,669	Outstanding

COMMUNITY DEVELOPMENT INVESTMENT SUMMARY (Includes Investments and Donations)			
	#	\$(000s)	Conclusion
Institution – Entire U.S.	2	8,000	
Multistate MSAs			
Kansas City, MO-KS CSA	874	99,988	Outstanding
St. Louis, MO-IL MSA	810	67,632	Outstanding
Missouri			High Satisfactory
Springfield, MO MSA	153	13,259	Excellent
Columbia, MO MSA	163	1,698	Adequate
Limited Review MSA AAs	65	1,339	Below
Limited Review Rural AAs	214	117	Below
Additional Statewide MO	7	4,102	
Kansas			Outstanding
Wichita, KS MSA	138	39,334	Excellent
Limited Review MSA AAs	44	938	Below
Limited Review Rural AAs	283	5,355	Consistent
Additional Statewide KS	37	7,706	
Illinois			High Satisfactory
Peoria, IL MSA	92	162	Poor
Limited Review MSA AAs	140	5,382	Above
Colorado – Denver MSA			Outstanding
Denver, CO MSA	35	34,541	Excellent
Additional Statewide CO	6	6,850	
Oklahoma			High Satisfactory
Tulsa, OK MSA	55	3,598	Adequate
Additional Statewide OK	12	2,399	
TOTALS	3,130	302,400	

COMMUNITY DEVELOPMENT SERVICES SUMMARY		
	#	Conclusions
Multistate MSAs		
Kansas City, MO-KS CSA	528	Outstanding
St. Louis, MO-IL MSA	320	Outstanding
Missouri		Outstanding
Springfield, MO MSA	57	Relatively High
Columbia, MO MSA	83	Leader
Limited Review MSA AAs	64	Consistent
Limited Review Rural AAs	108	Consistent
Kansas		Outstanding
Wichita, KS MSA	82	Leader
Limited Review MSA AAs	41	Consistent
Limited Review Rural AAs	101	Consistent
Illinois		Outstanding
Peoria, IL MSA	134	Leader
Limited Review MSA AAs	62	Consistent
Colorado		High Satisfactory
Denver, CO MSA	18	Relatively High ¹
Oklahoma		Low Satisfactory
Tulsa, OK MSA	32	Adequate ²
OKC, OK MSA	4	NA
TOTALS		Outstanding
¹ Enhanced by the retail portion of the test, due to outstanding branch distribution. ² Lowered by the retail portion of the test, due to poor branch distribution.		

**CRA APPENDIX D
ANALYSIS TABLES**

- A. 2012 Limited Review MO MSA AAs
- B. 2012 Limited Review Missouri nonMSA AAs
- C. 2012 Limited Review Kansas MSA AAs
- D. 2012 Limited Review Kansas nonMSA AAs
- E. 2012 Limited Review Illinois MSA AAs
- F. 2013 Full Review Multistate MSA AAs
- G. 2013 Full Review Missouri MSA AAs
- H. 2013 Full Review Kansas MSA AA
- I. 2013 Full Review Illinois MSA AA
- J. 2013 Full Review Colorado MSA AA
- K. 2013 Full Review Oklahoma MSA AA
- L. 2013 Limited Review Missouri MSA AAs
- M. 2013 Limited Review Missouri nonMSA AAs
- N. 2013 Limited Review Kansas MSA AA
- O. 2013 Limited Review Kansas nonMSA AA
- P. 2013 Limited Review Illinois MSA AAs

Footnotes for all Analysis Tables:

- Census tract income classifications, percentage of families by income classifications, percentage of owner-occupied housing units and multifamily housing units by tract, and percentage of businesses and farms by tract based on 2006-2010 ACS data.
- Business and farm data based on 2012 or 2013 D&B data.
- Aggregate HMDA data reflects all originations in the AA reported by all HMDA filers.
- Aggregate CRA LAR data reflects all SB and SF loan originations in the AA reported by all CRA LAR filers.
- The CRA LAR reports only business loans in amounts of \$1 million or less and farm loans in amounts of \$500m or less.
- The borrower distribution analysis for business and farm loans focuses on the bank's lending to "small businesses" and "small farms" as defined by the CRA, which are those businesses and farms with gross annual revenues of \$1 million or less.
- Low-income census tracts are those geographies with MFI less than 50 percent of the MSA or statewide nonMSA MFI based on 2006-2010 ACS data; moderate-income equals 50 percent to 80 percent; middle-income is 80 percent to 120 percent; and upper-income is greater than 120 percent.
- Percentages may not total 100 percent due to slight rounding differences. Also, aggregate percentages may be off due to the omission of loans with unknown census tract information.
- For the borrower distribution tables, total HMDA loans will not foot, as multifamily loans are not considered in the borrower distribution.

A. 2012 Limited Review MO MSA AAs

2012 CAPE GIRARDEAU MISSOURI MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	6.3	689	3.5	293	42.5	3,500	17.7
Moderate-income	3	18.8	1,844	9.3	437	23.7	3,398	17.2
Middle-income	8	50.0	11,485	58.0	863	7.5	4,395	22.2
Upper-income	4	25.0	5,776	29.2	337	5.8	8,501	42.9
Total AA	16	100.0	19,794	100.0	1,930	9.8	19,794	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,309	290	1.5	22.2	802	61.3	217	16.6
Moderate-income	3,769	1,212	6.1	32.2	2,221	58.9	336	8.9
Middle-income	18,649	12,113	60.7	65.0	5,042	27.0	1,494	8.0
Upper-income	8,504	6,356	31.8	74.7	1,588	18.7	560	6.6
Total AA	32,231	19,971	100.0	62.0	9,653	29.9	2,607	8.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	143	3.6	109	3.1	29	8.7	5	3.3
Moderate-income	375	9.4	316	9.0	35	10.5	24	15.9
Middle-income	2,569	64.2	2,244	63.8	224	67.3	101	66.9
Upper-income	917	22.9	851	24.2	45	13.5	21	13.9
Total AA	4,004	100.0	3,520	100.0	333	100.0	151	100.0
Percentage of Total Businesses:				87.9		8.3		3.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.3	1	0.3	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	221	71.5	220	71.4	1	100.0	0	0.0
Upper-income	87	28.2	87	28.2	0	0.0	0	0.0
Total AA	309	100.0	308	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.7		0.3		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS CAPE GIRARDEAU MISSOURI MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	9	511	16.1	8.2	5.5	2.6	17.7
Moderate	5	425	8.9	6.8	12.5	8.1	17.2
Middle	13	1,169	23.2	18.7	19.5	15.5	22.2
Upper	22	3,124	39.3	50.0	45.3	54.2	42.9
Unknown	7	1,025	12.5	16.4	17.1	19.6	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	5.9	3.2	17.7
Moderate	2	206	22.2	15.4	18.8	14.4	17.2
Middle	1	220	11.1	16.4	22.2	20.8	22.2
Upper	3	500	33.3	37.3	34.4	44.2	42.9
Unknown	3	416	33.3	31.0	18.8	17.4	0.0
Home Refinance Loans							
Low	7	444	19.4	10.3	5.1	2.5	17.7
Moderate	2	197	5.6	4.6	9.7	5.7	17.2
Middle	8	756	22.2	17.5	18.3	14.0	22.2
Upper	15	2,315	41.7	53.6	51.8	61.6	42.9
Unknown	4	609	11.1	14.1	15.2	16.2	0.0
Home Improvement Loans							
Low	2	67	18.2	11.3	10.2	3.1	17.7
Moderate	1	22	9.1	3.7	11.7	8.5	17.2
Middle	4	193	36.4	32.7	24.1	17.7	22.2
Upper	4	309	36.4	52.3	43.8	57.2	42.9
Unknown	0	0	0.0	0.0	10.2	13.5	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES CAPE GIRARDEAU MISSOURI MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.9	0.6	1.5
Moderate	4	199	7.1	3.2	4.3	3.3	6.1
Middle	31	3,803	55.4	60.8	60.8	58.1	60.7
Upper	21	2,252	37.5	36.0	34.0	38.0	31.8
Home Purchase Loans							
Low	0	0	0.0	0.0	1.4	0.4	1.5
Moderate	1	81	11.1	6.0	5.3	2.9	6.1
Middle	6	1,111	66.7	82.8	62.7	61.0	60.7
Upper	2	150	22.2	11.2	30.6	35.7	31.8
Home Refinance Loans							
Low	0	0	0.0	0.0	0.3	0.3	1.5
Moderate	1	51	2.8	1.2	3.3	2.2	6.1
Middle	18	2,367	50.0	54.8	60.3	58.4	60.7
Upper	17	1,903	47.2	44.0	36.2	39.1	31.8
Home Improvement Loans							
Low	0	0	0.0	0.0	2.9	1.1	1.5
Moderate	2	67	18.2	11.3	7.3	3.9	6.1
Middle	7	325	63.6	55.0	57.7	59.5	60.7
Upper	2	199	18.2	33.7	32.1	35.5	31.8

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE CAPE GIRARDEAU MISSOURI MSA AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	80	5,482	67.8	50.2	37.5	41.9	87.9
Over \$1MM	32	5,300	27.1	48.5	Not Reported		8.3
Not Known	6	143	5.1	1.3			3.8
SF Loans							
\$1MM or less	30	3,401	90.9	84.3	58.2	74.2	99.7
Over \$1MM	0	0	0.0	0.0	Not Reported		0.3
Not Known	3	634	9.1	15.7			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY CAPE GIRARDEAU MISSOURI MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	2	600	1.7	5.5	4.3	8.5	3.6
Moderate	7	1,251	5.9	11.5	9.6	14.3	9.4
Middle	85	8,058	72.0	73.8	57.6	60.7	64.2
Upper	24	1,016	20.3	9.3	23.6	15.0	22.9
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.3
Moderate	0	0	0.0	0.0	2.2	0.3	0.0
Middle	24	2,703	72.7	67.0	73.6	69.6	71.5
Upper	9	1,333	27.3	33.0	24.2	30.2	28.2

2012 JEFFERSON CITY MISSOURI MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	924	23.5
Moderate-income	0	0.0	0	0.0	0	0.0	695	17.7
Middle-income	4	100.0	3,932	100.0	418	10.6	1,252	31.8
Upper-income	0	0.0	0	0.0	0	0.0	1,061	27.0
Total AA	4	100.0	3,932	100.0	418	10.6	3,932	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	6,145	4,288	100.0	69.8	1,187	19.3	670	10.9
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	6,145	4,288	100.0	69.8	1,187	19.3	670	10.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	681	100.0	618	100.0	33	100.0	30	100.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	681	100.0	618	100.0	33	100.0	30	100.0
Percentage of Total Businesses:				90.7		4.8		4.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	180	100.0	179	100.0	1	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	180	100.0	179	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.4		0.6		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS JEFFERSON CITY MISSOURI MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	8	451	15.7	8.6	16.9	10.0	23.5
Moderate	15	1,420	29.4	27.1	23.3	20.0	17.7
Middle	13	1,151	25.5	22.0	30.2	31.7	31.8
Upper	11	1,980	21.6	37.8	24.3	32.8	27.0
Unknown	4	238	7.8	4.5	5.3	5.5	0.0
Home Purchase Loans							
Low	1	55	7.1	3.4	23.2	13.8	23.5
Moderate	4	685	28.6	42.5	24.9	22.3	17.7
Middle	4	317	28.6	19.7	30.8	34.6	31.8
Upper	2	342	14.3	21.2	17.8	26.4	27.0
Unknown	3	213	21.4	13.2	3.2	2.9	0.0
Home Refinance Loans							
Low	6	391	20.7	11.1	12.7	8.1	23.5
Moderate	9	700	31.0	19.8	22.6	18.5	17.7
Middle	6	815	20.7	23.1	28.6	30.0	31.8
Upper	8	1,629	27.6	46.1	29.3	36.3	27.0
Unknown	0	0	0.0	0.0	6.7	7.1	0.0
Home Improvement Loans							
Low	1	5	12.5	5.4	17.4	8.4	23.5
Moderate	2	35	25.0	37.6	21.7	24.6	17.7
Middle	3	19	37.5	20.4	37.0	33.7	31.8
Upper	1	9	12.5	9.7	19.6	31.3	27.0
Unknown	1	25	12.5	26.9	4.3	2.0	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES JEFFERSON CITY MISSOURI MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	51	5,240	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	14	1,612	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	29	3,535	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	8	93	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE JEFFERSON CITY MISSOURI MSA AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	70	5,327	85.4	72.5	58.8	67.3	90.7
Over \$1MM	10	1,885	12.2	25.6	Not Reported		4.8
Not Known	2	140	2.4	1.9			4.4
SF Loans							
\$1MM or less	104	9,724	96.3	97.7	90.6	96.1	99.4
Over \$1MM	2	220	1.9	2.2	Not Reported		0.6
Not Known	2	14	1.9	0.1			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY JEFFERSON CITY MISSOURI MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	82	7,352	100.0	100.0	94.5	99.2	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	108	9,958	100.0	100.0	98.0	99.8	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0

2012 JOPLIN MISSOURI MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	9,205	20.3
Moderate-income	5	14.7	5,057	11.2	1,211	23.9	8,590	19.0
Middle-income	26	76.5	37,084	81.9	4,888	13.2	9,021	19.9
Upper-income	3	8.8	3,142	6.9	244	7.8	18,467	40.8
Total AA	34	100.0	45,283	100.0	6,343	14.0	45,283	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	10,736	4,705	10.4	43.8	4,432	41.3	1,599	14.9
Middle-income	59,097	37,269	82.1	63.1	15,480	26.2	6,348	10.7
Upper-income	4,502	3,414	7.5	75.8	823	18.3	265	5.9
Total AA	74,335	45,388	100.0	61.1	20,735	27.9	8,212	11.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,164	14.7	1,014	14.0	105	25.1	45	16.2
Middle-income	6,173	77.9	5,676	78.5	282	67.3	215	77.6
Upper-income	590	7.4	541	7.5	32	7.6	17	6.1
Total AA	7,927	100.0	7,231	100.0	419	100.0	277	100.0
Percentage of Total Businesses:				91.2		5.3		3.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	6	1.2	6	1.2	0	0.0	0	0.0
Middle-income	465	96.3	463	96.3	2	100.0	0	0.0
Upper-income	12	2.5	12	2.5	0	0.0	0	0.0
Total AA	483	100.0	481	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.6		0.4		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS JOPLIN MISSOURI MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	3	62	3.9	0.7	5.9	3.0	20.3
Moderate	7	330	9.2	3.8	16.1	10.9	19.0
Middle	15	900	19.7	10.3	19.6	16.9	19.9
Upper	31	4,152	40.8	47.6	37.5	46.7	40.8
Unknown	20	3,274	26.3	37.6	20.9	22.5	0.0
Home Purchase Loans							
Low	1	45	5.6	1.6	7.3	4.0	20.3
Moderate	1	62	5.6	2.2	19.8	14.6	19.0
Middle	2	239	11.1	8.3	21.4	20.4	19.9
Upper	9	2,099	50.0	73.2	29.5	39.2	40.8
Unknown	5	422	27.8	14.7	21.9	21.8	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	4.5	2.3	20.3
Moderate	4	222	10.5	5.8	13.0	8.5	19.0
Middle	7	574	18.4	15.1	17.9	14.6	19.9
Upper	16	1,938	42.1	51.0	43.8	52.9	40.8
Unknown	11	1,064	28.9	28.0	20.9	21.7	0.0
Home Improvement Loans							
Low	2	17	11.8	3.7	10.3	5.5	20.3
Moderate	2	46	11.8	10.1	19.9	11.7	19.0
Middle	6	87	35.3	19.0	24.7	20.2	19.9
Upper	6	115	35.3	25.2	36.8	48.0	40.8
Unknown	1	192	5.9	42.0	8.2	14.6	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES JOPLIN MISSOURI MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	11	0	0.0	0.0	0.0	0.0	0.0
Moderate	12	993	15.8	11.4	8.5	6.3	10.4
Middle	55	4,279	72.4	49.1	83.7	82.6	82.1
Upper	9	3,446	11.8	39.5	7.8	11.1	7.5
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	266	22.2	9.3	10.1	7.5	10.4
Middle	13	1,301	72.2	45.4	83.7	83.7	82.1
Upper	1	1,300	5.6	45.3	6.1	8.8	7.5
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	5	478	13.2	12.6	7.2	5.4	10.4
Middle	26	2,374	68.4	62.5	83.6	81.8	82.1
Upper	7	946	18.4	24.9	9.2	12.8	7.5
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	2	53	11.8	11.6	9.6	5.9	10.4
Middle	15	404	88.2	88.4	84.9	85.9	82.1
Upper	0	0	0.0	0.0	5.5	8.2	7.5
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	196	33.3	12.3	21.4	8.9	24.7
Middle	1	200	33.3	12.5	71.4	75.3	72.0
Upper	1	1,200	33.3	75.2	7.1	15.8	3.3

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE JOPLIN MISSOURI MSA AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	48	13,778	47.5	49.3	36.4	48.8	91.2
Over \$1MM	37	12,723	36.6	45.5	Not Reported		5.3
Not Known	16	1,437	15.8	5.1			3.5
SF Loans							
\$1MM or less	8	1,360	80.0	84.0	66.8	83.2	99.6
Over \$1MM	0	0	0.0	0.0	Not Reported		0.4
Not Known	2	260	20.0	16.0			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY JOPLIN MISSOURI MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	11	2,984	10.9	10.7	14.8	13.8	14.7
Middle	84	23,940	83.2	85.7	71.2	77.4	77.9
Upper	6	1,014	5.9	3.6	7.6	7.9	7.4
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	3.7	5.2	1.2
Middle	10	1,620	100.0	100.0	93.2	88.0	96.3
Upper	0	0	0.0	0.0	1.6	2.6	2.5

B. 2012 Limited Review Missouri non MSA AAs

2012 COMBINED RURAL MISSOURI AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	1.5	827	1.0	350	42.3	16,319	19.2
Moderate-income	8	12.1	8,428	9.9	1,842	21.9	15,275	18.0
Middle-income	46	69.7	63,370	74.7	7,505	11.8	18,420	21.7
Upper-income	11	16.7	12,179	14.4	752	6.2	34,790	41.0
Total AA	66	100.0	84,804	100.0	10,449	12.3	84,804	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,424	636	0.7	44.7	578	40.6	210	14.7
Moderate-income	14,503	8,012	8.8	55.2	4,693	32.4	1,798	12.4
Middle-income	118,796	68,165	75.2	57.4	24,168	20.3	26,463	22.3
Upper-income	26,200	13,809	15.2	52.7	3,412	13.0	8,979	34.3
Total AA	160,923	90,622	100.0	56.3	32,851	20.4	37,450	23.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	121	0.8	111	0.8	7	0.9	3	0.5
Moderate-income	1,145	7.5	1,034	7.4	74	9.8	37	6.4
Middle-income	11,447	75.1	10,461	75.2	548	72.5	438	75.8
Upper-income	2,526	16.6	2,299	16.5	127	16.8	100	17.3
Total AA	15,239	100.0	13,905	100.0	756	100.0	578	100.0
Percentage of Total Businesses:				91.2		5.0		3.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.1	1	0.1	0	0.0	0	0.0
Moderate-income	123	8.9	123	8.9	0	0.0	0	0.0
Middle-income	1,069	77.1	1,063	77.0	5	100.0	1	100.0
Upper-income	193	13.9	193	14.0	0	0.0	0	0.0
Total AA	1,386	100.0	1,380	100.0	5	100.0	1	100.0
Percentage of Total Farms:				99.6		0.4		0.1

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS COMBINED RURAL MISSOURI AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	25	904	8.3	2.8	5.4	2.5	19.2
Moderate	28	2,175	9.2	6.8	13.9	8.4	18.0
Middle	49	3,626	16.2	11.4	16.6	12.5	21.7
Upper	164	20,900	54.1	65.7	50.0	61.7	41.0
Unknown	37	4,207	12.2	13.2	14.1	14.9	0.0
Home Purchase Loans							
Low	4	196	6.3	2.8	6.8	3.2	19.2
Moderate	4	413	6.3	6.0	17.5	11.7	18.0
Middle	9	1,140	14.3	16.5	18.3	15.3	21.7
Upper	34	4,088	54.0	59.2	43.9	57.1	41.0
Unknown	12	1,069	19.0	15.5	13.4	12.7	0.0
Home Refinance Loans							
Low	15	638	7.5	2.9	4.1	2.0	19.2
Moderate	20	1,684	10.0	7.7	11.4	6.7	18.0
Middle	34	2,427	17.0	11.1	15.2	11.1	21.7
Upper	110	15,760	55.0	71.8	54.4	65.1	41.0
Unknown	21	1,447	10.5	6.6	14.8	15.1	0.0
Home Improvement Loans							
Low	6	70	16.7	5.6	10.4	5.1	19.2
Moderate	4	78	11.1	6.2	18.1	12.6	18.0
Middle	6	59	16.7	4.7	21.2	18.0	21.7
Upper	20	1,052	55.6	83.6	44.2	55.2	41.0
Unknown	0	0	0.0	0.0	6.1	9.2	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES COMBINED RURAL MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	2	62	0.7	0.2	0.3	0.1	0.7
Moderate	27	1,221	8.9	3.8	6.0	3.9	8.8
Middle	220	22,716	72.6	71.4	71.9	71.4	75.2
Upper	54	7,813	17.8	24.6	21.8	24.6	15.2
Home Purchase Loans							
Low	0	0	0.0	0.0	0.5	0.3	0.7
Moderate	3	158	4.8	2.3	7.4	4.9	8.8
Middle	45	5,072	71.4	73.4	70.1	69.3	75.2
Upper	15	1,676	23.8	24.3	21.8	25.4	15.2
Home Refinance Loans							
Low	1	56	0.5	0.3	0.1	0.1	0.7
Moderate	18	966	9.0	4.4	4.8	3.1	8.8
Middle	147	16,543	73.5	75.3	72.8	73.1	75.2
Upper	34	4,391	17.0	20.0	22.2	23.7	15.2
Home Improvement Loans							
Low	1	6	2.8	0.5	1.0	0.2	0.7
Moderate	6	97	16.7	7.7	9.0	5.9	8.8
Middle	25	813	69.4	64.6	73.9	72.8	75.2
Upper	4	343	11.1	27.2	16.1	21.2	15.2
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	15.4	12.4	8.2
Middle	3	288	75.0	17.0	57.7	22.6	62.0
Upper	1	1,403	25.0	83.0	26.9	64.9	29.9

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE COMBINED RURAL MISSOURI AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	223	15,683	71.0	50.4	46.2	54.6	91.2
Over \$1MM	63	13,921	20.1	44.7	Not Reported		5.0
Not Known	28	1,524	8.9	4.9			3.8
SF Loans							
\$1MM or less	249	16,662	85.9	83.6	65.5	78.3	99.6
Over \$1MM	6	1,404	2.1	7.0	Not Reported		0.4
Not Known	35	1,866	12.1	9.4			0.1

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY COMBINED RURAL MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	2	340	0.6	1.1	0.7	1.1	0.8
Moderate	19	877	6.1	2.8	6.2	4.0	7.5
Middle	241	25,063	76.8	80.5	66.7	75.1	75.1
Upper	52	4,848	16.6	15.6	18.8	18.2	16.6
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.1
Moderate	9	552	3.1	2.8	5.8	7.1	8.9
Middle	260	17,604	89.7	88.3	86.2	87.1	77.1
Upper	21	1,776	7.2	8.9	7.0	5.5	13.9

2012 RURAL BARRY-LAWRENCE COUNTY MISSOURI AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,177	20.3
Moderate-income	2	14.3	1,622	7.9	351	21.6	3,709	18.0
Middle-income	12	85.7	18,977	92.1	2,397	12.6	4,891	23.7
Upper-income	0	0.0	0	0.0	0	0.0	7,822	38.0
Total AA	14	100.0	20,599	100.0	2,748	13.3	20,599	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	2,695	1,593	7.4	59.1	800	29.7	302	11.2
Middle-income	31,137	19,996	92.6	64.2	6,910	22.2	4,231	13.6
Upper-income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	33,832	21,589	100.0	63.8	7,710	22.8	4,533	13.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	233	7.1	213	7.1	11	7.5	9	7.3
Middle-income	3,048	92.9	2,798	92.9	136	92.5	114	92.7
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,281	100.0	3,011	100.0	147	100.0	123	100.0
Percentage of Total Businesses:				91.8		4.5		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	17	4.0	17	4.0	0	0.0	0	0.0
Middle-income	411	96.0	408	96.0	3	100.0	0	0.0
Upper-income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	428	100.0	425	100.0	3	100.0	0	0.0
Percentage of Total Farms:				99.3		0.7		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL BARRY-LAWRENCE COUNTY MISSOURI AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	2	32	6.9	1.1	8.8	4.7	20.3
Moderate	3	188	10.3	6.7	17.2	12.0	18.0
Middle	6	395	20.7	14.1	18.9	16.2	23.7
Upper	16	2,000	55.2	71.2	38.4	50.0	38.0
Unknown	2	193	6.9	6.9	16.7	17.2	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	12.1	7.7	20.3
Moderate	1	84	14.3	6.0	20.8	16.1	18.0
Middle	1	139	14.3	9.9	20.2	19.7	23.7
Upper	5	1,187	71.4	84.2	29.6	42.3	38.0
Unknown	0	0	0.0	0.0	17.3	14.1	0.0
Home Refinance Loans							
Low	1	25	6.3	2.5	6.3	3.1	20.3
Moderate	2	104	12.5	10.4	15.2	10.1	18.0
Middle	4	249	25.0	24.9	17.7	14.3	23.7
Upper	7	428	43.8	42.8	43.7	53.9	38.0
Unknown	2	193	12.5	19.3	17.2	18.7	0.0
Home Improvement Loans							
Low	1	7	16.7	1.8	12.9	5.4	20.3
Moderate	0	0	0.0	0.0	12.9	8.3	18.0
Middle	1	7	16.7	1.8	24.7	19.9	23.7
Upper	4	385	66.7	96.5	48.2	64.7	38.0
Unknown	0	0	0.0	0.0	1.2	1.8	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL BARRY-LAWRENCE COUNTY MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	3	88	10.3	3.1	6.1	4.6	7.4
Middle	26	2,720	89.7	96.9	93.9	95.4	92.6
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	7.0	5.8	7.4
Middle	7	1,410	100.0	100.0	93.0	94.2	92.6
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	2	81	12.5	8.1	5.5	3.9	7.4
Middle	14	918	87.5	91.9	94.5	96.1	92.6
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	7	16.7	1.8	7.1	3.8	7.4
Middle	5	392	83.3	98.2	92.9	96.2	92.6
Upper	0	0	0.0	0.0	0.0	0.0	0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL BARRY-LAWRENCE COUNTY MISSOURI AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	35	3,967	85.4	66.4	38.2	48.2	91.8
Over \$1MM	4	1,950	9.8	32.6	Not Reported		4.5
Not Known	2	57	4.9	1.0			3.7
SF Loans							
\$1MM or less	41	3,445	93.2	95.6	72.2	84.9	99.3
Over \$1MM	0	0	0.0	0.0	Not Reported		0.7
Not Known	3	160	6.8	4.4			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL BARRY-LAWRENCE COUNTY MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	6.0	5.7	7.1
Middle	41	5,974	100.0	100.0	82.0	92.0	92.9
Upper	0	0	0.0	0.0	0.0	0.0	0.0
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	123	9.1	3.4	6.8	11.9	4.0
Middle	40	3,482	90.9	96.6	90.9	87.4	96.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0

2012 RURAL HANNIBAL MISSOURI AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,616	15.2
Moderate-income	0	0.0	0	0.0	0	0.0	1,576	14.8
Middle-income	7	63.6	6,264	58.9	786	12.5	2,390	22.5
Upper-income	4	36.4	4,368	41.1	273	6.3	5,050	47.5
Total AA	11	100.0	10,632	100.0	1,059	10.0	10,632	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	10,925	6,305	57.1	57.7	3,093	28.3	1,527	14.0
Upper-income	6,993	4,745	42.9	67.9	1,380	19.7	868	12.4
Total AA	17,918	11,050	100.0	61.7	4,473	25.0	2,395	13.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,075	56.3	981	56.7	52	49.5	42	56.0
Upper-income	836	43.7	750	43.3	53	50.5	33	44.0
Total AA	1,911	100.0	1,731	100.0	105	100.0	75	100.0
Percentage of Total Businesses:				90.6		5.5		3.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	163	51.1	163	51.1	0	0.0	0	0.0
Upper-income	156	48.9	156	48.9	0	0.0	0	0.0
Total AA	319	100.0	319	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL HANNIBAL MISSOURI AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	6	137	10.0	3.0	5.9	3.3	15.2
Moderate	6	416	10.0	9.2	14.0	8.9	14.8
Middle	7	252	11.7	5.6	17.4	14.2	22.5
Upper	33	3,043	55.0	67.1	51.2	61.3	47.5
Unknown	8	689	13.3	15.2	11.5	12.3	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	6.7	2.6	15.2
Moderate	1	106	5.6	7.2	21.3	15.5	14.8
Middle	2	95	11.1	6.4	21.9	20.7	22.5
Upper	11	952	61.1	64.5	40.4	51.7	47.5
Unknown	4	322	22.2	21.8	9.6	9.5	0.0
Home Refinance Loans							
Low	4	122	11.4	4.9	5.4	3.6	15.2
Moderate	4	295	11.4	11.8	10.1	6.1	14.8
Middle	4	147	11.4	5.9	15.1	11.5	22.5
Upper	21	1,791	60.0	71.9	57.0	65.5	47.5
Unknown	2	136	5.7	5.5	12.5	13.4	0.0
Home Improvement Loans							
Low	2	15	40.0	4.4	7.0	4.7	15.2
Moderate	1	15	20.0	4.4	17.5	8.8	14.8
Middle	1	10	20.0	2.9	19.3	11.6	22.5
Upper	1	300	20.0	88.2	49.1	65.1	47.5
Unknown	0	0	0.0	0.0	7.0	9.7	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL HANNIBAL MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	33	1,467	55.0	32.3	46.6	37.3	57.1
Upper	27	3,070	45.0	67.7	52.7	62.0	42.9
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	9	436	50.0	29.6	51.2	39.5	57.1
Upper	9	1,039	50.0	70.4	48.2	60.1	42.9
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	19	768	54.3	30.8	42.8	35.7	57.1
Upper	16	1,723	45.7	69.2	56.4	63.4	42.9
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	3	32	60.0	9.4	63.2	46.4	57.1
Upper	2	308	40.0	90.6	36.8	53.6	42.9
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	2	231	100.0	100.0	100.0	100.0	73.7
Upper	0	0	0.0	0.0	0.0	0.0	26.3

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL HANNIBAL MISSOURI AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	60	3,632	78.9	62.8	45.0	44.8	90.6
Over \$1MM	14	2,035	18.4	35.2	Not Reported		5.5
Not Known	2	118	2.6	2.0			3.9
SF Loans							
\$1MM or less	23	2,089	85.2	92.6	53.5	82.1	100.0
Over \$1MM	0	0	0.0	0.0	Not Reported		0.0
Not Known	4	166	14.8	7.4			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL HANNIBAL MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	35	2,377	46.1	41.1	44.5	33.3	56.3
Upper	41	3,408	53.9	58.9	49.7	64.3	43.7
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	9	629	33.3	27.9	65.8	65.3	51.1
Upper	18	1,626	66.7	72.1	34.2	34.7	48.9

2012 RURAL LEBANON MISSOURI AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,075	17.6
Moderate-income	1	5.9	1,222	5.3	271	22.2	4,408	19.1
Middle-income	13	76.5	18,190	78.8	1,854	10.2	5,305	23.0
Upper-income	3	17.6	3,686	16.0	215	5.8	9,310	40.3
Total AA	17	100.0	23,098	100.0	2,340	10.1	23,098	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	1,992	1,018	4.1	51.1	836	42.0	138	6.9
Middle-income	41,778	19,801	78.9	47.4	6,039	14.5	15,938	38.1
Upper-income	11,907	4,263	17.0	35.8	744	6.2	6,900	57.9
Total AA	55,677	25,082	100.0	45.0	7,619	13.7	22,976	41.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	157	3.1	142	3.1	13	6.0	2	1.1
Middle-income	3,948	78.7	3,643	78.8	166	76.5	139	79.0
Upper-income	909	18.1	836	18.1	38	17.5	35	19.9
Total AA	5,014	100.0	4,621	100.0	217	100.0	176	100.0
Percentage of Total Businesses:				92.2		4.3		3.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	3	1.1	3	1.1	0	0.0	0	0.0
Middle-income	255	94.4	253	94.4	1	100.0	1	100.0
Upper-income	12	4.4	12	4.5	0	0.0	0	0.0
Total AA	270	100.0	268	100.0	1	100.0	1	100.0
Percentage of Total Farms:				99.3		0.4		0.4

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL LEBANON MISSOURI AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	9	471	8.0	2.9	3.0	1.3	17.6
Moderate	13	1,294	11.5	7.9	9.3	5.1	19.1
Middle	20	2,258	17.7	13.8	12.7	8.8	23.0
Upper	57	11,152	50.4	68.4	62.1	71.8	40.3
Unknown	14	1,139	12.4	7.0	12.9	13.0	0.0
Home Purchase Loans							
Low	3	129	12.0	4.8	3.4	1.4	17.6
Moderate	2	223	8.0	8.2	11.7	7.0	19.1
Middle	4	641	16.0	23.6	12.9	9.6	23.0
Upper	11	1,323	44.0	48.8	61.2	71.3	40.3
Unknown	5	397	20.0	14.6	10.7	10.7	0.0
Home Refinance Loans							
Low	6	342	7.4	2.6	2.6	1.3	17.6
Moderate	10	1,048	12.3	7.8	7.7	4.1	19.1
Middle	15	1,610	18.5	12.0	12.4	8.3	23.0
Upper	41	9,650	50.6	72.1	63.1	72.2	40.3
Unknown	9	742	11.1	5.5	14.3	14.1	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	5.3	2.6	17.6
Moderate	1	23	14.3	11.0	17.5	11.7	19.1
Middle	1	7	14.3	3.3	18.4	11.5	23.0
Upper	5	179	71.4	85.6	54.4	67.8	40.3
Unknown	0	0	0.0	0.0	4.4	6.4	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL LEBANON MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	8	542	7.1	3.3	3.2	1.6	4.1
Middle	97	14,338	85.8	87.9	71.0	71.6	78.9
Upper	8	1,434	7.1	8.8	25.8	26.8	17.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	3	158	12.0	5.8	4.3	2.2	4.1
Middle	19	2,203	76.0	81.2	67.2	67.5	78.9
Upper	3	352	12.0	13.0	28.4	30.3	17.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	377	4.9	2.8	2.5	1.2	4.1
Middle	72	11,933	88.9	89.1	72.8	73.5	78.9
Upper	5	1,082	6.2	8.1	24.7	25.2	17.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	7	14.3	3.3	3.5	2.5	4.1
Middle	6	202	85.7	96.7	78.9	71.6	78.9
Upper	0	0	0.0	0.0	17.5	25.8	17.0

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL LEBANON MISSOURI AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	89	5,195	65.4	44.1	55.3	66.7	92.2
Over \$1MM	28	5,429	20.6	46.1	Not Reported		4.3
Not Known	19	1,150	14.0	9.8			3.5
SF Loans							
\$1MM or less	180	11,029	85.3	80.7	69.5	77.0	99.3
Over \$1MM	3	1,100	1.4	8.0	Not Reported		0.4
Not Known	28	1,540	13.3	11.3			0.4

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL LEBANON MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	9	611	6.6	5.2	1.8	0.9	3.1
Middle	126	10,894	92.6	92.5	71.5	78.8	78.7
Upper	1	269	0.7	2.3	19.7	19.0	18.1
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	123	0.5	0.9	0.6	0.6	1.1
Middle	208	13,426	98.6	98.2	95.2	94.9	94.4
Upper	2	120	0.9	0.9	4.2	4.5	4.4

2012 RURAL POPULAR BLUFF MISSOURI AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	10.0	827	7.4	350	42.3	2,814	25.1
Moderate-income	3	30.0	2,636	23.5	699	26.5	1,995	17.8
Middle-income	5	50.0	6,389	56.9	832	13.0	1,968	17.5
Upper-income	1	10.0	1,374	12.2	52	3.8	4,449	39.6
Total AA	10	100.0	11,226	100.0	1,933	17.2	11,226	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,424	636	5.5	44.7	578	40.6	210	14.7
Moderate-income	5,007	2,534	22.1	50.6	1,796	35.9	677	13.5
Middle-income	11,364	6,883	60.1	60.6	3,035	26.7	1,446	12.7
Upper-income	1,873	1,409	12.3	75.2	200	10.7	264	14.1
Total AA	19,668	11,462	100.0	58.3	5,609	28.5	2,597	13.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	121	6.2	111	6.4	7	5.3	3	4.2
Moderate-income	389	20.0	346	19.9	28	21.1	15	20.8
Middle-income	1,224	62.9	1,087	62.4	87	65.4	50	69.4
Upper-income	213	10.9	198	11.4	11	8.3	4	5.6
Total AA	1,947	100.0	1,742	100.0	133	100.0	72	100.0
Percentage of Total Businesses:				89.5		6.8		3.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	0.4	1	0.4	0	0.0	0	0.0
Moderate-income	89	39.6	89	39.6	0	0.0	0	0.0
Middle-income	121	53.8	121	53.8	0	0.0	0	0.0
Upper-income	14	6.2	14	6.2	0	0.0	0	0.0
Total AA	225	100.0	225	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL POPULAR BLUFF MISSOURI AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	3	62	6.5	1.6	6.4	3.0	25.1
Moderate	0	0	0.0	0.0	17.6	11.8	17.8
Middle	5	234	10.9	5.9	19.3	16.4	17.5
Upper	27	3,021	58.7	75.6	41.1	51.6	39.6
Unknown	11	679	23.9	17.0	15.6	17.1	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	5.8	3.3	25.1
Moderate	0	0	0.0	0.0	22.9	18.3	17.8
Middle	1	163	10.0	15.0	22.2	21.3	17.5
Upper	6	571	60.0	52.7	33.5	41.9	39.6
Unknown	3	350	30.0	32.3	15.7	15.2	0.0
Home Refinance Loans							
Low	2	56	6.5	2.0	5.4	2.3	25.1
Moderate	0	0	0.0	0.0	13.3	7.4	17.8
Middle	2	46	6.5	1.6	15.8	12.7	17.5
Upper	20	2,425	64.5	86.6	49.7	61.6	39.6
Unknown	7	272	22.6	9.7	15.8	16.1	0.0
Home Improvement Loans							
Low	1	6	25.0	10.7	14.9	8.4	25.1
Moderate	0	0	0.0	0.0	17.2	9.8	17.8
Middle	2	25	50.0	44.6	25.3	20.8	17.5
Upper	1	25	25.0	44.6	31.0	36.4	39.6
Unknown	0	0	0.0	0.0	11.5	24.6	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL POPULAR BLUFF MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	2	62	4.3	1.6	3.3	1.8	5.5
Moderate	11	478	23.9	12.0	15.8	13.8	22.1
Middle	25	2,055	54.3	51.4	59.8	57.1	60.1
Upper	8	1,401	17.4	35.1	21.0	27.3	12.3
Home Purchase Loans							
Low	0	0	0.0	0.0	5.1	3.3	5.5
Moderate	0	0	0.0	0.0	18.1	13.5	22.1
Middle	7	799	70.0	73.7	54.7	53.5	60.1
Upper	3	285	30.0	26.3	22.2	29.7	12.3
Home Refinance Loans							
Low	1	56	3.2	2.0	1.5	0.8	5.5
Moderate	11	478	35.5	17.1	14.1	12.9	22.1
Middle	15	1,164	48.4	41.6	63.8	59.9	60.1
Upper	4	1,101	12.9	39.3	20.6	26.3	12.3
Home Improvement Loans							
Low	1	6	25.0	10.7	5.7	1.1	5.5
Moderate	0	0	0.0	0.0	13.8	9.9	22.1
Middle	2	35	50.0	62.5	62.1	65.4	60.1
Upper	1	15	25.0	26.8	18.4	23.5	12.3
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	33.3	81.8	40.1
Middle	1	57	100.0	100.0	66.7	18.2	59.9
Upper	0	0	0.0	0.0	0.0	0.0	0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL POPULAR BLUFF MISSOURI AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	35	2,551	76.1	52.3	35.4	44.4	89.5
Over \$1MM	8	2,166	17.4	44.4	Not Reported		6.8
Not Known	3	163	6.5	3.3			3.7
SF Loans							
\$1MM or less	5	99	62.5	24.6	22.4	20.1	100.0
Over \$1MM	3	304	37.5	75.4	Not Reported		0.0
Not Known	0	0	0.0	0.0			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL POPULAR BLUFF MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	2	340	4.3	7.0	6.0	12.0	6.2
Moderate	9	231	19.6	4.7	21.5	7.3	20.0
Middle	28	4,069	60.9	83.4	57.7	66.4	62.9
Upper	7	240	15.2	4.9	11.1	13.5	10.9
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.4
Moderate	4	306	50.0	75.9	39.7	23.0	39.6
Middle	3	67	37.5	16.6	51.7	73.5	53.8
Upper	1	30	12.5	7.4	5.2	3.0	6.2

2012 RURAL ST. FRANCOIS MISSOURI AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,637	18.9
Moderate-income	2	14.3	2,948	15.3	521	17.7	3,587	18.6
Middle-income	9	64.3	13,550	70.4	1,636	12.1	3,866	20.1
Upper-income	3	21.4	2,751	14.3	212	7.7	8,159	42.4
Total AA	14	100.0	19,249	100.0	2,369	12.3	19,249	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	4,809	2,867	13.4	59.6	1,261	26.2	681	14.2
Middle-income	23,592	15,180	70.8	64.3	5,091	21.6	3,321	14.1
Upper-income	5,427	3,392	15.8	62.5	1,088	20.0	947	17.4
Total AA	33,828	21,439	100.0	63.4	7,440	22.0	4,949	14.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	366	11.9	333	11.9	22	14.3	11	8.3
Middle-income	2,152	69.7	1,952	69.7	107	69.5	93	70.5
Upper-income	568	18.4	515	18.4	25	16.2	28	21.2
Total AA	3,086	100.0	2,800	100.0	154	100.0	132	100.0
Percentage of Total Businesses:				90.7		5.0		4.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	14	9.7	14	9.8	0	0.0	0	0.0
Middle-income	119	82.6	118	82.5	1	100.0	0	0.0
Upper-income	11	7.6	11	7.7	0	0.0	0	0.0
Total AA	144	100.0	143	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.3		0.7		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL ST. FRANCOIS MISSOURI AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	5	202	9.1	4.9	6.2	3.0	18.9
Moderate	6	277	10.9	6.7	17.8	12.8	18.6
Middle	11	487	20.0	11.7	20.2	17.4	20.1
Upper	31	1,684	56.4	40.5	41.6	48.8	42.4
Unknown	2	1,507	3.6	36.3	14.2	18.0	0.0
Home Purchase Loans							
Low	1	67	33.3	29.9	8.1	4.1	18.9
Moderate	0	0	0.0	0.0	19.9	15.0	18.6
Middle	1	102	33.3	45.5	22.3	20.2	20.1
Upper	1	55	33.3	24.6	35.2	44.9	42.4
Unknown	0	0	0.0	0.0	14.5	15.8	0.0
Home Refinance Loans							
Low	2	93	5.4	4.1	4.3	2.3	18.9
Moderate	4	237	10.8	10.4	16.0	11.7	18.6
Middle	9	375	24.3	16.5	19.0	16.2	20.1
Upper	21	1,466	56.8	64.4	46.7	54.6	42.4
Unknown	1	104	2.7	4.6	14.1	15.2	0.0
Home Improvement Loans							
Low	2	42	14.3	16.5	11.4	5.7	18.9
Moderate	2	40	14.3	15.7	22.1	19.9	18.6
Middle	1	10	7.1	3.9	19.5	24.6	20.1
Upper	9	163	64.3	63.9	40.3	42.4	42.4
Unknown	0	0	0.0	0.0	6.7	7.4	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL ST. FRANCOIS MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	5	113	9.1	2.7	9.7	7.1	13.4
Middle	39	2,136	70.9	51.4	70.1	70.6	70.8
Upper	11	1,908	20.0	45.9	20.2	22.3	15.8
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	10.8	8.4	13.4
Middle	3	224	100.0	100.0	68.4	71.5	70.8
Upper	0	0	0.0	0.0	20.7	20.0	15.8
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	30	2.7	1.3	8.3	6.4	13.4
Middle	27	1,760	73.0	77.4	71.6	73.9	70.8
Upper	9	485	24.3	21.3	20.1	19.8	15.8
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	83	28.6	32.5	14.8	10.8	13.4
Middle	9	152	64.3	59.6	70.5	71.5	70.8
Upper	1	20	7.1	7.8	14.8	17.7	15.8
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	8.3	0.9	13.9
Middle	0	0	0.0	0.0	33.3	5.8	63.8
Upper	1	1,403	100.0	100.0	58.3	93.3	22.3

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL ST. FRANCOIS MISSOURI AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
\$1MM or less	4	338	26.7	12.4	42.7	42.1	90.7
Over \$1MM	9	2,341	60.0	86.2	Not Reported		5.0
Not Known	2	36	13.3	1.3			4.3

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL ST. FRANCOIS MISSOURI AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	35	6.7	1.3	9.0	8.7	11.9
Middle	11	1,749	73.3	64.4	63.6	72.4	69.7
Upper	3	931	20.0	34.3	19.1	17.2	18.4

C. 2012 Limited Review Kansas MSA AAs

2012 MANHATTAN KANSAS MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,296	17.4
Moderate-income	3	16.7	3,183	16.8	736	23.1	3,453	18.2
Middle-income	10	55.6	9,896	52.2	885	8.9	4,076	21.5
Upper-income	4	22.2	5,866	31.0	178	3.0	8,120	42.9
Unknown-Income	1	5.6	0	0.0	0	0.0	0	0.0
Total AA	18	100.0	18,945	100.0	1,799	9.5	18,945	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-Income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-Income	5,423	1,288	7.5	23.8	3,699	68.2	436	8.0
Middle-Income	21,443	9,895	57.7	46.1	9,351	43.6	2,197	10.2
Upper-Income	8,803	5,968	34.8	67.8	2,401	27.3	434	4.9
Unknown-Income	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	35,669	17,151	100.0	48.1	15,451	43.3	3,067	8.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	590	15.7	514	15.4	40	16.0	36	22.8
Middle-income	1,915	51.1	1,705	51.1	130	52.0	80	50.6
Upper-income	1,242	33.1	1,120	33.5	80	32.0	42	26.6
Unknown Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,747	100.0	3,339	100.0	250	100.0	158	100.0
Percentage of Total Businesses:				89.1		6.7		4.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	4	0.9	4	0.9	0	0.0	0	0.0
Middle-income	333	77.6	329	77.4	4	100.0	0	0.0
Upper-income	91	21.2	91	21.4	0	0.0	0	0.0
Unknown Income	1	0.2	1	0.2	0	0.0	0	0.0
Total AA	429	100.0	425	100.0	4	100.0	0	0.0
Percentage of Total Farms:				99.1		0.9		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS MANHATTAN KANSAS MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	3	227	3.9	0.9	2.9	1.3	17.4
Moderate	3	339	3.9	1.3	11.2	6.8	18.2
Middle	7	699	9.1	2.6	18.5	15.0	21.5
Upper	33	6,964	42.9	26.3	43.4	46.7	42.9
Unknown	31	18,295	40.3	69.0	24.1	30.1	0.0
Home Purchase Loans							
Low	2	211	11.1	7.4	3.3	1.3	17.4
Moderate	2	178	11.1	6.2	14.3	9.3	18.2
Middle	1	120	5.6	4.2	22.4	20.8	21.5
Upper	10	1,944	55.6	67.8	40.0	47.6	42.9
Unknown	3	413	16.7	14.4	20.0	21.0	0.0
Refinance Loans							
Low	1	16	2.2	0.2	2.5	1.4	17.4
Moderate	1	161	2.2	2.2	9.0	5.9	18.2
Middle	6	579	13.0	8.0	16.5	13.0	21.5
Upper	22	4,820	47.8	66.6	45.3	50.0	42.9
Unknown	16	1,662	34.8	23.0	26.7	29.7	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	5.6	2.9	17.4
Moderate	0	0	0.0	0.0	15.7	9.3	18.2
Middle	0	0	0.0	0.0	15.7	15.1	21.5
Upper	1	200	50.0	46.1	53.5	66.8	42.9
Unknown	1	234	50.0	53.9	9.6	5.9	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHY MANHATTAN KANSAS MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	6	3,237	7.8	12.2	4.6	4.5	7.5
Middle	53	16,923	68.8	63.8	47.8	42.7	57.7
Upper	18	6,364	23.4	24.0	47.6	52.8	34.8
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	90	5.6	3.1	3.8	2.9	7.5
Middle	11	1,571	61.1	54.8	45.8	38.0	57.7
Upper	6	1,205	33.3	42.0	50.4	59.1	34.8
Refinanced Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	544	8.7	7.5	4.8	4.6	7.5
Middle	32	4,769	69.6	65.9	48.4	43.1	57.7
Upper	10	1,925	21.7	26.6	46.7	52.2	34.8
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	7.6	6.0	7.5
Middle	1	200	50.0	46.1	50.5	46.1	57.7
Upper	1	234	50.0	53.9	41.9	48.0	34.8
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	2,603	9.1	16.3	12.5	12.3	13.5
Middle	9	10,383	81.8	65.0	75.0	65.7	65.1
Upper	1	3,000	9.1	18.8	12.5	22.0	21.3

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE MANHATTAN KANSAS MSA AA							
Business Revenue Size	SB Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	# %	\$ %	# %	\$ %	
\$1MM or less	43	6,552	51.2	60.0	41.1	42.1	89.1
Over \$1MM	22	3,523	26.2	32.2	Not Reported		6.7
Not Known	19	852	22.6	7.8			4.2
Farm Revenue Size	SF Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	# %	\$ %	# %	\$ %	
\$1MM or less	4	137	100.0	100.0	48.3	63.6	99.1
Over \$1MM	0	0	0.0	0.0	Not Reported		0.9
Not Known	0	0	0.0	0.0			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY MANHATTAN KANSAS MSA AA							
Census Tract Income Level	SB Loans				Aggregate CRA Data		% of Businesses
	#	\$(000)	# %	\$ %	# %	\$ %	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	8	1,045	9.5	9.6	12.9	13.8	15.7
Middle	43	4,842	51.2	44.3	49.1	40.8	51.1
Upper	33	5,040	39.3	46.1	33.9	44.8	33.1
Census Tract Income Level	SF Loans				Aggregate CRA Data		% of Farms
	#	\$(000)	# %	\$ %	# %	\$ %	
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.9
Middle	2	61	50.0	44.5	72.4	69.5	77.6
Upper	2	76	50.0	55.5	27.6	30.5	21.2

D. 2012 Limited Review Kansas nonMSA AAs

2012 COMBINED RURAL KANSAS AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	9,957	18.3
Moderate-income	10	16.4	8,291	15.2	1,487	17.9	10,412	19.1
Middle-income	43	70.5	36,911	67.8	3,112	8.4	12,651	23.2
Upper-income	8	13.1	9,212	16.9	485	5.3	21,394	39.3
Total AA	61	100.0	54,414	100.0	5,084	9.3	54,414	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	15,777	8,416	14.4	53.3	5,525	35.0	1,836	11.6
Middle-income	62,812	40,356	68.8	64.2	15,570	24.8	6,886	11.0
Upper-income	15,376	9,864	16.8	64.2	4,071	26.5	1,441	9.4
Total AA	93,965	58,636	100.0	62.4	25,166	26.8	10,163	10.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,667	16.9	1,445	16.5	149	20.8	73	18.9
Middle-income	6,657	67.4	5,907	67.3	485	67.6	265	68.7
Upper-income	1,558	15.8	1,427	16.3	83	11.6	48	12.4
Total AA	9,882	100.0	8,779	100.0	717	100.0	386	100.0
Percentage of Total Businesses:				88.8		7.3		3.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	125	8.3	125	8.4	0	0.0	0	0.0
Middle-income	1,214	80.3	1,198	80.2	16	84.2	0	0.0
Upper-income	173	11.4	170	11.4	3	15.8	0	0.0
Total AA	1,512	100.0	1,493	100.0	19	100.0	0	0.0
Percentage of Total Farms:				98.7		1.3		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS COMBINED RURAL KANSAS AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	13	400	7.1	2.2	7.4	3.8	18.3
Moderate	24	1,093	13.0	6.1	17.5	12.1	19.1
Middle	28	1,956	15.2	11.0	23.2	19.5	23.2
Upper	73	8,116	39.7	45.6	37.9	46.1	39.3
Unknown	46	6,250	25.0	35.1	14.0	18.5	0.0
Home Purchase Loans							
Low	3	163	7.7	2.4	9.9	5.8	18.3
Moderate	3	201	7.7	2.9	22.2	17.0	19.1
Middle	10	922	25.6	13.4	23.6	22.5	23.2
Upper	15	2,557	38.5	37.2	30.3	40.7	39.3
Unknown	8	3,034	20.5	44.1	14.0	14.0	0.0
Home Refinance Loans							
Low	9	230	8.3	2.8	5.4	2.6	18.3
Moderate	17	811	15.6	9.8	13.9	9.1	19.1
Middle	14	921	12.8	11.2	23.4	18.7	23.2
Upper	43	4,898	39.4	59.3	42.6	51.3	39.3
Unknown	26	1,398	23.9	16.9	14.6	18.2	0.0
Home Improvement Loans							
Low	1	7	3.6	0.7	9.0	3.8	18.3
Moderate	4	81	14.3	8.6	18.6	13.1	19.1
Middle	4	113	14.3	12.0	20.6	12.5	23.2
Upper	15	661	53.6	70.2	46.4	63.5	39.3
Unknown	4	80	14.3	8.5	5.5	7.2	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHY COMBINED RURAL KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	19	863	10.3	4.8	14.3	9.4	14.4
Middle	138	13,103	75.0	73.6	61.3	57.2	68.8
Upper	27	3,849	14.7	21.6	24.1	33.2	16.8
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	3	166	7.7	2.4	15.9	11.1	14.4
Middle	28	5,211	71.8	75.8	62.3	59.2	68.8
Upper	8	1,500	20.5	21.8	21.3	29.4	16.8
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	15	683	13.8	8.3	12.9	8.5	14.4
Middle	79	5,582	72.5	67.6	60.4	56.8	68.8
Upper	15	1,993	13.8	24.1	26.7	34.6	16.8
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	14	3.6	1.5	16.5	7.4	14.4
Middle	23	572	82.1	60.7	62.3	61.8	68.8
Upper	4	356	14.3	37.8	20.9	30.8	16.8
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	18.8	4.7	19.7
Middle	8	1,738	100.0	100.0	68.8	32.4	50.4
Upper	0	0	0.0	0.0	12.5	62.9	30.0

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE COMBINED RURAL KANSAS AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	206	19,915	63.0	46.8	28.8	33.6	88.8
Over \$1MM	101	20,134	30.9	47.3	Not Reported		7.3
Not Known	20	2,515	6.1	5.9			3.9
SF Loans							
\$1MM or less	197	21,126	90.4	85.6	59.1	75.1	98.7
Over \$1MM	11	2,430	5.0	9.9	Not Reported		1.3
Not Known	10	1,113	4.6	4.5			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY COMBINED RURAL KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	40	4,339	12.2	10.2	13.6	9.8	16.9
Middle	196	23,803	59.9	55.9	63.9	68.1	67.4
Upper	91	14,422	27.8	33.9	16.1	20.8	15.8
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	6	630	2.8	2.6	5.8	2.5	8.3
Middle	178	20,865	81.7	84.6	77.4	83.3	80.3
Upper	34	3,174	15.6	12.9	16.6	14.0	11.4

RURAL GARDEN CITY KANSAS AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	1,486	14.9
Moderate-income	0	0.0	0	0.0	0	0.0	1,720	17.3
Middle-income	10	76.9	8,057	81.0	704	8.7	2,501	25.2
Upper-income	3	23.1	1,887	19.0	163	8.6	4,237	42.6
Total AA	13	100.0	9,944	100.0	867	8.7	9,944	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	12,081	8,073	83.6	66.8	2,801	23.2	1,207	10.0
Upper-income	2,937	1,584	16.4	53.9	949	32.3	404	13.8
Total AA	15,018	9,657	100.0	64.3	3,750	25.0	1,611	10.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,484	85.5	1,317	85.3	115	87.8	52	86.7
Upper-income	251	14.5	227	14.7	16	12.2	8	13.3
Total AA	1,735	100.0	1,544	100.0	131	100.0	60	100.0
Percentage of Total Businesses:				89.0		7.6		3.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	273	83.0	261	83.1	12	80.0	0	0.0
Upper-income	56	17.0	53	16.9	3	20.0	0	0.0
Total AA	329	100.0	314	100.0	15	100.0	0	0.0
Percentage of Total Farms:				95.4		4.6		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL GARDEN CITY KANSAS AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	1	14	2.7	0.2	6.8	3.7	14.9
Moderate	11	441	29.7	7.0	18.9	13.7	17.3
Middle	3	373	8.1	5.9	23.4	20.3	25.2
Upper	18	2,644	48.6	42.1	34.8	43.7	42.6
Unknown	4	2,812	10.8	44.7	16.1	18.5	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	9.3	5.0	14.9
Moderate	1	48	10.0	1.1	19.4	14.4	17.3
Middle	1	173	10.0	4.0	22.3	19.5	25.2
Upper	6	1,438	60.0	33.3	32.4	41.6	42.6
Unknown	2	2,655	20.0	61.5	16.5	19.6	0.0
Home Refinance Loans							
Low	1	14	4.5	0.9	3.9	2.2	14.9
Moderate	9	386	40.9	23.6	16.9	12.1	17.3
Middle	2	200	9.1	12.2	25.1	21.7	25.2
Upper	10	1,037	45.5	63.3	37.6	46.5	42.6
Unknown	0	0	0.0	0.0	16.6	17.5	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	10.3	3.6	14.9
Moderate	1	7	25.0	3.4	37.9	36.5	17.3
Middle	0	0	0.0	0.0	17.2	12.0	25.2
Upper	2	169	50.0	82.0	31.0	45.9	42.6
Unknown	1	30	25.0	14.6	3.4	2.1	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL GARDEN CITY KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	27	4,515	73.0	71.8	73.0	65.1	83.6
Upper	10	1,769	27.0	28.2	26.8	34.7	16.4
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	6	3,230	60.0	74.9	73.1	66.3	83.6
Upper	4	1,084	40.0	25.1	26.6	33.4	16.4
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	17	1,101	77.3	67.3	72.4	63.9	83.6
Upper	5	536	22.7	32.7	27.6	36.1	16.4
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	3	57	75.0	27.7	79.3	53.5	83.6
Upper	1	149	25.0	72.3	20.7	46.5	16.4
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	1	127	100.0	100.0	100.0	100.0	32.7
Upper	0	0	0.0	0.0	0.0	0.0	67.3

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL GARDEN CITY KANSAS AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	42	5,994	60.0	47.9	26.9	38.9	89.0
Over \$1MM	23	5,287	32.9	42.2	Not Reported		7.6
Not Known	5	1,236	7.1	9.9			3.5
SF Loans							
\$1MM or less	66	10,625	89.2	85.9	53.5	76.6	95.4
Over \$1MM	7	1,254	9.5	10.1	Not Reported		4.6
Not Known	1	490	1.4	4.0			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL GARDEN CITY KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	55	9,421	78.6	75.3	78.5	78.8	85.5
Upper	15	3,096	21.4	24.7	13.5	19.1	14.5
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	69	11,519	93.2	93.1	88.9	92.1	83.0
Upper	5	850	6.8	6.9	10.4	7.5	17.0

2012 RURAL HAYS KANSAS AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	879	13.1
Moderate-income	0	0.0	0	0.0	0	0.0	958	14.3
Middle-income	4	66.7	3,927	58.7	299	7.6	1,523	22.8
Upper-income	2	33.3	2,764	41.3	109	3.9	3,331	49.8
Total AA	6	100.0	6,691	100.0	408	6.1	6,691	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	0	0	0.0	0.0	0	0.0	0	0.0
Middle-income	8,006	4,233	57.3	52.9	3,239	40.5	534	6.7
Upper-income	4,746	3,156	42.7	66.5	1,093	23.0	497	10.5
Total AA	12,752	7,389	100.0	57.9	4,332	34.0	1,031	8.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	1,134	67.4	1,004	66.3	91	79.8	39	70.9
Upper-income	549	32.6	510	33.7	23	20.2	16	29.1
Total AA	1,683	100.0	1,514	100.0	114	100.0	55	100.0
Percentage of Total Businesses:				90.0		6.8		3.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	0	0.0	0	0.0	0	0.0	0	0.0
Middle-income	133	61.6	131	61.2	2	100.0	0	0.0
Upper-income	83	38.4	83	38.8	0	0.0	0	0.0
Total AA	216	100.0	214	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.1		0.9		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL HAYS KANSAS AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	2	67	10.0	3.3	4.4	1.9	13.1
Moderate	2	49	10.0	2.4	12.6	8.8	14.3
Middle	2	243	10.0	12.1	22.2	18.6	22.8
Upper	8	1,317	40.0	65.4	49.4	56.0	49.8
Unknown	6	339	30.0	16.8	11.3	14.6	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	4.9	2.4	13.1
Moderate	0	0	0.0	0.0	16.4	12.1	14.3
Middle	2	243	50.0	48.6	27.1	24.4	22.8
Upper	2	257	50.0	51.4	40.4	49.3	49.8
Unknown	0	0	0.0	0.0	11.1	11.7	0.0
Home Refinance Loans							
Low	2	67	14.3	4.5	3.0	1.4	13.1
Moderate	1	39	7.1	2.6	10.4	7.1	14.3
Middle	0	0	0.0	0.0	20.5	16.7	22.8
Upper	5	1,051	35.7	70.3	53.8	61.5	49.8
Unknown	6	339	42.9	22.7	12.3	13.3	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	14.0	6.9	13.1
Moderate	1	10	50.0	52.6	11.6	7.1	14.3
Middle	0	0	0.0	0.0	11.6	2.5	22.8
Upper	1	9	50.0	47.4	60.5	81.3	49.8
Unknown	0	0	0.0	0.0	2.3	2.2	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL HAYS KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	16	1,039	80.0	51.6	55.4	50.7	57.3
Upper	4	976	20.0	48.4	43.5	48.8	42.7
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	4	500	100.0	100.0	56.9	52.5	57.3
Upper	0	0	0.0	0.0	40.4	46.3	42.7
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	10	520	71.4	34.8	54.1	47.1	57.3
Upper	4	976	28.6	65.2	45.6	52.6	42.7
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	2	19	100.0	100.0	58.1	48.4	57.3
Upper	0	0	0.0	0.0	41.9	51.6	42.7
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	0	0	0.0	0.0	100.0	100.0	65.4
Upper	0	0	0.0	0.0	0.0	0.0	34.6

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL HAYS KANSAS AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	82	7,690	73.2	59.6	33.0	39.5	90.0
Over \$1MM	29	5,057	25.9	39.2	Not Reported		6.8
Not Known	1	149	0.9	1.2			3.3
SF Loans							
\$1MM or less	60	5,522	89.6	78.9	73.2	75.3	99.1
Over \$1MM	4	1,176	6.0	16.8	Not Reported		0.9
Not Known	3	303	4.5	4.3			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL HAYS KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	72	8,385	64.3	65.0	68.1	68.9	67.4
Upper	40	4,511	35.7	35.0	28.9	30.6	32.6
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	0.0
Middle	39	4,697	58.2	67.1	54.3	66.6	61.6
Upper	28	2,304	41.8	32.9	45.7	33.4	38.4

2012 RURAL HUTCHINSON KANSAS AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	3,453	20.3
Moderate-income	7	41.2	6,586	38.8	1,157	17.6	3,371	19.8
Middle-income	8	47.1	6,925	40.8	420	6.1	3,904	23.0
Upper-income	2	11.8	3,482	20.5	187	5.4	6,265	36.9
Total AA	17	100.0	16,993	100.0	1,764	10.4	16,993	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	12,332	6,943	37.5	56.3	4,056	32.9	1,333	10.8
Middle-income	11,040	7,842	42.3	71.0	2,451	22.2	747	6.8
Upper-income	4,860	3,739	20.2	76.9	845	17.4	276	5.7
Total AA	28,232	18,524	100.0	65.6	7,352	26.0	2,356	8.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	1,224	42.4	1,064	41.7	107	48.6	53	47.3
Middle-income	1,156	40.1	1,019	39.9	89	40.5	48	42.9
Upper-income	505	17.5	470	18.4	24	10.9	11	9.8
Total AA	2,885	100.0	2,553	100.0	220	100.0	112	100.0
Percentage of Total Businesses:				88.5		7.6		3.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	110	27.1	110	27.1	0	0.0	0	0.0
Middle-income	272	67.0	272	67.0	0	0.0	0	0.0
Upper-income	24	5.9	24	5.9	0	0.0	0	0.0
Total AA	406	100.0	406	100.0	0	0.0	0	0.0
Percentage of Total Farms:				100.0		0.0		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL HUTCHINSON KANSAS AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	1	48	9.1	12.9	7.6	4.2	20.3
Moderate	2	39	18.2	10.5	17.6	12.5	19.8
Middle	5	207	45.5	55.5	24.1	19.9	23.0
Upper	3	79	27.3	21.2	38.3	46.0	36.9
Unknown	0	0	0.0	0.0	12.4	17.5	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	10.4	6.7	20.3
Moderate	0	0	0.0	0.0	23.3	18.7	19.8
Middle	2	137	100.0	100.0	25.0	24.3	23.0
Upper	0	0	0.0	0.0	29.5	38.3	36.9
Unknown	0	0	0.0	0.0	11.8	12.0	0.0
Home Refinance Loans							
Low	1	48	16.7	24.4	5.6	2.8	20.3
Moderate	1	25	16.7	12.7	14.2	9.1	19.8
Middle	2	55	33.3	27.9	23.6	17.7	23.0
Upper	2	69	33.3	35.0	43.0	50.3	36.9
Unknown	0	0	0.0	0.0	13.5	20.1	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	9.6	3.3	20.3
Moderate	1	14	33.3	35.9	15.6	8.8	19.8
Middle	1	15	33.3	38.5	23.0	13.3	23.0
Upper	1	10	33.3	25.6	48.9	64.6	36.9
Unknown	0	0	0.0	0.0	3.0	10.1	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL HUTCHINSON KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	6	219	54.5	58.7	32.2	21.9	37.5
Middle	4	129	36.4	34.6	37.6	39.3	42.3
Upper	1	25	9.1	6.7	30.1	38.8	20.2
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	42	50.0	30.7	38.7	28.6	37.5
Middle	1	95	50.0	69.3	36.0	37.2	42.3
Upper	0	0	0.0	0.0	25.3	34.1	20.2
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	163	66.7	82.7	27.2	17.6	37.5
Middle	1	9	16.7	4.6	38.9	40.4	42.3
Upper	1	25	16.7	12.7	33.9	41.9	20.2
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	1	14	33.3	35.9	38.5	22.9	37.5
Middle	2	25	66.7	64.1	36.3	40.1	42.3
Upper	0	0	0.0	0.0	25.2	37.0	20.2

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL HUTCHINSON KANSAS AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	17	1,076	54.8	17.0	22.7	22.4	88.5
Over \$1MM	13	5,232	41.9	82.8	Not Reported		7.6
Not Known	1	10	3.2	0.2			3.9
SF Loans							
\$1MM or less	6	634	100.0	100.0	30.4	74.3	100.0
Over \$1MM	0	0	0.0	0.0	Not Reported		0.0
Not Known	0	0	0.0	0.0			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL HUTCHINSON KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	10	1,184	32.3	18.7	35.8	27.0	42.4
Middle	6	260	19.4	4.1	40.7	36.4	40.1
Upper	15	4,874	48.4	77.1	14.9	34.4	17.5
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	4	374	66.7	59.0	32.9	30.4	27.1
Middle	2	260	33.3	41.0	64.6	68.2	67.0
Upper	0	0	0.0	0.0	2.5	1.4	5.9

2012 RURAL SOUTHEAST KANSAS AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	4,139	19.9
Moderate-income	3	12.0	1,705	8.2	330	19.4	4,363	21.0
Middle-income	21	84.0	18,002	86.6	1,689	9.4	4,723	22.7
Upper-income	1	4.0	1,079	5.2	26	2.4	7,561	36.4
Total AA	25	100.0	20,786	100.0	2,045	9.8	20,786	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	3,445	1,473	6.4	42.8	1,469	42.6	503	14.6
Middle-income	31,685	20,208	87.6	63.8	7,079	22.3	4,398	13.9
Upper-income	2,833	1,385	6.0	48.9	1,184	41.8	264	9.3
Total AA	37,963	23,066	100.0	60.8	9,732	25.6	5,165	13.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	443	12.4	381	12.0	42	16.7	20	12.6
Middle-income	2,883	80.6	2,567	81.0	190	75.4	126	79.2
Upper-income	253	7.1	220	6.9	20	7.9	13	8.2
Total AA	3,579	100.0	3,168	100.0	252	100.0	159	100.0
Percentage of Total Businesses:				88.5		7.0		4.4
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	15	2.7	15	2.7	0	0.0	0	0.0
Middle-income	536	95.5	534	95.5	2	100.0	0	0.0
Upper-income	10	1.8	10	1.8	0	0.0	0	0.0
Total AA	561	100.0	559	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.5		0.4		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS RURAL SOUTHEAST KANSAS AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	9	271	7.8	3.0	8.8	4.5	19.9
Moderate	9	564	7.8	6.2	18.5	12.4	21.0
Middle	18	1,133	15.5	12.4	22.6	19.3	22.7
Upper	44	4,076	37.9	44.6	34.4	42.3	36.4
Unknown	36	3,099	31.0	33.9	15.8	21.5	0.0
Home Purchase Loans							
Low	3	163	13.0	8.5	11.6	7.4	19.9
Moderate	2	153	8.7	7.9	24.6	19.9	21.0
Middle	5	369	21.7	19.2	21.9	22.3	22.7
Upper	7	862	30.4	44.8	26.5	38.0	36.4
Unknown	6	379	26.1	19.7	15.5	12.3	0.0
Home Refinance Loans							
Low	5	101	7.5	2.0	7.0	3.3	19.9
Moderate	6	361	9.0	7.3	13.8	8.9	21.0
Middle	10	666	14.9	13.5	23.6	19.9	22.7
Upper	26	2,741	38.8	55.6	39.6	49.6	36.4
Unknown	20	1,059	29.9	21.5	16.0	18.3	0.0
Home Improvement Loans							
Low	1	7	5.3	1.0	6.5	2.6	19.9
Moderate	1	50	5.3	7.4	19.6	13.6	21.0
Middle	3	98	15.8	14.5	21.7	16.9	22.7
Upper	11	473	57.9	69.8	42.8	58.1	36.4
Unknown	3	50	15.8	7.4	9.4	8.8	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL SOUTHEAST KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	13	644	11.2	7.0	4.7	3.9	6.4
Middle	91	7,420	78.4	81.2	86.7	79.4	87.6
Upper	12	1,079	10.3	11.8	8.3	16.6	6.0
Home Purchase Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	2	124	8.7	6.4	4.9	4.8	6.4
Middle	17	1,386	73.9	72.0	87.1	85.3	87.6
Upper	4	416	17.4	21.6	7.6	9.7	6.0
Home Refinance Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	11	520	16.4	10.6	4.8	3.9	6.4
Middle	51	3,952	76.1	80.2	86.7	83.6	87.6
Upper	5	456	7.5	9.3	8.5	12.5	6.0
Home Improvement Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	3.6	3.0	6.4
Middle	16	471	84.2	69.5	85.5	83.1	87.6
Upper	3	207	15.8	30.5	10.1	13.8	6.0
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0	0.0	19.1
Middle	7	1,611	100.0	100.0	80.0	15.7	60.4
Upper	0	0	0.0	0.0	20.0	84.3	20.4

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE RURAL SOUTHEAST KANSAS AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	85	5,155	57.0	47.6	32.3	32.0	88.5
Over \$1MM	36	4,558	31.6	42.1	Not Reported		7.0
Not Known	13	1,120	11.4	10.3			4.4
SF Loans							
\$1MM or less	65	4,345	91.5	93.1	67.1	71.8	99.6
Over \$1MM	0	0	0.0	0.0	Not Reported		0.4
Not Known	6	320	8.5	6.9			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL SOUTHEAST KANSAS AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	30	3,155	26.3	29.1	13.6	13.7	12.4
Middle	63	5,737	55.3	53.0	72.6	78.7	80.6
Upper	21	1,941	18.4	17.9	7.7	6.3	7.1
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.0
Moderate	2	256	2.8	5.5	2.1	4.6	2.7
Middle	68	4,389	95.8	94.1	95.7	93.6	95.5
Upper	1	20	1.4	0.4	2.1	1.8	1.8

E. 2012 Limited Review Illinois MSA AAs

2012 BLOOMINGTON ILLINOIS MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.4	319	0.8	31	9.7	7,506	19.1
Moderate-income	7	17.1	4,782	12.2	590	12.3	6,806	17.4
Middle-income	25	61.0	24,513	62.5	1,512	6.2	9,470	24.1
Upper-income	7	17.1	9,603	24.5	279	2.9	15,441	39.4
Unknown-Income	1	2.4	6	0.0	6	100.0	0	0.0
Total AA	41	100.0	39,223	100.0	2,418	6.2	39,223	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,551	282	0.7	18.2	962	62.0	307	19.8
Moderate-income	10,480	5,888	13.7	56.2	3,080	29.4	1,512	14.4
Middle-income	42,886	26,496	61.5	61.8	13,325	31.1	3,065	7.1
Upper-income	13,564	10,451	24.2	77.0	2,446	18.0	667	4.9
Unknown-Income	308	0	0.0	0.0	215	69.8	93	30.2
Total AA	68,789	43,117	100.0	62.7	20,028	29.1	5,644	8.2
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	371	5.4	324	5.2	30	7.5	17	5.4
Moderate-income	727	10.5	667	10.8	44	11.0	16	5.1
Middle-income	4,588	66.5	4,081	66.0	266	66.3	241	77.0
Upper-income	1,183	17.1	1,091	17.6	58	14.5	34	10.9
Unknown-Income	32	0.5	24	0.4	3	0.7	5	1.6
Total AA	6,901	100.0	6,187	100.0	401	100.0	313	100.0
Percentage of Total Businesses:				89.7		5.8		4.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	15	2.0	15	2.0	0	0.0	0	0.0
Middle-income	681	91.7	680	91.6	1	100.0	0	0.0
Upper-income	47	6.3	47	6.3	0	0.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	743	100.0	742	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.9		0.1		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS BLOOMINGTON ILLINOIS MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	12	654	10.0	4.5	9.4	4.9	19.1
Moderate	17	981	14.2	6.8	17.2	12.0	17.4
Middle	29	2,681	24.2	18.5	25.5	22.2	24.1
Upper	54	8,620	45.0	59.4	38.6	44.4	39.4
Unknown	8	1,579	6.7	10.9	9.3	16.5	0.0
Home Purchase Loans							
Low	2	145	11.1	5.4	13.9	8.1	19.1
Moderate	4	416	22.2	15.5	22.1	17.9	17.4
Middle	4	606	22.2	22.6	26.5	27.3	24.1
Upper	8	1,516	44.4	56.5	29.9	39.7	39.4
Unknown	0	0	0.0	0.0	7.7	7.0	0.0
Home Refinance Loans							
Low	8	419	9.9	4.2	7.2	4.0	19.1
Moderate	7	364	8.6	3.6	15.1	10.7	17.4
Middle	22	2,025	27.2	20.3	25.3	22.8	24.1
Upper	42	6,999	51.9	70.1	43.0	52.3	39.4
Unknown	2	184	2.5	1.8	9.4	10.2	0.0
Home Improvement Loans							
Low	2	90	13.3	20.2	15.7	10.3	19.1
Moderate	6	201	40.0	45.1	19.2	14.9	17.4
Middle	3	50	20.0	11.2	24.6	22.0	24.1
Upper	4	105	26.7	23.5	39.1	51.7	39.4
Unknown	0	0	0.0	0.0	1.4	1.1	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHY BLOOMINGTON ILLINOIS MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	1	57	0.8	0.4	0.4	0.4	0.7
Moderate	7	661	5.8	4.6	8.2	6.3	13.7
Middle	73	9,443	60.8	65.1	55.4	51.4	61.5
Upper	39	4,354	32.5	30.0	36.0	41.7	24.2
Home Purchase Loans							
Low	0	0	0.0	0.0	0.4	0.4	0.7
Moderate	2	306	11.1	11.4	8.6	5.9	13.7
Middle	10	1,299	55.6	48.4	58.1	52.5	61.5
Upper	6	1,078	33.3	40.2	33.0	41.1	24.2
Home Refinance Loans							
Low	1	57	1.2	0.6	0.3	0.2	0.7
Moderate	4	330	4.9	3.3	7.9	5.7	13.7
Middle	50	6,593	61.7	66.0	53.7	49.8	61.5
Upper	26	3,011	32.1	30.1	38.0	44.2	24.2
Home Improvement Loans							
Low	0	0	0.0	0.0	1.1	0.4	0.7
Moderate	1	25	6.7	5.6	8.5	5.1	13.7
Middle	8	244	53.3	54.7	64.1	58.7	61.5
Upper	6	177	40.0	39.7	26.3	35.8	24.2
Multifamily Loans							% of Multifamily Units
Low	0	0	0.0	0.0	7.0	2.2	5.0
Moderate	0	0	0.0	0.0	12.7	12.5	11.4
Middle	5	1,307	83.3	93.7	63.4	58.3	64.8
Upper	1	88	16.7	6.3	15.5	25.5	16.8
Unknown	0	0	0.0	0.0	7.0	2.2	5.0

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE BLOOMINGTON ILLINOIS MSA AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	45	5,631	47.9	30.1	30.8	44.9	89.7
Over \$1MM	46	12,669	48.9	67.6	Not Reported		5.8
Not Known	3	434	3.2	2.3			4.5
SF Loans							
\$1MM or less	72	9,351	83.7	72.4	74.3	73.2	99.9
Over \$1MM	11	2,992	12.8	23.2	Not Reported		0.1
Not Known	3	580	3.5	4.5			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY BLOOMINGTON ILLINOIS MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	7	1,851	7.4	9.9	4.2	6.4	5.4
Moderate	3	1,250	3.2	6.7	9.8	9.3	10.5
Middle	51	9,602	54.3	51.3	58.1	54.9	66.5
Upper	33	6,031	35.1	32.2	20.6	27.7	17.1
SF Loans							
Low	0	0	0.0	0.0	0.4	0.2	0.0
Moderate	5	523	5.8	4.0	1.3	1.4	2.0
Middle	78	11,758	90.7	91.0	93.0	92.2	91.7
Upper	3	642	3.5	5.0	5.2	6.2	6.3

2012 CHAMPAIGN ILLINOIS MSA AA DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	14.0	2,111	4.9	687	32.5	9,292	21.5
Moderate-income	8	18.6	5,651	13.1	1,024	18.1	7,513	17.4
Middle-income	18	41.9	25,894	60.0	2,127	8.2	9,083	21.1
Upper-income	9	20.9	9,440	21.9	327	3.5	17,235	40.0
Unknown-Income	2	4.7	27	0.1	0	0.0	0	0.0
Total AA	43	100.0	43,123	100.0	4,165	9.7	43,123	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,221	1,045	2.4	10.2	7,472	73.1	1,704	16.7
Moderate-income	14,121	4,985	11.5	35.3	7,532	53.3	1,604	11.4
Middle-income	43,937	26,805	61.6	61.0	13,320	30.3	3,812	8.7
Upper-income	15,612	10,692	24.6	68.5	4,252	27.2	668	4.3
Unknown-Income	1,997	0	0.0	0.0	1,748	87.5	249	12.5
Total AA	85,888	43,527	100.0	50.7	34,324	40.0	8,037	9.4
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	871	10.5	737	10.0	64	13.3	70	17.4
Moderate-income	1,491	18.0	1,325	17.9	93	19.4	73	18.1
Middle-income	3,954	47.8	3,555	48.1	216	45.0	183	45.4
Upper-income	1,878	22.7	1,706	23.1	98	20.4	74	18.4
Unknown-Income	74	0.9	62	0.8	9	1.9	3	0.7
Total AA	8,268	100.0	7,385	100.0	480	100.0	403	100.0
Percentage of Total Businesses:				89.3		5.8		4.9
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	5	0.7	5	0.7	0	0.0	0	0.0
Moderate-income	19	2.7	19	2.7	0	0.0	0	0.0
Middle-income	618	88.4	615	88.5	3	75.0	0	0.0
Upper-income	57	8.2	56	8.1	1	25.0	0	0.0
Unknown-Income	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	699	100.0	695	100.0	4	100.0	0	0.0
Percentage of Total Farms:				99.4		0.6		0.0

DISTRIBUTION OF 2012 HMDA LOANS BY BORROWER INCOME LEVELS CHAMPAIGN ILLINOIS MSA AA							
Borrower Income Level	Bank Loans				Aggregate HMDA Data		% of Families
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	1	50	4.5	0.6	6.6	2.7	21.5
Moderate	0	0	0.0	0.0	17.5	10.0	17.4
Middle	2	285	9.1	3.2	21.8	15.6	21.1
Upper	16	3,386	72.7	37.9	41.5	41.4	40.0
Unknown	3	5,217	13.6	58.4	12.6	30.2	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	9.4	5.1	21.5
Moderate	0	0	0.0	0.0	22.8	17.5	17.4
Middle	1	160	20.0	12.7	22.9	22.8	21.1
Upper	3	1,037	60.0	82.3	34.3	44.5	40.0
Unknown	1	63	20.0	5.0	10.6	10.1	0.0
Home Refinance Loans							
Low	1	50	7.1	2.0	5.1	2.6	21.5
Moderate	0	0	0.0	0.0	15.2	10.3	17.4
Middle	1	125	7.1	5.0	22.0	18.0	21.1
Upper	12	2,340	85.7	93.0	46.9	55.0	40.0
Unknown	0	0	0.0	0.0	10.7	14.1	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	14.7	4.3	21.5
Moderate	0	0	0.0	0.0	24.8	17.1	17.4
Middle	0	0	0.0	0.0	22.0	20.7	21.1
Upper	1	9	100.0	100.0	31.8	40.9	40.0
Unknown	0	0	0.0	0.0	6.7	17.0	0.0

DISTRIBUTION OF 2012 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHY CHAMPAIGN ILLINOIS MSA AA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	# %	\$ %	
Total Home Mortgage Loans							
Low	1	2,750	4.5	30.8	2.9	11.0	2.4
Moderate	0	0	0.0	0.0	7.5	7.0	11.5
Middle	7	3,141	31.8	35.1	59.5	48.1	61.6
Upper	14	3,047	63.6	34.1	29.7	30.0	24.6
Home Purchase Loans							
Low	0	0	0.0	0.0	1.8	1.0	2.4
Moderate	0	0	0.0	0.0	8.3	6.3	11.5
Middle	3	483	60.0	38.3	62.9	60.2	61.6
Upper	2	777	40.0	61.7	26.9	31.9	24.6
Home Refinance Loans							
Low	0	0	0.0	0.0	2.3	2.4	2.4
Moderate	0	0	0.0	0.0	6.8	6.2	11.5
Middle	2	245	14.3	9.7	58.5	54.4	61.6
Upper	12	2,270	85.7	90.3	32.2	36.4	24.6
Home Improvement Loans							
Low	0	0	0.0	0.0	3.7	1.4	2.4
Moderate	0	0	0.0	0.0	8.0	15.7	11.5
Middle	1	9	100.0	100.0	68.8	58.4	61.6
Upper	0	0	0.0	0.0	19.6	24.6	24.6
Multifamily Loans							% of Multifamily Units
Low	1	2,750	50.0	53.4	30.1	47.6	30.6
Moderate	0	0	0.0	0.0	18.9	9.8	20.9
Middle	1	2,404	50.0	46.6	29.1	15.3	29.6
Upper	0	0	0.0	0.0	12.2	10.1	11.5

DISTRIBUTION OF 2012 SB / SF LOANS BY REVENUE SIZE CHAMPAIGN ILLINOIS MSA AA							
Business/Farm Size by Revenue	Bank Loans				Aggregate CRA Data		% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
\$1MM or less	11	3,785	68.8	64.4	31.9	45.8	89.3
Over \$1MM	5	2,092	31.3	35.6	Not Reported		5.8
Not Known	0	0	0.0	0.0			4.9
SF Loans							
\$1MM or less	1	240	100.0	100.0	52.6	83.5	99.4
Over \$1MM	0	0	0.0	0.0	Not Reported		0.6
Not Known	0	0	0.0	0.0			0.0

DISTRIBUTION OF 2012 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY CHAMPAIGN ILLINOIS MSA AA							
Census Tract Income Level	Bank Loans				Aggregate CRA Data		% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	# %	\$ %	
SB Loans							
Low	1	480	6.3	8.2	8.7	11.5	10.5
Moderate	3	1,410	18.8	24.0	16.3	15.4	18.0
Middle	8	3,309	50.0	56.3	46.8	48.6	47.8
Upper	4	678	25.0	11.5	21.9	23.0	22.7
SF Loans							
Low	0	0	0.0	0.0	0.0	0.0	0.7
Moderate	0	0	0.0	0.0	0.7	0.2	2.7
Middle	1	240	100.0	100.0	96.7	99.3	88.4
Upper	0	0	0.0	0.0	2.0	0.4	8.2

F. 2013 Full Review Multistate MSA AAs

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS KANSAS CITY/ST. JOSEPH/LAWRENCE MISSOURI-KANSAS CSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	91	4,935	7.2	2.4	20.1
Moderate	182	12,898	14.4	6.3	17.5
Middle	239	21,718	19.0	10.6	21.4
Upper	658	133,436	52.2	64.9	41.0
Unknown	91	32,593	7.2	15.9	0.0
Home Purchase Loans					
Low	23	2,284	7.0	3.4	20.1
Moderate	41	4,769	12.4	7.1	17.5
Middle	63	8,254	19.1	12.3	21.4
Upper	181	49,213	54.8	73.2	41.0
Unknown	22	2,747	6.7	4.1	0.0
Home Refinance Loans					
Low	55	2,448	7.9	2.2	20.1
Moderate	92	7,097	13.2	6.4	17.5
Middle	125	11,717	17.9	10.6	21.4
Upper	370	78,298	53.0	70.5	41.0
Unknown	56	11,498	8.0	10.4	0.0
Home Improvement Loans					
Low	13	203	5.8	2.2	20.1
Moderate	49	1,032	21.7	11.4	17.5
Middle	51	1,747	22.6	19.3	21.4
Upper	107	5,925	47.3	65.5	41.0
Unknown	6	141	2.7	1.6	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES KANSAS CITY/ST. JOSEPH/LAWRENCE MISSOURI-KANSAS CSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	24	7,445	1.9	3.6	5.1
Moderate	146	13,469	11.6	6.6	18.0
Middle	487	52,940	38.6	25.8	39.7
Upper	604	131,726	47.9	64.1	37.1
Home Purchase Loans					
Low	7	912	2.1	1.4	5.1
Moderate	27	2,583	8.2	3.8	18.0
Middle	107	13,065	32.4	19.4	39.7
Upper	189	50,707	57.3	75.4	37.1
Home Refinance Loans					
Low	11	1,238	1.6	1.1	5.1
Moderate	89	7,814	12.8	7.0	18.0
Middle	275	31,260	39.4	28.1	39.7
Upper	323	70,746	46.3	63.7	37.1
Home Improvement Loans					
Low	4	95	1.8	1.0	5.1
Moderate	28	692	12.4	7.6	18.0
Middle	103	2,688	45.6	29.7	39.7
Upper	91	5,573	40.3	61.6	37.1
Multifamily Loans					% of Multifamily Units
Low	2	5,200	28.6	28.6	15.8
Moderate	2	2,380	28.6	13.1	29.5
Middle	2	5,927	28.6	32.6	31.8
Upper	1	4,700	14.3	25.8	22.9

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE KANSAS CITY/ST. JOSEPH/LAWRENCE MISSOURI-KANSAS CSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	538	59,419	51.4	37.1	89.1
Over \$1MM	395	91,657	37.8	57.2	7.6
Not Known	113	9,223	10.8	5.8	3.3
SF Loans					
\$1MM or less	51	4,907	81.0	86.3	99.0
Over \$1MM	4	397	6.3	7.0	0.9
Not Known	8	379	12.7	6.7	0.1

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY KANSAS CITY/ST. JOSEPH/LAWRENCE MISSOURI-KANSAS CSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	36	4,479	3.4	2.8	7.1
Moderate	216	42,027	20.7	26.2	19.5
Middle	335	43,521	32.0	27.1	35.2
Upper	438	64,227	41.9	40.1	36.9
Unknown	21	6,045	2.0	3.8	0.0
SF Loans					
Low	0	0	0.0	0.0	1.4
Moderate	2	23	3.2	4.2	4.8
Middle	43	3,673	68.3	64.6	59.7
Upper	18	1,772	28.6	31.2	33.9

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS ST. LOUIS MISSOURI-ILLINOIS MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	111	5,420	9.3	3.3	20.9
Moderate	210	13,045	17.6	8.0	16.8
Middle	241	17,661	20.3	10.8	20.8
Upper	555	99,441	46.6	60.9	41.6
Unknown	73	27,813	6.1	17.0	0.0
Home Purchase Loans					
Low	10	655	6.3	1.7	20.9
Moderate	15	1,616	9.4	4.2	16.8
Middle	25	3,220	15.6	8.3	20.8
Upper	104	31,695	65.0	81.7	41.6
Unknown	6	1,599	3.8	4.1	0.0
Home Refinance Loans					
Low	83	4,410	10.4	4.3	20.9
Moderate	154	10,341	19.3	10.0	16.8
Middle	169	13,551	21.2	13.1	20.8
Upper	344	61,566	43.2	59.4	41.6
Unknown	47	13,745	5.9	13.3	0.0
Home Improvement Loans					
Low	18	355	8.2	3.6	20.9
Moderate	41	1,088	18.7	11.2	16.8
Middle	47	890	21.5	9.1	20.8
Upper	107	6,180	48.9	63.4	41.6
Unknown	6	1,240	2.7	12.7	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES ST. LOUIS MISSOURI-ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	30	3,145	2.5	1.9	5.1
Moderate	125	10,302	10.5	6.3	16.5
Middle	451	37,672	37.9	23.1	41.5
Upper	584	112,261	49.1	68.7	36.9
Home Purchase Loans					
Low	5	321	3.1	0.8	5.1
Moderate	13	1,559	8.1	4.0	16.5
Middle	54	8,514	33.8	22.0	41.5
Upper	88	28,391	55.0	73.2	36.9
Home Refinance Loans					
Low	18	1,133	2.3	1.1	5.1
Moderate	81	6,125	10.2	5.9	16.5
Middle	308	26,537	38.6	25.6	41.5
Upper	390	69,818	48.9	67.4	36.9
Home Improvement Loans					
Low	2	25	0.9	0.3	5.1
Moderate	28	714	12.8	7.3	16.5
Middle	86	2,190	39.3	22.5	41.5
Upper	103	6,824	47.0	70.0	36.9
Multifamily Loans					% of Multifamily Units
Low	5	1,666	35.7	14.8	13.4
Moderate	3	1,904	21.4	17.0	19.5
Middle	3	431	21.4	3.8	37.7
Upper	3	7,228	21.4	64.4	29.1

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE ST. LOUIS MISSOURI-ILLINOIS MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	463	43,472	47.4	24.7	88.8
Over \$1MM	413	120,871	42.3	68.7	7.7
Not Known	100	11,647	10.2	6.6	3.5
SF Loans					
\$1MM or less	7	684	63.6	69.5	99.1
Over \$1MM	0	0	0.0	0.0	0.9
Not Known	4	300	36.4	30.5	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY ST. LOUIS MISSOURI-ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	58	18,059	5.9	10.3	6.4
Moderate	182	38,790	18.6	22.0	16.3
Middle	315	47,090	32.3	26.8	36.3
Upper	421	72,051	43.1	40.9	40.9
SF Loans					
Low	0	0	0.0	0.0	0.6
Moderate	0	0	0.0	0.0	5.0
Middle	8	550	72.7	55.9	48.8
Upper	3	434	27.3	44.1	45.6

G. 2013 Full Review Missouri MSA AAs

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS SPRINGFIELD/BRANSON MISSOURI CSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	28	1,758	8.5	2.5	19.2
Moderate	47	3,285	14.2	4.7	17.9
Middle	45	3,953	13.6	5.6	22.4
Upper	147	23,860	44.4	33.8	40.5
Unknown	64	37,748	19.3	53.5	0.0
Home Purchase Loans					
Low	7	477	9.0	4.1	19.2
Moderate	13	1,237	16.7	10.5	17.9
Middle	15	1,711	19.2	14.6	22.4
Upper	34	6,952	43.6	59.2	40.5
Unknown	9	1,373	11.5	11.7	0.0
Home Refinance Loans					
Low	15	1,104	7.7	3.7	19.2
Moderate	27	1,770	13.8	6.0	17.9
Middle	25	2,101	12.8	7.1	22.4
Upper	92	16,336	46.9	55.0	40.5
Unknown	37	8,415	18.9	28.3	0.0
Home Improvement Loans					
Low	6	177	15.0	14.8	19.2
Moderate	7	278	17.5	23.3	17.9
Middle	5	141	12.5	11.8	22.4
Upper	21	572	52.5	47.9	40.5
Unknown	1	25	2.5	2.1	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES SPRINGFIELD/BRANSON MISSOURI CSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	273	0.9	0.4	0.5
Moderate	39	7,755	11.8	11.0	13.3
Middle	193	44,246	58.3	62.7	64.6
Upper	96	18,330	29.0	26.0	21.6
Home Purchase Loans					
Low	0	0	0.0	0.0	0.5
Moderate	5	357	6.4	3.0	13.3
Middle	43	6,149	55.1	52.3	64.6
Upper	30	5,244	38.5	44.6	21.6
Home Refinance Loans					
Low	2	108	1.0	0.4	0.5
Moderate	24	3,267	12.2	11.0	13.3
Middle	121	16,525	61.7	55.6	64.6
Upper	49	9,826	25.0	33.1	21.6
Home Improvement Loans					
Low	0	0	0.0	0.0	0.5
Moderate	5	84	12.5	7.0	13.3
Middle	21	828	52.5	69.4	64.6
Upper	14	281	35.0	23.6	21.6
Multifamily Loans					% of Multifamily Units
Low	1	165	5.9	0.6	6.3
Moderate	5	4,047	29.4	14.5	22.3
Middle	8	20,744	47.1	74.3	58.0
Upper	3	2,979	17.6	10.7	13.4

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE SPRINGFIELD/BRANSON MISSOURI CSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	189	30,699	57.3	47.4	90.2
Over \$1MM	107	29,833	32.4	46.1	6.4
Not Known	34	4,221	10.3	6.5	3.4
SF Loans					
\$1MM or less	161	11,021	92.0	90.6	99.7
Over \$1MM	4	324	2.3	2.7	0.3
Not Known	10	823	5.7	6.8	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY SPRINGFIELD/BRANSON MISSOURI CSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	2	203	0.6	0.3	0.6
Moderate	82	23,520	24.8	36.3	20.4
Middle	171	25,861	51.8	39.9	61.4
Upper	75	15,169	22.7	23.4	17.6
SF Loans					
Low	0	0	0.0	0.0	0.3
Moderate	18	1,054	10.3	8.7	7.5
Middle	152	10,388	86.9	85.4	82.7
Upper	5	726	2.9	6.0	9.6

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS COLUMBIA/MEXICO/MOBERLY MISSOURI CSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	20	1,455	4.9	2.5	20.2
Moderate	44	3,365	10.8	5.7	17.2
Middle	64	6,441	15.8	10.8	22.1
Upper	172	27,219	42.4	45.8	40.5
Unknown	106	20,891	26.1	35.2	0.0
Home Purchase Loans					
Low	6	474	5.1	3.1	20.2
Moderate	14	1,243	11.9	8.2	17.2
Middle	16	1,624	13.6	10.8	22.1
Upper	60	10,074	50.8	66.7	40.5
Unknown	22	1,686	18.6	11.2	0.0
Home Refinance Loans					
Low	12	964	4.7	3.2	20.2
Moderate	27	2,051	10.5	6.8	17.2
Middle	43	4,484	16.7	14.8	22.1
Upper	99	16,262	38.5	53.6	40.5
Unknown	76	6,555	29.6	21.6	0.0
Home Improvement Loans					
Low	2	17	8.0	1.2	20.2
Moderate	3	71	12.0	5.1	17.2
Middle	5	333	20.0	24.0	22.1
Upper	13	883	52.0	63.6	40.5
Unknown	2	84	8.0	6.1	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES COLUMBIA/MEXICO/MOBERLY MISSOURI CSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	5	1,046	1.2	1.8	1.1
Moderate	73	4,088	18.0	6.9	15.7
Middle	193	33,706	47.5	56.8	53.6
Upper	135	20,531	33.3	34.6	29.6
Home Purchase Loans					
Low	1	68	0.8	0.5	1.1
Moderate	26	1,676	22.0	11.1	15.7
Middle	56	7,508	47.5	49.7	53.6
Upper	35	5,849	29.7	38.7	29.6
Home Refinance Loans					
Low	2	133	0.8	0.4	1.1
Moderate	41	1,961	16.0	6.5	15.7
Middle	121	13,940	47.1	46.0	53.6
Upper	93	14,282	36.2	47.1	29.6
Home Improvement Loans					
Low	0	0	0.0	0.0	1.1
Moderate	5	211	20.0	15.2	15.7
Middle	13	777	52.0	56.0	53.6
Upper	7	400	28.0	28.8	29.6
Multifamily Loans					% of Multifamily Units
Low	2	845	33.3	6.7	18.8
Moderate	1	240	16.7	1.9	31.4
Middle	3	11,481	50.0	91.4	20.1
Upper	0	0	0.0	0.0	29.7

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE COLUMBIA/MEXICO/MOBERLY MISSOURI CSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	255	21,827	58.9	48.0	90.1
Over \$1MM	83	16,021	19.2	35.2	5.9
Not Known	95	7,649	21.9	16.8	4.0
SF Loans					
\$1MM or less	135	10,164	82.3	80.2	99.9
Over \$1MM	6	1,135	3.7	9.0	0.1
Not Known	23	1,374	14.0	10.8	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY COLUMBIA/MEXICO/MOBERLY MISSOURI CSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	25	4,098	5.8	9.0	12.4
Moderate	94	7,401	21.7	16.3	19.2
Middle	209	20,565	48.3	45.2	43.2
Upper	105	13,433	24.2	29.5	25.2
SF Loans					
Low	1	240	0.6	1.9	0.1
Moderate	14	1,113	8.5	8.8	7.1
Middle	107	8,748	65.2	69.0	76.0
Upper	42	2,572	25.6	20.3	16.8

H. 2013 Full Review Kansas MSA AA

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS WICHITA KANSAS MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	16	818	10.3	2.8	20.6
Moderate	19	1,160	12.2	3.9	18.4
Middle	25	2,389	16.0	8.0	21.1
Upper	76	18,803	48.7	63.3	39.9
Unknown	20	6,547	12.8	22.0	0.0
Home Purchase Loans					
Low	4	195	7.5	2.1	20.6
Moderate	3	316	5.7	3.4	18.4
Middle	10	1,167	18.9	12.6	21.1
Upper	26	6,317	49.1	68.4	39.9
Unknown	10	1,236	18.9	13.4	0.0
Home Refinance Loans					
Low	8	594	9.4	3.6	20.6
Moderate	15	815	17.6	5.0	18.4
Middle	12	1,172	14.1	7.2	21.1
Upper	41	11,804	48.2	72.3	39.9
Unknown	9	1,931	10.6	11.8	0.0
Home Improvement Loans					
Low	4	29	23.5	3.7	20.6
Moderate	1	29	5.9	3.7	18.4
Middle	3	50	17.6	6.3	21.1
Upper	9	682	52.9	86.3	39.9
Unknown	0	0	0.0	0.0	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES WICHITA KANSAS MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	5	112	3.2	0.4	3.5
Moderate	27	3,011	17.3	10.1	25.0
Middle	32	3,734	20.5	12.6	33.4
Upper	92	22,860	59.0	76.9	38.1
Home Purchase Loans					
Low	1	36	1.9	0.4	3.5
Moderate	3	111	5.7	1.2	25.0
Middle	9	1,316	17.0	14.3	33.4
Upper	40	7,768	75.5	84.2	38.1
Home Refinance Loans					
Low	2	54	2.4	0.3	3.5
Moderate	18	2,805	21.2	17.2	25.0
Middle	20	2,386	23.5	14.6	33.4
Upper	45	11,071	52.9	67.9	38.1
Home Improvement Loans					
Low	2	22	11.8	2.8	3.5
Moderate	6	95	35.3	12.0	25.0
Middle	3	32	17.6	4.1	33.4
Upper	6	641	35.3	81.1	38.1
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	13.6
Moderate	0	0	0.0	0.0	37.0
Middle	0	0	0.0	0.0	33.7
Upper	1	3,380	100.0	100.0	15.7

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE WICHITA KANSAS MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	107	16,396	59.1	51.5	89.0
Over \$1MM	62	13,313	34.3	41.8	7.6
Not Known	12	2,148	6.6	6.7	3.5
SF Loans					
\$1MM or less	30	3,021	90.9	96.6	98.9
Over \$1MM	0	0	0.0	0.0	1.1
Not Known	3	105	9.1	3.4	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY WICHITA KANSAS MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	18	3,599	9.9	11.3	10.7
Moderate	52	6,079	28.7	19.1	24.3
Middle	46	8,775	25.4	27.5	30.5
Upper	65	13,404	35.9	42.1	34.5
SF Loans					
Low	0	0	0.0	0.0	0.7
Moderate	0	0	0.0	0.0	4.3
Middle	25	2,189	75.8	70.0	48.1
Upper	8	937	24.2	30.0	46.9

I. 2013 Full Review Illinois MSA AA

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS PEORIA ILLINOIS MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	14	360	11.0	2.5	19.7
Moderate	18	923	14.2	6.4	18.3
Middle	32	2,258	25.2	15.5	22.2
Upper	52	8,228	40.9	56.6	39.8
Unknown	11	2,765	8.7	19.0	0.0
Home Purchase Loans					
Low	2	103	8.3	3.3	19.7
Moderate	2	174	8.3	5.5	18.3
Middle	5	615	20.8	19.5	22.2
Upper	15	2,260	62.5	71.7	39.8
Unknown	0	0	0.0	0.0	0.0
Home Refinance Loans					
Low	7	210	9.5	2.5	19.7
Moderate	11	594	14.9	7.2	18.3
Middle	20	1,345	27.0	16.3	22.2
Upper	29	5,741	39.2	69.6	39.8
Unknown	7	353	9.5	4.3	0.0
Home Improvement Loans					
Low	5	47	19.2	6.3	19.7
Moderate	5	155	19.2	20.7	18.3
Middle	7	298	26.9	39.9	22.2
Upper	8	227	30.8	30.4	39.8
Unknown	1	20	3.8	2.7	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES PEORIA ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	#%	\$%	\$(000s)
Total Home Mortgage Loans					
Low	2	25	1.6	0.2	2.5
Moderate	26	1,317	20.5	9.1	14.1
Middle	61	6,907	48.0	47.5	59.1
Upper	38	6,285	29.9	43.2	24.3
Home Purchase Loans					
Low	0	0	0.0	0.0	2.5
Moderate	0	0	0.0	0.0	14.1
Middle	12	1,548	50.0	49.1	59.1
Upper	12	1,604	50.0	50.9	24.3
Home Refinance Loans					
Low	1	18	1.4	0.2	2.5
Moderate	23	1,148	31.1	13.9	14.1
Middle	30	2,595	40.5	31.5	59.1
Upper	20	4,482	27.0	54.4	24.3
Home Improvement Loans					
Low	1	7	3.8	0.9	2.5
Moderate	3	169	11.5	22.6	14.1
Middle	16	372	61.5	49.8	59.1
Upper	6	199	23.1	26.6	24.3
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	11.1
Moderate	0	0	0.0	0.0	15.8
Middle	3	2,392	100.0	100.0	49.0
Upper	0	0	0.0	0.0	24.1

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE PEORIA ILLINOIS MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	38	3,697	48.7	25.7	88.1
Over \$1MM	36	9,308	46.2	64.7	7.8
Not Known	4	1,388	5.1	9.6	4.1
SF Loans					
\$1MM or less	35	3,948	87.5	85.7	99.5
Over \$1MM	1	150	2.5	3.3	0.3
Not Known	4	507	10.0	11.0	0.2

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY PEORIA ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	16	2,635	20.5	18.3	7.3
Moderate	9	1,438	11.5	10.0	14.8
Middle	33	6,862	42.3	47.7	53.8
Upper	20	3,458	25.6	24.0	24.1
SF Loans					
Low	0	0	0.0	0.0	0.2
Moderate	0	0	0.0	0.0	1.4
Middle	38	4,235	95.0	92.0	71.9
Upper	2	370	5.0	8.0	26.5

J. 2013 Full Review Colorado MSA AA

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS DENVER COLORADO MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	184	2.2	0.6	27.4
Moderate	6	863	4.4	2.8	18.8
Middle	5	950	3.7	3.1	19.9
Upper	19	4,207	14.0	13.9	33.9
Unknown	103	24,121	75.7	79.5	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	27.4
Moderate	2	417	3.0	2.5	18.8
Middle	2	495	3.0	2.9	19.9
Upper	5	899	7.5	5.4	33.9
Unknown	58	14,982	86.6	89.2	0.0
Home Refinance Loans					
Low	2	164	3.4	1.5	27.4
Moderate	4	446	6.8	4.0	18.8
Middle	3	455	5.1	4.1	19.9
Upper	13	3,274	22.0	29.7	33.9
Unknown	37	6,683	62.7	60.6	0.0
Home Improvement Loans					
Low	1	20	20.0	2.4	27.4
Moderate	0	0	0.0	0.0	18.8
Middle	0	0	0.0	0.0	19.9
Upper	1	34	20.0	4.0	33.9
Unknown	3	790	60.0	93.6	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES DENVER COLORADO MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	25	3,486	18.4	11.5	10.6
Moderate	41	6,893	30.1	22.7	26.3
Middle	43	10,250	31.6	33.8	36.3
Upper	27	9,696	19.9	32.0	26.9
Home Purchase Loans					
Low	11	1,941	16.4	11.6	10.6
Moderate	21	3,758	31.3	22.4	26.3
Middle	22	6,388	32.8	38.0	36.3
Upper	13	4,706	19.4	28.0	26.9
Home Refinance Loans					
Low	10	704	16.9	6.4	10.6
Moderate	18	2,290	30.5	20.8	26.3
Middle	19	3,680	32.2	33.4	36.3
Upper	12	4,348	20.3	39.4	26.9
Home Improvement Loans					
Low	0	0	0.0	0.0	10.6
Moderate	1	20	20.0	2.4	26.3
Middle	2	182	40.0	21.6	36.3
Upper	2	642	40.0	76.1	26.9
Multifamily Loans					% of Multifamily Units
Low	4	841	80.0	50.5	25.7
Moderate	1	825	20.0	49.5	32.5
Middle	0	0	0.0	0.0	29.5
Upper	0	0	0.0	0.0	12.4

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE DENVER COLORADO MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	5	84	5.3	0.3	89.8
Over \$1MM	3	260	3.2	0.9	6.5
Not Known	86	29,990	91.5	98.9	3.6
SF Loans					
\$1MM or less	0	0	0.0	0.0	97.2
Over \$1MM	0	0	0.0	0.0	2.8
Not Known	1	10	100.0	100.0	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY DENVER COLORADO MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	29	9,787	30.9	32.3	13.7
Moderate	29	8,747	30.9	28.8	25.7
Middle	20	6,570	21.3	21.7	29.8
Upper	14	3,830	14.9	12.6	30.5
Unknown	2	1,400	2.1	4.6	0.0
SF Loans					
Low	0	0	0.0	0.0	6.7
Moderate	0	0	0.0	0.0	14.4
Middle	1	10	100.0	100.0	43.5
Upper	0	0	0.0	0.0	35.4

K. 2013 Full Review Oklahoma MSA AA

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS TULSA OKLAHOMA MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	2	146	1.6	0.5	21.0
Moderate	4	604	3.2	2.1	17.6
Middle	1	7	0.8	0.0	19.6
Upper	54	16,618	43.5	56.7	41.9
Unknown	63	11,921	50.8	40.7	0.0
Home Purchase Loans					
Low	1	120	2.2	1.1	21.0
Moderate	3	550	6.5	4.9	17.6
Middle	0	0	0.0	0.0	19.6
Upper	25	6,903	54.3	62.1	41.9
Unknown	17	3,550	37.0	31.9	0.0
Home Refinance Loans					
Low	1	26	1.4	0.1	21.0
Moderate	1	54	1.4	0.3	17.6
Middle	0	0	0.0	0.0	19.6
Upper	27	9,620	37.0	54.3	41.9
Unknown	44	8,027	60.3	45.3	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	21.0
Moderate	0	0	0.0	0.0	17.6
Middle	1	7	25.0	2.0	19.6
Upper	2	95	50.0	26.9	41.9
Unknown	1	251	25.0	71.1	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES TULSA OKLAHOMA MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	2	351	1.6	1.2	5.4
Moderate	19	1,513	15.3	5.2	20.6
Middle	25	2,898	20.2	9.9	31.6
Upper	78	24,534	62.9	83.7	42.5
Home Purchase Loans					
Low	0	0	0.0	0.0	5.4
Moderate	7	636	15.2	5.7	20.6
Middle	8	1,037	17.4	9.3	31.6
Upper	31	9,450	67.4	85.0	42.5
Home Refinance Loans					
Low	2	351	2.7	2.0	5.4
Moderate	10	619	13.7	3.5	20.6
Middle	16	1,768	21.9	10.0	31.6
Upper	45	14,989	61.6	84.6	42.5
Home Improvement Loans					
Low	0	0	0.0	0.0	5.4
Moderate	2	258	50.0	73.1	20.6
Middle	0	0	0.0	0.0	31.6
Upper	2	95	50.0	26.9	42.5
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	11.0
Moderate	0	0	0.0	0.0	34.3
Middle	1	93	100.0	100.0	28.5
Upper	0	0	0.0	0.0	26.2

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE TULSA OKLAHOMA MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	51	10,167	34.0	28.5	88.5
Over \$1MM	54	15,848	36.0	44.4	8.2
Not Known	45	9,652	30.0	27.1	3.3

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY TULSA OKLAHOMA MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	6	822	4.0	2.3	7.2
Moderate	26	9,024	17.3	25.3	24.8
Middle	34	10,826	22.7	30.4	28.7
Upper	84	14,996	56.0	42.0	39.3

L. 2013 Limited Review Missouri MSA AAs

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS CAPE GIRARDEAU-JACKSON MISSOURI-ILLINOIS MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	12	661	12.4	5.9	17.7
Moderate	12	1,122	12.4	10.0	17.2
Middle	15	1,450	15.5	13.0	22.2
Upper	42	6,277	43.3	56.1	42.9
Unknown	16	1,680	16.5	15.0	0.0
Home Purchase Loans					
Low	2	134	6.7	3.5	17.7
Moderate	0	0	0.0	0.0	17.2
Middle	8	904	26.7	23.7	22.2
Upper	13	2,135	43.3	55.9	42.9
Unknown	7	648	23.3	17.0	0.0
Home Refinance Loans					
Low	10	527	17.5	7.8	17.7
Moderate	12	1,122	21.1	16.7	17.2
Middle	6	496	10.5	7.4	22.2
Upper	21	3,685	36.8	54.7	42.9
Unknown	8	904	14.0	13.4	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	17.7
Moderate	0	0	0.0	0.0	17.2
Middle	1	50	11.1	9.9	22.2
Upper	8	457	88.9	90.1	42.9

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES CAPE GIRARDEAU-JACKSON MISSOURI-ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	1.5
Moderate	16	1,524	16.5	13.6	6.1
Middle	43	4,411	44.3	39.4	60.7
Upper	38	5,255	39.2	47.0	31.8
Home Purchase Loans					
Low	0	0	0.0	0.0	1.5
Moderate	7	455	23.3	11.9	6.1
Middle	14	1,618	46.7	42.3	60.7
Upper	9	1,748	30.0	45.7	31.8
Home Refinance Loans					
Low	0	0	0.0	0.0	1.5
Moderate	8	941	14.0	14.0	6.1
Middle	25	2,596	43.9	38.6	60.7
Upper	24	3,197	42.1	47.5	31.8
Home Improvement Loans					
Low	0	0	0.0	0.0	1.5
Moderate	0	0	0.0	0.0	6.1
Middle	4	197	44.4	38.9	60.7
Upper	5	310	55.6	61.1	31.8
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	8.4
Moderate	1	128	100.0	100.0	29.4
Middle	0	0	0.0	0.0	46.8
Upper	0	0	0.0	0.0	15.3

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE CAPE GIRARDEAU-JACKSON MISSOURI-ILLINOIS MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	77	5,727	65.3	41.6	88.1
Over \$1MM	39	7,999	33.1	58.1	8.5
Not Known	2	53	1.7	0.4	3.3
SF Loans					
\$1MM or less	35	2,851	89.7	85.4	99.7
Over \$1MM	2	422	5.1	12.6	0.3
Not Known	2	67	5.1	2.0	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY CAPE GIRARDEAU-JACKSON MISSOURI-ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	3	972	2.5	7.1	3.6
Moderate	4	591	3.4	4.3	9.2
Middle	92	10,206	78.0	74.1	64.0
Upper	19	2,010	16.1	14.6	23.2
SF Loans					
Low	0	0	0.0	0.0	0.6
Moderate	0	0	0.0	0.0	0.3
Middle	26	1,767	66.7	52.9	67.8
Upper	13	1,573	33.3	47.1	31.3

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS JEFFERSON CITY MISSOURI MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	633	5.9	9.6	23.5
Moderate	10	951	19.6	14.4	17.7
Middle	8	823	15.7	12.4	31.8
Upper	16	2,493	31.4	37.6	27.0
Unknown	14	1,725	27.5	26.0	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	23.5
Moderate	1	80	9.1	5.4	17.7
Middle	2	225	18.2	15.2	31.8
Upper	4	959	36.4	64.9	27.0
Unknown	4	213	36.4	14.4	0.0
Home Refinance Loans					
Low	3	633	8.3	12.4	23.5
Moderate	9	871	25.0	17.1	17.7
Middle	5	583	13.9	11.4	31.8
Upper	9	1,496	25.0	29.4	27.0
Unknown	10	1,512	27.8	29.7	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	23.5
Moderate	0	0	0.0	0.0	17.7
Middle	1	15	25.0	28.3	31.8
Upper	3	38	75.0	71.7	27.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES JEFFERSON CITY MISSOURI MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	51	6,625	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	11	1,477	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	36	5,095	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	4	53	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE JEFFERSON CITY MISSOURI MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	64	6,325	84.2	77.5	92.4
Over \$1MM	6	1,545	7.9	18.9	4.6
Not Known	6	294	7.9	3.6	3.0
SF Loans					
\$1MM or less	89	9,363	90.8	91.7	99.4
Over \$1MM	2	300	2.0	2.9	0.6
Not Known	7	553	7.1	5.4	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY JEFFERSON CITY MISSOURI MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	76	8,164	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	98	10,216	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS JOPLIN MISSOURI MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	1	15	1.4	0.1	20.3
Moderate	3	94	4.1	0.6	19.0
Middle	13	1,267	17.8	8.2	19.9
Upper	34	4,612	46.6	29.9	40.8
Unknown	22	9,437	30.1	61.2	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	20.3
Moderate	0	0	0.0	0.0	19.0
Middle	5	636	27.8	18.3	19.9
Upper	11	1,903	61.1	54.7	40.8
Unknown	2	940	11.1	27.0	0.0
Home Refinance Loans					
Low	0	0	0.0	0.0	20.3
Moderate	2	87	4.5	1.5	19.0
Middle	7	486	15.9	8.1	19.9
Upper	18	2,561	40.9	42.9	40.8
Unknown	17	2,833	38.6	47.5	0.0
Home Improvement Loans					
Low	1	15	12.5	4.8	20.3
Moderate	1	7	12.5	2.2	19.0
Middle	1	145	12.5	46.0	19.9
Upper	5	148	62.5	47.0	40.8

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES JOPLIN MISSOURI MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	12	2,201	16.4	14.3	10.4
Middle	53	10,008	72.6	64.9	82.1
Upper	8	3,216	11.0	20.8	7.5
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	3	267	16.7	7.7	10.4
Middle	12	2,463	66.7	70.8	82.1
Upper	3	749	16.7	21.5	7.5
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	7	1,375	15.9	23.0	10.4
Middle	34	3,833	77.3	64.2	82.1
Upper	3	759	6.8	12.7	7.5
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	15	12.5	4.8	10.4
Middle	6	265	75.0	84.1	82.1
Upper	1	35	12.5	11.1	7.5
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	1	544	33.3	9.6	24.7
Middle	1	3,447	33.3	60.9	72.0
Upper	1	1,673	33.3	29.5	3.3

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE JOPLIN MISSOURI MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	34	7,080	38.2	32.0	91.2
Over \$1MM	19	5,577	21.3	25.2	5.7
Not Known	36	9,456	40.4	42.8	3.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY JOPLIN MISSOURI MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	14	3,518	15.7	15.9	15.2
Middle	66	17,077	74.2	77.2	77.6
Upper	9	1,518	10.1	6.9	7.2
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	1.1
Middle	9	1,606	100.0	100.0	96.2
Upper	0	0	0.0	0.0	2.7

M. 2013 Limited Review Missouri nonMSA AAs

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS COMBINED RURAL MISSOURI AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	21	874	7.4	2.8	19.2
Moderate	36	2,425	12.6	7.8	18.0
Middle	57	3,922	20.0	12.7	21.7
Upper	125	17,006	43.9	54.9	41.0
Unknown	46	6,737	16.1	21.8	0.0
Home Purchase Loans					
Low	2	76	3.1	0.8	19.2
Moderate	9	735	14.1	8.0	18.0
Middle	12	1,041	18.8	11.3	21.7
Upper	32	5,886	50.0	63.7	41.0
Unknown	9	1,497	14.1	16.2	0.0
Home Refinance Loans					
Low	15	743	7.9	3.8	19.2
Moderate	25	1,633	13.2	8.3	18.0
Middle	36	2,723	18.9	13.8	21.7
Upper	81	10,768	42.6	54.8	41.0
Unknown	33	3,799	17.4	19.3	0.0
Home Improvement Loans					
Low	4	55	14.3	5.8	19.2
Moderate	2	57	7.1	6.0	18.0
Middle	9	158	32.1	16.7	21.7
Upper	12	352	42.9	37.2	41.0
Unknown	1	325	3.6	34.3	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES COMBINED RURAL MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	76	1.1	0.2	0.7
Moderate	19	1,305	6.7	4.2	8.8
Middle	216	24,534	75.8	79.2	75.2
Upper	47	5,049	16.5	16.3	15.2
Home Purchase Loans					
Low	0	0	0.0	0.0	0.7
Moderate	2	159	3.1	1.7	8.8
Middle	49	7,141	76.6	77.3	75.2
Upper	13	1,935	20.3	21.0	15.2
Home Refinance Loans					
Low	3	76	1.6	0.4	0.7
Moderate	16	1,114	8.4	5.7	8.8
Middle	144	15,479	75.8	78.7	75.2
Upper	27	2,997	14.2	15.2	15.2
Home Improvement Loans					
Low	0	0	0.0	0.0	0.7
Moderate	1	32	3.6	3.4	8.8
Middle	20	798	71.4	84.3	75.2
Upper	7	117	25.0	12.4	15.2
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	8.2
Middle	3	1,116	100.0	100.0	62.0
Upper	0	0	0.0	0.0	29.9

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE COMBINED RURAL MISSOURI AAs					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	201	12,455	69.6	45.8	91.2
Over \$1MM	46	10,184	15.9	37.4	5.3
Not Known	42	4,564	14.5	16.8	3.5
SF Loans					
\$1MM or less	223	15,200	82.9	83.1	99.6
Over \$1MM	15	2,211	5.6	12.1	0.3
Not Known	31	871	11.5	4.8	0.1

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY COMBINED RURAL MISSOURI AAs					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	1	37	0.3	0.1	0.8
Moderate	22	1,161	7.6	4.3	7.5
Middle	231	23,023	79.9	84.6	74.9
Upper	35	2,982	12.1	11.0	16.9
SF Loans					
Low	0	0	0.0	0.0	0.1
Moderate	18	1,948	6.7	10.7	8.5
Middle	223	13,879	82.9	75.9	77.2
Upper	28	2,455	10.4	13.4	14.2

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL BARRY-LAWRENCE COUNTY MISSOURI AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	117	8.3	2.0	20.3
Moderate	5	385	13.9	6.6	18.0
Middle	4	512	11.1	8.8	23.7
Upper	18	2,964	50.0	50.8	38.0
Unknown	6	1,855	16.7	31.8	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	20.3
Moderate	1	67	6.7	2.3	18.0
Middle	3	304	20.0	10.5	23.7
Upper	9	1,774	60.0	61.2	38.0
Unknown	2	753	13.3	26.0	0.0
Home Refinance Loans					
Low	3	117	16.7	5.8	20.3
Moderate	4	318	22.2	15.8	18.0
Middle	1	208	5.6	10.3	23.7
Upper	8	1,183	44.4	58.8	38.0
Unknown	2	186	11.1	9.2	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	20.3
Moderate	0	0	0.0	0.0	18.0
Middle	0	0	0.0	0.0	23.7
Upper	1	7	100.0	100.0	38.0
Unknown	0	0	0.0	0.0	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL BARRY-LAWRENCE COUNTY MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	3	237	8.3	4.1	7.4
Middle	33	5,596	91.7	95.9	92.6
Upper	0	0	0.0	0.0	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	101	6.7	3.5	7.4
Middle	14	2,797	93.3	96.5	92.6
Upper	0	0	0.0	0.0	0.0
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	2	136	11.1	6.8	7.4
Middle	16	1,876	88.9	93.2	92.6
Upper	0	0	0.0	0.0	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	7.4
Middle	1	7	100.0	100.0	92.6
Upper	0	0	0.0	0.0	0.0
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	14.2
Middle	2	916	100.0	100.0	85.8
Upper	0	0	0.0	0.0	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL BARRY-LAWRENCE COUNTY MISSOURI AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	36	3,350	80.0	47.2	91.4
Over \$1MM	5	1,654	11.1	23.3	4.9
Not Known	4	2,090	8.9	29.5	3.7
SF Loans					
\$1MM or less	36	3,293	78.3	75.7	99.5
Over \$1MM	8	1,024	17.4	23.6	0.5
Not Known	2	31	4.3	0.7	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL BARRY-LAWRENCE COUNTY MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	38	2.2	0.5	6.7
Middle	44	7,056	97.8	99.5	93.3
Upper	0	0	0.0	0.0	0.0
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	15	1,511	32.6	34.8	4.9
Middle	31	2,837	67.4	65.2	95.1
Upper	0	0	0.0	0.0	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL HANNIBAL MISSOURI AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	4	134	6.7	2.3	15.2
Moderate	4	387	6.7	6.7	14.8
Middle	13	636	21.7	11.1	22.5
Upper	27	3,442	45.0	59.9	47.5
Unknown	12	1,144	20.0	19.9	0.0
Home Purchase Loans					
Low	2	76	10.0	3.3	15.2
Moderate	3	348	15.0	15.1	14.8
Middle	4	205	20.0	8.9	22.5
Upper	8	1,345	40.0	58.3	47.5
Unknown	3	333	15.0	14.4	0.0
Home Refinance Loans					
Low	1	53	3.0	1.9	15.2
Moderate	1	39	3.0	1.4	14.8
Middle	7	414	21.2	14.7	22.5
Upper	17	2,033	51.5	72.0	47.5
Unknown	7	286	21.2	10.1	0.0
Home Improvement Loans					
Low	1	5	16.7	1.2	15.2
Moderate	0	0	0.0	0.0	14.8
Middle	2	17	33.3	4.1	22.5
Upper	2	64	33.3	15.6	47.5
Unknown	1	325	16.7	79.1	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL HANNIBAL MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	35	3,187	58.3	55.5	57.1
Upper	25	2,556	41.7	44.5	42.9
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	10	1,050	50.0	45.5	57.1
Upper	10	1,257	50.0	54.5	42.9
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	21	1,597	63.6	56.5	57.1
Upper	12	1,228	36.4	43.5	42.9
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	3	340	50.0	82.7	57.1
Upper	3	71	50.0	17.3	42.9
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	1	200	100.0	100.0	73.7
Upper	0	0	0.0	0.0	26.3

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL HANNIBAL MISSOURI AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	45	1,836	77.6	55.0	90.6
Over \$1MM	6	1,200	10.3	36.0	5.5
Not Known	7	300	12.1	9.0	3.9
SF Loans					
\$1MM or less	27	2,464	81.8	96.0	100.0
Over \$1MM	0	0	0.0	0.0	0.0
Not Known	6	104	18.2	4.0	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL HANNIBAL MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	32	1,286	55.2	38.5	56.5
Upper	26	2,050	44.8	61.5	43.5
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	7	279	21.2	10.9	53.2
Upper	26	2,289	78.8	89.1	46.8

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL LEBANON MISSOURI AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	8	493	8.5	4.0	17.6
Moderate	12	940	12.8	7.6	19.1
Middle	18	1,418	19.1	11.5	23.0
Upper	43	6,997	45.7	56.8	40.3
Unknown	13	2,468	13.8	20.0	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	17.6
Moderate	4	190	20.0	6.9	19.1
Middle	2	277	10.0	10.1	23.0
Upper	11	2,109	55.0	76.8	40.3
Unknown	3	169	15.0	6.2	0.0
Home Refinance Loans					
Low	8	493	12.7	5.3	17.6
Moderate	8	750	12.7	8.1	19.1
Middle	11	1,016	17.5	11.0	23.0
Upper	26	4,662	41.3	50.6	40.3
Unknown	10	2,299	15.9	24.9	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	17.6
Moderate	0	0	0.0	0.0	19.1
Middle	5	125	45.5	35.6	23.0
Upper	6	226	54.5	64.4	40.3

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL LEBANON MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	5	284	5.3	2.3	4.1
Middle	80	10,174	85.1	82.6	78.9
Upper	9	1,858	9.6	15.1	17.0
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	58	5.0	2.1	4.1
Middle	17	2,109	85.0	76.8	78.9
Upper	2	578	10.0	21.1	17.0
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	4	226	6.3	2.5	4.1
Middle	53	7,729	84.1	83.8	78.9
Upper	6	1,265	9.5	13.7	17.0
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	4.1
Middle	10	336	90.9	95.7	78.9
Upper	1	15	9.1	4.3	17.0

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL LEBANON MISSOURI AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	87	5,230	66.4	45.8	92.3
Over \$1MM	21	4,700	16.0	41.1	4.4
Not Known	23	1,500	17.6	13.1	3.3
SF Loans					
\$1MM or less	157	9,312	85.8	86.3	99.2
Over \$1MM	4	775	2.2	7.2	0.4
Not Known	22	701	12.0	6.5	0.4

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL LEBANON MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	9	636	6.9	5.6	3.0
Middle	120	10,434	91.6	91.3	79.0
Upper	2	360	1.5	3.1	18.0
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	125	0.5	1.2	1.1
Middle	182	10,663	99.5	98.8	92.3
Upper	0	0	0.0	0.0	6.5

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL POPLAR BLUFF MISSOURI AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	50	6.4	1.2	25.1
Moderate	4	269	8.5	6.5	17.8
Middle	6	489	12.8	11.9	17.5
Upper	20	2,172	42.6	52.7	39.6
Unknown	14	1,142	29.8	27.7	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	25.1
Moderate	1	130	16.7	15.4	17.8
Middle	1	150	16.7	17.8	17.5
Upper	3	322	50.0	38.2	39.6
Unknown	1	242	16.7	28.7	0.0
Home Refinance Loans					
Low	2	40	5.4	1.3	25.1
Moderate	2	89	5.4	2.8	17.8
Middle	4	330	10.8	10.4	17.5
Upper	16	1,825	43.2	57.3	39.6
Unknown	13	900	35.1	28.3	0.0
Home Improvement Loans					
Low	1	10	25.0	10.6	25.1
Moderate	1	50	25.0	53.2	17.8
Middle	1	9	25.0	9.6	17.5
Upper	1	25	25.0	26.6	39.6

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL POPLAR BLUFF MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	76	6.4	1.8	5.5
Moderate	7	677	14.9	16.4	22.1
Middle	33	3,183	70.2	77.2	60.1
Upper	4	186	8.5	4.5	12.3
Home Purchase Loans					
Low	0	0	0.0	0.0	5.5
Moderate	0	0	0.0	0.0	22.1
Middle	5	744	83.3	88.2	60.1
Upper	1	100	16.7	11.8	12.3
Home Refinance Loans					
Low	3	76	8.1	2.4	5.5
Moderate	7	677	18.9	21.3	22.1
Middle	25	2,354	67.6	73.9	60.1
Upper	2	77	5.4	2.4	12.3
Home Improvement Loans					
Low	0	0	0.0	0.0	5.5
Moderate	0	0	0.0	0.0	22.1
Middle	3	85	75.0	90.4	60.1
Upper	1	9	25.0	9.6	12.3

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL POPLAR BLUFF MISSOURI AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	24	1,895	63.2	50.8	89.8
Over \$1MM	8	1,450	21.1	38.9	7.1
Not Known	6	385	15.8	10.3	3.1
SF Loans					
\$1MM or less	3	131	42.9	22.7	100.0
Over \$1MM	3	412	42.9	71.3	0.0
Not Known	1	35	14.3	6.1	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL POPLAR BLUFF MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	1	37	2.6	1.0	6.0
Moderate	12	487	31.6	13.1	19.9
Middle	21	2,987	55.3	80.1	62.3
Upper	4	219	10.5	5.9	11.8
SF Loans					
Low	0	0	0.0	0.0	0.5
Moderate	2	312	28.6	54.0	38.2
Middle	3	100	42.9	17.3	56.5
Upper	2	166	28.6	28.7	4.8

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL ST. FRANCOIS MISSOURI AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	80	6.3	2.7	18.9
Moderate	11	444	22.9	15.1	18.6
Middle	16	867	33.3	29.4	20.1
Upper	17	1,431	35.4	48.5	42.4
Unknown	1	128	2.1	4.3	0.0
Home Purchase Loans					
Low	0	0	0.0	0.0	18.9
Moderate	0	0	0.0	0.0	18.6
Middle	2	105	66.7	23.8	20.1
Upper	1	336	33.3	76.2	42.4
Home Refinance Loans					
Low	1	40	2.6	1.6	18.9
Moderate	10	437	25.6	18.0	18.6
Middle	13	755	33.3	31.1	20.1
Upper	14	1,065	35.9	43.9	42.4
Unknown	1	128	2.6	5.3	0.0
Home Improvement Loans					
Low	2	40	33.3	47.6	18.9
Moderate	1	7	16.7	8.3	18.6
Middle	1	7	16.7	8.3	20.1
Upper	2	30	33.3	35.7	42.4

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL ST. FRANCOIS MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	4	107	8.3	3.6	13.4
Middle	35	2,394	72.9	81.2	70.8
Upper	9	449	18.8	15.2	15.8
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	13.4
Middle	3	441	100.0	100.0	70.8
Upper	0	0	0.0	0.0	15.8
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	3	75	7.7	3.1	13.4
Middle	29	1,923	74.4	79.3	70.8
Upper	7	427	17.9	17.6	15.8
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	32	16.7	38.1	13.4
Middle	3	30	50.0	35.7	70.8
Upper	2	22	33.3	26.2	15.8

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL ST. FRANCOIS MISSOURI AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	9	144	52.9	8.9	90.6
Over \$1MM	6	1,180	35.3	73.2	5.7
Not Known	2	289	11.8	17.9	3.8

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL ST. FRANCOIS MISSOURI AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	12.0
Middle	14	1,260	82.4	78.1	68.5
Upper	3	353	17.6	21.9	19.5

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DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS MANHATTAN KANSAS MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	5	297	8.8	3.7	17.4
Moderate	3	156	5.3	1.9	18.2
Middle	7	993	12.3	12.3	21.5
Upper	28	4,717	49.1	58.2	42.9
Unknown	14	1,938	24.6	23.9	0.0
Home Purchase Loans					
Low	3	209	15.0	6.3	17.4
Moderate	1	85	5.0	2.6	18.2
Middle	4	814	20.0	24.7	21.5
Upper	10	2,042	50.0	61.8	42.9
Unknown	2	152	10.0	4.6	0.0
Home Refinance Loans					
Low	1	80	4.2	2.0	17.4
Moderate	2	71	8.3	1.8	18.2
Middle	2	154	8.3	3.9	21.5
Upper	13	2,589	54.2	64.9	42.9
Unknown	6	1,098	25.0	27.5	0.0
Home Improvement Loans					
Low	1	8	11.1	3.8	17.4
Moderate	0	0	0.0	0.0	18.2
Middle	1	25	11.1	12.0	21.5
Upper	5	86	55.6	41.1	42.9
Unknown	2	90	22.2	43.1	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES MANHATTAN KANSAS MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	3	192	5.3	2.4	7.5
Middle	28	2,804	49.1	34.6	57.7
Upper	26	5,105	45.6	63.0	34.8
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	96	5.0	2.9	7.5
Middle	13	1,562	65.0	47.3	57.7
Upper	6	1,644	30.0	49.8	34.8
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	80	4.2	2.0	7.5
Middle	7	521	29.2	13.1	57.7
Upper	16	3,391	66.7	84.9	34.8
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	16	11.1	7.7	7.5
Middle	4	123	44.4	58.9	57.7
Upper	4	70	44.4	33.5	34.8
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	13.5
Middle	4	598	100.0	100.0	65.1
Upper	0	0	0.0	0.0	21.3

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE MANHATTAN KANSAS MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	45	7,163	64.3	64.0	88.9
Over \$1MM	15	3,324	21.4	29.7	7.3
Not Known	10	713	14.3	6.4	3.8
SF Loans					
\$1MM or less	2	103	66.7	88.0	98.8
Over \$1MM	0	0	0.0	0.0	1.2
Not Known	1	14	33.3	12.0	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY MANHATTAN KANSAS MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	15	4,445	21.4	39.7	15.5
Middle	31	2,999	44.3	26.8	51.1
Upper	24	3,756	34.3	33.5	33.4
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.7
Middle	2	103	66.7	88.0	77.5
Upper	1	14	33.3	12.0	21.8

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DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS COMBINED RURAL KANSAS AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	10	459	6.6	2.7	18.3
Moderate	17	959	11.2	5.7	19.1
Middle	34	2,397	22.4	14.3	23.2
Upper	62	7,798	40.8	46.4	39.3
Unknown	29	5,180	19.1	30.8	0.0
Home Purchase Loans					
Low	4	225	9.1	4.7	18.3
Moderate	6	568	13.6	11.8	19.1
Middle	7	810	15.9	16.8	23.2
Upper	17	2,385	38.6	49.5	39.3
Unknown	10	827	22.7	17.2	0.0
Home Refinance Loans					
Low	5	224	6.3	2.2	18.3
Moderate	7	248	8.9	2.4	19.1
Middle	21	1,535	26.6	14.8	23.2
Upper	33	4,654	41.8	44.9	39.3
Unknown	13	3,699	16.5	35.7	0.0
Home Improvement Loans					
Low	1	10	3.8	0.9	18.3
Moderate	4	143	15.4	13.3	19.1
Middle	6	52	23.1	4.8	23.2
Upper	12	759	46.2	70.7	39.3
Unknown	3	109	11.5	10.2	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES COMBINED RURAL KANSAS AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	13	1,367	8.6	8.1	14.4
Middle	101	10,069	66.4	60.0	68.8
Upper	38	5,357	25.0	31.9	16.8
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	5	267	11.4	5.5	14.4
Middle	24	2,443	54.5	50.7	68.8
Upper	15	2,105	34.1	43.7	16.8
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	7	1,089	8.9	10.5	14.4
Middle	57	6,963	72.2	67.2	68.8
Upper	15	2,308	19.0	22.3	16.8
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	11	3.8	1.0	14.4
Middle	18	481	69.2	44.8	68.8
Upper	7	581	26.9	54.1	16.8
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	19.7
Middle	2	182	66.7	33.4	50.4
Upper	1	363	33.3	66.6	30.0

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE COMBINED RURAL KANSAS AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	182	13,904	61.5	36.3	88.7
Over \$1MM	96	23,343	32.4	60.9	7.7
Not Known	18	1,088	6.1	2.8	3.6
SF Loans					
\$1MM or less	171	17,517	81.8	75.9	98.7
Over \$1MM	18	4,738	8.6	20.5	1.3
Not Known	20	823	9.6	3.6	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY COMBINED RURAL KANSAS AAs					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	39	5,160	13.2	13.5	16.8
Middle	175	21,435	59.1	55.9	67.1
Upper	82	11,740	27.7	30.6	16.0
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	5	452	2.4	2.0	8.3
Middle	181	20,319	86.6	88.0	80.4
Upper	23	2,307	11.0	10.0	11.3

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL GARDEN CITY KANSAS AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	2	104	6.5	1.9	14.9
Moderate	4	266	12.9	4.9	17.3
Middle	5	216	16.1	4.0	25.2
Upper	17	2,631	54.8	48.3	42.6
Unknown	3	2,231	9.7	41.0	0.0
Home Purchase Loans					
Low	1	58	11.1	4.5	14.9
Moderate	2	199	22.2	15.3	17.3
Middle	0	0	0.0	0.0	25.2
Upper	5	977	55.6	75.0	42.6
Unknown	1	68	11.1	5.2	0.0
Home Refinance Loans					
Low	1	46	6.3	1.2	14.9
Moderate	2	67	12.5	1.8	17.3
Middle	3	199	18.8	5.4	25.2
Upper	9	1,580	56.3	42.8	42.6
Unknown	1	1,800	6.3	48.8	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	14.9
Moderate	0	0	0.0	0.0	17.3
Middle	2	17	40.0	18.7	25.2
Upper	3	74	60.0	81.3	42.6

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL GARDEN CITY KANSAS AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	19	3,181	61.3	58.4	83.6
Upper	12	2,267	38.7	41.6	16.4
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	4	484	44.4	37.2	83.6
Upper	5	818	55.6	62.8	16.4
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	11	2,613	68.8	70.8	83.6
Upper	5	1,079	31.3	29.2	16.4
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	4	84	80.0	92.3	83.6
Upper	1	7	20.0	7.7	16.4
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	0	0	0.0	0.0	32.7
Upper	1	363	100.0	100.0	67.3

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL GARDEN CITY KANSAS AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
\$1MM or less	53	7,573	70.7	60.4	95.2
Over \$1MM	18	4,738	24.0	37.8	4.8
Not Known	4	225	5.3	1.8	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL GARDEN CITY KANSAS AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	66	9,736	76.7	71.4	85.0
Upper	20	3,893	23.3	28.6	15.0
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	72	11,961	96.0	95.4	83.7
Upper	3	575	4.0	4.6	16.3

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL HAYES KANSAS AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	1	50	5.0	2.0	13.1
Moderate	3	326	15.0	13.1	14.3
Middle	3	334	15.0	13.5	22.8
Upper	8	1,327	40.0	53.5	49.8
Unknown	5	443	25.0	17.9	0.0
Home Purchase Loans					
Low	1	50	11.1	3.9	13.1
Moderate	2	266	22.2	20.6	14.3
Middle	2	324	22.2	25.1	22.8
Upper	3	538	33.3	41.7	49.8
Unknown	1	112	11.1	8.7	0.0
Home Refinance Loans					
Low	0	0	0.0	0.0	13.1
Moderate	0	0	0.0	0.0	14.3
Middle	0	0	0.0	0.0	22.8
Upper	3	362	50.0	62.5	49.8
Unknown	3	217	50.0	37.5	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	13.1
Moderate	1	60	25.0	12.1	14.3
Middle	1	10	25.0	2.0	22.8
Upper	2	427	50.0	85.9	49.8

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL HAYES KANSAS AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	13	1,470	65.0	59.3	57.3
Upper	7	1,010	35.0	40.7	42.7
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	7	926	77.8	71.8	57.3
Upper	2	364	22.2	28.2	42.7
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	5	430	83.3	74.3	57.3
Upper	1	149	16.7	25.7	42.7
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	0	0	0.0	0.0	57.3
Upper	4	497	100.0	100.0	42.7
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	1	114	100.0	100.0	65.4
Upper	0	0	0.0	0.0	34.6

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL HAYES KANSAS AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
\$1MM or less	65	6,144	95.6	97.3	99.1
Over \$1MM	0	0	0.0	0.0	0.9
Not Known	3	173	4.4	2.7	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL HAYES KANSAS AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	48	5,714	64.9	69.1	67.8
Upper	26	2,560	35.1	30.9	32.2
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	48	4,585	70.6	72.6	61.8
Upper	20	1,732	29.4	27.4	38.2

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL HUTCHINSON KANSAS AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	1	54	11.1	4.1	20.3
Moderate	2	90	22.2	6.8	19.8
Middle	0	0	0.0	0.0	23.0
Upper	6	1,181	66.7	89.1	36.9
Home Purchase Loans					
Low	1	54	50.0	24.8	20.3
Moderate	0	0	0.0	0.0	19.8
Middle	0	0	0.0	0.0	23.0
Upper	1	164	50.0	75.2	36.9
Home Refinance Loans					
Low	0	0	0.0	0.0	20.3
Moderate	1	23	25.0	2.3	19.8
Middle	0	0	0.0	0.0	23.0
Upper	3	997	75.0	97.7	36.9
Home Improvement Loans					
Low	0	0	0.0	0.0	20.3
Moderate	1	67	33.3	77.0	19.8
Middle	0	0	0.0	0.0	23.0
Upper	2	20	66.7	23.0	36.9

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL HUTCHINSON KANSAS AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	2	101	22.2	7.6	37.5
Middle	4	983	44.4	74.2	42.3
Upper	3	241	33.3	18.2	20.2
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	54	50.0	24.8	37.5
Middle	0	0	0.0	0.0	42.3
Upper	1	164	50.0	75.2	20.2
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	47	25.0	4.6	37.5
Middle	3	973	75.0	95.4	42.3
Upper	0	0	0.0	0.0	20.2
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	37.5
Middle	1	10	33.3	11.5	42.3
Upper	2	77	66.7	88.5	20.2

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL HUTCHINSON KANSAS AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	21	1,471	52.5	22.1	88.3
Over \$1MM	18	5,180	45.0	77.8	8.0
Not Known	1	3	2.5	0.0	3.7
SF Loans					
\$1MM or less	4	512	80.0	95.3	99.8
Over \$1MM	0	0	0.0	0.0	0.2
Not Known	1	25	20.0	4.7	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL HUTCHINSON KANSAS AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	14	2,382	35.0	35.8	41.6
Middle	6	221	15.0	3.3	40.7
Upper	20	4,051	50.0	60.9	17.7
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	4	377	80.0	70.2	26.3
Middle	1	160	20.0	29.8	67.7
Upper	0	0	0.0	0.0	6.0

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS RURAL SOUTHEAST KANSAS AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	6	251	6.5	3.3	19.9
Moderate	8	277	8.7	3.7	21.0
Middle	26	1,847	28.3	24.5	22.7
Upper	31	2,659	33.7	35.3	36.4
Unknown	21	2,506	22.8	33.2	0.0
Home Purchase Loans					
Low	1	63	4.2	3.1	19.9
Moderate	2	103	8.3	5.1	21.0
Middle	5	486	20.8	24.2	22.7
Upper	8	706	33.3	35.2	36.4
Unknown	8	647	33.3	32.3	0.0
Home Refinance Loans					
Low	4	178	7.5	3.5	19.9
Moderate	4	158	7.5	3.1	21.0
Middle	18	1,336	34.0	26.4	22.7
Upper	18	1,715	34.0	33.8	36.4
Unknown	9	1,682	17.0	33.2	0.0
Home Improvement Loans					
Low	1	10	7.1	2.5	19.9
Moderate	2	16	14.3	4.0	21.0
Middle	3	25	21.4	6.3	22.7
Upper	5	238	35.7	59.8	36.4
Unknown	3	109	21.4	27.4	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES RURAL SOUTHEAST KANSAS AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	0	0	0.0	0.0	0.0
Moderate	11	1,266	12.0	16.8	6.4
Middle	65	4,435	70.7	58.8	87.6
Upper	16	1,839	17.4	24.4	6.0
Home Purchase Loans					
Low	0	0	0.0	0.0	0.0
Moderate	4	213	16.7	10.6	6.4
Middle	13	1,033	54.2	51.5	87.6
Upper	7	759	29.2	37.9	6.0
Home Refinance Loans					
Low	0	0	0.0	0.0	0.0
Moderate	6	1,042	11.3	20.6	6.4
Middle	38	2,947	71.7	58.1	87.6
Upper	9	1,080	17.0	21.3	6.0
Home Improvement Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	11	7.1	2.8	6.4
Middle	13	387	92.9	97.2	87.6
Upper	0	0	0.0	0.0	6.0
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	19.1
Middle	1	68	100.0	100.0	60.4
Upper	0	0	0.0	0.0	20.4

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE RURAL SOUTHEAST KANSAS AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	47	2,681	49.0	27.4	88.4
Over \$1MM	32	6,012	33.3	61.5	7.6
Not Known	17	1,085	17.7	11.1	3.9
SF Loans					
\$1MM or less	49	3,288	80.3	89.2	99.8
Over \$1MM	0	0	0.0	0.0	0.2
Not Known	12	400	19.7	10.8	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY RURAL SOUTHEAST KANSAS AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	0	0	0.0	0.0	0.0
Moderate	25	2,778	26.0	28.4	13.0
Middle	55	5,764	57.3	58.9	79.5
Upper	16	1,236	16.7	12.6	7.4
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	1	75	1.6	2.0	3.1
Middle	60	3,613	98.4	98.0	95.1
Upper	0	0	0.0	0.0	1.8

P. 2013 Limited Review Illinois MSA AAs

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS BLOOMINGTON-NORMAL ILLINOIS MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	13	745	11.5	6.2	19.1
Moderate	37	2,931	32.7	24.5	17.4
Middle	19	1,406	16.8	11.7	24.1
Upper	36	5,060	31.9	42.3	39.4
Unknown	8	1,831	7.1	15.3	0.0
Home Purchase Loans					
Low	4	269	15.4	7.4	19.1
Moderate	9	1,001	34.6	27.5	17.4
Middle	5	434	19.2	11.9	24.1
Upper	7	1,477	26.9	40.6	39.4
Unknown	1	458	3.8	12.6	0.0
Home Refinance Loans					
Low	9	476	12.3	6.8	19.1
Moderate	23	1,670	31.5	23.8	17.4
Middle	12	934	16.4	13.3	24.1
Upper	26	3,533	35.6	50.3	39.4
Unknown	3	410	4.1	5.8	0.0
Home Improvement Loans					
Low	0	0	0.0	0.0	19.1
Moderate	5	260	50.0	74.7	17.4
Middle	2	38	20.0	10.9	24.1
Upper	3	50	30.0	14.4	39.4

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES BLOOMINGTON-NORMAL ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	1	42	0.9	0.4	0.7
Moderate	15	1,670	13.3	13.9	13.7
Middle	72	6,810	63.7	56.9	61.5
Upper	25	3,451	22.1	28.8	24.2
Home Purchase Loans					
Low	0	0	0.0	0.0	0.7
Moderate	2	398	7.7	10.9	13.7
Middle	18	2,053	69.2	56.4	61.5
Upper	6	1,188	23.1	32.6	24.2
Home Refinance Loans					
Low	1	42	1.4	0.6	0.7
Moderate	10	1,224	13.7	17.4	13.7
Middle	46	3,584	63.0	51.0	61.5
Upper	16	2,173	21.9	30.9	24.2
Home Improvement Loans					
Low	0	0	0.0	0.0	0.7
Moderate	3	48	30.0	13.8	13.7
Middle	4	210	40.0	60.3	61.5
Upper	3	90	30.0	25.9	24.2
Multifamily Loans					% of Multifamily Units
Low	0	0	0.0	0.0	5.0
Moderate	0	0	0.0	0.0	11.4
Middle	4	963	100.0	100.0	64.8
Upper	0	0	0.0	0.0	16.8

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE BLOOMINGTON-NORMAL ILLINOIS MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	40	7,592	48.8	37.0	89.2
Over \$1MM	34	11,206	41.5	54.6	6.6
Not Known	8	1,736	9.8	8.5	4.2
SF Loans					
\$1MM or less	51	6,561	68.9	58.7	99.9
Over \$1MM	7	2,225	9.5	19.9	0.1
Not Known	16	2,392	21.6	21.4	0.0

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY BLOOMINGTON-NORMAL ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	8	2,326	9.8	11.3	5.5
Moderate	12	3,386	14.6	16.5	10.1
Middle	41	10,372	50.0	50.5	66.9
Upper	21	4,450	25.6	21.7	17.0
SF Loans					
Low	0	0	0.0	0.0	0.0
Moderate	2	325	2.7	2.9	2.2
Middle	68	10,351	91.9	92.6	92.4
Upper	4	502	5.4	4.5	5.4

DISTRIBUTION OF 2013 HMDA LOANS BY BORROWER INCOME LEVELS CHAMPAIGN-URBANA ILLINOIS MSA AA					
Borrower Income Level	Bank Loans				% of Families
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	3	130	20.0	2.7	21.5
Moderate	0	0	0.0	0.0	17.4
Middle	0	0	0.0	0.0	21.1
Upper	8	2,374	53.3	49.3	40.0
Unknown	4	2,313	26.7	48.0	0.0
Home Purchase Loans					
Low	1	51	11.1	2.2	21.5
Moderate	0	0	0.0	0.0	17.4
Middle	0	0	0.0	0.0	21.1
Upper	5	1,141	55.6	48.7	40.0
Unknown	3	1,151	33.3	49.1	0.0
Home Refinance Loans					
Low	2	79	33.3	3.2	21.5
Moderate	0	0	0.0	0.0	17.4
Middle	0	0	0.0	0.0	21.1
Upper	3	1,233	50.0	49.8	40.0
Unknown	1	1,162	16.7	47.0	0.0

DISTRIBUTION OF 2013 HMDA LOANS BY INCOME LEVEL OF GEOGRAPHIES CHAMPAIGN-URBANA ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Owner- occupied Units
	#	\$(000s)	# %	\$ %	
Total Home Mortgage Loans					
Low	1	51	6.7	1.1	2.4
Moderate	0	0	0.0	0.0	11.5
Middle	8	2,805	53.3	58.2	61.6
Upper	6	1,961	40.0	40.7	24.6
Home Purchase Loans					
Low	1	51	11.1	2.2	2.4
Moderate	0	0	0.0	0.0	11.5
Middle	5	1,478	55.6	63.1	61.6
Upper	3	814	33.3	34.7	24.6
Home Refinance Loans					
Low	0	0	0.0	0.0	2.4
Moderate	0	0	0.0	0.0	11.5
Middle	3	1,327	50.0	53.6	61.6
Upper	3	1,147	50.0	46.4	24.6

DISTRIBUTION OF 2013 SB / SF LOANS BY REVENUE SIZE CHAMPAIGN-URBANA ILLINOIS MSA AA					
Business/Farm Size by Revenue	Bank Loans				% of AA Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
\$1MM or less	8	2,227	47.1	55.8	89.2
Over \$1MM	8	1,741	47.1	43.6	6.4
Not Known	1	25	5.9	0.6	4.4

DISTRIBUTION OF 2013 SB / SF LOANS BY INCOME LEVEL OF GEOGRAPHY CHAMPAIGN-URBANA ILLINOIS MSA AA					
Census Tract Income Level	Bank Loans				% of Businesses/ Farms
	#	\$(000s)	# %	\$ %	
SB Loans					
Low	2	225	11.8	5.6	10.6
Moderate	4	454	23.5	11.4	17.9
Middle	5	1,860	29.4	46.6	47.2
Upper	6	1,454	35.3	36.4	23.3

**CRA APPENDIX E
Median Family Income Report**

<u>State- Year</u>	<u>MSA Code - Name</u>	<u>FFIEC Estimated MFI</u>
Missouri		
2011	16020 - CAPE GIRARDEAU-JACKSON, MO-IL	53,900
2012	16020 - CAPE GIRARDEAU-JACKSON, MO-IL	54,600
2013	16020 - CAPE GIRARDEAU-JACKSON, MO-IL	55,000
2011	17860 - COLUMBIA, MO	65,100
2012	17860 - COLUMBIA, MO	66,000
2013	17860 - COLUMBIA, MO	65,300
2011	27620 - JEFFERSON CITY, MO	65,000
2012	27620 - JEFFERSON CITY, MO	65,900
2013	27620 - JEFFERSON CITY, MO	65,700
2011	27900 - JOPLIN, MO	47,500
2012	27900 - JOPLIN, MO	48,200
2013	27900 - JOPLIN, MO	53,700
2011	28140 - KANSAS CITY, MO-KS	72,300
2012	28140 - KANSAS CITY, MO-KS	73,300
2013	28140 - KANSAS CITY, MO-KS	71,200
2011	41140 - ST. JOSEPH, MO-KS	55,700
2012	41140 - ST. JOSEPH, MO-KS	56,400
2013	41140 - ST. JOSEPH, MO-KS	59,300
2011	41180 - ST. LOUIS, MO-IL	69,500
2012	41180 - ST. LOUIS, MO-IL	70,400
2013	41180 - ST. LOUIS, MO-IL	69,200
2011	44180 - SPRINGFIELD, MO	54,700
2012	44180 - SPRINGFIELD, MO	55,400
2013	44180 - SPRINGFIELD, MO	53,200

<u>State- Year</u>	<u>MSA Code - Name</u>	<u>FFIEC Estimated MFI</u>
Kansas		
2011	29940 - LAWRENCE, KS	70,600
2012	29940 - LAWRENCE, KS	71,500
2013	29940 - LAWRENCE, KS	70,800
2011	31740 - MANHATTAN, KS	59,000
2012	31740 - MANHATTAN, KS	59,800
2013	31740 - MANHATTAN, KS	61,100
2011	48620 - WICHITA, KS	64,100
2012	48620 - WICHITA, KS	65,000
2013	48620 - WICHITA, KS	63,200
Illinois		
2011	14060 - BLOOMINGTON-NORMAL, IL	79,100
2012	14060 - BLOOMINGTON-NORMAL, IL	80,200
2013	14060 - BLOOMINGTON-NORMAL, IL	86,800
2011	16580 - CHAMPAIGN-URBANA, IL	67,100
2012	16580 - CHAMPAIGN-URBANA, IL	68,000
2013	16580 - CHAMPAIGN-URBANA, IL	72,000
2011	37900 - PEORIA, IL	68,200
2012	37900 - PEORIA, IL	69,100
2013	37900 - PEORIA, IL	66,600
Colorado		
2011	19740 - DENVER-AURORA-BROOMFIELD, CO	78,200
2012	19740 - DENVER-AURORA-BROOMFIELD, CO	79,300
2013	19740 - DENVER-AURORA-BROOMFIELD, CO	77,800
Oklahoma		
2011	46140 - TULSA, OK	59,600
2012	46140 - TULSA, OK	60,400
2013	46140 - TULSA, OK	59,700

State Non MSA Median Family Income used to Classify Borrowers

<u>Year</u>	<u>State Name</u>	<u>FFIEC Estimated MFI</u>
2011	MISSOURI	47,200
2012	MISSOURI	47,800
2013	MISSOURI	48,200
2011	KANSAS	53,700
2012	KANSAS	54,400
2013	KANSAS	55,200

CRA APPENDIX F

GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons and average about 4,000 inhabitants.

Combined Statistical Area (“CSA”): A CSA is a grouping of adjacent metropolitan statistical areas (“MSAs”) or an MSA with adjacent nonMSA counties, as defined by the Office of Management and Budget.

Community development: Includes affordable housing (including multifamily rental housing) for low- and moderate-income individuals; community services targeted to low- and moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies. Effective September 1, 2005, the Board of Governors of the Federal Reserve System, adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize (i) low- or moderate-income geographies; (ii) designated disaster areas; or (iii) distressed or underserved nonmetropolitan middle-income geographies designated by the Board, based on: (a) rates of poverty, unemployment, and population loss; or (b) population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, SB, or SF loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity 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 nonrelatives 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 review: Performance under the lending, investment and service tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity and responsiveness).

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

Home Mortgage Disclosure Act (“HMDA”): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include data such as race, gender and income of applications, amount of loan requested, and disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 review: Performance under the lending, investment and service tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is 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 metropolitan area/assessment area.

Metropolitan area (“MA”): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated area: A rated area is a state or multistate metropolitan 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 area, the institution will receive a rating for the multistate metropolitan 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"). 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 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.

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