



PUBLIC DISCLOSURE

May 24, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Missouri Bank
RSSD# 710176**

300 West Lockling Street
Brookfield, Missouri 64628

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'S COMMUNITY REINVESTMENT ACT RATING

First Missouri Bank (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 of the assessment areas (AAs).
- A majority of the bank's loans are originated inside the AAs.
- A reasonable dispersion 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. A full-scope review of the bank's lending performance was conducted for the North Central Missouri AA and the Kansas City Metropolitan AA, where a majority of the bank's deposits and lending activities occurs. Performance in both AAs was weighted equally. A limited scope-review was conducted for the Harrison County AA. The following data was reviewed:

- The bank's 17- quarter average NLTD ratio,
- The universe of 213 home mortgage loans reported on the bank's Home Mortgage Disclosure Act (HMDA) Loan/Application Registers between January 1, 2018 and December 31, 2019, and
- A statistical sample of 101 small business loans from a universe of 201 loans originated between January 1, 2020 and December 31, 2020.
- More weight was placed on small business loans in this analysis due to the bank's strategic focus on commercial lending.

While conclusions with respect to HMDA lending performance were evaluated for multiple years, only 2019 lending tables for the AAs that received a full-scope review are reflected in the body of the report, with comparisons to 2018 performance. The bank's 2018 lending data, as well as the lending data for the limited-scope review AA, can be found in the tables in Appendix B of this report.

DESCRIPTION OF INSTITUTION

First Missouri Bank is a community bank headquartered in Brookfield, Missouri. The bank's characteristics include:

- The bank is a wholly owned subsidiary of First Missouri Bancshares, Inc.
- The bank has total assets of \$340.6 million (MM) as of December 31, 2020.
- In addition to its main office in Brookfield, Missouri, the bank has four additional offices located in Eagleville, Milan, Kearney, and North Kansas City, Missouri.
 - The Milan branch was acquired in October of 2018.
 - The bank closed a branch in Ridgeway, Missouri in October of 2020.
- All five locations include a full-service automated teller machine (ATM) at each location.
- The bank's primary business focus is commercial, agricultural, and residential real estate lending.

Loan Type	\$(000)	%
Commercial	150,765	53.1
Agricultural	80,193	28.3
Residential Real Estate	49,755	17.5
Consumer	3,184	1.1
Other	17	0.0
Gross Loans	283,914	100.0

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

The bank was rated Satisfactory under the CRA at its March 27, 2017 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 the ratios of similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and area in which they are located. The bank's NLTD ratio is above the ratios of all three comparable banks, which is considered more than reasonable.

TABLE 2 COMPARATIVE NLTD RATIOS			
Institution	Location	Asset Size (\$000s)	NLTD Ratio (%)
			17-Quarter Average
First Missouri Bank	Brookfield, Missouri	340,671	91.7
Regional Missouri Bank	Marceline, Missouri	446,583	89.4
Community Bank of Raymore	Raymore, Missouri	361,927	59.1
Wells Bank	Platte City, Missouri	293,261	87.9

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	79	7,543	66.4	60.8	40	4,859	33.6	39.2
Home Refinance	42	3,737	79.2	67.5	11	1,797	20.8	32.5
Home Improvement	17	790	73.9	65.3	6	419	26.1	34.7
Multifamily	7	2,390	77.8	74.2	2	831	22.2	25.8
Other Closed/Exempt	6	222	66.7	65.5	3	117	33.3	34.5
Other Open	0	0	0.0	0.0	0	0	0.0	0.0
N/A	0	0	0.0	0.0	0	0	0.0	0.0
Total HMDA Loans	151	14,682	70.9	64.7	62	8,023	29.1	35.3
Small Business Loans	73	8,931	72.3	63.3	28	5,178	27.7	36.7
Total Loans	224	23,613	71.3	64.1	90	13,201	28.7	35.9

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 AAs by income level of census tracts. The bank’s geographic distribution of loans reflects overall reasonable dispersion among the different census tracts within the AAs. In the North Central Missouri AA, the distribution by income level of census tracts was excellent for home mortgage loans and reasonable for small business loans. In the Kansas City Metropolitan AA, the distribution by income level of census tracts was reasonable for both home mortgage loans and small business loans. In addition, performance was consistent for the Harrison County AA, which received a limited-scope review.

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 an overall reasonable penetration among individuals of different income levels and businesses of different sizes. In the North Central

Missouri AA, lending to borrowers of different income levels and to businesses of different revenue sizes was reasonable. In the Kansas City Metropolitan AA, lending of home mortgage loans to borrowers of different income levels was poor; however, lending to businesses of different revenue sizes was reasonable. In addition, performance was consistent for the Harrison County AA, which received a limited-scope review.

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.

**NORTH CENTRAL MISSOURI ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full Scope Review)**

DESCRIPTION OF ASSESSMENT AREA

The bank’s North Central Missouri AA is comprised of Linn and Sullivan Counties in their entirety (see Appendix A for an AA map).

- The AA has expanded since the prior evaluation to include Sullivan County with the addition of the branch in Milan, Missouri.
- The AA is comprised of one moderate-, six middle-, and one upper-income census tracts.
- The bank has two branch locations in this AA, including its main office in Brookfield, Missouri and a branch in Milan, Missouri. Each location has a full-service ATM.
- The June 30, 2020 FDIC Deposit Market Share Report shows the bank has a 22.5 percent deposit market share, ranking first of nine FDIC-insured depository institutions operating in the AA.
- Two interviews with members of the communities within the bank’s AA were conducted to ascertain the credit needs of the communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. One contact represented a municipality in the AA. The other contact represented an organization focused on economic development.

**TABLE 4
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
North Central Missouri AA	19,475	18,913	(2.9)
Linn County	12,761	12,401	(2.8)
Sullivan County	6,714	6,512	(3.0)
NonMSA Missouri	1,556,057	1,550,288	(0.4)
State of Missouri	5,988,927	6,045,448	0.9

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

- Main population centers in the AA include the cities of Milan (1,775 residents) and Brookfield (4,213 residents).
- A community member indicated that net out-migration is increasing as more and more young people are leaving the towns they grew up in to seek broader education, employment, and social and economic opportunities elsewhere. In general, these migration patterns of young adults can often result in an aging population and a decrease in the number of skilled workers in the local economy.

**TABLE 5
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
North Central Missouri AA	48,859	47,058	(3.7)
Linn County	52,323	46,649	(10.8)
Sullivan County	42,751	47,857	11.9
NonMSA Missouri	49,277	48,341	(1.9)
State of Missouri	62,790	60,809	(3.2)

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 2015 dollars.

- According to the 2015 American Community Survey (ACS), 37.8 percent of AA families are LMI, which is below the statewide and nonmetropolitan figures at 39.3 percent and 38.7 percent, respectively.
- The percentage of AA families living below the poverty line, at 11.9 percent, is comparable to the statewide figure of 11.1 percent and below the nonmetropolitan figure of 14.2 percent. Linn County has the highest percentage of families living below poverty at 12.4 percent compared to Sullivan County at 11.1 percent.

**TABLE 6
HOUSING COST BURDEN**

Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
North Central Missouri AA	56.9	22.5	31.2	67.3	24.5	18.0
Linn County	56.0	25.1	33.8	60.4	24.4	15.5
Sullivan County	58.6	15.4	26.8	79.0	24.6	23.1
NonMSA Missouri	68.5	30.9	38.7	57.1	28.3	19.3
State of Missouri	74.3	31.1	42.4	61.3	32.9	20.0

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy

- The median housing value in the AA of \$76,936 is below the statewide figure of \$138,400 and the nonmetropolitan figure of \$100,293.
- The AA's median gross rent of \$521 is also below both the statewide and nonmetropolitan figures of \$746 and \$611, respectively.
- The percentage of owner-occupied units in the AA at 55.6 percent is comparable to figures for both the nonmetropolitan areas in the state at 54.7 percent and the state of Missouri at 58.3 percent.
- The AA has a lower percentage of rental units, 19.9 percent, compared to the state and nonmetropolitan areas at 28.4 percent and 23.8 percent, respectively.
- According to two community members, the AA has limited multi-family housing and rental homes. The multi-family housing options available in the area are income-based and are at

full capacity. Additionally, the community members indicated rent costs have increased due to the high demand for rental homes.

TABLE 7 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
North Central Missouri AA	6.7	6.4	5.2	4.1	4.4
Linn County	7.0	6.7	5.8	4.6	4.9
Sullivan County	5.9	5.8	4.0	3.1	3.5
NonMSA Missouri	5.9	5.5	4.4	3.7	4.0
State of Missouri	5.0	4.6	3.7	3.2	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The AA’s largest employers are: Walsworth Publishing Company, Sullivan County Hospital, Smithfield Foods, Inc., Milan School District, Brookfield School District, Marceline School District, Farmland Foods, Inc., CRST International, Inc, Hogan Transports Inc, U.S. Xpress, Inc., Transland, Inc., Uber Technologies, Inc., Paschall Truck Lines, Inc., Wal-mart, Inc., Dollar General Corporation.
- Major industries found in the area include the following: manufacturing, agriculture, health services, education, and transportation.
- According to a community member the area has experienced layoffs from major employers.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Geographic Distribution of Loans

The bank’s overall geographic distribution of loans in the North Central Missouri AA reflects a reasonable distribution among the different census tracts within the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. In 2019, the bank’s lending in the AA’s moderate-income census tract was above aggregate lending and the percentage of owner-occupied units in the moderate-income census tract. The bank’s lending in 2018 was consistent with the 2019 lending performance.

Loan dispersion throughout each of the AA’s geographies was also evaluated, and no significant gaps or lapses in lending were identified.

**TABLE 8
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

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	12	694	30.0	30.6	16.7	17.0	14.9
Middle	16	1,011	40.0	44.6	63.2	63.3	68.1
Upper	12	562	30.0	24.8	19.0	17.8	17.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	1.1	1.9	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. In 2019, the bank’s lending in the moderate-income census tract was comparable to the percentage of businesses operating in the moderate-income census tract.

Loan dispersion throughout each of the AA’s geographies was also evaluated, and no significant gaps or lapses in lending were identified.

**TABLE 9
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	6	679	26.1	29.8	25.6
Middle	11	1,443	47.8	63.3	65.5
Upper	6	157	26.1	6.9	9.0
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.

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

The bank’s lending reflects an overall reasonable penetration among individuals of different income levels and businesses of different sizes in the North Central Missouri AA.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. In 2019, the bank’s lending to low-income borrowers was above aggregate lending but comparable to the percentage of low-income families in the AA. Lending to moderate-income borrowers was comparable to both aggregate lending and the percentage of moderate-income families in the AA. Additionally, the bank’s 2018 lending was consistent with 2019 performance.

**TABLE 10
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	5	127	12.5	5.6	7.4	3.8	16.9
Moderate	6	269	15.0	11.9	19.3	13.7	20.9
Middle	5	255	12.5	11.2	21.6	20.3	22.5
Upper	22	1,339	55.0	59.1	40.1	49.0	39.7
Unknown	2	277	5.0	12.2	11.5	13.2	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 revenues of \$1MM or less was comparable to the percentage of total businesses operating in the AA with revenues of \$1MM or less.

**TABLE 11
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	21	1,200	91.3	52.6	87.4
Over \$1 Million	1	300	4.3	13.2	6.7
Not Known	1	779	4.3	34.2	5.9
Total	23	2,279	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	19	625	82.6	27.4	
\$100,001 – \$250,000	1	200	4.3	8.8	
\$250,001 – \$1 Million	3	1,454	13.0	63.8	
Total	23	2,279	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	19	625	90.5	52.1	
\$100,001 – \$250,000	1	200	4.8	16.7	
\$250,001 – \$1 Million	1	375	4.8	31.3	
Total	21	1,200	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.

**KANSAS CITY METROPOLITAN ASSESSMENT AREA
(Full Scope Review)**

DESCRIPTION OF ASSESSMENT AREA

The bank’s Kansas City Metropolitan AA includes the entirety of Clay and Jackson Counties and nine census tracts in Platte County. (see Appendix A for an AA map).

- Since the prior examination, the AA was expanded to include Jackson County.
- The AA is comprised of 49 low-, 70 moderate-, 76 middle-, 50 upper-income census tracts, and 7 unknown-income census tracts.
- The bank operates two branches in the AA. One branch is located in Kearney, Missouri and the other is located in North Kansas City, Missouri. Each location has a full-service ATM.
- The June 30, 2020 FDIC Deposit Market Share Report shows the bank has a 0.3 percent deposit market share, ranking 26th of 50 FDIC-insured depository institutions operating in the counties in the AA.
- One interview with a member of the community within the bank’s AA was conducted to ascertain the credit needs of the communities and the responsiveness of area banks in meeting those credit needs. The contact represented an organization focused on affordable housing.

**TABLE 12
POPULATION CHANGE**

Area	2010 Population	2015 Population	Percent Change
Kansas City Metropolitan AA	985,419	1,004,660	2.0
Clay County	221,939	230,361	3.8
Jackson County	674,158	680,905	1.0
Platte County	89,322	93,394	4.6
Kansas City, MO-KS MSA	2,009,342	2,055,675	2.3
State of Missouri	5,988,927	6,045,448	0.9

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

- The AA’s 2015 population accounts for 16.6 percent of the statewide population.
- A community member stated that many families and individuals are moving from coastal areas to Kansas City because the cost of housing is much lower. Additionally, the capabilities of working remotely have influenced many individuals and families to move to the area.

**TABLE 13
MEDIAN FAMILY INCOME CHANGE**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Kansas City Metropolitan AA	68,916	66,100	(4.1)
Clay County	77,325	75,104	(2.9)
Jackson County	64,064	61,076	(4.7)
Platte County	86,541	84,309	(2.6)
Kansas City, MO-KS MSA	74,970	72,623	(3.1)
State of Missouri	62,790	60,809	(3.2)

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 2015 dollars.

- According to the 2015 ACS, 44.1 percent of AA families are LMI, which is above the statewide and Metropolitan Statistical Area (MSA) figures at 39.3 percent and 38.9 percent, respectively. Clay and Jackson Counties have the highest number of LMI families at 36.5 percent and 47.5 percent, respectively.
- The percentage of AA families living below the poverty line, at 11.5 percent, is comparable to the statewide figure of 11.1 percent and above the MSA figure of 9.1 percent. Jackson County has the highest percentage of families living below poverty at 13.5 percent.

**TABLE 14
HOUSING COST BURDEN**

Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Kansas City Metropolitan AA	76.9	26.1	44.0	62.3	35.2	20.9
Clay County	79.1	19.6	37.5	61.6	33.2	17.7
Jackson County	75.9	26.5	45.9	62.2	34.9	22.5
Platte County	84.4	36.0	40.4	65.6	45.2	18.3
Kansas City, MO-KS MSA	75.7	28.2	41.7	62.9	35.3	20.2
State of Missouri	74.3	31.1	42.4	61.3	32.9	20.0

Cost Burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD), 2011-2015 Comprehensive Housing Affordability Strategy

- The median housing value in the AA of \$136,689 is below the statewide figure of \$138,400 and the MSA figure of \$159,473.
- The AA median rent of \$814 is above the statewide figure at \$746 but below the MSA figure of \$844.
- There is a lower percentage of owner-occupied units in the AA, at 54.8 percent, compared to the state and the MSA figures of 58.3 percent and 59.6 percent, respectively.
- The AA has a higher percentage of rental units, 34.1 percent, compared to the state and MSA at 28.4 percent and 31.2 percent, respectively.
- According to the community member, affordable housing, including multi-family housing, for LMI residents is very limited. In addition, many LMI families have struggled to afford rent or

save for a down payment due to the increase in rent in recent years. Many of the affordable homes that LMI people could qualify for in the area are being purchased by investors and rented to the LMI families.

TABLE 15 UNEMPLOYMENT RATES					
Region	2015	2016	2017	2018	2019
Kansas City Metropolitan AA	5.4	4.7	4.1	3.4	3.4
Clay County	4.6	3.9	3.6	2.9	2.9
Jackson County	5.9	5.1	4.4	3.7	3.7
Platte County	4.2	3.6	3.2	2.5	2.7
Kansas City, MO-KS MSA	4.8	4.3	3.8	3.3	3.3
State of Missouri	5.0	4.6	3.7	3.2	3.3

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The most prominent industries in the AA include healthcare/social assistance, retail, manufacturing, professional/technical services, and education. Major employers include Cerner, Sprint, Children’s Mercy/St. Luke’s Hospitals, Burns & McDonnell, General Motors, and Ford. The community contact stated that although the entire area has benefited from a strong economy and low unemployment, the need for affordable housing remains.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Geographic Distribution of Loans

The bank’s overall geographic distribution of loans in the Kansas City Metropolitan AA reflects a reasonable dispersion among the different census tracts within the AA.

Home Mortgage Lending

The geographic distribution of home mortgage lending is reasonable. In 2019, the bank’s lending in the AA’s LMI census tracts was comparable to aggregate lending and the demographic figure. In 2018, the bank’s performance slightly exceeded 2019 performance as lending in low-income census tracts was above aggregate lending and the demographic figure.

Loan dispersion throughout each of the AA’s geographies was also evaluated. While some gaps in home mortgage lending were noted in eastern Jackson County, the bank’s overall performance was not altered, considering the location of the bank’s two branch offices, neither of which are in Jackson County, and the high level of competition in the AA. As stated previously, the bank maintains only 0.3 percent of AA’s deposit market share and operates only 2 of the 279 total branches of FDIC-insured institutions in the AA.

**TABLE 16
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Low	1	297	5.6	9.5	4.3	3.5	8.2
Moderate	4	774	22.2	24.7	21.5	15.6	24.9
Middle	10	1,587	55.6	50.7	38.1	37.3	37.7
Upper	3	471	16.7	15.1	35.8	43.3	28.9
Unknown	0	0	0.0	0.0	0.3	0.3	0.3
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. In 2020, the bank’s lending in low-income census tracts was above the demographic figure; however, lending in moderate-income tracts was below the demographic figure.

Loan dispersion throughout each of the AA’s geographies was also evaluated. Some gaps in small business lending were noted among the geographies in eastern Jackson County, similar to home mortgage lending; however, these gaps were not considered significant due to the lack of bank presence (no branch offices) in Jackson county and the overall level of competition present in the AA, as noted previously.

**TABLE 17
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	6	1,437	15.8	23.2	9.9
Moderate	3	988	7.9	16.0	27.9
Middle	15	2,213	39.5	35.8	35.0
Upper	14	1,549	36.8	25.0	26.6
Unknown	0	0	0.0	0.0	0.7
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.

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

The bank’s lending reflects an overall reasonable penetration among individuals of different income levels and businesses of different sizes in the Kansas City Metropolitan AA.

Home Mortgage Lending

The borrower distribution of home mortgage lending is poor. In 2019, the bank’s lending to LMI borrowers was below both aggregate lending and the demographic figures. Lending in 2018 was consistent with lending performance in 2019.

**TABLE 18
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	1	145	5.6	4.6	10.1	5.2	25.2
Moderate	2	385	11.1	12.3	21.1	15.0	19.0
Middle	1	143	5.6	4.6	22.0	19.3	20.6
Upper	5	797	27.8	25.5	30.0	35.0	35.3
Unknown	9	1,659	50.0	53.0	16.8	25.5	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 revenues of \$1MM or less was comparable to the percentage of total businesses operating in the AA with revenues of \$1MM or less.

**TABLE 19
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	28	3,723	73.7	60.2	91.0
Over \$1 Million	9	2,438	23.7	39.4	8.3
Not Known	1	25	2.6	0.4	0.7
Total	38	6,187	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	24	988	63.2	16.0	
\$100,001 – \$250,000	7	1,193	18.4	19.3	
\$250,001 – \$1 Million	7	4,006	18.4	64.8	
Total	38	6,187	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	21	858	75.0	23.1	
\$100,001 – \$250,000	4	742	14.3	19.9	
\$250,001 – \$1 Million	3	2,123	10.7	57.0	
Total	28	3,723	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.

**HARRISON COUNTY ASSESSMENT AREA
NONMETROPOLITAN AREA
(Limited Scope Review)**

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN HARRISON COUNTY AA

The bank's Harrison County AA includes Harrison County in its entirety. The AA is comprised of three middle-income census tracts. There have been no changes to the AA delineation since the previous evaluation.

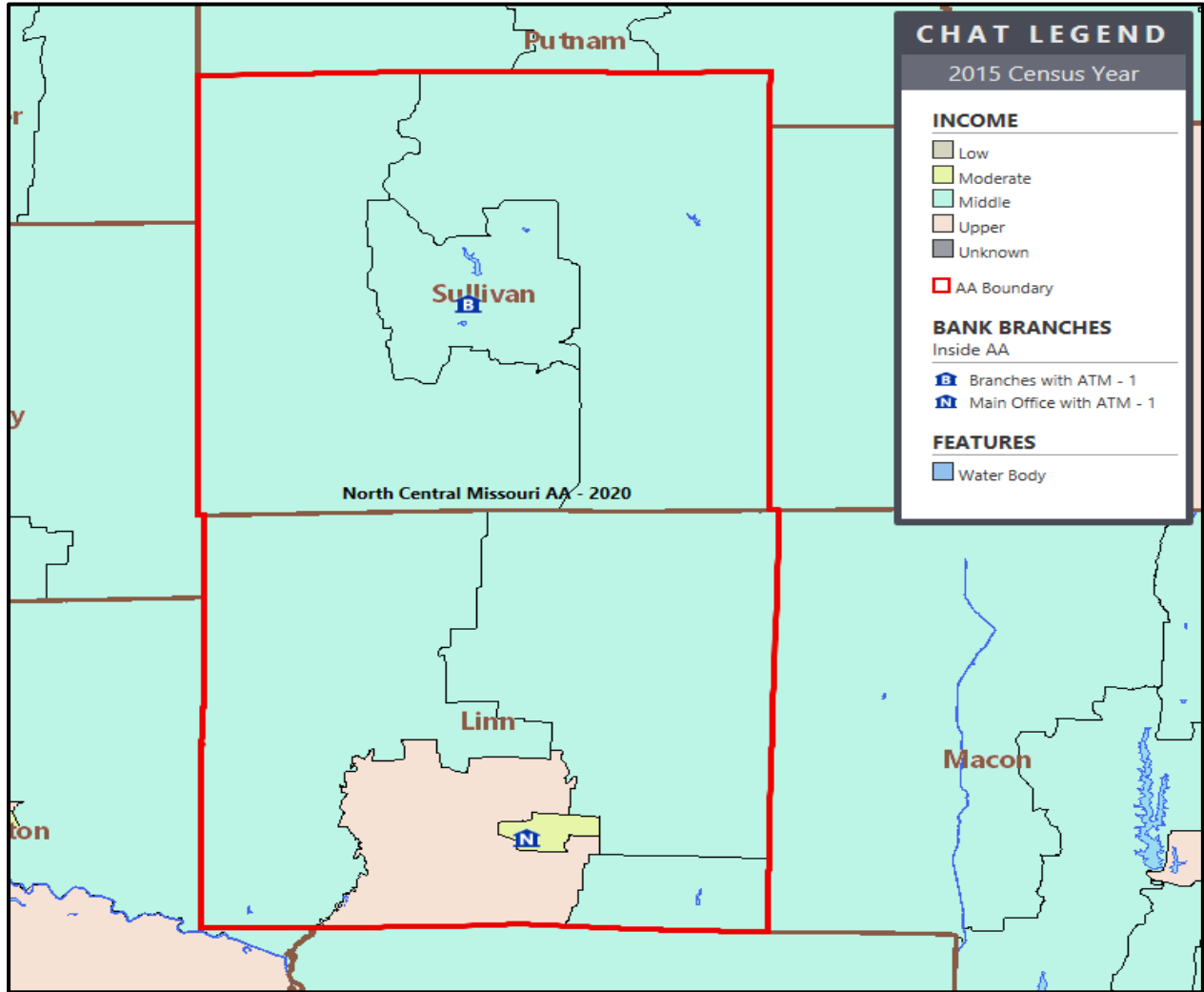
The bank operates one full-service branch in Eagleville, Missouri, with a full-service ATM. The bank closed its Ridgeway branch in October 2020. According to the June 30, 2020 FDIC Deposit Market Share Report, the bank ranked third of six FDIC-insured depository institutions operating in the AA with a market share of 10.5 percent. According to the 2015 ACS, the AA's population is 8,722 compared to the state of Missouri population of 6,045,448 and the nonmetropolitan population of 1,550,288.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN HARRISON COUNTY AA

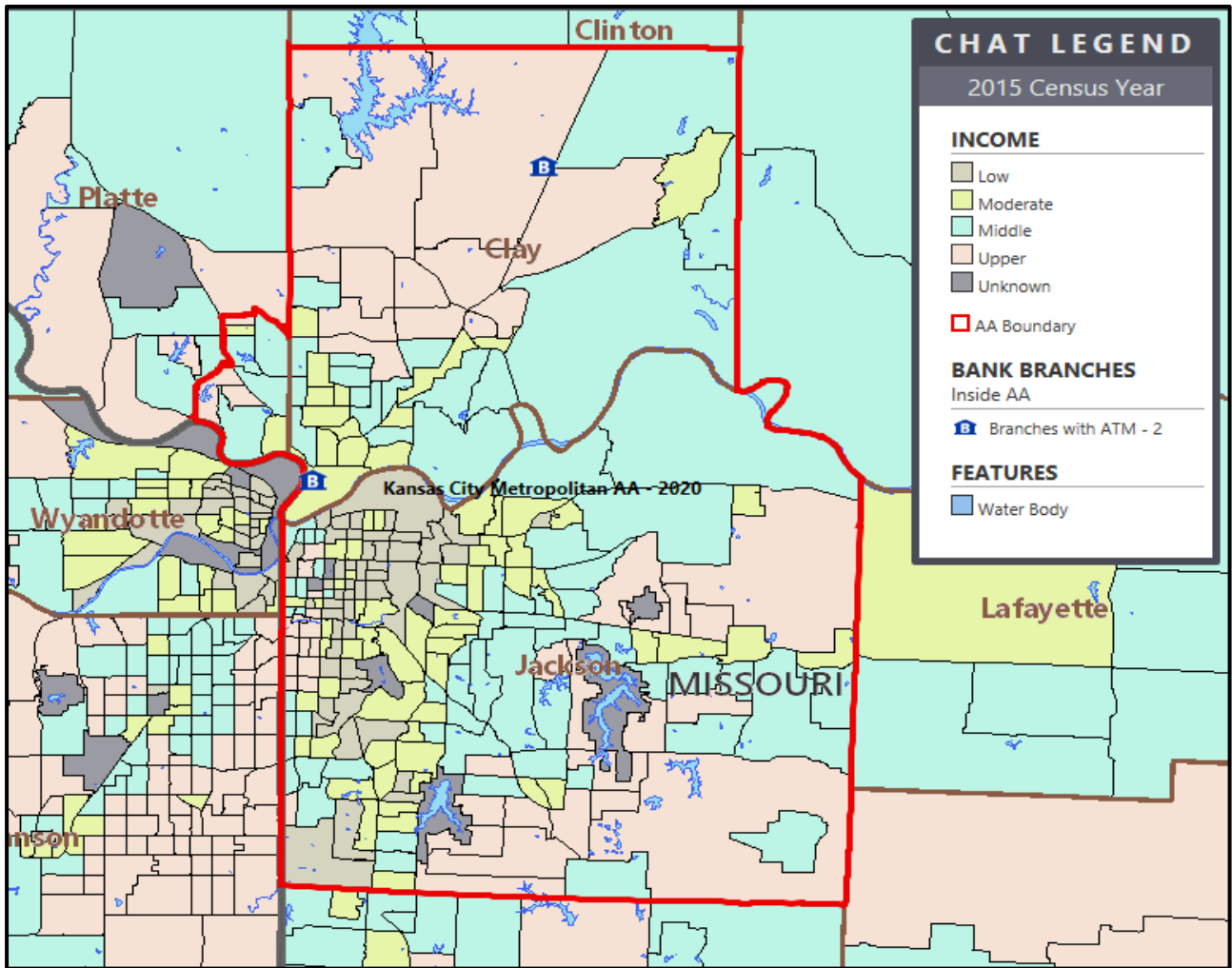
The bank's performance in the Harrison County AA was reviewed using the limited-scope examination procedures. The institution's lending performance in the area is consistent with the bank's performance overall, with consideration given to the low number of originations in this AA. The bank's lending activity in the AA included 8 home mortgage loans in 2019, 2 home mortgage loans in 2018, and 12 small business loans in 2020. Demographic and lending tables for this AA are included in Appendix B.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

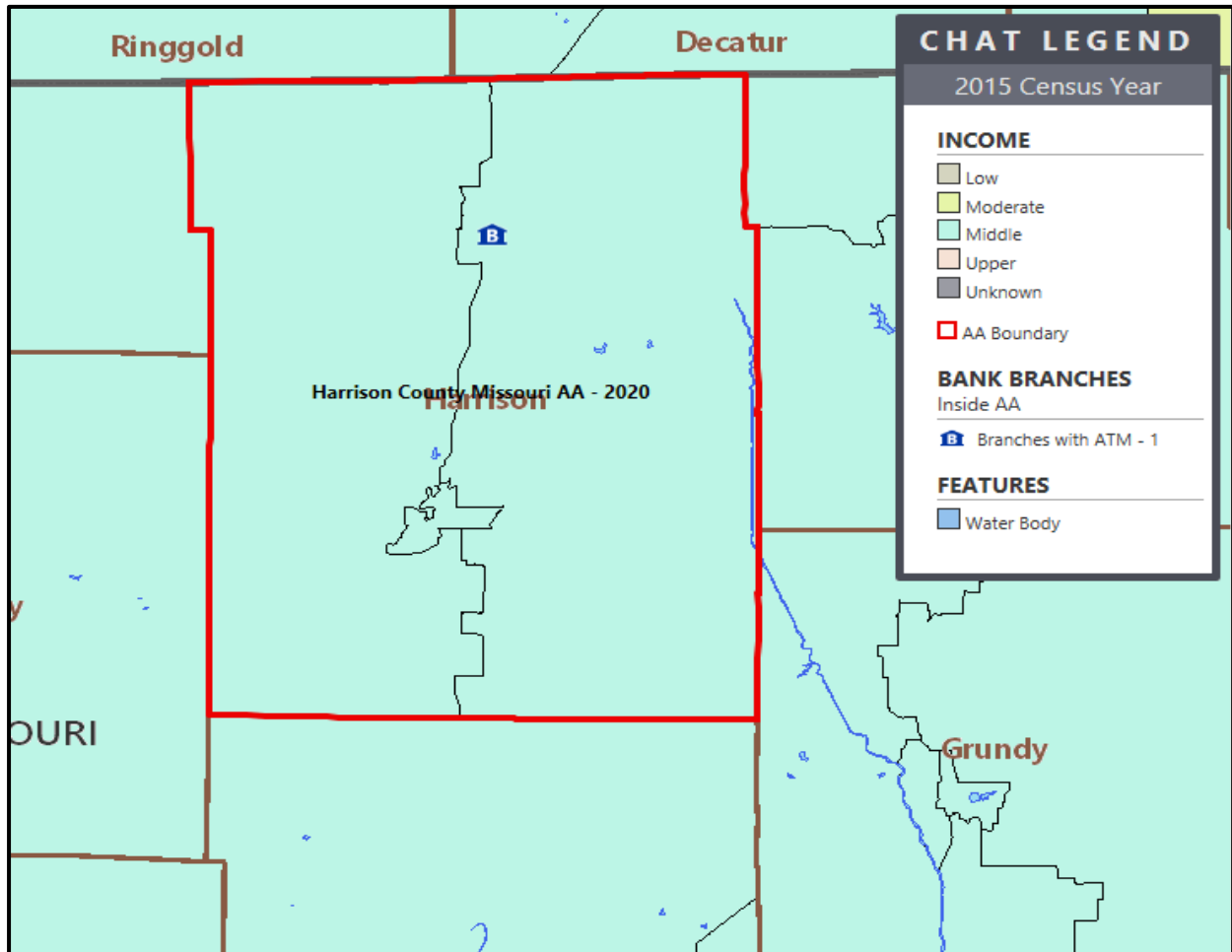
North Central Missouri AA – 2020



Kansas City Metropolitan AA – 2020



Harrison County AA – 2020



APPENDIX B – DEMOGRAPHIC & LENDING TABLES

A. North Central Missouri AA (Full-Scope Review) - 2018 through 2020 Demographic Tables and 2018 HMDA Lending Tables

TABLE B-1 NORTH CENTRAL MISSOURI AA 2018 INCOME AND HOUSING DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income ¹	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	818	17.0
Moderate	1	12.5	743	15.5	199	26.8	1,011	21.0
Middle	6	75.0	3,315	69.0	340	10.3	1,083	22.5
Upper	1	12.5	748	15.6	35	4.7	1,894	39.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8	100.0	4,806	100.0	574	11.9	4,806	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	1,648	803	14.9	48.7	423	25.7	422	25.6
Middle	6,571	3,680	68.1	56.0	1,320	20.1	1,571	23.9
Upper	1,504	922	17.1	61.3	192	12.8	390	25.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	9,723	5,405	100.0	55.6	1,935	19.9	2,383	24.5
Source: 2018 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 B-2
NORTH CENTRAL MISSOURI AA
2019 INCOME AND HOUSING DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income ¹	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	810	16.9
Moderate	1	12.5	743	15.5	199	26.8	1,006	20.9
Middle	6	75.0	3,315	69.0	340	10.3	1,082	22.5
Upper	1	12.5	748	15.6	35	4.7	1,908	39.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8	100.0	4,806	100.0	574	11.9	4,806	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	1,648	803	14.9	48.7	423	25.7	422	25.6
Middle	6,571	3,680	68.1	56.0	1,320	20.1	1,571	23.9
Upper	1,504	922	17.1	61.3	192	12.8	390	25.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	9,723	5,405	100.0	55.6	1,935	19.9	2,383	24.5

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 B-3
NORTH CENTRAL MISSOURI AA
2020 BUSINESS DEMOGRAPHICS**

	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	183	25.6	162	25.9	17	35.4	4	9.5
Middle	468	65.5	403	64.5	29	60.4	36	85.7
Upper	64	9.0	60	9.6	2	4.2	2	4.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	715	100.0	625	100.0	48	100.0	42	100.0
Percentage of Total Businesses:				87.4		6.7		5.9

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 B-4
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

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	17	831	32.1	22.2	19.3	17.5	14.9
Middle	14	1,051	26.4	28.1	53.5	56.3	68.1
Upper	22	1,864	41.5	49.8	26.4	24.5	17.1
Unknown	0	0	0.0	0.0	0.0	0.0	0.0
Not Reported	0	0	0.0	0.0	0.8	1.6	0.0

Source: 2018 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 B-5
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	6	138	11.3	3.7	9.8	4.9	17.0
Moderate	7	201	13.2	5.4	18.9	12.4	21.0
Middle	8	274	15.1	7.3	20.5	18.3	22.5
Upper	27	2,678	50.9	71.5	36.2	47.8	39.4
Unknown	5	455	9.4	12.1	14.6	16.5	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

B. Kansas City Metropolitan AA (Full-Scope Review) – 2018 through 2020 Demographic Tables and 2018 HMDA Lending Tables

TABLE B-6 KANSAS CITY METROPOLITAN AA 2018 – 2019 INCOME AND HOUSING DEMOGRAPHICS								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	49	19.4	25,427	10.9	9,244	36.4	58,469	25.2
Moderate	70	27.8	63,469	27.3	10,044	15.8	44,058	19.0
Middle	76	30.2	82,982	35.7	5,533	6.7	47,817	20.6
Upper	50	19.8	59,769	25.7	1,445	2.4	82,047	35.3
Unknown	7	2.8	744	0.3	339	45.6	0	0.0
Total AA	252	100.0	232,391	100.0	26,605	11.4	232,391	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	62,859	19,122	8.2	30.4	28,722	45.7	15,015	23.9
Moderate	127,427	58,272	24.9	45.7	53,938	42.3	15,217	11.9
Middle	145,633	88,232	37.7	60.6	45,717	31.4	11,684	8.0
Upper	87,305	67,526	28.9	77.3	15,413	17.7	4,366	5.0
Unknown	3,290	621	0.3	18.9	1,578	48.0	1,091	33.2
Total AA	426,514	233,773	100.0	54.8	145,368	34.1	47,373	11.1
2020 BUSINESS DEMOGRAPHICS								
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,445	9.9	3,860	9.4	562	15.1	23	7.7
Moderate	12,550	27.9	11,407	27.8	1,069	28.6	74	24.9
Middle	15,744	35.0	14,338	35.0	1,308	35.0	98	33.0
Upper	11,974	26.6	11,112	27.1	764	20.5	98	33.0
Unknown	301	0.7	267	0.7	30	0.8	4	1.3
Total AA	45,014	100.0	40,984	100.0	3,733	100.0	297	100.0
	Percentage of Total Businesses:			91.0		8.3		0.7
Source: 2018-2020 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 B-7
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				Aggregate HMDA Data		% of Owner- Occupied Units
	#	\$(000)	#%	\$%	#%	\$%	
Low	5	722	16.7	14.1	4.3	3.6	8.2
Moderate	7	869	23.3	16.9	22.9	17.5	24.9
Middle	10	1,975	33.3	38.5	37.9	36.5	37.7
Upper	7	1,330	23.3	25.9	34.6	42.1	28.9
Unknown	1	236	3.3	4.6	0.3	0.4	0.3
Not Reported	0	0	0	0	0.0	0.0	0.0

Source: 2018 Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

**TABLE B-8
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	10.2	5.4	25.2
Moderate	1	76	3.3	1.5	22.1	16.0	19.0
Middle	1	77	3.3	1.5	21.7	19.4	20.6
Upper	10	1,346	33.3	26.2	29.1	34.2	35.3
Unknown	18	3,633	60.0	70.8	17.0	24.9	0.0

Source: 2018 FFIEC Census Data
2011-2015 U.S. Census Bureau: American Community Survey
NOTE: Percentages may not add up to 100.0 due to rounding.

C. Harrison County AA (Limited-Scope Review) – 2018 through 2020 Demographic Tables, and 2018 through 2019 HMDA and 2020 Small Business Lending Tables

**TABLE B-9
HARRISON COUNTY AA
2018 INCOME AND HOUSING DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income ¹	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	487	20.3
Moderate	0	0.0	0	0.0	0	0.0	385	16.1
Middle	3	100.0	2,395	100.0	321	13.4	628	26.2
Upper	0	0.0	0	0.0	0	0.0	895	37.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3	100.0	2,395	100.0	321	13.4	2,395	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	4,388	2,623	100.0	59.8	951	21.7	814	18.6
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	4,388	2,623	100.0	59.8	951	21.7	814	18.6

Source: 2018-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 B-10
HARRISON COUNTY AA
2019 INCOME AND HOUSING DEMOGRAPHICS**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income ¹	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	483	20.2
Moderate	0	0.0	0	0.0	0	0.0	382	15.9
Middle	3	100.0	2,395	100.0	321	13.4	624	26.1
Upper	0	0.0	0	0.0	0	0.0	906	37.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3	100.0	2,395	100.0	321	13.4	2,395	100.00
	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	4,388	2,623	100.0	59.8	951	21.7	814	18.6
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	4,388	2,623	100.0	59.8	951	21.7	814	18.6

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 B-11
HARRISON COUNTY AA
2020 BUSINESS DEMOGRAPHICS**

	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	408	100.0	369	100.0	23	100	16	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	408	100.0	369	100.0	23	100.0	16	100.0
Percentage of Total Businesses:				90.4		5.6		3.9

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 B-12
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

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	2	42	100.0	100.0	98.9	98.6	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	1.1	1.4	0.0

Source: 2018 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 B-13
DISTRIBUTION OF 2018 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	4.4	2.6	20.3
Moderate	0	0	0.0	0.0	20.0	16.8	16.1
Middle	0	0	0.0	0.0	23.3	24.1	26.2
Upper	2	42	100.0	100.0	37.8	44.7	37.4
Unknown	0	0	0.0	0.0	14.4	11.8	0.0

Source: 2018 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 B-14
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY INCOME LEVEL OF GEOGRAPHY**

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	8	366	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 B-15
DISTRIBUTION OF 2019 HOME MORTGAGE LENDING
BY BORROWER INCOME LEVEL**

Borrower Income Level	Bank Loans				Aggregate HMDA Data		Families by Family Income %
	#	\$(000)	#%	\$%	#%	\$%	
Low	0	0	0.0	0.0	6.1	2.2	20.2
Moderate	3	68	37.5	18.6	24.3	16.3	15.9
Middle	2	62	25.0	16.9	16.5	16.6	26.1
Upper	3	236	37.5	64.5	40.0	47.9	37.8
Unknown	0	0	0.0	0.0	13.0	16.9	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 B-16
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY INCOME LEVEL OF GEOGRAPHY**

Census Tract Income Level	Bank Loans				% of Businesses
	#	\$(000)	#%	\$%	
Low	0	0	0.0	0.0	0.0
Moderate	0	0	0.0	0.0	0.0
Middle	12	465	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 B-17
DISTRIBUTION OF 2020 SMALL BUSINESS LENDING
BY REVENUE SIZE OF BUSINESSES**

	Bank Loans				Total Businesses
	#	\$(000)	#%	\$%	%
By Revenue					
\$1 Million or Less	11	345	91.7	74.2	90.4
Over \$1 Million	1	120	8.3	25.8	5.6
Not Known	0	0	0.0	0.0	3.9
Total	12	465	100.0	100.0	100.0
By Loan Size					
\$100,000 or less	10	200	83.3	43.0	
\$100,001 – \$250,000	2	265	16.7	57.0	
\$250,001 – \$1 Million	0	0	0.0	0.0	
Total	12	465	100.0	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or less	10	200	90.9	58.0	
\$100,001 – \$250,000	1	145	9.1	42.0	
\$250,001 – \$1 Million	0	0	0.0	0.0	
Total	11	345	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.

APPENDIX C – 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 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-scope 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.