

# **PUBLIC DISCLOSURE**

**December 1, 2003**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**Progress Bank of Missouri  
RSSD# 2576433**

**3 East Springfield  
Sullivan, Missouri 63080**

**Federal Reserve Bank of St. Louis**

**P.O. Box 442  
St. Louis, Missouri 63166-0442**

**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 the 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'S CRA RATING:** This institution is rated **SATISFACTORY**.

Progress Bank of Missouri (Progress Bank) meets the criteria for a satisfactory rating, based upon the performance evaluation of the bank's lending activity. Geographic distribution analysis reflects excellent dispersion throughout the bank's assessment area. Loan activity analysis reveals reasonable penetration among individuals of different income levels (including low- and moderate-income levels) and businesses of different sizes. The bank's loan-to-deposit ratio is more than reasonable given the bank's size, financial condition and assessment area credit needs. Lastly, a substantial majority of the bank's loans and other lending related activities are within the bank's assessment area.

**DESCRIPTION OF INSTITUTION<sup>1</sup>**

Progress Bank is a full-service, retail bank offering both consumer and commercial loan and deposit products. The bank's branch network consists of three branches (including the main office). In addition to being a full-service facility, the main office also has drive-up accessibility. The second branch office in Sullivan, Missouri, is also a full-service facility offering drive-up accessibility. The bank opened its third branch, a full-service facility with drive-up accessibility, in nearby Wright City, Missouri<sup>2</sup> in February 2002. The bank operates an automated teller machine (ATM) at each branch facility, all of which accept deposits and dispense cash. No branch offices or ATMs have been closed in the period between this CRA evaluation and the evaluation conducted as of November 29, 1999, by the Federal Deposit Insurance Corporation.

The bank opened for business in 1997, and is currently majority owned (71.0 percent) by Progress Bancshares Inc., a two-bank holding company headquartered in Sullivan, Missouri. The bank opened a mortgage company subsidiary in 1998, Progress Mortgage Company LLC, Sullivan, Missouri. Besides Progress Bank's "sister bank," First State Bank of St. Robert in St. Robert, Missouri, and mortgage company subsidiary, other key bank-related affiliates include: Branson Bank, Branson, Missouri; Maries County Bank, Vienna, Missouri; and parent company, Maries County Bancorp Inc., Vienna, Missouri.

The bank has the ability to meet the credit needs of its assessment area based on the bank's asset size, financial condition, and other resources. As of September 30, 2003, the bank reported total assets of \$100.6 million. As of the same date, outstanding loans and leases were \$84.6 million (84.1 percent of total assets) and deposits totaled \$84.2

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<sup>1</sup> Any percentage row or column "TOTAL" figure displayed throughout this evaluation that does not equal exactly 100 percent is strictly due to rounding differences, which are considered immaterial to overall performance conclusions.

<sup>2</sup> Wright City is approximately 55 miles north of Sullivan, Missouri.

million. The bank's loan portfolio composition by credit category is displayed in the following table.<sup>3</sup>

<b>Distribution of Total Loans</b>		
<b>Credit Product Type</b>	<b>Amount in \$000s</b>	<b>Percentage of Total Loans</b>
Construction and Development	\$ 1,706	2.0%
Commercial Real Estate	\$ 15,033	17.8%
Multifamily Residential	\$ 2,320	2.7%
1-4 Family Residential	\$ 41,277	48.8%
Farmland	\$ 2,677	3.2%
Farm Loans	\$ 506	0.6%
Commercial and Industrial	\$ 10,040	11.9%
Loans to Individuals	\$ 11,043	13.1%
Total Other Loans	\$ -	0.0%
<b>TOTAL</b>	<b>\$ 84,602</b>	<b>100%</b>

As indicated by the table above, a significant portion of the bank's lending resources is directed to loans secured by 1-4 family residential properties and commercial real estate loans.

As part of this evaluation under the CRA, the bank's performance was assessed in relation to the performance of local competitors. Three financial institutions were identified as regional competitors with asset sizes ranging from \$129.5 million to \$263.9 million.<sup>4</sup>

The bank received a satisfactory rating at its previous CRA evaluation conducted on November 29, 1999, by the Federal Deposit Insurance Corporation.

<sup>3</sup> For purposes of this table, total loan information is derived from gross loans and leases data reported on the Consolidated Report of Condition and Income as of September 30, 2003.

<sup>4</sup> These regional competitor asset sizes are as of September 30, 2003.

**DESCRIPTION OF ASSESSMENT AREA**

Based upon 1990 Census Data demographics and geographic boundaries, the bank’s assessment area is comprised of 18 geographies, which are located in the central portion of eastern Missouri. Of these 18 geographies, 13 are located within the extreme western portion of the St. Louis Metropolitan Statistical Area (MSA #7040). The remaining 5 geographies are contiguous to and just west of the St. Louis MSA (see Appendix A for addition detail regarding the composition of the bank’s assessment area). Also, based on 1990 Census Data, the total population of the assessment area was 122,920. Year 2000 Census Data reflect a population increase of 22,583 to a total population of 145,503 (an increase of 18.4 percent). The following table reflects the number and family population of the assessment area geographies for each income category.<sup>5</sup>

<b>Assessment Area Geographical Information by Income Category</b>					
<b>1990 Census Data</b>	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>TOTAL</b>
Assessment Area	0	4	14	0	<b>18</b>
Geographies	0.0%	22.2%	77.8%	0.0%	<b>100%</b>
Family Population	0	7,400	26,787	0	34,187
	0.0%	21.6%	78.4%	0.0%	<b>100%</b>

The previous table reveals that the largest portion of the bank’s assessment area family population resides in middle-income geographies. Further, the assessment area does not contain any low-income or upper-income designated geographies. Of the four geographies designated as moderate-income, three are located within Franklin County (within the St. Louis MSA) and one is located inside the non-MSA county of Crawford.

Based upon 1990 Census Data, the median family income for the assessment area was \$31,096, while the same figure for the state of Missouri was \$31,837. Year 2000 Census Data reflect median family income increased to \$46,742 (50.3 percent) and \$46,044 (44.6 percent), respectively. The following table displays population percentages of assessment area families by income level, as compared to the Missouri state family population as a whole.

<sup>5</sup> See the glossary in Appendix B for the definitions of the low-, moderate-, middle-, and upper-income categories.

<b>Assessment Area Family Population by Income Level</b>					
<b>1990 Census Data</b>	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>TOTAL</b>
Assessment Area	7,404	7,467	9,700	9,616	<b>34,187</b>
	21.7%	21.8%	28.4%	28.1%	<b>100%</b>
State of Missouri	267,134	246,338	330,039	534,509	<b>1,378,020</b>
	19.4%	17.9%	24.0%	38.8%	<b>100%</b>

As indicated in the previous table, the assessment area is slightly less affluent than the state of Missouri as a whole. The assessment area has higher percentages of both low- and moderate-income (LMI) category families and 10.7 percent less of upper-income families as compared to the state of Missouri. In addition, the first table in this section indicates that the vast majority of the assessment area families lived in middle-income geographies. However, this table reveals that a very significant portion of assessment area families (43.5 percent) are considered LMI, regardless of income category or the geography in which they live.

Housing in the assessment area is somewhat more affordable relative to the state of Missouri, as shown by a lower median gross rent value and also by a higher affordability ratio.<sup>6</sup> The 2000 median gross rent for the assessment area was \$455 per month compared to \$484 for the state. Further, the assessment area affordability ratio as of 2000 was 45.0 compared to the state figure of 43.0. Therefore, even though the assessment area appears to be slightly less affluent than the state as a whole, a greater portion of the assessment area appears to have better access to affordable housing.

The assessment area economy is diverse and is supported by a mixture of industries such as: service-oriented, construction, retail trade, and light and heavy manufacturing. Major employers in the assessment area include: AeroFil Technology, Inc. (approximately 300 employees), The Meramec Group, Ace Manufacturing and Parts Co., and Industrial Wire Products, Inc. Further, even though assessment area population growth increased significantly during the 1990s, employment has kept pace as evidenced by relatively low unemployment rates. As of September of 2003, the Missouri state unemployment rate was 5.3 percent, whereas unemployment rates for the three counties most pertinent to the bank's assessment area, ranged from 5.3 percent to 6.2 percent (the three county average was 5.7 percent).

One community contact interview was completed as part this CRA evaluation process, with an individual who worked in local government. During the interview, the contact categorized the assessment area economy as stable with moderate growth and relatively low unemployment. Further, he stated that he was currently working with several employers to aid in their expansion efforts. However, he noted unemployment

<sup>6</sup> This figure is calculated by dividing the median household income by the median housing value; it represents the amount of single family owner-occupied housing that a dollar of income can purchase for the median household in the geography. Values closer to 100 percent indicate greater affordability.

rates in the area would be even lower if the workforce was more skilled and that local manufacturing employers often have difficulty finding workers with enough skill to operate their complex machinery. It was also noted that despite the area's generally positive economic environment, the majority of jobs are low-paying because the area depends heavily upon the manufacturing industry. In addition, comments regarding housing development indicated that the area has been able to keep up with the increased commercial development, largely through such affordable housing options as multi-family developments. Lastly, this contact revealed pertinent information regarding the credit needs of the assessment area's residents and businesses. These comments were useful in determining the context in which to evaluate the bank's performance for this assessment area.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA<sup>7</sup>**

Progress Bank meets the criteria for a satisfactory rating, based upon its lending performance as measured by the CRA small bank performance standards. This lending performance was based upon loan information from 2002 Home Mortgage Disclosure Act (HMDA) data.<sup>8</sup> In addition, a statistical sample of commercial real estate loans originated in the last six months was also used in evaluating the bank's lending performance. These loan categories are considered the bank's primary lines of business, based upon lending volume by number and dollar amounts and in light of the bank's stated business strategy. Therefore, loan activity represented by these credit products is deemed indicative of the overall lending performance of the bank. The CRA small bank performance standards evaluate the following five criteria as applicable:

- The geographic distribution of loans;
- The distribution of loans by borrower income and business/farm revenue;
- The bank's average loan-to-deposit ratio;
- The level of lending within the assessment area; and
- A review of written complaints.

The remaining sections of this evaluation are based upon analyses of the bank's lending performance under these five performance criteria.

### **Geographic Distribution**

As noted in the description of the bank's assessment area, the bank's assessment area contains no low-income geographies, 4 moderate-income geographies, 14 middle-income geographies, and no upper-income geographies (based upon 1990 Census Data demographics and geographic boundaries). The analysis in this section illustrates the distribution of the bank's loan activity across these geographies. The following table

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<sup>7</sup> Demographic data used for comparison purpose as part of the 2002 HMDA data review, was drawn from 1990 Census Data demographics and geographic, while 2000 Census Data was utilized for the analysis 2003 business loan activity.

<sup>8</sup> The HMDA loan category includes loans for the purpose of home purchase, refinancing, and home improvement.

displays the geographic distribution of the bank’s 2002 HMDA data, in comparison to owner-occupied housing statistics for the assessment area.

<b>Distribution of Loans (Number and Dollar Volume in \$000s) Inside Assessment Area by Income Level of Geography</b>					
<b>Loan Type</b>	<b>Geography Income Classification</b>				<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	
2002 HMDA Data	0	89	156	0	<b>245</b>
	0.0%	36.3%	63.7%	0.0%	<b>100%</b>
	0	\$ 6,336	\$ 12,425	0	<b>\$ 18,761</b>
	0.0%	33.8%	66.2%	0.0%	<b>100%</b>
Owner-Occupied Housing	0.0%	20.7%	79.3%	0.0%	<b>100%</b>

The analysis of HMDA data reflect excellent performance under the CRA. The previous table shows that by number of loans, the bank originated 36.3 percent of HMDA reportable loans to individuals residing in moderate-income geographies. This is significantly higher than the percentage of owner-occupied housing units located in LMI geographies used for comparison. In addition, the bank’s penetration to LMI areas also compares well to 2002 HMDA aggregate data,<sup>9</sup> which indicate that based upon number of loans, other lenders in the area made 19.5 percent of mortgage loans in LMI geographies. Consequently, based upon the geographic distribution of the bank’s HMDA data, the bank’s assessment area penetration is strong.

As with HMDA data, the bank’s geographic distribution of small business loans secured by commercial real estate was also reviewed. The following table displays the results of this review, along with estimated percentages of business institutions located in each geography income category used for comparison.<sup>10</sup>

<sup>9</sup> HMDA Aggregate Data represent all lending activity collected and reported under the HMDA for this assessment area, based upon all financial institutions required to report such data (less the subject bank if applicable).

<sup>10</sup> These statistics are derived from Business Geodemographic Data for the assessment area, as reported by Dun & Bradstreet (for the year 2003).



<b>Distribution of Loans (Number and Dollar Volume in \$000s) Inside Assessment Area by Income Level of Geography</b>					
<b>Loan Type</b>	<b>Geography Income Classification</b>				<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	
Small Business	0	23	21	0	<b>44</b>
	0.0%	52.3%	47.7%	0.0%	<b>100%</b>
	\$ -	\$ 2,367	\$ 2,280	\$ -	<b>\$ 4,647</b>
	0.0%	50.9%	49.1%	0.0%	<b>100%</b>
Business Institutions	0.0%	14.6%	85.4%	0.0%	<b>100%</b>

Analysis of business lending activity revealed lending performance well above figures used for comparison purposes. As displayed in the previous table, most of the bank's business lending activity occurred in moderate-income geographies, along with a significant portion of lending in middle-income geographies. This performance level is substantially higher than business geodemographic data, which estimate that the significant majority of businesses in the assessment area are located in middle-income geographies. Further, the bank's lending performance appears strong in light of market performance for the assessment area. The 2002 CRA Aggregate Data<sup>11</sup> indicate that 18.9 percent of all small business loans made within the assessment area were located in LMI geographies. Based on this analysis, the bank's geographic distribution of business lending appears strong.

In addition, based upon 2002 HMDA data, the bank had loan activity inside 13 of 18 assessment area geographies (72.2 percent), including loan activity inside all four moderate-income geographies (based upon 1990 Census Data demographics and geographic boundaries). Additionally, 11 of 24 geographies contained loan activity (45.8 percent) including both moderate-income designated geographies, based upon business loans sampled from 2003 activity.<sup>12</sup> Consequently, the geographic distribution of loans, based on activity from both loan categories reviewed as part of these analyses, reflects excellent penetration throughout the assessment area and exceeds standards for satisfactory performance under this performance criterion.

### **Lending to Borrowers of Different Income Levels and to Various Size Businesses**

In addition to the bank's geographic distribution of lending activity, the small bank performance standards also evaluate the bank's lending to borrowers of various income levels. Borrowers are classified into low-, moderate-, middle-, and upper-income

<sup>11</sup> CRA Aggregate Data represent all lending activity collected and reported under the CRA for this assessment area, based upon all financial institutions required to report such data (less the subject bank if applicable).

<sup>12</sup> Bases upon 1990 Census Data used during the analysis of Progress Bank's 2002 HMDA data, the assessment area contained 18 geographies (4 of which were designated as LMI). Year 2000 Census Data used for the analysis of 2003 business loan activity, the assessment area contained 24 geographies (2 of which were designated as LMI).

categories by comparing the borrower's income against HUD's estimated median family income level for either the St. Louis MSA or the non-metropolitan portion of the state of Missouri, depending upon the location of the borrower. The Department of Housing and Urban Development (HUD) estimated the 2002 median family income for the non-MSA portion of Missouri to be \$40,600, the same estimated figure for the St. Louis MSA was \$61,400. The following table displays the distribution of HMDA loans by income level of the borrower, in relation to the percentages of families categorized by income category.<sup>13</sup>

<b>Distribution of Loans (Number and Dollar Volume) Inside Assessment Area by Income Level of Borrower</b>					
<b>Loan Type</b>	<b>Borrower Income Classification</b>				<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	
2002 HMDA Data	24	47	57	104	<b>232</b>
	10.3%	20.3%	24.6%	44.8%	<b>100%</b>
	\$ 820	\$ 2,587	\$ 4,334	\$ 10,252	<b>\$ 17,993</b>
	4.6%	14.4%	24.1%	57.0%	<b>100%</b>
Family Population	21.7%	21.8%	28.4%	28.1%	<b>100%</b>

Even though the bank's LMI lending percentages are slightly below that of comparison figures, the bank's distribution of HMDA loans by borrower income still appears reasonable. Overall, the table indicates that 30.6 percent of the 232 HMDA loans analyzed were originated to LMI borrowers. This level of lending does not compare favorably with the family population, which reflects that 43.5 percent of the families within the assessment area are LMI. Similarly, 2002 HMDA Aggregate Data reflect that 38.0 percent of all HMDA loans within the assessment area were made to LMI borrowers. While the bank's lending to moderate-income borrowers is commensurate with comparison figures, these comparisons indicate that the bank's lending to low-income borrowers is weak.

However, in light of the assessment area population percentage living below the poverty level, the bank's performance does not appear unreasonable. Year 1990 census data indicate that 7.8 percent of the assessment area population is living below the poverty level. Therefore, it is likely that this portion of the family population living below the poverty level reduces the number of bankable, low-income individuals. Consequently, the bank's distribution of HMDA loans to LMI borrowers, although low, still appears adequate in comparison to demographic and competitor data.

As with the borrower distribution analysis conducted for the HMDA loan category, the bank's distribution of loans to businesses of various sizes was also reviewed. The

<sup>13</sup> Of the 245 HMDA loans originated within the bank's assessment area, 13 did not have income information available and were, therefore, not able to be used in this analysis.

following table reflects the bank's distribution of business loans by gross annual revenue and loan amount.

<b>Lending Distribution by Business Revenue Level</b>				
<b>Gross Revenue</b>	<b>Loan Origination Amount (in \$000s)</b>			<b>TOTAL</b>
	<b>≤\$100</b>	<b>&gt;100≤250</b>	<b>&gt;250≤1,000</b>	
<b>\$1 Million or Less</b>	28 63.6%	9 20.5%	4 9.1%	<b>41</b> <b>93.2%</b>
<b>Greater Than \$1 Million</b>	1 2.3%	1 2.3%	1 2.3%	<b>3</b> <b>6.8%</b>
<b>TOTAL</b>	<b>29</b> <b>65.9%</b>	<b>10</b> <b>22.7%</b>	<b>5</b> <b>11.4%</b>	<b>44</b> <b>100%</b>

Based on this analysis of business loans, the bank is meeting the credit needs of small businesses.<sup>14</sup> The above table demonstrates that 41 of 44 loans reviewed (93.2 percent) were made to businesses with gross annual revenues of \$1 million or less. In comparison, 2003 business geodemographic data from Dun & Bradstreet indicate that 83.6 percent of business institutions inside the assessment area are small businesses. The 2002 CRA Aggregate Data for the assessment area reflect that 52.8 percent of business lending was to small business. Therefore, based upon the distribution of the bank's HMDA data and small businesses lending, the bank meets the standard for satisfactory performance under this performance criterion.

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<sup>14</sup> Under the CRA, a small business is considered to be one in which gross annual revenues for the preceding calendar year are \$1 million or less.

**Loan-to-Deposit Ratio**

One indication of the bank’s overall level of lending activity is its loan-to-deposit (LTD) ratio. The table<sup>15</sup> below displays the bank’s average LTD ratio<sup>16</sup> in comparison to that of regional competitors.

<b>Loan-to-Deposit Ratio Analysis</b>			
<b>Name</b>	<b>Asset Size</b>	<b>Headquarters</b>	<b>Average LTD Ratio</b>
Progress Bank	\$ 100,608	Sullivan, Missouri	98.9%
Regional Bank Competitors	\$ 129,527	Cuba, Missouri	72.4%
	\$ 242,021	Sullivan, Missouri	96.7%
	\$ 263,893	Salem, Missouri	80.5%

Based on data from the previous table, the bank’s level of lending indicates exceptional responsiveness to assessment area credit needs. For the last 16 quarters, the bank’s LTD ratio ranged from a low of only 91.7 percent, to a high of 101.1 percent and represents an increase from the bank’s average LTD ratio of 88.0 percent, as noted at the bank’s previous CRA evaluation. In comparison, the bank’s performance exceeds that of all regional competitors’ average LTD ratios, which varied from 72.4 percent to 96.7 percent. Therefore, in light of data from local competitors as displayed in the table above, the bank’s average LTD ratio exceeds the standards for satisfactory performance for this performance criterion.

<sup>15</sup> Asset size figures in this table represent total assets as of September 30, 2003 (in \$000s).

<sup>16</sup> The average LTD ratio represents a 16-quarter average, dating back to Progress Bank’s last CRA evaluation.

**Lending in the Assessment Area**

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside the bank’s assessment area.

<b>Lending Inside and Outside of Assessment Area</b>			
<b>Loan Type</b>	<b>Inside Assessment Area</b>	<b>Outside Assessment Area</b>	<b>TOTAL</b>
2002 HMDA Data	245	31	<b>276</b>
	88.8%	11.2%	<b>100%</b>
	\$ 18,761	\$ 3,862	<b>\$ 22,623</b>
Small Business	82.9%	17.1%	<b>100%</b>
	44	11	<b>55</b>
	80.0%	20.0%	<b>100%</b>
<b>TOTAL</b>	\$ 4,646	\$ 1,362	<b>\$ 6,008</b>
	77.3%	22.7%	<b>100%</b>
	<b>289</b>	<b>42</b>	<b>331</b>
	<b>87.3%</b>	<b>12.7%</b>	<b>100%</b>
	<b>\$ 23,407</b>	<b>\$ 5,224</b>	<b>\$ 28,631</b>
	<b>81.8%</b>	<b>18.2%</b>	<b>100%</b>

The previous table demonstrates that a substantial majority of loans were extended to borrowers residing inside the bank’s assessment area, for both loan categories reviewed. Therefore, the bank’s lending practices under this performance criterion meet the standard for satisfactory performance.

**Review of Complaints**

No CRA related complaints were received for this institution during the time frame used for this evaluation (November 29, 1999 through December 1, 2003).

**Additional Information**

During the Consumer Affairs Examination conducted concurrently with this CRA evaluation, a fair lending analysis was performed to assess the bank’s compliance under Regulation B (Equal Credit Opportunity) and the Fair Housing Act. The analysis concluded that the bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations for the products and services reviewed.

<b>Progress Bank Assessment Area<sup>17</sup></b>				
<b>County</b>	<b>Geography Number</b>	<b>Geography Income Category</b>	<b>MSA</b>	<b>Contains Bank Office</b>
Franklin	8011.00	Moderate	7040	Yes <sup>18</sup>
Warren	8201.02	Moderate	7040	No
Crawford	9501.00	Middle	N/A	No
Crawford	9502.00	Middle	N/A	No
Crawford	9503.00	Middle	N/A	No
Crawford	9504.00	Middle	N/A	No
Franklin	8001.00	Middle	7040	No
Franklin	8002.01	Middle	7040	No
Franklin	8002.02	Middle	7040	No
Franklin	8003.00	Middle	7040	No
Franklin	8004.01	Middle	7040	No
Franklin	8004.02	Middle	7040	No
Franklin	8005.00	Middle	7040	No
Franklin	8006.01	Middle	7040	No
Franklin	8006.02	Middle	7040	No
Franklin	8007.01	Middle	7040	No
Franklin	8007.02	Middle	7040	No
Franklin	8008.00	Middle	7040	No
Franklin	8009.00	Middle	7040	No
Franklin	8010.00	Middle	7040	No
Warren	8201.01	Middle	7040	No
Warren	8201.03	Middle	7040	Yes
Warren	8202.00	Middle	7040	No
Washington	9602.00	Middle	N/A	No

<sup>17</sup> The demographic characteristics displayed in this table are based upon 2000 Census Data.

<sup>18</sup> This geography contains two branch offices (one of which is the main office), both of which maintain deposit accepting ATMs.

## GLOSSARY

**Aggregate lending:** The number of loans originated and purchased by all lenders subject to reporting requirements as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

**Block numbering area ("BNA"):** Statistical subdivisions of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. BNAs do not cross county lines.

**Census tract:** Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** Affordable housing for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals, activities that promote economic development by financing businesses or farms that meet the 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.

**Consumer loan:** A loan to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories of loans: motor vehicle, credit card, home equity, other secured loan, and other unsecured loan.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married couple family or other family, which is further classified into "male householder" (a family with a male household 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 (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

**Geography:** A census tract or a block numbering area 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 such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home mortgage loans:** Include 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.

**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 geography.

**Limited review:** Performance under the lending, investment, and service tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

**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 lenders in the MSA/assessment area.

**Metropolitan area:** Any primary metropolitan statistical area ("PMSA"), metropolitan statistical area ("MSA"), or consolidated metropolitan area ("CMSA"), as defined by the Office of Management and Budget, with a population of 250 thousand or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**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.



**Multifamily:** Refers to a residential structure that contains five or more units.

**Optional loans:** Includes any unreported category of loans for which the institution collects and maintains data for consideration during a CRA examination. Also includes 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.

**Small loans to business:** 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 are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

**Small loans to farms:** A loan included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**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.

**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.