



PUBLIC DISCLOSURE

May 17, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Bank of the Flint Hills
RSSD# 552059

806 5th Street
Wamego, Kansas 66547

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.

TABLE OF CONTENTS

Institution’s Community Reinvestment Act Rating..... 2

Institution

 Scope of Examination 2

 Description of Institution 3

Conclusions with Respect to Performance Criteria 3

Fair Lending or Other Illegal Credit Practices Review..... 5

Manhattan Metropolitan Assessment Area (Full Review)

 Description of Operations..... 6

 Conclusions with Respect to Performance Criteria 8

Topeka Metropolitan Assessment Area (Limited Review)

 Description of Operations..... 14

 Conclusions with Respect to Performance Criteria 14

Morris County Assessment Area (Limited Review)

 Description of Operations..... 15

 Conclusions with Respect to Performance Criteria 15

Appendix A – Map of the Assessment Areas 16

Appendix B – Demographic Information 17

Appendix C – Demographic and Analysis Tables for Limited Review Assessment Areas 19

Appendix D – Glossary 27

INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

Bank of the Flint Hills (the bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria:

- The bank's net loan-to-deposit ratio (NLTD) is more than reasonable given the bank's size, financial condition, and credit needs within its assessment areas (AAs).
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable penetration among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's *Interagency Examination Procedures for Small Institutions* were utilized to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. The following data was reviewed:

- The bank's 19-quarter average NLTD ratio,
- The universe of 191 home mortgage loans reported on the bank's 2019 Home Mortgage Disclosure Act Loan/Application Register,
- A statistical sample of 147 small business loans from a universe of 529 loans originated between January 1, 2020 and December 31, 2020.

For this evaluation, performance in the Manhattan Metropolitan AA was assessed using full scope review procedures, as most of the bank's lending, deposits, and branches are located within this AA. Performance in the Topeka Metropolitan AA and Morris County AA was assessed using limited review procedures.

Additionally, small business performance was weighted more heavily in the overall analysis, as this product represents a strategic focus for the bank. In addition, the bank's HMDA performance was focused on total HMDA lending, as well as home purchase and home refinance lending; home improvement and multifamily products were not evaluated due to limited loan volume.

DESCRIPTION OF INSTITUTION

Bank of the Flint Hills is an intrastate community bank headquartered in Wamego, Kansas. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Wamego Bancshares, Inc.
- The bank reported total assets of \$359.7 million as of December 31, 2020.
- In addition to its main office in Wamego, the bank has seven additional branch offices including two located in Manhattan, Kansas and one located in each town of Alma, Rossville, St. Marys, Wamego, and White City, Kansas.
- The bank maintains eight full-service automated teller machines (ATMs) located at each branch location.
- The bank's primary business focus is commercial lending.

**TABLE 1
COMPOSITION OF LOAN PORTFOLIO AS OF DECEMBER 31, 2020**

Loan Type	\$(000)	%
Commercial	155,362	59.3
Agricultural	52,783	20.2
Residential Real Estate	47,532	18.1
Consumer	5,895	2.3
Other	406	0.2
Gross Loans	261,978	100.0

Note: Percentages may not total 100.0 percent due to rounding.

The bank was rated Satisfactory under the CRA at its August 8, 2016 performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AAs, and in comparison to similarly situated FDIC-insured institutions. The similarly situated institutions were selected based on similar asset size, geographic proximity to the bank, and similar portfolio mixes, with an emphasis on those banks also concentrated in commercial lending.

The bank's NLTD ratio is more than reasonable, as it is above all four similarly situated institutions.

**TABLE 2
COMPARATIVE NLTD RATIOS**

Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			19 Quarter Average
Bank of the Flint Hills	Wamego, Kansas	359,732	97.9
The Stockgrowers State Bank	Maple Hill, Kansas	94,750	69.8
Silver Lake Bank	Topeka, Kansas	343,522	90.1
First Security Bank	Overbrook, Kansas	72,433	79.8
ESB Financial	Emporia, Kansas	313,320	77.7

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AAs. A majority of the bank’s loans, by number and dollar, are originated inside the AAs.

**TABLE 3
LENDING INSIDE AND OUTSIDE THE AAs**

Loan Type	Inside				Outside			
	#	\$(000)	#%	\$%	#	\$(000)	#%	\$%
Home Purchase	54	9,450	85.7	85.6	9	1,590	14.3	14.4
Home Refinance	111	18,102	89.5	87.0	13	2,715	10.5	13.0
Home Improvement	1	62	50.0	47.0	1	70	50.0	53.0
Multi-Family	0	0	0.0	0.0	2	381	100.0	100.0
Total HMDA Loans	166	27,614	86.9	85.3	25	4,756	13.1	14.7
Small Business Loans	117	11,479	79.6	78.7	30	3,108	20.4	21.3
Total Loans	283	39,093	83.7	83.3	55	7,864	16.3	16.7

Note: Percentages may not add to 100.0 percent due to rounding.

Geographic Distribution of Loans

This performance criterion evaluates the bank’s distribution of lending within its AA by income level of census tracts. Overall, the bank’s geographic distribution of loans reflects reasonable distribution among the different census tracts in the Manhattan Metropolitan AA. Additionally, in the Topeka Metropolitan AA, lending was consistent with performance in the full review AA. A geographic distribution analysis was not evaluated in the Morris County AA as this AA consists solely of middle-income census tracts.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

This performance criterion evaluates the bank’s lending to borrowers of different income levels and businesses of different revenue sizes. The bank’s lending reflects a reasonable penetration among individuals of different income levels and businesses of different sizes in the Manhattan Metropolitan AA. Additionally, lending in both the Topeka Metropolitan AA and the Morris County AA was consistent with performance in the full scope review AA.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

An evaluation of the bank's fair lending activities was conducted during the examination to determine compliance with the substantive provisions of antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**MANHATTAN METROPOLITAN ASSESSMENT AREA
(Full Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MANHATTAN METROPOLITAN ASSESSMENT AREA

The bank's Manhattan Metropolitan AA is comprised of Pottawatomie and Riley Counties in their entireties (see Appendix A for an AA map). Pottawatomie and Riley Counties are part of the three-county Manhattan, Kansas Metropolitan Statistical Area (MSA).

- The AA is comprised of 18 census tracts which include two moderate-, nine middle-, five upper, and two unknown-income tracts.
- One of the two moderate-income census tracts (and one unknown-income census tract) is located within the Fort Riley army base. The remaining moderate-income tract is located in Manhattan, which lies adjacent to the Kansas State University campus.
- The bank has five locations in the AA: two in Manhattan, two in Wamego, and one in St. Marys, KS, each of which maintains a full-service ATM.
- Based on the June 30, 2020 FDIC Deposit Market Share Report, the bank's deposit market share is 8.1 percent where the bank ranks 3rd of 19 FDIC-insured institutions in the market.
- Two contacts with community members were used to augment the evaluation of bank data. One community member was a representative of a local organization focused on small businesses, while the other community member was a representative of an economic development organization within the AA.

TABLE 4 POPULATION CHANGE			
Area	2010 Population	2015 Population	Percent Change
Pottawatomie County, KS	21,604	22,625	4.7
Riley County, KS	71,115	75,022	5.5
Manhattan, KS MSA	127,081	134,434	5.8
State of Kansas	2,853,118	2,892,987	1.4

*Source: 2010 U.S. Census Bureau Decennial Census
2011-2015 U.S. Census Bureau: American Community Survey*

- The largest city in the AA, Manhattan, is located mainly in Riley County, with a small portion extending into Pottawatomie County.
- Nearly 76.8 percent of the AA's population is located within Riley County, which contains the Fort Riley army base and Kansas State University.

**TABLE 5
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Pottawatomie County, KS	72,514	70,169	(3.2)
Riley County, KS	61,725	64,906	5.2
Manhattan, KS MSA	63,172	61,327	(2.9)
State of Kansas	67,977	66,389	(2.3)

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2010 dollars.

- The AA has a lower percentage of families in poverty when compared to the state of Kansas with 6.7 and 9.1 percent, respectively.

**TABLE 6
HOUSING COSTS CHANGE**

Area	Median Housing Value		Percent Change	Median Gross Rent		Percent Change
	2010	2015		2010	2015	
Pottawatomie County, KS	138,600	160,700	15.9	625	730	16.8
Riley County, KS	154,800	181,200	17.1	759	884	16.5
Manhattan, KS MSA	150,605	173,819	15.4	742	863	16.3
State of Kansas	122,600	132,000	7.7	671	757	12.8

Source: 2006-2010 U.S. Census Bureau: American Community Survey
2011-2015 U.S. Census Bureau: American Community Survey

- The percentage of rental units in Riley County is notable at 52.2 percent, which is higher than that of Pottawatomie County and the State of Kansas at 20.2 percent and 29.8 percent, respectively. This is likely due the presence of the military base and Kansas State University.
- Furthermore, the majority of housing units within the AA’s two moderate-income tracts are either rental or vacant.
- A community contact commented that the housing market in Pottawatomie County is relatively stable, though home prices increased in 2020. The contact also mentioned an increase in new residential construction on the west side of the county.

**TABLE 7
UNEMPLOYMENT RATES**

Region	2016	2017	2018	2019	2020
Pottawatomie County, KS	3.5	3.1	2.7	2.8	4.3
Riley County, KS	3.4	3.1	2.8	2.8	5.0
Manhattan, KS MSA	3.9	3.4	3.1	3.1	4.8
State of Kansas	4.0	3.6	3.3	3.2	4.7

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- A community contact indicated a significant portion of jobs in the area are in the public sector,

- with employers such as the Fort Riley army base and Kansas State University.
- The community contact also stated major private sector employers in the area include Caterpillar, Manko Window Systems, Florence Corporation, Parker Hannifin Corporation, and GTM Sportswear.
 - A community contact stated that roughly 35.0 percent of the workforce in Pottawatomie County commutes to Manhattan (Riley County) for work.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts within the AAs.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. The bank did not originate any home mortgage loans in the AA's moderate-income tracts; however, performance was comparable to both the demographic figure and aggregate lending data, which indicates limited opportunities and demand for home mortgage lending in these tracts.

Loan dispersion throughout all AA geographies was evaluated. While some gaps were identified within Riley County, dispersion is acceptable due to the demographic factors noted above (i.e., presence of the Fort Riley military base, Kansas State University campus, and higher percentage of rental and/or vacant units in these geographies), as well as the overall competitive market. According to the June 30, 2020 FDIC Deposit Market Share Report for Riley County, there are 14 other banking institutions operating out of 21 branch offices within this county. Additional analyses of the bank's individual home purchase and home refinance loans are noted below, which reflects similar performance.

Home Purchase

The geographic distribution of home purchase lending is reasonable. The bank did not originate any home purchase loans in the AA's moderate-income tracts, which was comparable to the demographic figure and aggregate lending data. The overall dispersion of home purchase loans was also reasonable based on the factors noted above.

Home Refinance

The geographic distribution of home refinance loans is reasonable. The bank did not originate any home refinance loans in the AA's moderate-income tracts, which was comparable to the demographic figure and aggregate lending data. The overall dispersion of home refinance loans was also reasonable based on the factors noted above.

**TABLE 8
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY
MANHATTAN METROPOLITAN ASSESSMENT AREA**

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	0	0	0.0	0.0	1.8	1.6	2.2
Middle	78	12,176	59.5	53.7	43.2	38.1	53.5
Upper	52	10,417	39.7	46.0	54.5	59.6	43.9
Unknown	1	65	0.8	0.3	0.5	0.7	0.4
Not Reported	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	1.7	1.2	2.2
Middle	23	3,838	54.8	49.6	42.6	34.3	53.5
Upper	18	3,842	42.9	49.6	55.3	64.2	43.9
Unknown	1	65	2.4	0.8	0.4	0.3	0.4
Not Reported	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	1.8	2.4	2.2
Middle	54	8,276	61.4	55.7	42.4	33.7	53.5
Upper	34	6,575	38.6	44.3	55.3	63.5	43.9
Unknown	0	0	0.0	0.0	0.5	0.4	0.4
Not Reported	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	1.5	3.4	2.2
Middle	1	62	100.0	100.0	45.6	48.6	53.5
Upper	0	0	0.0	0.0	52.9	48.0	43.9
Unknown	0	0	0.0	0.0	0.0	0.0	0.4
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0
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	4.3
Middle	0	0	0.0	0.0	75.0	75.2	51.8
Upper	0	0	0.0	0.0	15.0	19.8	41.0
Unknown	0	0	0.0	0.0	10.0	5.0	2.8
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. The bank’s small business lending in the AA’s moderate-income census tracts was below the 10.1 percent of businesses operating in moderate-income census tracts.

As previously stated, there are only two moderate-income tracts within the AA, one of which is part of the Fort Riley army base, where fewer businesses are located. According to a community contact, the remaining moderate-income census tract contains the majority of the 10.1 percent of businesses, which includes small businesses, large shopping malls and chain stores, and several hotels. Performance was considered reasonable based on these factors, as well as the high level of competition in Riley County, as noted previously.

Loan dispersion did not reflect significant lending gaps or concerns, despite the lower lending levels noted in the AA’s moderate-income tracts.

**TABLE 9
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY
MANHATTAN METROPOLITAN ASSESSMENT AREA**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	3	183	3.1	1.7	10.1
Middle	68	8,522	70.1	77.7	51.3
Upper	26	2,263	26.8	20.6	37.8

*Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey*
NOTE: Percentages may not add up to 100.0 due to rounding.

Lending to Borrowers of Different Income Levels and to Businesses of Different Sizes

The bank’s lending has a reasonable penetration among individuals of different income levels and businesses of different sizes.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. As shown in Table 10, the bank’s lending to low-income borrowers was below the percentage of low-income families in the AA, but comparable to the aggregate lending data by number and by dollar volume. The bank’s lending to moderate-income borrowers was comparable to both the demographic figure and aggregate lending data by number and by dollar volume. Additional analyses of the bank’s individual home purchase and home refinance loans are noted below, which reflects similar performance.

Home Purchase

The borrower distribution of home purchase loans is reasonable. The bank's lending to low-income borrowers was below the demographic figure but comparable to aggregate lending data by number and dollar volume. For moderate-income borrowers, the bank's lending was comparable to both the demographic figure and aggregate lending data by number and dollar volume.

Home Refinance

The borrower distribution of home refinance loans is reasonable. The bank's lending to low-income borrowers was below the demographic figure, but comparable to aggregate lending data by number and dollar volume. For moderate-income borrowers, the bank's lending was comparable to the demographic figure but above aggregate lending data by number and dollar volume.

**TABLE 10
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
MANHATTAN METROPOLITAN ASSESSMENT AREA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Total Home Mortgage Loans							
Low	4	692	3.1	3.1	3.3	1.3	17.2
Moderate	19	2,221	14.5	9.8	12.4	7.4	17.4
Middle	16	1,593	12.2	7.0	19.0	15.0	19.8
Upper	61	12,711	46.6	56.1	43.6	47.5	45.7
Unknown	31	5,441	23.7	24.0	21.7	28.7	0.0
Home Purchase Loans							
Low	1	78	2.4	1.0	3.5	1.6	17.2
Moderate	5	752	11.9	9.7	13.7	9.3	17.4
Middle	5	556	11.9	7.2	22.0	19.1	19.8
Upper	19	4,239	45.2	54.7	44.5	53.7	45.7
Unknown	12	2,120	28.6	27.4	16.3	16.3	0.0
Home Refinance Loans							
Low	3	614	3.4	4.1	2.8	1.3	17.2
Moderate	14	1,469	15.9	9.9	10.9	6.2	17.4
Middle	11	1,037	12.5	7.0	15.4	12.6	19.8
Upper	42	8,472	47.7	57.0	43.6	48.4	45.7
Unknown	18	3,259	20.5	21.9	27.3	31.5	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	7.4	3.8	17.2
Moderate	0	0	0.0	0.0	10.3	12.2	17.4
Middle	0	0	0.0	0.0	14.7	6.2	19.8
Upper	0	0	0.0	0.0	58.8	57.4	45.7
Unknown	1	62	100.0	100.0	8.8	20.3	0.0
Multifamily Loans							
Low	0	0	0.0	0.0	0.0	0.0	17.2
Moderate	0	0	0.0	0.0	0.0	0.0	17.4
Middle	0	0	0.0	0.0	0.0	0.0	19.8
Upper	0	0	0.0	0.0	12.5	8.5	45.7
Unknown	0	0	0.0	0.0	87.5	91.5	0.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank’s lending to businesses with revenue of \$1 million or less, as shown in Table 11, was comparable to the percent of total businesses in this income category by number. Additionally, of the loans originated to businesses with revenue of \$1 million or less, 93.1 percent were in amounts of \$250,000 or less. Typically, smaller entities do not have the need or capacity to borrow large amounts; thus, the bank’s performance indicates a willingness to lend and support smaller businesses. While lending to businesses with revenue of \$1 million or less by dollar was below the demographic figure, more weight was given to the

performance by number volume as it is a better indicator of the bank's willingness and ability to meet the credit demands of small businesses.

**TABLE 11
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
MANHATTAN METROPOLITAN ASSESSMENT AREA**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	73	5,975	75.3	54.5	89.4
Over \$1 Million	24	4,994	24.7	45.5	9.3
Not Known	0	0	0.0	0.0	1.3
Total	97	10,969	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	66	2,204	68.0	20.1	
\$100,001 – \$250,000	20	3,478	20.6	31.7	
\$250,001 – \$1 Million	11	5,287	11.3	48.2	
Total	97	10,969	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	59	1,821	80.8	30.5	
\$100,001 – \$250,000	9	1,528	12.3	25.6	
\$250,001 – \$1 Million	5	2,626	6.8	43.9	
Total	73	5,975	100.0	100.0	

Source: 2020 FFIEC Census Data
 2020 Dun & Bradstreet Data
 2011-2015 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TOPEKA METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN TOPEKA METROPOLITAN ASSESSMENT AREA

The bank's AA is comprised of Wabaunsee County in its entirety, two census tracts in Shawnee County, and one tract in Jackson County (see Appendix C for an AA map). All three counties are part of the five-county Topeka, Kansas MSA.

- The AA is comprised of five census tracts including three middle- and two upper-income tracts. This AA has changed since the prior exam when it was comprised of only Wabaunsee County in its entirety. The AA was expanded to include portions of Shawnee and Jackson Counties after the bank acquired a branch in Shawnee County.
- There are two branches, each with a full-service ATM, located within the AA: one located in the town of Alma in Wabaunsee County and one in the town of Rossville in Shawnee County.
- Based on the June 30, 2020 FDIC Deposit Market Share Report, the bank's deposit market share is 0.4 percent where the bank ranks 20th of 26 institutions in the market.
- The AA has a population of nearly 22,280 as of 2015.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TOPEKA METROPOLITAN ASSESSMENT AREA

The bank's performance in the Topeka Metropolitan AA was reviewed using the limited-scope examination procedures.

The bank's lending performance in the Topeka Metropolitan AA was consistent with the institution's lending performance overall. The bank's lending activity in the AA included 32 home mortgage loans in 2019 and 18 small business loans in 2020. Demographic and lending tables for this AA are included in Appendix C.

**MORRIS COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MORRIS COUNTY ASSESSMENT AREA

The bank's AA is comprised of Morris County in its entirety (see Appendix C for an AA map).

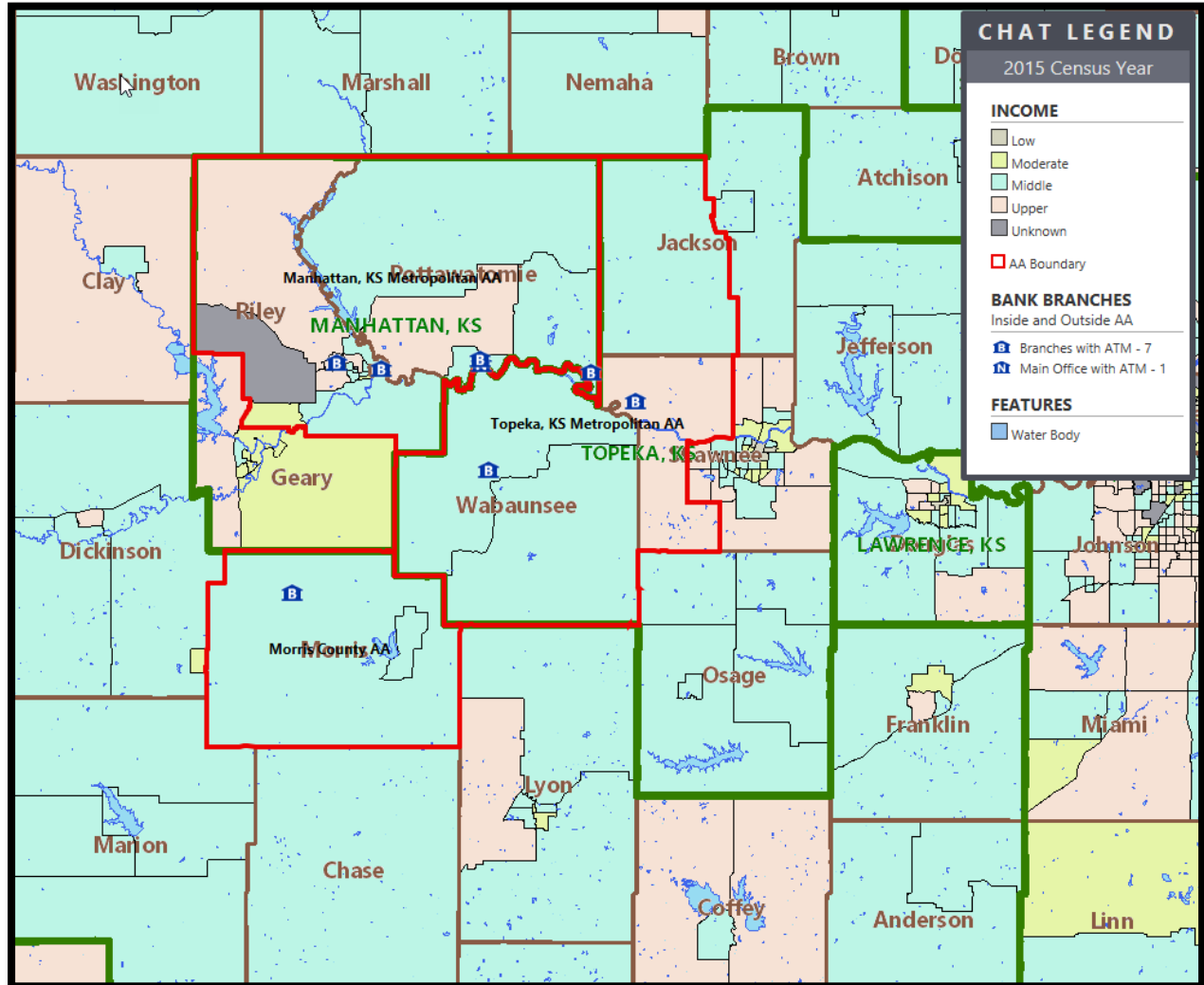
- The AA is comprised of two middle-income tracts. The AA is new since the prior examination and was added after the acquisition of a bank with a branch in the county.
- The AA has one branch in White City, which also maintains a full-service ATM.
- Based on the June 30, 2020 FDIC Deposit Market Share Report, the bank's deposit market share is 5.6 percent and ranks fifth of five institutions in the market.
- The AA has a population of nearly 5,750 as of 2015.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MORRIS COUNTY ASSESSMENT AREA

The bank's performance in the Morris County AA was reviewed using the limited-scope examination procedures.

The bank's lending performance in the Morris County AA was consistent with the institution's lending performance overall. The bank's lending activity in the AA included three home mortgage loans in 2019 and two small business loans in 2020. Demographic and lending tables for this AA are included in Appendix C.

APPENDIX A – MAP OF THE ASSESSMENT AREAS



APPENDIX B – DEMOGRAPHIC INFORMATION

TABLE B-1 MANHATTAN METROPOLITAN ASSESSMENT AREA 2020 DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,438	17.2
Moderate	2	11.1	1,826	9.1	182	10.0	3,477	17.4
Middle	9	50.0	10,112	50.5	764	7.6	3,969	19.8
Upper	5	27.8	7,940	39.6	355	4.5	9,150	45.7
Unknown	2	11.1	156	0.8	37	23.7	0	0.0
Total AA	18	100.0	20,034	100.0	1,338	6.7	20,034	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,021	389	2.2	12.9	2,240	74.1	392	13.0
Middle	21,314	9,327	53.5	43.8	9,964	46.7	2,023	9.5
Upper	13,620	7,656	43.9	56.2	4,609	33.8	1,355	9.9
Unknown	520	73	0.4	14.0	401	77.1	46	8.8
Total AA	38,475	17,445	100.0	45.3	17,214	44.7	3,816	9.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	345	10.1	300	9.8	41	12.9	4	8.9
Middle	1,751	51.3	1,552	50.9	174	54.7	25	55.6
Upper	1,288	37.8	1,171	38.4	101	31.8	16	35.6
Unknown	27	0.8	25	0.8	2	0.6	0	0.0
Total AA	3,411	100.0	3,048	100.0	318	100.0	45	100.0
Percentage of Total Businesses:				89.4		9.3		1.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	0.5	1	0.5	0	0.0	0	0.0
Middle	111	51.6	110	51.6	1	50.0	0	0.0
Upper	103	47.9	102	47.9	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	215	100.0	213	100.0	2	100.0	0	0.0
Percentage of Total Farms:				99.1		0.9		0.0
<p>Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.</p>								

**TABLE B-2
MANHATTAN METROPOLITAN ASSESSMENT AREA 2019 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	.00	3,438	17.2
Moderate	2	11.1	1,826	9.1	182	10.0	3,477	17.4
Middle	9	50.0	10,112	50.5	764	7.6	3,969	19.8
Upper	5	27.8	7,940	39.6	355	4.5	9,150	45.7
Unknown	2	11.1	156	0.8	37	23.7	0	0.0
Total AA	18	100.0	20,034	100.0	1,338	6.7	20,034	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	3,021	389	2.2	12.9	2,240	74.1	392	13.0
Middle	21,314	9,327	53.5	43.8	9,964	46.7	2,023	9.5
Upper	13,620	7,656	43.9	56.2	4,609	33.8	1,355	9.9
Unknown	520	73	0.4	14.0	401	77.1	46	8.8
Total AA	38,475	17,445	100.0	45.3	17,214	44.7	3,816	9.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	354	10.5	309	10.2	41	12.9	4	9.1
Middle	1,763	52.2	1,561	51.7	178	55.8	24	54.5
Upper	1,239	36.7	1,125	37.3	98	30.7	16	36.4
Unknown	24	0.7	22	0.7	2	0.6	0	0.0
Total AA	3,380	100.0	3,017	100.0	319	100.0	44	100.0
Percentage of Total Businesses:			89.3		9.4		1.3	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
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	51.4	106	51.2	2	66.7	0	0.0
Upper	102	48.6	101	48.8	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	210	100.0	207	100.0	3	100.0	0	0.0
Percentage of Total Farms:			98.6		1.4		0.0	

Source: 2019 FFIEC Census Data
 2019 Dun & Bradstreet Data
 2011-2015 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

APPENDIX C

2019 AND 2020 ANALYSIS TABLES FOR LIMITED REVIEW ASSESSMENT AREAS

A. Topeka Metropolitan Assessment Area (Limited Review) – 2019 & 2020 Lending and Demographic Tables

TABLE C-1 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY TOPEKA METROPOLITAN ASSESSMENT AREA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(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	0.0
Middle	17	2,668	53.1	56.5	42.3	39.2	49.2
Upper	15	2,050	46.9	43.5	57.7	60.8	50.8
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

TABLE C-2 DISTRIBUTION OF 2020 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY TOPEKA METROPOLITAN ASSESSMENT AREA					
Census Tract Income Level	Bank Small Business Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	14	409	77.8	82.5	50.7
Upper	4	87	22.2	17.5	49.3
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-3
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
TOPEKA METROPOLITAN ASSESSMENT AREA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	6	441	18.8	9.3	8.2	3.9	13.1
Moderate	5	593	15.6	12.6	21.2	16.1	16.8
Middle	6	948	18.8	20.1	22.6	20.5	25.9
Upper	9	2,324	28.1	49.3	34.3	44.9	44.3
Unknown	6	412	18.8	8.7	13.7	14.5	0.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-4
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
TOPEKA METROPOLITAN ASSESSMENT AREA**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	14	305	77.8	61.4	87.7
Over \$1 Million	4	192	22.2	38.6	7.0
Not Known	0	0	0.0	0.0	5.3
Total	18	496	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	17	376	94.4	75.8	
\$100,001 – \$250,000	1	120	5.6	24.2	
\$250,001 – \$1 Million	0	0	0.0	0.0	
Total	18	496	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	13	185	92.9	60.6	
\$100,001 – \$250,000	1	120	7.1	39.4	
\$250,001 – \$1 Million	0	0	0.0	0.0	
Total	14	305	100.0	100.0	

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-5
TOPEKA METROPOLITAN ASSESSMENT AREA 2020 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	806	13.1
Moderate	0	0.0	0	0.0	0	0.0	1,029	16.8
Middle	3	60.0	2,979	48.5	139	4.7	1,588	25.9
Upper	2	40.0	3,161	51.5	71	2.2	2,717	44.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	6,140	100.0	210	3.4	6,140	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
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	4,913	3,440	49.2	70.0	737	15.0	736	15.0
Upper	4,453	3,557	50.8	79.9	642	14.4	254	5.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	9,366	6,997	100.0	74.7	1,379	14.7	990	10.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
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	342	50.7	294	49.7	21	44.7	27	75.0
Upper	333	49.3	298	50.3	26	55.3	9	25.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	675	100.0	592	100.0	47	100.0	36	100.0
Percentage of Total Businesses:				87.7		7.0		5.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
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	87	67.4	86	67.2	1	100.0	0	0.0
Upper	42	32.6	42	32.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	129	100.0	128	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0

Source: 2020 FFIEC Census Data
 2020 Dun & Bradstreet Data
 2011-2015 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-6
TOPEKA METROPOLITAN ASSESSMENT AREA 2019 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	806	13.1
Moderate	0	0.0	0	0.0	0	0.0	1,029	16.8
Middle	3	60.0	2,979	48.5	139	4.7	1,588	25.9
Upper	2	40.0	3,161	51.5	71	2.2	2,717	44.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5	100.0	6,140	100.0	210	3.4	6,140	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
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	4,913	3,440	49.2	70.0	737	15.0	736	15.0
Upper	4,453	3,557	50.8	79.9	642	14.4	254	5.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	9,366	6,997	100.0	74.7	1,379	14.7	990	10.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
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	342	50.7	294	49.7	21	44.7	27	75.0
Upper	333	49.3	298	50.3	26	55.3	9	25.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	675	100.0	592	100.0	47	100.0	36	100.0
Percentage of Total Businesses:				87.7		7.0		5.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
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	87	67.4	86	67.2	1	100	0	0.0
Upper	42	32.6	42	32.8	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	129	100.0	128	100.0	1	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		0.0

Source: 2019 FFIEC Census Data
 2019 Dun & Bradstreet Data
 2011-2015 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

B. Morris County Assessment Area (Limited Review) – 2019 & 2020 Lending and Demographic Tables

TABLE C-7 DISTRIBUTION OF 2019 HOME MORTGAGE LENDING BY INCOME LEVEL OF GEOGRAPHY MORRIS COUNTY ASSESSMENT AREA							
Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(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	0.0
Middle	3	238	100.0	100.0	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0	0.0	0.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

TABLE C-8 DISTRIBUTION OF 2020 SMALL BUSINESS LENDING BY INCOME LEVEL OF GEOGRAPHY MORRIS COUNTY ASSESSMENT AREA					
Census Tract Income Level	Bank Small Business Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	2	14	100.0	100.0	100.0
Upper	0	0	0.0	0.0	0.0
Unknown	0	0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-9
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL
MORRIS COUNTY ASSESSMENT AREA**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	11.6	4.7	14.9
Moderate	1	38	33.3	16.0	17.8	11.2	18.5
Middle	0	0	0.0	0.0	19.4	16.7	29.6
Upper	2	200	66.7	84.0	42.6	57.6	36.9
Unknown	0	0	0.0	0.0	8.5	9.8	0.0

Source: 2019 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-10
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES
MORRIS COUNTY ASSESSMENT AREA**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	2	14	100.0	100.0	91.0
Over \$1 Million	0	0	0.0	0.0	5.8
Not Known	0	0	0.0	0.0	3.2
Total	2	14	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	2	14	100.0	100.0	
\$100,001 – \$250,000	0	0	0.0	0.0	
\$250,001 – \$1 Million	0	0	0.0	0.0	
Total	2	14	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	2	14	100.0	100.0	
\$100,001 – \$250,000	0	0	0.0	0.0	
\$250,001 – \$1 Million	0	0	0.0	0.0	
Total	2	14	100.0	100.0	

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-11
MORRIS COUNTY ASSESSMENT AREA 2020 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	245	14.9
Moderate	0	0.0	0	0.0	0	0.0	304	18.5
Middle	2	100.0	1,640	100.0	78	4.8	486	29.6
Upper	0	0.0	0	0.0	0	0.0	605	36.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2	100.0	1,640	100.0	78	4.8	1,640	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
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	3,195	1,846	100.0	57.8	560	17.5	789	24.7
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	3,195	1,846	100.0	57.8	560	17.5	789	24.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
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	345	100.0	314	100.0	20	100.0	11	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	345	100.0	314	100.0	20	100.0	11	100.0
Percentage of Total Businesses:				91.0		5.8		3.2
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
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	79	100.0	78	100.0	1	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	79	100.0	78	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.7		1.3		0.0

Source: 2020 FFIEC Census Data
 2020 Dun & Bradstreet Data
 2011-2015 U.S. Census Bureau: American Community Survey
 NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE C-12
MORRIS COUNTY ASSESSMENT AREA 2019 DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	245	14.9
Moderate	0	0.0	0	0.0	0	0.0	304	18.5
Middle	2	100.0	1,640	100.0	78	4.8	486	29.6
Upper	0	0.0	0	0.0	0	0.0	605	36.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2	100.0	1,640	100.0	78	4.8	1,640	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
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	3,195	1,846	100.0	57.8	560	17.5	789	24.7
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	3,195	1,846	100.0	57.8	560	17.5	789	24.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
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	350	100.0	316	100.0	23	100.0	11	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	350	100.0	316	100.0	23	100.0	11	100.0
Percentage of Total Businesses:				90.3		6.6		3.1
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
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	100.0	81	100.0	1	100.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	82	100.0	81	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.8		1.2		0.0
<p>Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey NOTE: Percentages may not add up to 100.0 due to rounding.</p>								

APPENDIX D – 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 subdivision 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. Census tracts 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 (including multifamily rental 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, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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, small business, or small farm 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-scope review: Performance 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 United States 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 (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 refinancing 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 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) instructions. 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): 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 \$500,000 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.