

PUBLIC DISCLOSURE

May 16, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**The Central Trust Bank
RSSD #853952**

**238 Madison Street
Jefferson City, Missouri 65101**

Federal Reserve Bank of St. Louis

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of the institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

I.	Institution’s CRA Rating	
	a. Performance Test and Overall Ratings Table	1
	b. Summary of Major Factors Supporting Rating.....	1
II.	Institution	
	a. Description of Institution	2
	b. Scope of Examination	4
	c. Conclusions with Respect to Performance Tests	9
III.	Missouri	
	a. Summary	
	i. State Rating.....	17
	ii. Scope of Examination.....	18
	iii. Description of Institution’s Operations.....	18
	iv. Conclusions with Respect to Performance Tests	19
	b. Jefferson City, Missouri Metropolitan Statistical Area (full-scope review)	
	i. Description of Institution’s Operations.....	25
	ii. Conclusions with Respect to Performance Tests	30
	c. Springfield, Missouri Metropolitan Statistical Area (full-scope review)	
	i. Description of Institution’s Operations.....	37
	ii. Conclusions with Respect to Performance Tests	42
	d. Mid-Missouri Nonmetropolitan Statistical Area (limited-scope review)	
	i. Description of Institution’s Operations.....	49
	ii. Conclusions with Respect to Performance Tests	50
	e. Columbia, Missouri Metropolitan Statistical Area (limited-scope review)	
	i. Description of Institution’s Operations.....	52
	ii. Conclusions with Respect to Performance Tests	53
	f. Branson, Missouri Nonmetropolitan Statistical Area (limited-scope review)	
	i. Description of Institution’s Operations.....	55
	ii. Conclusions with Respect to Performance Tests	56
IV.	Kansas City, Missouri-Kansas-Lawrence, Kansas Combined Multistate Metropolitan Statistical Area (full-scope review)	
	a. Description of Institution’s Operations.....	58
	b. Conclusions with Respect to Performance Tests	65

V.	St. Louis, Missouri-Illinois Multistate Metropolitan Statistical Area (full-scope review)	
	a. Description of Institution’s Operations.....	75
	b. Conclusions with Respect to Performance Tests	80
VI.	Oklahoma	
	a. Summary	
	i. State Rating.....	88
	ii. Scope of Examination.....	88
	iii. Description of Institution’s Operations.....	89
	iv. Conclusions with Respect to Performance Tests	90
	b. Tulsa, Oklahoma Metropolitan Statistical Area (full-scope review)	
	i. Description of Institution’s Operations.....	94
	ii. Conclusions with Respect to Performance Tests	99
	c. Oklahoma City, Oklahoma Metropolitan Statistical Area (limited-scope review)	
	i. Description of Institution’s Operations.....	105
	ii. Conclusions with Respect to Performance Tests	106
VII.	Colorado	
	a. Summary	
	i. State Rating.....	108
	ii. Scope of Examination.....	108
	iii. Description of Institution’s Operations.....	109
	iv. Conclusions with Respect to Performance Tests	110
	b. Colorado Springs, Colorado Metropolitan Statistical Area (full-scope review)	
	i. Description of Institution’s Operations.....	115
	ii. Conclusions with Respect to Performance Tests	119
	c. Denver, Colorado Metropolitan Statistical Area (limited-scope review)	
	i. Description of Institution’s Operations.....	124
	ii. Conclusions with Respect to Performance Tests	125
	d. Durango, Colorado Nonmetropolitan Statistical Area (limited-scope review)	
	i. Description of Institution’s Operations.....	127
	ii. Conclusions with Respect to Performance Tests	128
VIII.	Appendices	
	a. Scope of Examination Tables	130
	b. Summary of State and Multistate Metropolitan Statistical Area Ratings	131
	c. Lending Performance Tables by Assessment Area	132
	d. Glossary	228

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.

The following table shows the performance level of The Central Trust Bank with respect to the Lending, Investment, and Service Tests.

THE CENTRAL TRUST BANK			
Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at overall ratings.

The major factors supporting the institution's rating include:

- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment areas.
- A high percentage of the bank's loans were made in the assessment areas.
- The distribution of borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good dispersion throughout the assessment areas.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes an adequate level of qualified community development investments and grants.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment areas, particularly low- and moderate-income (LMI) geographies and/or LMI individuals.
- Record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of community development services.

DESCRIPTION OF INSTITUTION

The Central Trust Bank is a large, interstate retail bank offering both consumer and commercial loan and deposit products. The bank is headquartered in Jefferson City, Missouri, and is wholly owned by Central Bancompany, Inc., also headquartered in Jefferson City, Missouri. The bank has 25 domestic entities, finance companies, securities brokers/dealers, and data processing centers, which are not material with regard to consumer compliance. None of the bank's subsidiaries are credit granting. The bank is a full-service financial institution offering an array of commercial and consumer loan and deposit products across a branch network consisting of 154 branches, including the main office, across five states. The bank's most significant presence is in its home state of Missouri, specifically in its Jefferson City metropolitan statistical area (MSA) assessment area where the largest number of its branches, deposits, and loans are held.

As of the previous evaluation on October 1, 2018, The Central Trust Bank operated 13 branches in two assessment areas in the state of Missouri. It was affiliated with 12 other Central Bancompany, Inc., subsidiary banks that were headquartered throughout Missouri and Oklahoma. Since that time, the holding company consolidated its 13 subsidiary banks into one charter, designating The Central Trust Bank as the surviving bank. Through this merger with its affiliate banks, effective October 1, 2021, the bank added eight assessment areas and 138 branches. Subsequently, the bank opened three branches in three markets in Colorado, increasing the total number of assessment areas to 13. For purposes of this evaluation, two of the contiguous assessment areas with similar economic and demographic characteristics were combined for analysis, resulting in 12 assessment areas reviewed. The composition of each assessment area, including assessment areas that were combined for analysis, is detailed in the *General Demographics* section for each separate assessment area. The 12 assessment areas are listed below:

- Jefferson City, Missouri MSA (Jefferson City)
- Springfield, Missouri MSA (Springfield)
- Mid-Missouri nonMSA (Mid-Missouri)
- Columbia, Missouri MSA (Columbia)
- Branson, Missouri nonMSA (Branson)
- Kansas City, Missouri – Kansas – Lawrence, Kansas Combined Multistate MSA (Kansas City)
- St. Louis, Missouri – Illinois Multistate MSA (St. Louis)
- Tulsa, Oklahoma MSA (Tulsa)
- Oklahoma City, Oklahoma MSA (Oklahoma City)
- Colorado Springs, Colorado MSA (Colorado Springs)
- Denver, Colorado MSA (Denver)
- Durango, Colorado nonMSA (Durango)

The following table details the changes in the bank's branch network by assessment area since The Central Trust Bank's previous evaluation on October 1, 2018, as well as changes to its affiliates' branch networks completed after the affiliates' previous evaluation and prior to the merger.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

The Central Trust Bank Branch Activity								
Assessment Area	Affiliate Activity (Previous Evaluation through October 1, 2021)			Bank Activity (October 1, 2018 through May 15, 2022)				
	Branches at Previous Evaluation	Branches Opened	Branches Closed	Branches Acquired through Merger	Branches at Previous Evaluation	Branches Opened	Branches Closed	Current Branches
Jefferson City	4	-	-	4	12	-	-	16
Springfield	22	1	2	21	-	-	-	21
Mid-Missouri	21	-	1	20	1	-	1	20
Columbia	15	-	-	15	-	-	-	15
Branson	5	-	-	5	-	-	-	5
Kansas City	52	-	3	49	-	-	-	49
St. Louis	15	1	-	16	-	-	-	16
Tulsa	6	-	-	6	-	-	-	6
Oklahoma	1	1	-	2	-	1	-	3
Colorado Springs	-	-	-	-	-	1	-	1
Denver	-	-	-	-	-	1	-	1
Durango	-	-	-	-	-	1	-	1
TOTAL	141	3	6	138	13	4	1	154

In addition to the branch locations shown in the table above, the bank also operates 84 stand-alone automated teller machines (ATMs), four stand-alone interactive teller machines (ITMs), and 10 loan production offices (LPOs). All but two stand-alone ATMs and ITMs are located in the bank's Missouri and Kansas City assessment areas. The remaining two are located in the St. Louis assessment area. The bank maintains five of its LPOs outside of its assessment areas and five within its Missouri, Kansas City, and St. Louis assessment areas.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers. As such, the bank appears capable of meeting the credit needs of its assessment areas based on its available resources and financial products and services. As of March 31, 2022, the bank reported total assets of \$19.9 billion. As of the same date, loans and leases outstanding were \$10.4 billion (52.6 percent of total assets), and deposits totaled \$15.9 billion. The bank's loan portfolio composition by credit category is displayed in the following table:

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Distribution of Total Loans as of March 31, 2022		
Credit Category	Amount (\$ 000s)	Percentage of Total Loans
Commercial Real Estate	\$3,480,994	33.5%
1–4 Family Residential	\$1,983,965	19.1%
Commercial and Industrial	\$1,438,858	13.8%
Loans to Individuals	\$1,041,652	10.0%
Construction and Development	\$908,460	8.7%
Multifamily Residential	\$808,145	7.8%
Total Other Loans	\$401,715	3.9%
Farmland	\$277,005	2.7%
Farm Loans	\$64,686	0.6%
TOTAL	\$10,405,480	100%

The table shows that a significant portion of the bank’s lending resources is directed to commercial real estate loans, loans secured by 1–4 family residential properties, and commercial and industrial loans. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. Given the subsequent sale of these loans on the secondary market, this activity would not be captured in the table.

While farmland and farm loans do not represent a significant portion of the bank’s loan portfolio by dollar volume, these products are nevertheless an important product line in several of the bank’s assessment areas and are thus included for review where applicable.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on October 1, 2018.

SCOPE OF EXAMINATION

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) large bank procedures, which entail three performance tests: the Lending Test, Investment Test, and Service Test. The bank’s performance under these tests is rated at the institution level, as well as by state and multistate MSA. For this evaluation, the bank received a rating for three states and two multistate MSAs, along with an overall institution rating. The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. The rated areas are listed in order of significance towards the overall institution rating. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2021.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

State/Multistate MSA	Offices		Deposits as of June 30, 2021		Assessment Area Reviews		
	#	%	\$ (000s)	%	Full Scope	Limited Scope	TOTAL
Missouri	77	50.0%	9,484,341	62.0%	2	3	5
Kansas City	49	31.8%	3,391,976	22.2%	1	-	1
St. Louis	16	10.4%	1,812,063	11.8%	1	-	1
Oklahoma	9	5.8%	595,595	3.9%	1	1	2
Colorado	3	1.9%	14,271	0.1%	1	2	3
OVERALL	154	100%	\$13,619,382	100%	6	6	12

The bank's overall institution rating is a composite of these five rated areas, which are weighted according to the significance of the bank's operations in each area. Based on branch structure and loan and deposit activity, primary emphasis (in order of significance) was placed on performance in the state of Missouri, Kansas City, and St. Louis. As a combined group, these three rated areas represent 82.2 percent of the bank's total branches and 96.0 percent of total deposits.

Lending Test

Under the Lending Test, the bank's performance is evaluated using specific criteria and time periods that cover lending activity since the prior CRA examination. Once evaluated, lending activity may not be used in any other CRA examination. To uphold this requirement, the period of time used to conduct the Lending Test varies by assessment area, according to the applicable affiliate's most recent CRA examination. Further, data sources used in this test vary by assessment area as four of the affiliate banks were not CRA and/or Home Mortgage Disclosure Act (HMDA) data reporters at the time of the most recent performance evaluation. The below set of charts identifies the time periods used for each assessment area in this evaluation.

Lending Test Performance Criterion	Products Selected for Review
Level of Lending Activity	<ul style="list-style-type: none"> Loans reportable under the HMDA Small business and small farm loans reportable under the CRA
Assessment Area Concentration	
Loan Distribution by Borrower's Profile	
Geographic Distribution of Loans	
Community Development Lending Activities	
Product Innovation ¹	

¹ Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Assessment Area	Time Periods Used for Lending Test	
	Small Business, HMDA, and Small Farm Lending	Community Development Activities
Jefferson City	1/1/2019 – 12/31/2020	10/1/2018 – 12/31/2021
Springfield	1/1/2019 – 12/31/2020	10/1/2018 – 12/31/2021
Mid-Missouri	<ul style="list-style-type: none"> • 1/1/2020 – 12/31/2020 (Pettis, Randolph, and Audrain Counties) • 1/1/2019 – 12/31/2020 (Camden, Miller, Morgan, and Johnson Counties) 	<ul style="list-style-type: none"> • 11/5/2018 – 12/31/2021 (Camden, Miller, and Morgan Counties) • 7/27/2020 – 12/31/2021 (Pettis County) • 10/7/2020 – 12/31/2021 (Randolph and Audrain Counties) • 10/1/2018 – 12/31/2021 (Johnson County)
Columbia	1/1/2020 – 12/31/2020	12/6/2020 – 12/31/2021
Branson	1/1/2019 – 12/31/2020	7/15/2019 – 12/31/2021
Kansas City	1/1/2020 – 12/31/2020	11/2/2020 – 12/31/2021
St. Louis	1/1/2019 – 12/31/2020	10/1/2018 – 12/31/2021
Tulsa	1/1/2019 – 12/31/2020	3/11/2019 – 12/31/2021
Oklahoma City	1/1/2019 – 12/31/2020	3/11/2019 – 12/31/2021
Colorado Springs	1/1/2019 – 12/31/2020	10/18/2018 – 12/31/2021
Denver	1/1/2019 – 2/25/2020	2/25/2020 – 12/31/2021
Durango	1/1/2019 – 12/31/2020	5/21/2021 – 12/31/2021

As previously described, HMDA, small business, and small farm loans are used to evaluate the bank's lending performance. Given the bank's strategic focus on commercial and residential real estate lending, along with needs noted by community contacts, small business and HMDA loans are generally given more weight than small farm loans. When possible, equal emphasis is placed on performance in 2019 and 2020, though adjustments to this weighting are made according to exceptional circumstances, such as the limitations on data as identified in the table above and the unique circumstances surrounding COVID-19 that impacted 2020 data.

Under the Lending Test criteria previously noted, analyses often involve comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate data. Unless otherwise noted, the following are the information sources referenced throughout the evaluation:

- Assessment area demographics are based on 2015 American Community Survey (ACS) data, and business demographics are based on 2019 and 2020 Dun & Bradstreet data.
- Median family incomes are based on the FFIEC's 2019 and 2020 annual estimates. The 2020 estimates were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.
- Industry demographics are sourced from the 2020 U.S. Census Bureau Business Patterns data, according to the North American Industry Classification System.
- Unemployment data is sourced from the U.S. Department of Labor, Bureau of Labor Statistics and is not seasonally adjusted.

- In order to evaluate the bank's lending performance to borrowers of different income levels, borrowers are classified as low-, moderate-, middle-, or upper-income. In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses and farms of different revenue sizes, the demographic figure refers to the percentage of families in that assessment area who are classified as either low or moderate income or the percentage of businesses and farms with annual revenues of \$1 million or less.
- In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to the percentage of owner-occupied housing units in that assessment area that are located in either low- or moderate-income census tracts or the percentage of businesses and farms located in LMI census tracts.

When analyzing bank performance, greater emphasis is placed on annually updated aggregate lending data, which is expected to describe many factors impacting lenders and to predict more relevant comparisons.

Investment Test

The Investment Test considers community development investments, including grants and donations, made since the previous CRA examination. In addition, investments made prior to the date of the previous CRA examination, but still outstanding as of this review date, are considered. As with the Lending Test, the time periods used for the Investment Test varied by assessment area, according to the applicable affiliate's prior CRA examination as identified below.

Assessment Area	Time Periods
Jefferson City	10/1/2018 – 12/31/2021
Springfield	10/1/2018 – 12/31/2021
Mid-Missouri	<ul style="list-style-type: none"> • 11/5/2018 – 12/31/2021 (Camden, Miller, and Morgan Counties) • 7/27/2020 – 12/31/2021 (Pettis County) • 10/7/2020 – 12/31/2021 (Randolph and Audrain Counties) • 10/1/2018 – 12/31/2021 (Johnson County)
Columbia	12/6/2020 – 12/31/2021
Branson	7/15/2019 – 12/31/2021
Kansas City	11/2/2020 – 12/31/2021
St. Louis	10/1/2018 – 12/31/2021
Tulsa	3/11/2019 – 12/31/2021
Oklahoma City	3/11/2019 – 12/31/2021
Colorado Springs	10/18/2018 – 12/31/2021
Denver	2/25/2020 – 12/31/2021
Durango	5/21/2021 – 12/31/2021

Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to assessment area credit and community development needs.

Service Test

The Service Test considers the following criteria:

- Distribution and accessibility of bank branches and alternative delivery systems.
- Changes in branch locations.
- Reasonableness of business hours and retail services.
- Community development services.

The review period for retail and community development services includes activity from the date of the previous CRA evaluation to the date of the current evaluation. As with the Lending and Investment Tests, the time periods used for this test vary by assessment area, according to the applicable affiliate's prior CRA examination as identified below.

Assessment Area	Time Periods	
	Community Development Services	Retail Services
Jefferson City	10/1/2018 – 12/31/2021	10/1/2018 – 5/16/2022
Springfield	10/1/2018 – 12/31/2021	10/1/2018 – 5/16/2022
Mid-Missouri	<ul style="list-style-type: none"> • 11/5/2018 – 12/31/2021 (Camden, Miller, and Morgan Counties) • 7/27/2020 – 12/31/2021 (Pettis County) • 10/7/2020 – 12/31/2021 (Randolph and Audrain Counties) • 10/1/2018 – 12/31/2021 (Johnson County) 	<ul style="list-style-type: none"> • 11/5/2018 – 5/16/2022 (Camden, Miller, and Morgan Counties) • 7/27/2020 – 5/16/2022 (Pettis County) • 10/7/2020 – 5/16/2022 (Randolph and Audrain Counties) • 10/1/2018 – 5/16/2022 (Johnson County)
Columbia	12/6/2020 – 12/31/2021	12/6/2020 – 5/16/2022
Branson	7/15/2019 – 12/31/2021	7/15/2019 – 5/16/2022
Kansas City	11/2/2020 – 12/31/2021	11/2/2020 – 5/16/2022
St. Louis	10/1/2018 – 12/31/2021	10/1/2018 – 5/16/2022
Tulsa	3/11/2019 – 12/31/2021	3/11/2019 – 5/16/2022
Oklahoma City	3/11/2019 – 12/31/2021	3/11/2019 – 5/16/2022
Colorado Springs	10/18/2018 – 12/31/2021	10/18/2018 – 5/16/2022
Denver	2/25/2020 – 12/31/2021	2/25/2020 – 5/16/2022
Durango	5/21/2021 – 12/31/2021	5/21/2021 – 5/16/2022

Community Contacts

To augment this evaluation, nine community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions in the bank's assessment areas. These interviews were conducted with knowledgeable individuals residing or conducting business in the assessment areas. Key details from these interviews are included in the *Description of Assessment Area* section, applicable to the assessment area for which they were conducted.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The Central Trust Bank's performance under the Lending Test is rated High Satisfactory. The rating reflects an aggregation of the ratings for each rated area shown in the table below, with Missouri, Kansas City, and St. Louis carrying the most weight toward the overall rating. The bank's performance under each of the criteria of the Lending Test are shown in the tables that follow.

Rated Area	Lending Activity
Missouri	High Satisfactory
Kansas City	High Satisfactory
St. Louis	High Satisfactory
Oklahoma	Low Satisfactory
Colorado	Low Satisfactory
OVERALL	High Satisfactory

Assessment Area Concentration

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

Lending Inside and Outside of Assessment Areas (\$ 000s)						
January 1, 2019 through December 31, 2020						
Loan Type	Inside Assessment Areas		Outside Assessment Areas		TOTAL	
HMDA	14,897	81.3%	3,426	18.7%	18,323	100%
	\$3,417,625	78.3%	\$949,231	21.7%	\$4,366,857	100%
Small Business	20,228	93.3%	1,442	6.7%	21,670	100%
	\$2,091,369	91.7%	\$189,235	8.3%	\$2,280,604	100%
Small Farm Loans	2,734	83.0%	560	17.0%	3,294	100%
	\$191,877	83.7%	\$37,490	16.3%	\$229,367	100%
TOTAL LOANS	37,859	87.5%	5,428	12.5%	43,287	100%
	\$5,700,872	82.9%	\$1,175,956	17.1%	\$6,876,828	100%

A high percentage of loans were made in the bank's assessment areas. As shown above, 87.5 percent of the total loans were made inside the assessment areas, accounting for 82.9 percent of the dollar volume of total loans.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Lending Activity

Rated Area	Lending Activity
Missouri	Excellent
Kansas City	Adequate
St. Louis	Excellent
Oklahoma	Good
Colorado	Good
OVERALL	EXCELLENT

Overall lending levels reflect excellent responsiveness to the credit needs of the bank's assessment areas. This conclusion is driven by performance in Missouri and St. Louis. The total number and dollar amount of loans were considered in arriving at lending activity conclusions, in addition to competitive factors and the bank's overall market share in the area. Additional details are discussed later for each assessment area reviewed under full-scope procedures.

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following table.

Rated Area	Loan Distribution by Borrower's Profile
Missouri	Good
Kansas City	Good
St. Louis	Good
Oklahoma	Adequate
Colorado	Good
OVERALL	GOOD

The overall geographic distribution of loans reflects good penetration throughout the assessment areas, as displayed below.

Rated Area	Geographic Distribution of Loans
Missouri	Good
Kansas City	Good
St. Louis	Adequate
Oklahoma	Good
Colorado	Adequate
OVERALL	GOOD

The bank's geographic distribution of loans varied slightly between rated areas and is considered good overall, primarily driven by performance in Missouri and Kansas City.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Community Development Lending Activity

The bank makes a relatively high level of community development loans, as shown in the table below.

Rated Area	Community Development Lending Activity
Missouri	Leader
Kansas City	Adequate
St. Louis	Relatively High
Oklahoma	Adequate
Colorado	Low Level
OVERALL	RELATIVELY HIGH

The overall performance conclusion is driven by Missouri, Kansas City, and St. Louis. Collectively, performance balances to a relatively high level. The bank made 182 qualified community development loans totaling \$217.5 million throughout its assessment areas. Included in these numbers are 38 Paycheck Protection Program (PPP) loans, totaling \$25.5 million, that had a community development purpose. These loans made to small businesses impacted by the COVID-19 pandemic (the pandemic) in 2020 helped to support and retain LMI jobs (see the *Product Innovation* section that follows for more information).

Product Innovation

The Central Trust Bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.

Rated Area	Use of Product Innovation
Missouri	Makes extensive use
Kansas City	Makes extensive use
St. Louis	Makes extensive use
Oklahoma	Limited use
Colorado	Limited use
OVERALL	MAKES EXTENSIVE USE

Performance in Missouri, Kansas City, and St. Louis drives the overall performance conclusion. Following are descriptions of each of the innovative and/or flexible lending options offered by the bank during the review period, listed in order of uniqueness.

- **Home Turf Program**: The bank created this program specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas. Initially offered in Kansas City only, the bank expanded the reach of this program to include St. Louis and more recently, Colorado Springs. Through this program, eligible borrowers are allowed to make a reduced minimum down payment of 3.0 percent, using the borrowers' personal funds, government assistance programs, or a gift from a relative. From January 1, 2019, through December 31, 2021, the bank originated 439 mortgage loans under this program, totaling \$59.2 million in its Kansas City, St. Louis, and Colorado Springs assessment areas.

- Missouri Housing Development Commission Loan Program: This program helps with closing cost and down payment assistance for LMI families. From 2019 through 2021, the bank originated 148 loans, totaling \$17.8 million, primarily in its Missouri, Kansas City, and St. Louis assessment areas.
- Federal Home Loan Bank (FHLB) of Des Moines HomeStart Plus Program: This FHLB assistance program provides down payment assistance to LMI individuals funded through direct subsidies from member banks. The bank provided direct subsidies totaling \$2.8 million on 30 mortgage loans through this program in its Missouri assessment areas from 2019 through 2021.
- Small Business Administration (SBA) Loan Programs: As an approved financial institution, the bank participates in two SBA loan programs, the SBA-Certified Development Company (CDC)/504 Loan Program and the SBA 7(a) Loan Program. Through these programs, the bank offers loans that support small business operations and/or expansion. From 2019 through 2021, the bank originated a total of 149 loans totaling \$63.9 million in its Missouri, Kansas City, and St. Louis assessment areas.
- Fannie Mae HomeReady Loan Program: This program is targeted to LMI individuals and has lower down payment requirements than traditional conventional loans. Borrowers are also provided financial education as an incident of the provision of credit. From 2019 through 2021, the bank originated a total of 463 loans, totaling \$78.9 million, both inside and outside of its assessment areas.
- Freddie Mac HomePossible Loan Program: This program is targeted to LMI individuals and has lower down payment requirements than traditional conventional loans. Borrowers are also provided financial education as an incident of the provision of credit. From 2019 through 2021, the bank originated a total of 47 loans, totaling \$7.9 million, both inside and outside of its assessment areas.
- Farmer Mac Farm Credit System Loan Program: This program offers flexible terms and makes loans available to farmers and ranchers to allow them to improve operations and increase productivity. The bank originated seven loans totaling \$3.0 million from 2019 through 2021.
- U.S. Department of Agriculture (USDA) Programs: The USDA offers loan programs, including the Farm Service Agency (FSA) and Rural Development (RD) that are designed to assist farmers and ranchers obtain the financing needed to start, expand, or maintain a family farm. From 2019 to 2021, the bank originated 63 loans totaling \$29.6 million through these programs.
- Veterans Affairs (VA) Loan Program: This program, which is offered to veterans, provides flexible, long-term home financing to eligible borrowers with low or no down payments. The bank originated 1,175 loans totaling \$402.1 million from 2019 to 2021.

- Federal Housing Administration (FHA) Loan Program: This program offers flexible, long-term financing to eligible borrowers and has lower down payment and credit score requirements. From 2019 to 2021, the bank originated 1,038 loans totaling \$207.8 million, both in and outside of its assessment areas.
- USDA, RD Home Loans: This loan program is designed to assist LMI individuals in purchasing affordable housing in rural areas. There are no down payment requirements. During the review period, the bank originated 510 RD home loans totaling \$77.9 million.

Activities in Response to the COVID-19 Pandemic

Pursuant to the joint statements issued by the federal financial institution regulatory agencies and state bank regulators in March 2020, retail banking services and retail lending activities that are responsive to the needs of LMI individuals, small businesses, and small farms affected by COVID-19 are given favorable consideration under the CRA. A summary of each of the bank's retail lending activities taken in response to the pandemic follows:

- SBA PPP: PPP loans are available to businesses with fewer than 500 employees or businesses that meet SBA industry size standards. The program provides funds for payroll costs and other operational costs to businesses impacted by the pandemic and are fully forgivable if employee retention criteria are met and the funds are used for eligible purposes. The Central Trust Bank took quick, extensive measures to put new systems and processes in place to offer these loans. From 2020 through 2021, the bank originated 17,047 PPP loans totaling \$1.3 billion across the nation, with a significant majority of these loans originated in its assessment areas. According to metrics provided by the SBA, by number of originations, the bank ranked 66th (2020) and 73rd (2021) out of the over 4,500 lenders that participated in the program. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- Loan Forbearance and Modification Programs: Consideration was given to financial institutions offering payment accommodations, such as loan forbearance or payment modification plans, to consumer and commercial borrowers impacted by the pandemic. These activities had a significant impact in helping borrowers avoid delinquencies or negative credit bureau reporting caused by hardships from pandemic-related issues and eased cash flow pressures on businesses impacted by the pandemic. For consumer borrowers, The Central Trust Bank maintained an average of 537 mortgage loan accommodations, including forbearances and payment plans, between May 2020 and May 2021. For commercial borrowers, a significant number of loan deferrals were offered between April 2020 and October 2020, peaking at 2,195 loan deferrals in June 2020.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

INVESTMENT TEST

Overall, the bank is rated Low Satisfactory under the Investment Test. Though the bank makes a significant level of community development investments and grants in two of its major assessment areas, it makes adequate and poor levels in its three other areas, driving the rating down to Low Satisfactory. The following table provides details on the total dollar volume of qualified community development investments, grants, and donations and the overall Investment Test rating for each rated area.

Multistate MSA/State	Investments (\$)	Donations/Grants (\$)	Investment Test Rating
Missouri	\$21.2 million	\$1,096,837	High Satisfactory
Kansas City	\$5.9 million	\$386,250	Low Satisfactory
St. Louis	\$8.8 million	\$217,550	High Satisfactory
Oklahoma	\$1.7 million	\$83,380	Low Satisfactory
Colorado	-	\$5,000	Needs to Improve
TOTAL	\$37.7 million	\$1,789,017	LOW SATISFACTORY

The \$37.7 million in investments largely consisted of mortgage-backed securities (MBS) made up of affordable housing loans to LMI borrowers, and municipal bonds that benefitted schools or municipal infrastructure projects in LMI areas in the bank's assessment areas. They included investments made in a prior period but still outstanding as of the date of this evaluation as well as investments made to broader statewide areas. Investments benefitting more than one of the bank's assessment areas within a state are detailed in the respective statewide section. Additional details of the bank's investment and donation/grant activity are discussed later in the evaluation of each rated area and assessment area.

SERVICE TEST

The bank's performance under the Service Test is rated High Satisfactory. Of the four criteria assessed in the Service Test, greater emphasis is placed on the level of community development services provided by the bank. Service Test ratings by rated area are shown in the table below, with performance under each of the four Service Test criteria detailed in the tables that follow.

Rated Area	Service Test Rating
Missouri	High Satisfactory
Kansas City	Low Satisfactory
St. Louis	High Satisfactory
Oklahoma	Low Satisfactory
Colorado	High Satisfactory
OVERALL	HIGH SATISFACTORY

While there is some variance in the bank's performance by rated area, the Service Test is rated High Satisfactory in three of its assessment areas; two of which are among those that are given the most weight in this evaluation (Missouri and St. Louis). Therefore, overall performance is High Satisfactory.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Accessibility of Delivery Systems

Overall, the bank's delivery systems are reasonably accessible to the geographies and individuals of different income levels in the bank's assessment areas. Branch locations are given the most weight when determining performance conclusions; however, consideration was also given to the bank's network of ATMs, ITMs, and LPOs, as well as its online and mobile services. At the institution level, conclusions were primarily driven by performance in Missouri, Kansas City, and St. Louis, which balance out to reasonably accessible.

Rated Area	Accessibility of Delivery Systems
Missouri	Accessible
Kansas City	Reasonably Accessible
St. Louis	Unreasonably Inaccessible to Portions
Oklahoma	Reasonably Accessible
Colorado	Readily Accessible
OVERALL	REASONABLY ACCESSIBLE

Changes in Branch Locations

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.

Rated Area	Changes in Branch Locations
Missouri	Generally Not Adversely Affected
Kansas City	Generally Not Adversely Affected
St. Louis	Not Adversely Affected
Oklahoma	Not Adversely Affected
Colorado	Improved Accessibility
OVERALL	GENERALLY NOT ADVERSELY AFFECTED

When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. While these factors were considered, more weight was given to the changes in branch locations that were executed by The Central Trust Bank outside of the merger.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly to LMI geographies or individuals. The bank's branch locations are generally open between 8 a.m. to 5 p.m., with many locations operating extended hours and drive-through access with extended banking hours. Some of the bank's locations also offer Saturday hours from 9 a.m. to noon or Saturday drive-through hours. While the bank's hours vary between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Rated Area	Reasonableness of Business Hours and Services
Missouri	Do Not Vary in a Way That Inconveniences
Kansas City	Do Not Vary in a Way That Inconveniences
St. Louis	Do Not Vary in a Way That Inconveniences
Oklahoma	Do Not Vary in a Way That Inconveniences
Colorado	Do Not Vary in a Way That Inconveniences
OVERALL	DO NOT VARY IN A WAY THAT INCONVENIENCES

Community Development Services

Overall, the bank provides a relatively high level of community development services throughout its assessment areas, as displayed in the following table.

Rated Area	Community Development Services
Missouri	Relatively High
Kansas City	Adequate
St. Louis	Relatively High
Oklahoma	Adequate
Colorado	Limited
OVERALL	RELATIVELY HIGH

During the review period, 229 bank employees provided 13,122 hours of community development service activities to 143 organizations. Despite challenges posed by the pandemic, bank employees lent their expertise in various capacities, such as board member, financial service provider, and financial literacy instructor, to local community service and economic development organizations. The bank was also able to continue delivering its financial literacy and coaching services through its proprietary ProsperU program by offering virtual options.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Consumer Affairs examination included a fair lending analysis performed under Regulation B – Equal Credit Opportunity and the Fair Housing Act requirements and was conducted concurrently with this CRA evaluation. Based on findings from that concurrent examination, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

MISSOURI

CRA RATING FOR MISSOURI:**The Lending Test is rated:****The Investment Test is rated:****The Service Test is rated:****Satisfactory****High Satisfactory****High Satisfactory****High Satisfactory**

Major factors supporting the institution's Missouri rating include the following.

- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment areas.
- The distribution of borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good dispersion throughout the assessment areas.
- The bank is a leader in making community development loans throughout the Missouri assessment areas.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes a significant level of qualified community development investments and grants.
- Delivery systems are accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals
- The bank provides a relatively high level of community development services.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Missouri assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. In four of the five assessment areas, small business lending received the greatest weight in the analysis, followed by HMDA lending, then small farm lending. In one assessment area, Jefferson City, small business and HMDA lending received equal weighting, followed by small farm lending.

The bank operates five assessment areas throughout Missouri, located in three MSAs and two noncontiguous nonMSA portions of the state. Two of the bank's Missouri assessment areas were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in the Jefferson City assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Missouri, three community contact interviews were leveraged. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSOURI

The Central Trust Bank operates 77 offices (50.0 percent of total branches) throughout the five CRA assessment areas in the state of Missouri. The following table gives additional detail regarding the bank's operations within Missouri.

Assessment Area	Offices		Deposits As of June 30, 2021		Review Procedures
	#	%	\$	%	
Jefferson City	16	20.8%	3,049,070	32.1%	Full Scope
Springfield	21	27.3%	1,573,455	16.6%	Full Scope
Mid-Missouri	20	26.0%	2,138,947	22.6%	Limited Scope
Columbia	15	19.5%	2,251,623	23.7%	Limited Scope
Branson	5	6.5%	471,246	5.0%	Limited Scope
TOTAL	77	100.0%	9,484,341	100.0%	2 – Full Scope

As shown above, the bank's deposits in Missouri total \$9.5 billion, which represents 62.0 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank also operates two LPO locations, 61 stand-alone ATMs, and three stand-alone ITMs. The bank's operations in the state are heavily concentrated in Jefferson City, which carried the greatest weight toward determining statewide ratings.

Through the merger with its affiliates, The Central Trust Bank added 65 branches and three assessment areas in Missouri. Prior to the merger, the bank's affiliates opened one branch, closed three branches, and relocated one branch across the five assessment areas, resulting in a net reduction of two branches. There was no other branch activity completed by the bank.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

The bank's Lending Test performance in Missouri is rated High Satisfactory. The test considers the following criteria.

Lending Activity

Full-Scope Review Areas	Lending Activity
Jefferson City	Excellent
Springfield	Excellent
OVERALL	EXCELLENT

Limited-Scope Review Areas	Lending Activity
Mid-Missouri	Consistent
Columbia	Consistent
Branson	Consistent

The bank's overall level of lending reflects excellent responsiveness to the credit needs of the Missouri assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

Borrower and Geographic Distribution

As displayed in the following tables, the bank's performance by borrower's income and revenue profile is good in Missouri.

Full-Scope Review Areas	Loan Distribution by Borrower's Profile
Jefferson City	Good
Springfield	Good
OVERALL	GOOD

Limited-Scope Review Areas	Loan Distribution by Borrower's Profile
Mid-Missouri	Consistent
Columbia	Consistent
Branson	Below

Likewise, the bank's geographic distribution of loans in Missouri reflects good penetration.

Full-Scope Review Areas	Geographic Distribution of Loans
Jefferson City	Good
Springfield	Excellent
OVERALL	GOOD

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Limited-Scope Review Areas	Geographic Distribution of Loans
Mid-Missouri	Consistent
Columbia	Consistent
Branson	Exceeds

Community Development Lending Activities

Overall, the bank is a leader in making community development loans in its Missouri assessment areas, as displayed below.

Full-Scope Review Areas	Community Development Lending Activities
Jefferson City	Leader
Springfield	Relatively High
OVERALL	LEADER

Limited-Scope Review Areas	Community Development Lending Activities
Mid-Missouri	Below
Columbia	Below
Branson	Below

The bank's level of community development lending varied between the two full-scope assessment areas. As performance in Jefferson City received primary consideration towards overall statewide conclusions, the bank is considered a leader in community development lending overall. Though performance in the limited-scope review areas was below the statewide conclusion, activity levels in those assessment areas were relatively high or adequate. During the review period, the bank made 114 community development loans totaling \$106.3 million in the state of Missouri, 31 of which were PPP loans with a community development purpose.

Product Innovation

The bank makes extensive use of flexible lending practices in serving the credit needs of the Missouri assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance Tests* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Missouri is described below:

- Through the SBA's PPP, the bank originated 12,418 PPP loans totaling \$682.3 million in its Missouri assessment areas and nearby geographies. According to metrics provided by the SBA, the bank ranked first in number of originations in Missouri¹ out of all lenders that participated in the program. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.

¹ Includes loans originated in the Missouri geographies pertaining to Kansas City and St. Louis.

- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those located in the bank's Missouri assessment areas.
- Through the Missouri Housing Development Commission Loan Program, which helps LMI families with closing costs and down payment assistance, the bank originated 90 loans totaling \$10.5 million in its Missouri assessment areas from 2019 through 2021.
- The bank provided 30 direct subsidies, totaling \$2.8 million, to LMI borrowers through the FHLB of Des Moines HomeStart Plus Program.
- The bank originated a significant volume of mortgage loans through the Fannie Mae HomeReady Loan Program and the Freddie Mac HomePossible Loan Program. Each program is targeted to LMI individuals and offers lower down payment requirements than traditional conventional loans. From 2019 through 2021, the bank originated 154 HomeReady loans, totaling \$19.2 million, and two HomePossible loans, totaling \$319,130, in its Missouri assessment areas.
- From 2019 through 2021, the bank originated 87 loans, totaling \$25.4 million through the SBA-CDC/504 Loan Program and the SBA 7(a) Loan Program in its Missouri assessment areas. Through these programs, the bank offered small business loans that support small business operations and/or expansion.
- Through various programs, including the Farmer Mac Farm Credit System Loan Program and USDA FSA and RD Programs, the bank originated 60 farm loans, totaling \$20.9 million, in its Missouri assessment areas from 2019 through 2021. These loans are tailored to the needs of farmers and ranchers, including those who own small farms.
- The bank also originated a significant volume of mortgage loans through government loan programs in its Missouri assessment areas, including 330 FHA loans (\$49.2 million), 356 RD home loans (\$49.4 million), and 253 VA loans (\$61.6 million).

INVESTMENT TEST

Overall, the bank's performance in Missouri is rated High Satisfactory under the Investment Test. The following tables display investment and grant activity performance in Missouri.

Full-Scope Review Areas	Investment and Grant Activity
Jefferson City	Significant
Springfield	Significant
OVERALL	SIGNIFICANT

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Limited-Scope Review Areas	Investment and Grant Activity
Mid-Missouri	Consistent
Columbia	Consistent
Branson	Below

As shown in the table below, the bank's total investment and grant activity included \$21.2 million in qualified investments and grants and \$1.1 million in donations. These activities consisted primarily of investments in MBS supporting affordable housing throughout the Missouri assessment areas, as well as municipal bonds supporting community service in LMI areas. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

Missouri Assessment Area	Investments	Donations/Grants
Jefferson City	\$3.6 million	\$387,086
Springfield	\$4.9 million	\$442,526
Mid-Missouri	\$6.4 million	\$187,850
Columbia	\$4.3 million	\$41,350
Branson	\$2.1 million	\$38,025
TOTAL	\$21.2 million	\$1.1 million

SERVICE TEST

The bank's performance in Missouri is rated High Satisfactory under the Service Test. This test considers the following criteria:

Accessibility of Delivery Systems

As displayed in the following tables, the bank's service delivery systems are accessible to geographies and individuals of different income levels in Missouri.

Full-Scope Review Areas	Accessibility of Delivery Systems
Jefferson City	Accessible
Springfield	Readily Accessible
OVERALL	ACCESSIBLE

Limited-Scope Review Areas	Accessibility of Delivery Systems
Mid-Missouri	Exceeds
Columbia	Consistent
Branson	Exceeds

Changes in Branch Locations

Through the merger with its affiliates, The Central Trust Bank added branches in all five of the assessment areas. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. While these factors

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

were considered, more weight was given to the changes in branch locations that were executed by The Central Trust Bank outside of the merger. Moreover, while the Jefferson City assessment area generally carried the greatest weight toward determining statewide ratings, aside from the merger, there was no other branching activity in Jefferson City by the bank or its affiliates; therefore, for this component the Springfield assessment area was weighted more heavily toward determining the overall conclusion. Given these considerations, the bank's record of opening and closing branches in the Missouri assessment areas has generally not adversely affected access to its service delivery systems.

Full-Scope Review Areas	Changes in Branch Locations
Jefferson City	Not Adversely Affected
Springfield	Generally Not Adversely Affected
OVERALL	GENERALLY NOT ADVERSELY AFFECTED

Limited-Scope Review Areas	Changes in Branch Locations
Mid-Missouri	Consistent
Columbia	Exceeds
Branson	Exceeds

Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the Missouri assessment areas, particularly LMI geographies and individuals. The bank's performance under this criterion is displayed by assessment area in the following tables.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Jefferson City	Do not vary in a way that inconveniences
Springfield	Do not vary in a way that inconveniences
OVERALL	DO NOT VARY IN A WAY THAT INCONVENIENCES

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Mid-Missouri	Below
Columbia	Consistent
Branson	Below

Community Development Services

The bank provides a relatively high level of community development services in the Missouri assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the Missouri assessment areas.

Full-Scope Review Areas	Community Development Services
Jefferson City	Relatively High
Springfield	Relatively High
OVERALL	RELATIVELY HIGH

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Limited-Scope Review Areas	Community Development Services
Mid-Missouri	Consistent
Columbia	Below
Branson	Below

During the review period, 106 bank employees provided 7,331 hours of community development service activities to 81 organizations throughout the Missouri assessment areas and nearby geographies. Despite challenges posed by the pandemic, bank employees lent their expertise in various capacities, such as board member, financial service provider, and financial literacy instructor, to local community service and economic development organizations. The bank was also able to continue delivering its financial literacy and coaching services through its proprietary ProsperU program by offering virtual options. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

JEFFERSON CITY, MISSOURI METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JEFFERSON CITY ASSESSMENT AREA

Bank Structure

Through the merger with its affiliate banks, The Central Trust Bank added four branches located in middle- and upper-income census tracts. The bank operates 16 of its offices in the Jefferson City assessment area, representing 10.4 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Number of Delivery Systems by Census Tract Classification				
	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Offices	3	0	7	6

In addition to branches, the bank operates one LPO, 19 standalone ATMs, and one standalone ITM in the assessment area. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

General Demographics

The assessment area comprises the entirety of the Jefferson City, Missouri MSA, which includes Cole, Callaway, Moniteau, and Osage Counties. The assessment area's population is shown in the following table.

County	Population
Cole County, Missouri	76,533
Callaway County, Missouri	44,566
Moniteau County, Missouri	15,801
Osage County, Missouri	13,758
TOTAL ASSESSMENT AREA POPULATION	150,658

The majority of the assessment area population of 150,658 is concentrated in Cole County (50.8%) where the state capital, Jefferson City, is located. As a capital city, Jefferson City's economy is largely based on the government; however, it also hosts manufacturing facilities, universities, and a state prison. The remaining counties are more rural in nature with Moniteau County being the most remote. Along with the population figures shown in the preceding table, the assessment area has 6,301 businesses, 5,616 of which are small businesses (89.1 percent).

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

There is a moderate level of competition in this assessment area where 20 FDIC-insured depository institutions operate 62 offices. The Central Trust Bank dominates the assessment area with a deposit market share of 52.4 percent, while the institution that ranks second possesses only 9.4 percent. The bank is also the leading HMDA and CRA lender in the assessment area, further illustrating the bank's significant role in meeting the community's credit needs.

As a result of the factors described, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels. Specifically, community contacts noted the need for home purchase loans, home improvement loans, and down payment assistance programs, as well as small dollar small business loans that apply nontraditional methods for determining creditworthiness. The contacts also stated that there are ample opportunities for financial institution involvement in community development efforts, though they would like to see an increase in the number of local community development financial institutions.

Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area in 2020.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census	1	3	22	5	0	31
Tracts	3.2%	9.7%	71.0%	16.1%	0.0%	100%
Family	461	3,255	25,546	7,833	0	37,095
Population	1.2%	8.8%	68.9%	21.1%	0.0%	100%

As shown in the preceding table, the majority of census tracts in the assessment area are middle-income (71.0 percent) while only 12.9 percent are LMI. Comparatively, 68.9 percent of the total families in the assessment area live in middle-income areas while 10.0 percent live in LMI census tracts. The LMI areas are primarily concentrated in Jefferson City in Cole County, while the remaining moderate-income census tract is in a rural portion of Callaway County. Community contacts noted that individuals in these areas find homeownership challenging to obtain due to low and aging affordable housing inventories. The contacts also identified challenges individuals face in starting new small businesses due to a lack of small dollar small business loan products and low credit scores.

According to 2015 ACS data, the median family income for the assessment area was \$62,506. In comparison, the median family income for the state of Missouri was below the assessment area at \$60,809. The following table displays the distribution of assessment area families by income level compared to all Missouri families.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Jefferson City	6,788	6,469	9,357	14,481	37,095
	18.3%	17.4%	25.2%	39.0%	100%
Missouri	327,271	274,380	319,267	609,088	1,530,006
	21.4%	17.9%	20.9%	39.8%	100%

As shown in the previous tables, 10.0 percent of families live in LMI census tracts, though 35.7 percent of families in the assessment area are LMI. This LMI family percentage is less than the 39.3 percent of LMI families in the state of Missouri. In addition, the percentage of families living below the poverty level in the assessment area (8.9 percent), is less than that of the state of Missouri (11.1 percent). This data conveys that the assessment area is more affluent than the state of Missouri. A review of county-level data shows consistent comparative affluence. Nevertheless, community contacts highlight that there are pockets of poverty throughout the assessment area.

Housing Demographics

The following table displays key housing demographics for the assessment area and state of Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)	Housing Cost Burden (Renters Owners)
Jefferson City	\$138,419	37.0%	\$608	32.0% 14.0%
Missouri	\$138,400	34.8%	\$746	40.6% 18.0%

Based on the affordability ratio and housing cost burden figures, housing is more affordable in the assessment area despite similar median housing values to the state. Though differences exist between counties, their comparative affordability to Missouri are consistently higher. The assessment area benefits from having a higher median family income, combined with a significantly lower median gross rent than the state of Missouri. Community contacts, however, noted that LMI residents struggle to obtain affordable housing. Jefferson City in particular has several LMI census tracts where affordable housing shortages have resulted in an overcrowding of housing units. In the rural areas, including Moniteau and Callaway Counties, housing is more affordable, but there is a need for home repairs. Overall, many LMI residents struggle to find loan products that meet their needs.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. According to Dun & Bradstreet, 5,616, or 89.1 percent, of businesses in the assessment area have revenues under \$1 million. County business patterns indicate that there are 74,589 paid employees in the assessment area. According to community contacts, healthcare and

higher education are major employers in Cole County where the state capital serves as a regional economic engine. In Moniteau, Callaway, and Osage Counties, agricultural and manufacturing employers have a dominant presence. By percentage of employees, the largest job category in the assessment area is by far the government at 31.2 percent. The next largest job categories are retail trade (11.4 percent), manufacturing (9.4 percent), and healthcare and social assistance (8.1 percent).

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Missouri.

Unemployment Data			
Dataset	2019 Annual Average	2020 Annual Average	2021 Annual Average
Jefferson City	2.7%	4.3%	3.2%
Missouri	3.3%	6.1%	4.4%

As shown in the preceding table, unemployment levels in the assessment area remained lower than the state of Missouri during the review period. Though differences exist between counties, their levels were consistently below that of Missouri. In 2020, unemployment levels significantly increased in line with the national unemployment trend resulting from the impact of the pandemic. The largest increase was in Cole County, where small businesses concentrated in that county were forced to lay off employees or close. As shown in the table, unemployment levels in 2021 declined, trending down toward their pre-pandemic levels.

Community Contact Information

For this assessment area, three community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions. Two interviews were with individuals specializing in affordable housing, while the third was with an individual specializing in economic development.

Contacts identified the need for affordable housing in all four counties of the assessment area with some noteworthy differences. In the more urban areas, namely Cole County, contacts highlighted the need for more affordable housing stock. While this has been a need in the county in the past, it has become more pronounced given the recent housing supply shortage, increased cost of materials and home maintenance, and rising home prices. Jefferson City in particular has several LMI census tracts where affordable housing shortages have resulted an overcrowding of housing units as multiple families consolidate into a single unit. In the rural areas, including Moniteau and Callaway Counties, housing is more affordable, but there is a need for home repairs, which are challenging for homeowners to fund due to the high costs of materials, maintenance, and labor. Homeowners also struggle to find loan products that meet their needs.

To assist LMI borrowers in obtaining needed housing, contacts suggested banks provide closing cost assistance, small dollar and low interest loans to respond to their unique needs, and alternative means to determining credit worthiness.

Regarding economic development, contacts noted a rise in new start-up businesses since the pandemic. However, start-up and existing businesses are challenged with finding affordable capital and access to credit. The contact shared that some business owners have poor credit histories. Others were not eligible for federal funding like the PPP loans and SBA's Economic Injury Disaster Loans due to credit score thresholds. Contacts also shared that most of these businesses seek small dollar loans, between \$10,000 to \$20,000 to start or scale their business, which are not always available or affordable.

Similar to the suggestions regarding affordable housing, contacts suggested banks offer small dollar business loans to small business owners and use alternative methods for determining creditworthiness.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JEFFERSON CITY ASSESSMENT AREA**LENDING TEST**

Lending levels reflect excellent responsiveness to the credit needs of the Jefferson City assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Additionally, the bank is a leader in making community development loans in this assessment area.

Lending Activity

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	42	0.6%	2,532	0.3%
Home Purchase	1,427	20.3%	237,401	26.2%
Multifamily Housing	19	0.3%	9,465	1.0%
Refinancing	1,756	25.0%	318,062	35.1%
Other	40	0.6%	4,374	0.5%
TOTAL HMDA	3,284	46.8%	571,834	63.2%
Small Business	3,309	47.2%	301,835	33.4%
Small Farm	423	6.0%	31,229	3.5%
TOTAL LOANS	7,016	100.0%	904,898	100.0%

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 24.3 percent by number and 14.1 percent by dollar were made in the Jefferson City assessment area in 2019 and 16.4 percent by number and 14.5 percent by dollar in 2020. These percentages are closely aligned with the percentage of total bank deposits held in the assessment area (19.9 percent by dollar) and higher than the percentage of total bank branches located in the Jefferson City assessment area (10.4 percent). Additionally, the bank's lending levels were compared to those of the other lenders in the assessment area. In 2019 and 2020 years, the bank ranked first in number of originations by wide margins across all HMDA and CRA products, demonstrating the key role the bank plays in meeting the area's credit needs. Finally, the bank's concentration on HMDA and small business lending helps meet the greatest credit needs identified by community contacts.

Loan Distribution by Borrower's Profile

The bank's borrower distribution of loans in the Jefferson City assessment area is considered good overall based on the performance of each of the three loan products reviewed. When determining

overall conclusions, HMDA and small business loans are given more weight than small farm loans.
HMDA Lending

In both 2019 and 2020, the bank's HMDA lending reflects good penetration among individuals of different income levels, particularly LMI individuals.

In 2019, the percentage of loans to low-income borrowers (10.4 percent) was slightly below the percentage of aggregate HMDA loans (12.0 percent) and the percentage of families in the assessment area that are low income (18.3 percent), reflecting adequate performance. The distribution of loans to moderate-income borrowers (19.9 percent) was above the aggregate (17.4 percent) and in line with the demographic (20.1 percent) figures, which is considered excellent. Therefore, overall distribution in 2019 is considered good.

In 2020, the percentage of loans to low-income borrowers (6.7 percent) was equal to the percentage of aggregate HMDA loans (6.7 percent) and under the percentage of families in the assessment area that are low income (18.3 percent), reflecting good performance. The distribution of loans to moderate-income borrowers (19.0 percent) was above both the aggregate (18.7 percent) and the demographic (17.4 percent) figures, which is considered excellent. Therefore, overall distribution in 2020 is considered good.

Small Business Lending

In both years, the bank's small business lending reflects a good distribution to businesses of different sizes. In 2019, the bank made 70.0 percent of its small business loans to businesses with annual revenues of \$1 million or less; this performance exceeded that of peer institutions in the assessment area at 50.1 percent but was significantly below the demographic estimate of assessment area businesses with this revenue profile at 89.1 percent, reflecting good performance.

In 2020, the bank made 40.4 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is slightly under the aggregate at 42.3 percent and significantly under the demographic at 89.1 percent. Initially, this portrays a significant decline in the bank's lending performance. A further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. The analysis revealed that 83.4 percent of total PPP loans had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community, as community contacts specializing in economic development noted the need for small dollar, small business loans. Therefore, overall distribution of loans to businesses of different revenue sizes is good.

Small Farm Lending

Small farm lending to farms of different sizes in the assessment area is excellent in both years. In 2019, the bank originated 90.2 percent of its small farm loans to farms with annual revenues of \$1 million or less, which is significantly higher than the aggregate lending level of 76.4 percent and near the demographic figure of 98.8 percent. Likewise, the bank's level of lending to farms with this revenue profile in 2020 (80.4 percent) also exceeded aggregate lending performance (72.9 percent) and approached the demographic figure (98.7 percent). Therefore, overall distribution remains excellent in 2020.

Geographic Distribution of Loans

Overall, the geographic distribution of loans in the assessment area is good based on all three products reviewed, with HMDA and small business lending receiving primary consideration and small farm lending weighted least heavily.

HMDA Lending

The geographic distribution of HMDA loans during the review period is considered good overall. In 2019, the bank's percent of HMDA loans originated in low-income census tracts (1.1 percent) was above the 0.6 percent originated by peer institutions in the assessment area and the percentage of owner-occupied housing units that are in low-income census tracts (0.4 percent), reflecting excellent performance. The bank's distribution of HMDA loans in moderate-income census tracts (4.8 percent) is slightly below the aggregate (6.2 percent) and the demographic (6.9 percent), which is considered adequate. Therefore, combined distribution in LMI census tracts in 2019 is good.

In 2020, the volume of HMDA lending and the distribution of loans in low-income census tracts declined, placing the bank's distribution (0.3 percent) more in line with the aggregate (0.5 percent) and the demographic (0.4 percent), reflecting good performance. The bank originated 4.2 percent of its HMDA loans in moderate-income census tracts, which is slightly below the 5.2 percent aggregate performance and the 6.9 percent demographic figure. When considering home purchase loans exclusively (a significant credit need), data shows bank distribution (6.0 percent) is fractions of a percent from the aggregate (6.2 percent) and near the demographic (6.9 percent). Therefore, distribution in moderate-income census tracts is good, resulting in overall good distribution in LMI census tracts in 2020

Small Business Lending

The distribution of small business loans by geography income level is good overall. In 2019 and 2020, the bank's level of small business lending in low-income census tracts (6.3 percent in both years) was similar to aggregate lending levels (6.2 percent in 2019 and 6.6 percent in 2020). The bank was below the demographic figure in both years (8.1 percent in 2019 and 8.3 percent in 2020), though the margin was small. Therefore, in both years, the bank's performance in low-income census tracts is good.

Bank performance in moderate-income census tracts was consistent in 2019 and 2020, with the bank outperforming both the aggregate and demographic each year. Bank distribution in 2019 and 2020 (15.0 percent and 12.9 percent, respectively) was above the aggregate (12.0 percent and 12.2 percent, respectively) and the demographic (13.2 percent and 12.8 percent, respectively), therefore, distribution in moderate-income census tracts is excellent both years. The bank's overall distribution in the combined LMI areas outperforms the aggregate and is slightly below the demographic and is, therefore, considered good.

Small Farm Lending

Based on the low number of farms in low-income census tracts, opportunities for small farm lending in low-income census tracts are de minimis in this assessment area; therefore, the bank's performance was based entirely on small farm lending in moderate-income census tracts.

In 2019, the bank's percentage of small farm loans in moderate-income census tracts (3.3 percent) was lower than both the aggregate percentage (10.0 percent) and demographic percentage (12.8 percent) and is considered poor. Similarly, in 2020, the bank's small farm loan distribution in moderate-income census tracts (4.3 percent) remained under the aggregate (8.9 percent) and the demographic (13.5 percent), reflecting poor performance. When evaluating both years of data, overall geographic distribution of small farm loans is poor.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. Loans were dispersed throughout the assessment area consistent with branching structure, and no conspicuous lending gaps in LMI areas were noted.

Community Development Lending Activities

The Central Trust Bank is a leader in making community development loans in the Jefferson City assessment area. During the review period, the bank originated or renewed 34 community development loans totaling \$35.5 million, including 11 PPP loans with a community development purpose totaling \$4.4 million. This amount is above the performance of peer banks operating in the assessment area and is also an increase in number and amount since the bank's previous CRA examination, when the bank was also considered a leader. Noteworthy loans are discussed following the table below.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		TOTAL	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Community Development Loans	11	6,237	7	1,504	5	23,400	0	0	23	31,141
PPP Loans	2	50	6	591	1	1,188	2	2,563	11	4,393
TOTAL	13	6,288	13	2,095	6	24,588	2	2,563	34	35,534

- Two originations totaling \$11.5 million for the purchase and renovation of office buildings to be leased out for commercial space in LMI census tracts, which are also designated as empowerment zones.
- Five revolving lines of credit totaling \$9.2 million to two healthcare facilities located in moderate-income census tracts to be used for working capital and renovations.
- Thirteen loan originations or extensions totaling \$6.3 million to build or improve affordable housing for LMI residents, including a 29-unit apartment building located in the low-income census tract.
- Eleven PPP loans totaling \$4.4 million qualified as community development, which helped sustain businesses and nonprofits during the pandemic and are considered particularly responsive to assessment area credit needs.

INVESTMENT TEST

The Central Trust Bank makes a significant level of qualified community development investments and grants in the Jefferson City assessment area. During the review period, the bank had 17 investments and 72 donations totaling \$4.0 million in the Jefferson City assessment area. Of that total, \$3.5 million were current-period investments, \$155,100 were prior-period investments still outstanding, and \$387,086 were in donations to various community development organizations. Overall investments and donations were slightly higher than performance at the bank's previous examination.

Community Development Investments										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		TOTAL	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Investments	5	\$553	10	\$1,495			2	\$1,600	17	\$3,648
Donations	9	\$66	62	\$319	-	-	1	\$3	72	\$387
TOTAL	14	\$619	72	\$1,804	-	-	3	\$1,603	89	\$4,035

Investments and donations deemed most responsive in the Jefferson City assessment area include:

- Ten municipal bonds, totaling \$1.5 million, that fund school districts where the majority of the students are LMI.
- Two investments, totaling \$1.6 million, into SBA loan funds that support small businesses in the area and promote economic development.
- Ten donations, totaling \$136,761, to a community service organization that provides the majority of its services to LMI children and families.

SERVICE TEST

Service delivery systems are accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the Jefferson City assessment area, particularly LMI geographies and LMI individuals. Lastly, the bank provides a relatively high level of community development services in the Jefferson City assessment area.

Accessibility of Delivery Systems

The bank operates 16 branches in the Jefferson City assessment area, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of assessment area census tracts and household population by income level of geography.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	3 18.8%	0 0.0%	7 43.8%	6 37.5%	0 0.0%	16 100%
Census Tracts	3.2%	9.7%	71.0%	16.1%	0.0%	100%
Household Population	2.2%	10.0%	67.1%	20.7%	0.0%	100%

As shown in the previous table, the bank operates three branches (18.8 percent) in the low-income geography, which is well above demographic data used for comparison. While the bank does not have any branches located in moderate-income geographies, several branches are located on or very near a moderate-income census tract border. Overall, the bank's service delivery systems are accessible to geographies and individuals of different income levels.

Changes in Branch Locations

At the start of the review period, the bank operated 12 branches in this assessment area. As a result of the merger with its affiliate banks, the bank added one branch in a middle-income census tract

and three branches in an upper-income census tract. No new branches were opened, and no branches were closed during the review period. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches. As such, the bank's record of opening and closing branches in the assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours, products, and services are generally consistent across all branches in the Jefferson City assessment area. Branches are typically open from 8:30 a.m. to 4:30 p.m. Monday through Friday or similar, and 13 branches, including one branch in an LMI census tract, have open lobby hours on Saturday mornings. Ten branches have drive-up access, including one branch in an LMI area; seven branches have ITM access with extended hours Monday through Saturday, including one branch in an LMI area; and 7 branches have loan officers on site, including two branches in LMI areas. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The bank provided a relatively high level of community development services in the assessment area during the review period. In total, 21 employees provided 3,320 hours of community development services to 20 different organizations benefitting the assessment area. Despite challenges posed by the pandemic, bank employees provided services to organizations promoting affordable housing, community services for LMI families and children, and economic development. Impactful services are described below:

- Fifteen employees offered 2,049 hours of service as board members of 12 community service, affordable housing, and economic development organizations in the assessment area.
- Five employees provided 662 hours of technical expertise to various affordable housing and community service organizations, serving in a human resource capacity (105 hours) or as treasurer (557 hours).

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

SPRINGFIELD, MISSOURI METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD ASSESSMENT AREA

Bank Structure

The bank added this assessment area and all branches therein as part of a merger with an affiliate bank during the review period. It now operates 21 of its offices in the Springfield assessment area, representing 13.6 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Number of Delivery Systems by Census Tract Classification				
	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Offices	0	7	11	3

In addition to branches, the bank operates 15 standalone ATMs. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to the entire assessment area.

General Demographics

The assessment area includes the Springfield, Missouri MSA in its entirety, which includes Christian, Dallas, Greene, Polk, and Webster Counties. The assessment area has a total population of 448,471, most of which is concentrated in Greene County (63.1 percent) where the city of Springfield is located. The city is the urban core of the assessment area and home to universities, including Missouri State University with a student population of over 23,000, and corporate headquarters for multiple national retailers. The second largest county, Christian County (18.0 percent), hosts a large suburban population, and the remaining counties are more rural in nature.

County	Population
Greene County, Missouri	283,206
Christian County, Missouri	80,904
Webster County, Missouri	36,690
Polk County, Missouri	31,107
Dallas County, Missouri	16,564
TOTAL ASSESSMENT AREA POPULATION	448,471

The Springfield assessment area has a highly competitive banking market to the point where community contacts suggest the market may be over-saturated. There are 32 FDIC-insured depository institutions operating 185 offices in the assessment area. The Central Trust Bank holds 10.8 percent of the deposit market share, ranking third behind two institutions that hold 13.5 percent

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

and 11.0 percent. Though third in deposit market share, compared to other HMDA and CRA data reporters, the bank is ranked first in CRA lending, with significantly higher lending levels than the second-ranked institution, and sixth in HMDA lending.

Along with the population figures shown in the preceding table, the assessment area has 19,641 businesses, 17,911 of which are small businesses (91.2 percent). Within the city of Springfield, there is a concentration of small businesses in the downtown area that include restaurants and boutiques. As a result, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels. More specifically, community contacts noted particular needs for affordable owner-occupied housing, home improvement loans, and small dollar small business loans.

Income and Wealth Demographics

The following table summarizes the assessment area's distribution of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	5	23	49	13	1	91
	5.5%	25.3%	53.8%	14.3%	1.1%	100%
Family Population	3,596	19,711	71,184	20,307	41	114,839
	3.1%	17.2%	62.4%	17.4%	0.0%	100%

As shown above, 30.8 percent of the census tracts in the assessment area are LMI geographies, but only 20.3 percent of the family population resides in these tracts. These LMI areas are primarily concentrated around the city of Springfield in Greene County. Further review of LMI tract information by county indicates all low-income tracts and 19 moderate-income tracts are located in Greene County; some of which include the student population of the nearby colleges. Furthermore, two moderate-income tracts are located in Dallas County, and the remaining two moderate-income tracts are located in Webster County.

According to 2015 ACS data, the median family income for the assessment area was \$54,507. At the same time, the median family income for the entire state of Missouri was \$60,809. The following table displays population percentages of assessment area families by income level compared to the state of Missouri.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Springfield	23,291	21,519	24,283	45,746	114,839
	20.3%	18.7%	21.2%	39.8%	100%
Missouri	327,271	274,380	319,267	609,088	1,530,006
	21.4%	17.9%	20.9%	39.8%	100%

The table above reveals that 39.0 percent of the families in the assessment area are considered LMI, which is similar to the state of Missouri (39.3 percent). Furthermore, the percentage of families living below the poverty level in the assessment area (12.0 percent) is just above the percentage of Missouri families (11.1 percent). Some differences in income exist between counties; for example, the portion of LMI families in Christian County is 32.5 percent, while in Dallas County it is 52.7 percent. However, the consolidated LMI percentages indicate that the overall assessment area is similar in affluence to the state of Missouri.

Housing Demographics

The following table displays key housing demographics for the assessment area and state of Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)	Housing Cost Burden (Renters Owners)
Springfield	\$129,482	33.3%	\$696	43.0% 16.6%
Missouri	\$138,400	34.8%	\$746	40.6% 18.0%

The data indicates that homeownership is similarly affordable in the assessment area compared to the state of Missouri. For homeowners, the housing cost burden (16.6 percent) is less than that of Missouri (18.0 percent), suggesting that homeownership is more affordable in the assessment area. In contrast, the housing cost burden for renters is higher in Springfield (43.0 percent) than the state (40.6 percent), signaling that renting is less affordable in the assessment area when considering household income. Community contacts explained that rental costs in comparison to area wages make it challenging for many households to transition to homeownership. According to 2015 ACS data, a higher percentage of low-income renters (78.4 percent) and moderate-income renters (37.5 percent) are paying greater than 30.0 percent of their income toward housing costs as compared to the state of Missouri (74.0 percent and 31.5 percent, respectively). Contacts also indicate that many homes in the city of Springfield are of older stock and are, therefore, more difficult for LMI individuals to acquire, considering the funds needed for down payment, updates, and renovation. To address housing needs in the area, contacts cite the need for more affordable housing so that LMI residents may transition from renting to owning.

Industry and Employment Demographics

The assessment area maintains a large and diverse business community. County business patterns indicate there are 204,527 paid employees in the assessment area. By percentage of employees, the three largest job categories are healthcare and social assistance (18.0 percent), government (13.7 percent), and retail trade (12.4 percent). Though major employers, such as hospitals, the city of Springfield, and large national retailers, account for much of the area's employment, the small business sector is also strong with 17,911 (91.2 percent) of businesses reporting annual revenues

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

of \$1 million or less. Community contacts describe the area as having a culture of entrepreneurship where resources for start-ups are readily available.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Missouri.

Unemployment Data			
Dataset	2019 Annual Average	2020 Annual Average	2021 Annual Average
Springfield	2.9%	5.2%	3.4%
Missouri	3.3%	6.1%	4.4%

Overall unemployment levels in the assessment area remained lower than the state of Missouri during the review period. Dallas County was the only geography with unemployment rates that were consistently above the state of Missouri. This aligns with data showing that the majority of employers are located closer to the assessment area's urban core, presenting a transportation challenge for individuals in rural Dallas County.

As generally seen nationwide, unemployment levels significantly increased in 2020 resulting from the impact of the pandemic. The largest increase was in Greene County where there is a large concentration of small businesses that were forced to lay off employees or close. As shown in the table, unemployment levels in 2021 declined, trending downward toward their pre-pandemic levels.

Community Contact Information

For this assessment area, two community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions. One interview was with a representative from an economic development organization that promotes affordable housing and small business development. The other was with an individual representing an organization that advocates for businesses in the area. The contacts described the overall economy as growing in size and diversity, citing healthcare, education, government, and manufacturing as the major industries. Contacts suggested that the mix of industries provides insulation from recession and limits dependency on individual corporations for employment. Regarding banking, contacts affirmed that there is significant competition in the area, with one contact suggesting the area may be saturated. Nevertheless, there are ample opportunities for banks to invest in the community.

Regarding small businesses, contacts stated that many are concentrated in the city of Springfield, particularly downtown. One contact described Springfield as having a strong entrepreneur culture with many small business partnerships and resources available to interested entrepreneurs. During the pandemic, many of the small businesses were forced to close, namely restaurants and boutiques, but have since begun to reopen. Business has increased, though labor and supply shortages have limited the return to pre-pandemic levels. Credit needs for small businesses were identified as microloans and diverse credit offerings tailored to individual small businesses.

Affordable housing needs in the area were identified as down payment and closing cost assistance for home purchase and home improvement loans. One contact explained that insufficient collateral and challenges paying for closing costs have prevented LMI residents from obtaining much-needed loans. Springfield has an aging housing stock, especially in LMI census tracts in the city of Springfield, which require improvements to sustain. In addition to credit needs related to aging homes, more affordable housing options are needed in the area.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPRINGFIELD ASSESSMENT AREA

LENDING TEST

Lending levels reflect excellent responsiveness to the credit needs of the Springfield assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects excellent penetration throughout the assessment area. Additionally, the bank makes a relatively high level of community development loans in this assessment area.

Lending Activity

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume.

Summary of Lending Activity				
January 1, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	13	0.3%	1,147	0.2%
Home Purchase	825	17.1%	155,536	25.4%
Multifamily Housing	23	0.5%	19,079	3.1%
Refinancing	748	15.5%	145,694	23.8%
Other	5	0.1%	616	0.1%
Total HMDA	1,614	33.5%	322,072	52.6%
Small Business	2,754	57.1%	254,555	41.6%
Small Farm	451	9.4%	35,373	5.8%
TOTAL LOANS	4,819	100.0%	612,000	100.0%

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 16.3 percent by number and 12.9 percent by dollar were made in the Springfield assessment area in 2019 and 11.4 percent by number and 9.6 percent by dollar in 2020. These percentages are closely aligned with the percentage of total bank deposits held in the assessment area (10.3 percent by dollar) and the percentage of total bank branches located in the Springfield assessment area (13.6 percent). Additionally, the bank's lending levels were compared to those of the other lenders in the assessment area. Consistent with the bank's concentration of commercial lending in its loan portfolio, the bank ranked first in CRA lending by a wide margin in 2019 and 2020. Related, the bank ranked sixth and eleventh in HMDA lending out of over 300 reporters in 2019 and 2020, respectively. As community contacts noted that both loan types were a significant need in the area, this level of lending compared to peer performance is especially significant.

Loan Distribution by Borrower's Profile

The bank's borrower distribution of loans in the Springfield assessment area is considered good overall based on the performance of each of the three loan products reviewed. When determining overall conclusions, small business loans are given the most weight, followed by HMDA loans. Small farm lending is given the least weight.

HMDA Lending

The bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals. The percentage of loans to low-income borrowers in 2019 and 2020 (6.8 percent and 7.0 percent, respectively) is above the percentage of aggregate HMDA loans to low-income borrowers in the assessment area over the same period (6.2 percent and 6.1 percent, respectively). Bank performance was below the percentage of families in the assessment area that are low income (20.3 percent, both years); however, a large portion of these families (59.4 percent in both years) are below the assessment area's poverty level, presenting a significant barrier to homeownership. Given this context, distribution of lending to low-income borrowers is considered good in both years.

The bank's performance in lending to moderate-income borrowers in 2019 is excellent as the percentage of HMDA loans originated to moderate-income borrowers (19.8 percent) is higher than the aggregate HMDA lending levels (17.2 percent) and the percentage of moderate-income families in the assessment area (18.7 percent). In 2020, the bank's distribution of HMDA loans to moderate-income borrowers (15.7 percent) dropped below the aggregate level (16.5 percent) and the demographic (18.7 percent). This represents adequate performance in 2020, yielding overall good performance in lending to moderate-income borrowers across both years. Thus, overall distribution to LMI borrowers in 2019 and 2020 is considered good.

Small Business Lending

The bank's small business lending reflects good distribution to businesses of different sizes overall. In 2019, the bank made 72.4 percent of its small business loans to businesses with annual revenues of \$1 million or less, which far exceeded that of peer institutions (47.4 percent) but was below the demographic estimate of assessment area businesses with this revenue profile (90.9 percent), reflecting good performance.

In 2020, the bank made 30.5 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is slightly under the aggregate at 36.2 percent and significantly under the demographic at 91.2 percent. Initially, this portrays a significant decline in the bank's lending performance. A further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 84.1 percent of total PPP loans had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness

to the needs of the small business community, as community contacts specializing in economic development noted the need for small dollar, small business loans. Therefore, distribution of loans to businesses of different revenue sizes is good in 2020, resulting in overall good performance across both years.

Small Farm Lending

Small farm lending to farms of different sizes in the assessment area is excellent in both years. In 2019, the bank originated 94.7 percent of its small farm loans to farms with annual revenues of \$1 million or less, which is significantly higher than aggregate lending level of 80.2 percent and near the demographic figure of 98.9 percent.

The bank's level of lending to small farms fell to 85.2 percent in 2020; however, it continued to exceed aggregate lending performance (79.3 percent) and approach the demographic figure (98.7 percent). Therefore, overall distribution remains excellent in 2020, resulting in excellent performance across both years.

Geographic Distribution of Loans

Overall, the geographic distribution of loans in the assessment area is excellent based on all three products reviewed, with small business lending receiving primary consideration, followed by HMDA then small farm lending.

HMDA Lending

The geographic distribution of HMDA loans during the review period is considered good in both years. In 2019, the bank originated the same percent of HMDA loans in low-income census tracts as the aggregate (2.1 percent) and a similar level to the area's owner-occupied units (2.2 percent), representing excellent performance. In moderate-income census tracts, the bank's distribution of HMDA loans (10.4 percent) is moderately lower than the aggregate performance (11.8 percent) as well as the demographic figure (14.7 percent); therefore, performance is adequate. Overall, distribution is good in LMI census tracts.

In 2020, the bank maintained good performance. In low-income census tracts, bank distribution (1.8 percent) moved slightly above that of the aggregate (1.7 percent) and slightly under the demographic figure (2.2 percent). Therefore, performance is good in low-income census tracts. In moderate-income census tracts, the distribution of HMDA loans at 9.1 percent is moderately lower than that of the aggregate percentage (10.0 percent) as well as the demographic figure (14.7 percent). Therefore, distribution remained adequate in moderate-income census tracts. Overall, the bank's combined HMDA lending performance to borrowers in LMI geographies is good.

Small Business Lending

The bank's small business lending reflects an excellent distribution to businesses by geography income level in both years. In 2019, the bank's distribution of small business loans in LMI census

tracts (3.2 percent and 25.1 percent, respectively) was greater than that of the aggregate figures (1.6 percent and 23.6 percent, respectively) as well as the percentage of businesses located in these tracts (2.2 percent and 24.4 percent, respectively). This reflects excellent distribution in both income categories.

This comparative performance was similar in 2020 where the bank's distribution in LMI census tracts (2.4 percent and 25.5 percent) was greater than the aggregate figures (1.8 percent and 23.6 percent) as well as the demographic figures (2.2 percent and 24.5 percent). This is especially noteworthy as community contacts cited small business loans as a credit need for the area, especially considering the significant presence of small businesses. Therefore, the bank's combined lending performance to small businesses in LMI geographies is excellent.

Small Farm Lending

Based on the small number of farms in low-income census tracts, opportunities for small farm lending in low-income census tracts are de minimis in this assessment area; therefore, the bank's performance was based entirely on small farm lending in moderate-income census tracts.

The bank's lending reflects excellent distribution of small farm loans in LMI census tracts overall. In 2019, the bank originated 16.7 percent of its small farm loans in moderate-income census tracts, which is similar to the percentage of small farms in the area (16.4 percent) and aggregate performance (17.2 percent). Given the bank's performance compared to the demographic, distribution in moderate-income areas, and overall, is considered excellent.

In 2020, the bank's performance in moderate-income geographies (15.2 percent) was above the percentage of small farms in moderate-income areas (14.1 percent) and in line with the aggregate lending in moderate-income census tracts (15.8 percent). As a result, performance is also considered excellent in 2020. In light of its performance in comparison to the demographic in both years, overall distribution of small farm loans during the review period is excellent.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. Loans were dispersed throughout the assessment area consistent with branching structure and no conspicuous lending gaps in LMI areas were noted.

Community Development Lending Activities

The Central Trust Bank makes a relatively high level of community development loans in the Springfield assessment area. During the review period, the bank originated or renewed 34 community development loans totaling \$51.7 million, including nine PPP loans with a community development purpose totaling \$4.5 million. When determining bank performance, consideration was given to the exclusion of certain community development loans that were evaluated as part of an affiliate bank's prior CRA examination. Noteworthy loans are discussed following the table below.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Community Development Loans	6	10,696	4	1,830	13	32,230	2	2,510	25	47,266
PPP Loans	-	-	7	2,659	2	1,803	-	-	9	4,462
TOTAL	6	10,696	11	4,489	15	34,033	2	2,510	34	51,728

- The bank made 12 originations targeting revitalization and stabilization efforts in moderate-income census tracts in the city of Springfield that are also designated as empowerment zones, including one loan, totaling \$12.9 million, for the construction of a hotel and parking lot, which will create numerous permanent LMI jobs.
- Nine PPP loans totaling \$4.5 million qualified as community development and helped sustain businesses and nonprofits during the pandemic. These loans are considered particularly responsive to assessment area credit needs.
- Three revolving lines of credit totaling \$1.5 million were extended to an organization serving homeless youth.

INVESTMENT TEST

The Central Trust Bank makes a significant level of qualified community development investments and grants in the Springfield assessment area. During the review period, the bank had 11 investments and 51 donations totaling \$5.3 million. Of that total, \$1.9 million were current-period investments, \$3.0 million were prior-period investments still outstanding, and \$442,526 were donations to various community development organizations. As with the Lending Test, consideration was given to the exclusion of certain community development investments that were previously evaluated in an affiliate bank's CRA examination. Noteworthy loans are discussed following the table below.

Community Development Investments										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		Total	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Investments	8	3,723	1	100			2	1,069	11	4,892
Donations	3	25	43	385	3	22	2	11	51	443
TOTAL	11	3,748	44	485	3	22	4	1,079	62	5,334

- A \$2.3 million investment was made in a low-income housing tax credit project that provides housing for LMI individuals with disabilities.
- Two investments in SBA loan funds were made, totaling \$1.1 million.

- Ten donations totaling \$163,500 were made to four organizations providing shelter and housing services for LMI individuals, including youth.
- Three donations totaling \$32,000 were made to organizations supporting small businesses in Springfield, including the downtown area, which was identified by community contacts as an area of need.

SERVICE TEST

Service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the Springfield assessment area, particularly LMI geographies and individuals. Lastly, the bank provides a relatively high level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 21 branches in the Springfield assessment area, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of assessment area census tracts and household population by income level of geography.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	0 0.0%	7 33.3%	11 52.4%	3 14.3%	0 0.0%	21 100%
Census Tracts	5.5%	25.3%	53.8%	14.3%	1.1%	100%
Household Population	4.3%	20.7%	58.4%	16.2%	0.4%	100%

As shown in the previous table, the bank operates seven branches (33.3 percent) in moderate-income geographies, which is above the demographic data used for comparison. While the bank does not have any branches located in low-income geographies, only 4.3 of assessment area households live in low-income census tracts. In addition, the bank operates a standalone ATM in a low-income census tract. Overall, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank added this assessment area and all branches therein as part of a merger with its affiliate banks during the review period. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. In the Springfield assessment area, an affiliate bank opened one new branch in an upper-income census tract and closed two branches (one in a middle-income and one in an upper-income geography). Therefore, the bank's

record of opening and closing branches in the assessment area has generally not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours, products, and services are generally consistent across all branches in the Springfield assessment area. Branches are typically open from 9:00 a.m. to 5:00 p.m. Monday through Friday or similar, and all branches have open lobby hours on Saturday mornings, along with drive-up accessibility during those hours and loans officers on site. Lastly, eight branches have ITMs with availability Monday through Saturday from 7:00 a.m. to 7:00 p.m. (including three of seven LMI branches). Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The bank provided a relatively high level of community development services in the assessment area during the review period. Despite challenges posed by the pandemic, 25 employees provided 849 hours of community development services to 22 different organizations benefitting the bank's assessment area. Services were provided to organizations promoting affordable housing, community services for LMI families and children, and economic development. As with the Lending Test, consideration was given to the exclusion of certain community development services that were previously evaluated in an affiliate bank's CRA examination. Impactful services are described below the following table:

Community Development Services					
	Affordable Housing	Community Services	Revitalization/ Stabilization	Economic Development	Total
Service Hours	72	594	79	105	849
Organizations Benefitted	1	15	2	4	22

- Nine employees provided 310 hours of service as board members of eight organizations that specialize in providing community services, such as shelter, food, and education.
- Three senior officers dedicated 136 hours serving as president or vice president of organizations providing clothing, housing, and academic support to LMI children.
- In various capacities, four employees lent 118 hours of financial expertise to organizations that promote economic development.

MID-MISSOURI NONMETROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MID-MISSOURI NONMSA ASSESSMENT AREA

The bank's Mid-Missouri assessment area is composed of Audrain, Camden, Johnson, Miller, Morgan, Pettis, and Randolph Counties. The bank's branch network consists of 20 offices, all of which are full-service facilities. This represents a net increase of 19 branches since the previous CRA exam as a result of a merger with its affiliate banks and the closure of one branch in a middle-income census tract post-merger. In addition to branches, the bank operates one LPO, 16 standalone ATMs, and one standalone ITM. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	10,663 18.2%	9,841 16.8%	11,856 20.2%	26,331 44.9%	58,700 100%
Household Population	18,499 21.1%	13,848 15.8%	15,321 17.4%	40,169 45.7%	87,837 100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	1 1.9%	5 9.3%	35 64.8%	13 24.1%	0 0.0%	54 100%
Family Population	494 0.8%	4,753 8.1%	36,185 61.6%	17,268 29.4%	0 0.0%	58,700 100%
Household Population	743 0.9%	8,214 9.4%	54,917 62.5%	23,963 27.3%	0 0.0%	87,837 100%
Business Institutions	53 0.5%	1,153 11.8%	60,43 61.8%	2,524 25.8%	0 0.0%	9,773 100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MID-MISSOURI NONMSA ASSESSMENT AREA**LENDING TEST**

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Missouri full-scope assessment areas, as displayed in the following table. When determining bank performance, consideration was given to the exclusion of certain community development loans that were evaluated as part of an affiliate bank's prior CRA examination. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Below
OVERALL	Consistent

During the review period, the bank made 34 community development loans totaling \$13.1 million, including ten PPP loans with a community development purpose totaling \$5.8 million. These loans qualified for a community development purpose of affordable housing (16), economic development (8), revitalization/stabilization of LMI geographies (6), and community services (4).

INVESTMENT TEST

The bank's Investment Test performance in the Mid-Missouri nonMSA assessment area is consistent with the investment performance in the full-scope assessment areas. The bank made 19 total qualified investments totaling \$6.4 million. These loans qualified for a community development purpose of affordable housing (3) economic development (2), and community services (14). In addition, the bank made 56 donations totaling \$187,850 with a mix of community development purposes. As with the Lending Test, consideration was given to the exclusion of certain community development investments that were evaluated as part of an affiliate bank's prior CRA examination.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the Service Test performance in the Missouri full-scope assessment areas, as detailed in the following table:

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Below
Community Development Services	Consistent
OVERALL	Consistent

Despite challenges posed by the pandemic, 22 employees provided 2,071 hours of community development services to 22 organizations during the review period. Fourteen bank employees served as board members of various organizations that provide housing to LMI individuals or promote economic development in LMI areas. Other employees lent their financial expertise to organizations that provide financial literacy training or education assistance to LMI children. As with the Lending and Investment Tests, consideration was given to the exclusion of certain community development services that were evaluated as part of an affiliate bank's prior CRA examination.

COLUMBIA, MISSOURI METROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBIA ASSESSMENT AREA

This assessment area and all branches therein were added during the review period as part of a merger with an affiliate bank. The assessment area is composed of the entire Columbia, Missouri MSA, which includes Boone, Cooper, and Howard Counties. The bank's branch network consists of 15 offices, all of which are full-service facilities. In addition to branches, the bank operates seven stand-alone ATMs and one stand-alone ITM. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	9,516 21.1%	7,478 16.6%	9,835 21.8%	18,249 40.5%	45,078 100%
Household Population	20,279 26.3	11,607 15.0%	12,401 16.1%	32,910 42.6%	77,197 100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	3 8.1%	6 16.2%	18 48.6%	7 18.9%	3 8.1%	37 100%
Family Population	1048 2.3%	5185 11.5%	26354 58.5%	12194 27.1%	297 0.7%	45,078 100%
Household Population	3,119 4.0%	9,884 12.8%	41,749 54.1%	19,621 25.4%	2,824 3.7%	77,197 100%
Business Institutions	823 9.9%	1,034 12.4%	3,946 47.4%	2,110 25.3%	414 5.0%	8,327 100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBIA ASSESSMENT AREA**LENDING TEST**

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Missouri full-scope assessment areas, as displayed in the following table. For this review period, a significant amount of retail lending data and community development activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Below
OVERALL	Consistent

During the review period, the bank made eight community development loans totaling \$4.7 million, including one PPP loan for \$295,024. These loans qualified with a community development purpose of affordable housing (7) and community services (1). Noteworthy loans include the PPP loan made to an organization that provides housing and foster care services to the area's children.

INVESTMENT TEST

The bank's Investment Test performance in the Columbia assessment area is consistent with the investment performance in the full-scope assessment areas. The bank's qualified investments included four MBS supporting affordable housing and one investment in low-income housing tax credits, totaling \$4.3 million. These investments were made prior to the review period, but are still outstanding. The bank also made 26 qualified donations totaling \$41,350. As with the Lending Test, consideration was given to the exclusion of certain community development investments that were previously evaluated in an affiliate bank's CRA examination.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the Service Test performance in the Missouri full-scope assessment areas, as detailed in the following table:

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Exceeds
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	Consistent

During the review period, seven bank employees provided 234 hours of community development service activities to seven different organizations. Despite challenges posed by the pandemic, bank employees served in various roles, such as treasurer and board member, for several community service and nonprofit organizations throughout the assessment area. In addition to these activities, the bank offers free financial education classes and one-on-one financial counseling through its proprietary training program, ProsperU, based out of its Columbia classroom. During the pandemic, the bank continued offering training and one-on-one counseling sessions virtually. In 2021, the bank provided 268 one-on-one, hour-long counseling sessions, as well as a total of 203 classroom training hours benefitting 2,216 classroom attendees. As with the Lending and Investment Tests, consideration was given to the exclusion of certain community development services that were previously evaluated in an affiliate bank's CRA examination.

BRANSON, MISSOURI NONMETROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BRANSON, MISSOURI NONMSA ASSESSMENT AREA

This assessment area and all branches therein were added during the review period as part of a merger with its affiliate banks. The Branson nonMSA assessment area is composed of Stone and Taney Counties, and the bank's branch network consists of five full-service offices. In addition to branches, the bank operates four standalone ATMs. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family	4,209	4,698	5,456	8,835	23,198
Population	18.1%	20.3%	23.5%	38.1%	100%
Household	7,192	6,029	6,844	14,071	34,136
Population	21.1%	17.7%	20.1%	41.2%	100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	1	14	1	0	16
	0.0%	6.3%	87.5%	6.3%	0.0%	100%
Family	0	1,922	20,221	1,055	0	23,198
Population	0.0%	8.3%	87.2%	4.6%	0.0%	100%
Household	0	2,942	29,753	1,441	0	34,136
Population	0.0%	8.6%	87.2%	4.2%	0.0%	100%
Business	0	279	3,716	238	0	4,233
Institutions	0.0%	6.6%	87.8%	5.6%	0.0%	100%

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE BRANSON, MISSOURI NONMSA ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Missouri full-scope assessment areas, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower's Profile	Below
Geographic Distribution of Loans	Exceeds
Community Development Lending Activity	Below
OVERALL	Consistent

During the review period, the bank made four community development loans totaling \$1.3 million. These loans qualified for a community development purpose of affordable housing (3) and revitalization/stabilization of LMI geographies (1). When determining bank performance, consideration was given to the exclusion of certain community development loans that were evaluated as part of an affiliate bank's prior CRA examination.

INVESTMENT TEST

The bank's investment performance in this assessment area is below the investment performance in the Missouri full-scope assessment areas. During the review period, the bank made six qualified community development investments totaling \$2.1 million. Three of the investments were made during the current period and supported local school districts. The remaining three were made prior to this review period but had remaining balances that qualified this period. In addition, the bank made 14 community development donations totaling \$38,025. These donations supported multiple school districts where majority of the students are LMI and an organization dedicated to economic development in moderate-income and distressed or underserved middle-income areas. As with the Lending Test, consideration was given to the exclusion of certain community development investments that were previously evaluated in an affiliate bank's CRA examination.

SERVICE TEST

The bank's service performance in this assessment area is consistent with the service performance in the Missouri full-scope assessment areas, as detailed in the following table:

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Exceeds
Reasonableness of Business Hours and Services	Below
Community Development Services	Below
OVERALL	Consistent

Despite challenges posed by the pandemic, eight employees provided 333 hours to nine organizations during the review period. Six bank employees served as board members or as the president of various organizations that provide housing to LMI individuals or promote economic development in LMI areas. Other employees lent their financial expertise to organizations that provide financial literacy training to LMI individuals. As with the Lending and Investment Tests, consideration was given to the exclusion of certain community development services that were previously evaluated in an affiliate bank's CRA examination.

KANSAS CITY, MISSOURI – KANSAS – LAWRENCE, KANSAS COMBINED MULTISTATE METROPOLITAN STATISTICAL AREA²

CRA RATING FOR KANSAS CITY:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

Satisfactory

High Satisfactory

Low Satisfactory

Low Satisfactory

Major factors supporting the institution's Kansas City rating include the following.

- The bank's lending levels reflect adequate responsiveness to the credit needs of its assessment area.
- The distribution of loans by borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good dispersion throughout the assessment area.
- The bank makes an adequate level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment area.
- The bank makes an adequate level of qualified community development investments and grants.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.
- Record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The bank provides an adequate level of community development services.

² This rating reflects performance within the multistate MSA. The Missouri and Kansas statewide evaluations are adjusted and do not reflect performance in the multistate MSA.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Kansas City assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. Based on loan demand and the bank's lending activity, small business and HMDA lending received the greatest weight in the analysis, followed by small farm lending.

The Kansas City assessment area was reviewed under full-scope examination procedures. To augment the evaluation, two community contacts were used to ascertain specific community credit needs and provide context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the section that follows.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KANSAS CITY ASSESSMENT AREA**Bank Structure**

The bank added this assessment area and all branches therein as part of a merger with an affiliate bank during the review period. It now operates 49 of its offices in its Kansas City assessment area, representing 31.8 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Number of Delivery Systems by Census Tract Classification				
	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Offices	0	15	25	9

In addition to branches, the bank operates two LPOs, 21 standalone ATMs, and one standalone ITM. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of its assessment area.

General Demographics

The bank's Kansas City assessment area consists of the Missouri counties of Cass, Clay, Clinton, Jackson, Lafayette, Platte, and Ray, and the Kansas counties of Douglas, Johnson, and Wyandotte, ten of the 22 counties that make up with the Kansas City – Overland Park – Kansas City, Missouri – Kansas Combined Statistical Area (CSA). While the bank has designated two assessment areas, they are combined as the Kansas City assessment area for purposes of this evaluation.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

The assessment area's population as of the 2015 U.S. Census is shown in the following table:

State	County	Population	Percent Change
Missouri	Cass County, Missouri	100,781	1.31%
	Clay County, Missouri	230,361	3.79%
	Clinton County, Missouri	20,498	-1.18%
	Jackson County, Missouri	680,905	1.00%
	Lafayette County, Missouri	32,916	-1.39%
	Platte County, Missouri	93,394	4.56%
	Ray County, Missouri	23,031	-1.97%
Kansas	Johnson County, Kansas	566,814	4.16%
	Wyandotte County, Kansas	160,806	2.10%
	Douglas County, Kansas	114,967	3.74%
TOTAL ASSESSMENT AREA POPULATION		1,975,025	2.43%

Concentrations of residents are found in Jackson County, Missouri, and Johnson County, Kansas, where each state's most populous cities are located, Kansas City and Overland Park, respectively. The assessment area is largely urban, though several of the outlying counties are more rural in nature.

The bank's Kansas City assessment area is a highly competitive banking market with 122 FDIC-insured financial institutions in the area operating 661 offices. According to the FDIC's Deposit Market Share Report of June 30, 2021, The Central Trust Bank is ranked sixth among these financial institutions, holding 4.1 percent of the assessment area's deposit market share.

Along with the population figures shown in the preceding table, the assessment area has 94,774 businesses, 85,705 of which are small businesses (90.4 percent). As the assessment area covers a wide metropolitan area, and the demographics reflect an economically diverse population, credit needs in the area are significant and varied. Community contacts noted particular needs for affordable owner-occupied housing, down payment assistance programs for consumers, microloans for small businesses, and financial literacy and small businesses counseling services.

Income and Wealth Demographics

The following table summarizes the assessment area's distribution of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	80	118	168	135	19	520
	15.4%	22.7%	32.3%	26.0%	3.7%	100%
Family Population	39,251	102,651	195,458	168,301	988	506,649
	7.8%	20.3%	38.6%	33.2%	0.2%	100%

As shown above, 38.1 percent of the census tracts in the assessment area are LMI geographies, but only 28.0 percent of the family population resides in these tracts. A significant portion of the LMI census tracts are concentrated in downtown Kansas City and the Lawrence MSA (Douglas County).

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

According to 2015 ACS data, the median family income for the assessment area was \$72,589. At the same time, the median family incomes for the state of Missouri and state of Kansas were \$60,809 and \$66,389, respectively. The following table displays population percentages of assessment area families by income level compared to the states of Kansas and Missouri.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Kansas City	107,719	89,025	103,430	206,475	506,649
	21.3%	17.6%	20.4%	40.8%	100%
Kansas	137,650	128,930	154,601	308,287	729,468
	18.9%	17.7%	21.2%	42.3%	100%
Missouri	327,271	274,380	319,267	609,088	1,530,006
	21.4%	17.9%	20.9%	39.8%	100%

The table above shows that a significantly higher percentage of families in the assessment area are LMI (38.9 percent) than reside in LMI geographies (28.0 percent). Overall, the percentage of families in the assessment area that are considered LMI is marginally lower than in Missouri (39.3 percent) and slightly higher than in Kansas (36.6 percent). Furthermore, the percentage of families living below the poverty level in the assessment area (9.1 percent) is the same as that of Kansas and lower than that of Missouri (11.1 percent). These LMI percentages indicate that the assessment area is similar in affluence to Kansas and marginally more affluent than Missouri. However, affluence differs among the counties comprising the assessment area, with Wyandotte and Jackson Counties reporting the highest level of families that are LMI and living below poverty, and Johnson and Platte Counties reporting the lowest levels.

Housing Demographics

The following table displays key housing demographics for the assessment area and the states of Kansas and Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)	Housing Cost Burden (Renters Owners)
Kansas City	\$161,061	35.5%	\$848	40.6% 17.1%
Kansas	\$132,000	39.6%	\$757	38.8% 16.3%
Missouri	\$138,400	34.8%	\$746	40.1% 17.4%

Across all measures of affordability, housing is less affordable in the assessment area than in the state of Kansas and similarly affordable in the state of Missouri. As with income levels, housing affordability varies by county. Based on affordability ratios, housing is most affordable in Wyandotte and Ray Counties (45.0 percent and 43.7 percent, respectively), though income data indicates homeownership may be out of reach for some individuals, namely residents of Wyandotte, due to high poverty rates. In addition, the aging housing stock in Wyandotte (55 years

old) creates the need for home improvement loans to maintain housing, which many LMI families cannot afford. Conversely, the ratios show that housing is least affordable in Douglas and Johnson counties (28.3 percent and 35.3 percent, respectively).

Community contacts explain that there is a high percentage of rental properties in Douglas County, partly due to student renters attending the University of Kansas. They also note that Johnson County has experienced significant growth in its housing market as affluent families move further from the city, which has impacted housing affordability. Across the assessment area, the largest barrier to home ownership is the rising cost of homes. Given the large percentage of people working in the service industry, many residents simply do not have the income to purchase homes at current prices. The pandemic has further exacerbated a tight housing market, making home purchase even more difficult for LMI individuals.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector, as evidenced by Dun & Bradstreet data that estimates 90.4 percent of businesses in the area have gross annual revenues of less than \$1 million. Community contacts note that downtown Kansas City, Missouri, and Johnson County, Kansas, are especially supportive of small businesses, benefitting from a supportive ecosystem with governmental, private sector, and financial institutions working together to meet the needs of entrepreneurs. In addition, Johnson County is one of the faster-growing and more affluent areas in the assessment area with access to capital and potential business. County business patterns indicate there are 980,156 paid employees in the assessment area. By percentage of employees, the three largest job categories are government (13.6 percent), healthcare and social assistance (13.3 percent), and retail trade (10.6 percent). Community contacts point to universities and hospitals as some of the major employers in the area.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Missouri.

Unemployment Data			
Dataset	2019 Annual Average	2020 Annual Average	2021 Annual Average
Kansas City	3.2%	6.1%	4.4%
Kansas	3.2%	5.9%	3.2%
Missouri	3.3%	6.1%	4.4%

As shown in the preceding table, unemployment levels in the assessment area were similar to those of Kansas and Missouri states during the review period. Again, the levels varied by county with highest unemployment found in Wyandotte and Jackson Counties (4.4 percent and 3.7 percent, respectively) both years and the lowest levels found in Johnson and Platte Counties (2.8 percent and 2.7 percent, respectively) in 2019 and Johnson and Lafayette Counties (5.1 percent and 5.3 percent, respectively) in 2020. Across all counties, unemployment levels significantly increased in 2020 in line with the national unemployment trend resulting from the impact of the pandemic. The largest increase was in Wyandotte and Jackson Counties where service industry jobs are more

prevalent and were unavailable due to business closures. As shown in the table, unemployment levels in 2021 trended downward toward their pre-pandemic levels.

The community contacts indicated that credit needs for small businesses in the area include start-up capital, microloans, and financial education. In addition, contacts noted that while many LMI families seem to earn livable wages, they continue to struggle financially due to the costs of childcare and transportation. Barriers for small business are funding and small dollar startup loans (\$5,000 or less) to get business off the ground.

Community Contact Information

For this assessment area, two community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions. One interview was with a representative from an economic development organization that is knowledgeable about affordable housing. The other was with an individual representing an organization that advocates for small businesses in the area.

The contacts described the overall economy as growing in size and diversity, citing transportation, professional services, education, and health services as the major industries. Contacts explained that COVID-19 has impacted the community similarly to how other areas of the country were impacted, most notably in the fact that service industry jobs have struggled due to shutdowns and trying to meet the evolving needs and expectations of customers. Overall, the area has been fortunate in that very few businesses had to close permanently due to the pandemic, and there has not been a major loss of job opportunities as a result. Though the economy has remained strong, contacts noted that there are still pockets of concentrated poverty and lower-income areas throughout Kansas City that have not experienced the same growth rates as the rest of the assessment area. These areas tend to be concentrated in the southeast portion of the assessment area and in eastern Wyandotte and Johnson Counties.

Regarding small businesses, contacts described the economic environment as good. A lot of effort has been put toward building up small businesses, including the establishment of a new technical school aimed at equipping future entrepreneurs to open their own businesses upon graduation. In addition, traditional colleges and universities, the Small Business Development Center, the SBA, and the Chamber of Commerce are also valuable resources to small business owners, offering services such as business plan development and management training. These resources are essential to entrepreneurs, and community contacts identify them as a continued top need for the area. In addition to educational support, funding is also a top need. Small business owners can find funding through microlenders and private investors, though contacts cite the need for more small dollar loans in the assessment area, specifically in amounts of \$2,500 to \$250,000. They also believe that businesses with \$50,000 or less in sales need the most support in the area.

Regarding affordable housing, contacts stated that conditions are good, though LMI individuals find it more challenging to obtain affordable housing in some areas over others. Newer affordable housing is limited, and there is an overall shortage of affordable housing to adequately meet their needs. Contacts state that the largest barrier to home ownership is the rising cost of homes. Given the large percentage of people working in the service industry, many residents simply do not have

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

the income to purchase homes at current prices. The pandemic has further exacerbated a tight housing market, making home purchase even more difficult for LMI individuals. Contacts believe that more partnerships with financial institutions and affordable housing development commissions would benefit the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY ASSESSMENT AREA**LENDING TEST**

The bank's Lending Test rating in the Kansas City assessment area is High Satisfactory. Lending levels reflect adequate responsiveness to the credit needs of the Kansas City assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses and farms of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Additionally, the bank makes an adequate level of community development loans in this assessment area.

For this review period, the majority of 2019 lending data and community development activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance.

Lending Activity

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume. As the majority of 2019 data was evaluated in an affiliate's prior CRA examination, the displayed data is largely from 2020.

Summary of Lending Activity January 1, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	15	0.3%	1,621	0.2%
Home Purchase	421	8.6%	89,771	13.0%
Multifamily Housing	18	0.4%	49,550	7.2%
Refinancing	601	12.2%	135,732	19.7%
Other	17	0.3%	2,412	0.4%
TOTAL HMDA	1,064	21.6%	278,620	40.4%
Small Business	3,537	71.8%	388,648	56.4%
Small Farm	322	6.5%	21,685	3.1%
TOTAL LOANS	4,923	100.0%	688,953	100.0%

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The 2019 data used in this evaluation shows that of the bank's total HMDA and CRA loans made in its combined assessment areas, 2.5 percent by number and 15.9 percent by dollar were made in the Kansas City assessment area, which is significantly lower than the percentage of total bank deposits held (22.2 percent by dollar) and the percentage of total bank branches located in the assessment area (31.8 percent). However, due to the exclusion of the majority of 2019 data, 2020 data is considered a more accurate representation of bank performance, which reveals that of the bank's total HMDA and CRA loans made in the bank's combined assessment areas, 16.9 percent by number and 15.9 percent by dollar were made in Kansas City. In addition, reportable lending data in 2020 shows that the bank ranked 40th out of 661 HMDA aggregate lenders and 5th out of

232 CRA aggregate lenders. In light of this level of lending compared to its significant branch presence and deposits held in the area, the bank's responsiveness to area needs is considered adequate.

Loan Distribution by Borrower's Profile

The bank's borrower distribution of loans in the Kansas City assessment area is considered good overall based on the performance of each of the three loan products reviewed. When determining overall conclusions, HMDA and small business loans are given more weight than small farm lending.

HMDA Lending

In both 2019 and 2020, the bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals.

A review of the applicable 2019 data shows that the percentage of loans to low-income borrowers (8.8 percent) was above the percentage of aggregate HMDA loans (8.2 percent) and below the percentage of families in the assessment area that are low income (21.3 percent), reflecting good performance. The distribution of loans to moderate-income borrowers (20.6 percent) was higher than both the aggregate (18.4 percent) and demographic (17.6 percent) figures, which is considered excellent. Given the high percentage of low-income families in the assessment area, more weight is given to the bank's performance relative to borrowers with that income level; therefore, overall distribution in 2019 is good.

In 2020, the bank's distribution of loans to low-income borrowers (8.8 percent) remained above the aggregate level (6.5 percent) and below the demographic figure (21.3 percent), demonstrating good performance. The distribution of loans to moderate-income borrowers (14.8 percent) fell slightly below the aggregate and demographic figures (17.6 percent each), which is considered adequate. As a larger percentage of families are low income versus moderate income, more weight is given to performance with respect to low-income borrowers. Therefore, overall distribution in 2020 is considered good.

Small Business Lending

When considering performance from both years, the bank's overall distribution of small business loans to businesses of different sizes is adequate.

In 2019, the bank's distribution of small business loans to businesses with annual revenues of \$1 million or less (81.6 percent) exceeded that of peer institutions (46.2 percent) and neared the estimated percentage of businesses with this revenue profile (90.2 percent) in this assessment area. Therefore, overall distribution in 2019 is good.

In 2020, the percentage of the bank's small business loans made to businesses with annual revenues of \$1 million or less (22.0 percent) was below both the aggregate (37.4 percent) and demographic

(90.4 percent) figures. Initially, this portrays a significant decline in the bank's lending performance. A further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 65.7 percent of total PPP loans had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community, as community contacts noted the need for small dollar, small business loans. Therefore, distribution of loans to businesses of different revenue sizes is adequate in 2020.

Given the exclusion of the majority of 2019 lending data, the bank's performance in 2020 is given more weight and is, therefore, considered adequate.

Small Farm Lending

Small farm lending to farms of different sizes in the assessment area is good overall. In 2019, the bank's percentage of small farm loans to farms with annual revenues of \$1 million or less (93.9 percent) was significantly higher than aggregate lending level (57.5 percent) and near the demographic figure (97.7 percent), demonstrating excellent performance.

The bank's level of lending to farms with this revenue profile fell to 74.0 percent in 2020; however, it continued to exceed aggregate lending performance (56.6 percent) and approach the demographic figure (97.6 percent). Therefore, overall distribution is considered good in 2020.

Given the exclusion of the majority of 2019 lending data, the bank's performance in 2020 is given more weight and the overall borrower distribution for small farms is, therefore, considered good.

Geographic Distribution of Loans

The bank's geographic distribution of loans in the Kansas City assessment area is considered good overall based on the performance of each of the three loan products reviewed. When determining overall conclusions, HMDA and small business loans are given more weight than small farm lending.

HMDA Lending

The geographic distribution of HMDA loans during the review period is considered good. In 2019, the bank originated 7.4 percent of its HMDA loans in low-income census tracts as compared to 2.7 percent originated by peer institutions in the assessment area and the percentage of owner-occupied housing units that are in low-income census tracts (5.7 percent), reflecting excellent performance. The bank's distribution of HMDA loans in moderate-income census tracts (11.8 percent) is lower than the aggregate (15.0 percent) and the demographic (18.0 percent) figures, reflecting adequate performance. Therefore, overall distribution in LMI census tracts in 2019 is good.

In 2020, the bank's distribution of loans in low-income census tracts (3.2 percent) fell below the demographic figure (5.7 percent), but remained above the aggregate level (2.3 percent), demonstrating good performance. In moderate-income census tracts, the bank's distribution of HMDA loans increased to 12.4 percent, which is in line with the aggregate (12.8 percent) and below the demographic (18.0 percent), and is considered good. Therefore, overall distribution in LMI census tracts in 2020 is good.

Small Business Lending

Overall, the distribution of small business loans in LMI census tracts is good. In 2019, the bank's level of small business lending in low- and moderate-income census tracts (3.9 percent and 11.8 percent, respectively) was lower than the aggregate level (6.5 percent and 18.1 percent, respectively) as well as the percentage of small businesses located in LMI income census tracts (7.0 percent and 20.1 percent, respectively), reflecting poor performance in both income categories. However, as previously explained, the majority of the bank's 2019 data is excluded from this evaluation; therefore, limited weight is given performance in 2019.

In 2020, the bank's percentage of loans originated in low-income census tracts (4.1 percent) was slightly lower than the aggregate (6.5 percent) and demographic (7.0 percent) figures, indicating adequate performance. In moderate-income census tracts, the bank's distribution (22.8 percent) was greater than that of the aggregate (18.9 percent) and demographic (20.2 percent) figures, which is considered excellent. Therefore, overall distribution in 2020 is good. Given the exclusion of portions of 2019 data, 2020 performance is given more weight; therefore, overall distribution of small business loans in LMI census tracts is good.

Small Farm Lending

Overall, the bank's lending reflects good distribution of small farm loans in LMI census tracts. In 2019, the bank did not originate any small farm loans in the low-income census tracts, while aggregate lenders originated 1.2 percent of small farm loans in these tracts where 1.4 percent of all small farms in the assessment area are located. Though the bank lacked small farm loan originations in low-income census tracts, there are limited opportunities available for small farm lending in those areas; therefore, performance is considered adequate. In moderate-income census tracts, the bank originated a higher percentage of small farm loans (17.5 percent) than both the aggregate level (11.9 percent) and the demographic figure (12.4 percent), reflecting excellent performance. As a result, overall performance in 2019 is considered good.

In 2020, the bank originated one small farm loan (0.5 percent of small farm loans originated in the assessment area) in low-income census tracts, which is in line with the aggregate level (0.8 percent) and slightly below the demographic figure (1.3 percent). Given the limited opportunities for small farm lending, this distribution is considered adequate. In moderate-income census tracts, the bank's small farm loan distribution (10.1 percent) was in line with the aggregate figure (10.6 percent) and approached the demographic figure (12.2 percent), reflecting good performance. With more opportunities for small farm lending in moderate-income census tracts, more weight is given to performance in those areas; therefore, overall distribution in 2020 is considered good.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. Loans were dispersed throughout the assessment area consistent with branching structure, and no conspicuous lending gaps in LMI areas were noted.

Community Development Lending Activities

The Central Trust Bank makes an adequate level of community development loans in the Kansas City assessment area. During the review period, the bank originated or renewed 14 community development loans for \$54.4 million, including one PPP loan for \$111,667. When determining bank performance, consideration was given to the exclusion of certain community development loans that were evaluated as part of an affiliate bank's prior CRA examination. The most notable loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		TOTAL	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Community Development Loans	6	\$3,015	1	\$3,835	5	\$44,470	1	\$3,001	13	\$54,322
PPP Loans	-	-	1	\$112	-	-	-	-	1	112
TOTAL	6	\$3,015	2	\$3,947	5	\$44,470	1	\$3,001	14	\$54,433

- One construction loan totaling \$30.7 million to build an apartment in a moderate-income census tract designated as an exclusive economic zone (EEZ) in Kansas City, which will serve to attract and retain residents in the area.
- Two loans totaling \$9.5 million for the purchase or renovation of commercial properties located in low-income census tracts that are designated EEZs in Kansas City, which will serve to attract and retain businesses.
- One PPP loan for \$111,667 qualified as community development and helped sustain a nonprofit that provides services to homeless and high-risk youth.

Product Innovation

The bank makes extensive use of flexible lending practices in serving the credit needs of the Kansas City assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Kansas City is described below:

- Through the SBA's PPP, the bank originated 4,062 PPP loans totaling \$369.5 million in its Kansas City assessment area and nearby geographies. According to metrics provided by the SBA, the bank ranked first in 2020 and fourth in 2021 in number of originations among all lenders participating in the program. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those in Kansas City.
- Specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas, the bank's Home Turf Program allows eligible borrowers to make a reduced minimum down payment using flexible sources of payment. From January 1, 2019, through December 31, 2021, the bank originated 45 mortgage loans, totaling \$4.7 million in the assessment area.
- Through the Missouri Housing Development Commission Loan Program, which helps LMI families with closing cost and down payment assistance, the bank originated 24 loans totaling \$3.3 million in Kansas City from 2019 through 2021.
- The bank originated a significant volume of mortgage loans through the Fannie Mae HomeReady Loan Program, which targets LMI individuals and offers lower down payment requirements than traditional conventional loans. From 2019 through 2021, the bank originated 14 HomeReady loans, totaling \$2.4 million, in Kansas City.
- From 2019 through 2021, the bank originated 52 loans, totaling \$31.5 million through the SBA-CDC/504 Loan Program and the SBA 7(a) Loan Program in its Kansas City assessment area. Through these programs, the bank offered small business loans that support small business operations and/or expansion.
- Though various programs, including the USDA FSA and RD Programs, the bank originated nine farm loans, totaling \$11.7 million, in Kansas City from 2019 through 2021. These loans are tailored to the needs of farmers and ranchers, including those who own small farms.
- The bank also originated a significant volume of mortgage loans through government loan programs in Kansas City, including 81 FHA loans, totaling \$13.9 million, nine RD home loans (\$1.2 million), and 29 VA loans (\$7.6 million).

INVESTMENT TEST

The bank's Investment Test rating in the Kansas City assessment area is Low Satisfactory. The Central Trust Bank made an adequate level of qualified community development investments and grants in the assessment area. For this review period, the majority of 2019 community development

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance. During the applicable review period, the bank made 17 investments and 45 donations totaling \$6.3 million that benefitted the assessment area. Of that, \$3.7 million were current-period investments, \$2.2 million were prior-period investments still outstanding, and \$386,250 were donations to various community development organizations. Noteworthy investments are discussed following the table below.

Community Development Investments										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		TOTAL	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Investments	8	\$1,210	4	\$1,000	-	-	5	\$3,737	17	\$5,948
Donations	7	\$265	31	\$107	-	-	7	\$15	45	\$386
TOTAL	15	\$1,475	35	\$1,107	-	-	12	\$3,752	62	\$6,334

- Three investments totaling \$3.2 million funding small businesses in Jackson County.
- Four municipal bonds totaling \$1.0 million that fund school districts where the majority of the students are LMI.

SERVICE TEST

The bank's Service Test rating in the Kansas City assessment area is Low Satisfactory. Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the Kansas City assessment area, particularly LMI geographies and LMI individuals. Lastly, the bank provides an adequate level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 49 branches in the Kansas City assessment area, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of assessment area census tracts and household population by income level of geography.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	0 0.0%	15 30.6%	25 51.0%	9 18.4%	0 0.0%	49 100%
Census Tracts	15.4%	22.7%	32.3%	26.0%	3.7%	100%
Household Population	9.4%	22.7%	38.4%	29.2%	0.3%	100%

As shown in the previous table, the bank maintains 15 branches (30.6 percent) in moderate-income geographies, which is above demographic data used for comparison. Conversely, the bank does not have any branches located in low-income geographies. In addition to the branches included in the table above, the bank also operates a commercial LPO in an upper-income census tract, and through a partnership with a local affordable housing organization, the bank maintains a mortgage LPO in a low-income census tract. Overall, the bank's distribution of branches is in line with the distribution of assessment area census tracts and household population; therefore, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels, particularly to those that are LMI.

Changes in Branch Locations

The bank added this assessment area and all branches therein as part of the merger with its affiliate banks during the review period. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. In the Kansas City assessment area, an affiliate bank closed a branch in a moderate-, middle-, and upper-income census tract for a total of three closures. No branch openings were completed by the bank or its affiliates in this assessment area during the review period. Therefore, the bank's record of opening and closing branches in the assessment area has generally not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours, products, and services are generally consistent across all branches in the Kansas City assessment area. All branches are typically open from 9:00 a.m. to 5:00 p.m., Monday through Friday, or similar, plus Saturday morning lobby access; in addition, all branches have drive-up accessibility and loan officers on site. Lastly, ten branches have ITM access with extended hours Monday through Saturday. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. For this review period, the majority of 2019 community development activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance. During the applicable review period, a total of 16 employees provided 1,214 hours of community development services to 25 different organizations benefitting the bank's assessment areas. Despite challenges posed by the pandemic, bank employees provided services to organizations promoting local economic development as well as affordable housing and education services for LMI families and individuals.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Impactful services are described below the following table:

Community Development Services					
	Affordable Housing	Community Services	Revitalization/ Stabilization	Economic Development	TOTAL
Service Hours	400	449	0	365	1,214
Organizations Benefitted	5	7	0	13	25

- Bank employees provided 388 service hours to four organizations that provide housing and supportive services to individuals and families in unstable housing or homeless situations.
- During the review period, 11 employees lent financial expertise to 12 organizations that provide small business counseling and area workforce development.

ST. LOUIS, MISSOURI-ILLINOIS MULTISTATE METROPOLITAN STATISTICAL AREA³

CRA RATING FOR ST. LOUIS:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

Satisfactory

High Satisfactory

High Satisfactory

High Satisfactory

Major factors supporting the institution's St. Louis rating include the following.

- The bank's lending levels reflect excellent responsiveness to the credit needs of its assessment area.
- The distribution of borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects adequate dispersion throughout the assessment area.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment area.
- The bank makes a significant level of qualified community development investments and grants.
- Delivery systems are unreasonably inaccessible to portions of its assessment area and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of community development services.

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

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the St. Louis assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. However, as the bank's small farm loan activity is minimal in this assessment area, this lending category did not play a material role in the evaluation of St. Louis MSA lending performance. Consequently, small farm lending activity is not included in the borrower and geographic discussions. Based on loan demand and the bank's lending activity, HMDA lending received the greatest weight in the analysis, followed by small business lending.

The St. Louis assessment area was reviewed under full-scope examination procedures. To augment the evaluation, two community contacts were used to ascertain specific community credit needs and provide context with which to evaluate the bank's responsiveness to these needs. Details from these interviews are included in the section that follows.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. LOUIS ASSESSMENT AREA**Bank Structure**

The bank added this assessment area and all branches therein as part of a merger with an affiliate bank during the review period. It now operates 16 of its offices in the St. Louis assessment area, representing 10.4 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Number of Delivery Systems by Census Tract Classification					
	Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown
Offices	0	2	3	11	0

In addition to branches, the bank operates one LPO and two standalone ATMs. Based on its branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to its entire assessment area.

General Demographics

The assessment area is composed of the independent city of St. Louis and four of the 15 counties that make up the St. Louis MSA, including the Missouri counties of St. Louis and St. Charles, and the Illinois counties of Monroe and St. Clair. The assessment area's population is shown in the following table:

County	Population
St. Louis City, Missouri	317,850
St. Louis County, Missouri	1,001,327
St. Charles, Missouri	374,805
Monroe, Illinois	33,539
St. Clair, Illinois	267,029
TOTAL ASSESSMENT AREA POPULATION	1,994,550

Along with the population figures shown in the preceding table, the assessment area has 94,076 businesses, 84,211 of which are small businesses (89.5 percent). The majority of the assessment area's population is concentrated in Missouri, particularly in St. Louis County. The assessment area hosts strong manufacturing and commercial industries and is anchored by several large national corporations with headquarters in the area. The assessment area is also home to numerous universities and colleges, most notably Washington University and St. Louis University, in the city of St. Louis.

The bank's assessment area is a highly competitive banking market with 76 FDIC-insured financial institutions in the area operating 583 offices. According to the FDIC's Deposit Market Share Report of June 30, 2021, The Central Trust Bank is ranked 12th among these financial institutions, holding 22.2 percent of the assessment area's deposit market share.

The assessment area covers a wide metropolitan area with a diverse population and demographic composition. As such, credit needs in the area are numerous and varied. Particular credit needs noted by community contacts include microloan funds for small businesses, homeownership counseling and down payment assistance for consumers, and affordable home purchase and home improvement loans. In addition, the St. Louis assessment area has high community development needs mixed with a large network of community development organizations. As such, there are significant opportunities for financial institution involvement in community development activities.

Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census	74	87	131	154	4	450
Tracts	16.4%	19.3%	29.1%	34.2%	0.9%	100%
Family	48,145	84,673	161,582	208,298	1439	504,137
Population	9.6%	16.8%	32.1%	41.3%	0.3%	100%

As shown in the preceding table, 35.7 percent of the assessment area geographies are LMI, but only 26.4 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in and around the city of St. Louis in Missouri and the city of East St. Louis in Illinois, which is located in St. Clair County. Community contacts indicated North St. Louis, North County, and East St. Louis combined have the highest concentrated poverty rate in the respective state and rank among the poorest in the country. In addition, St. Clair County, Illinois, faces poverty challenges in its large rural areas due to lack of economic opportunities. In the county's urban core, poverty and disinvestment are pervasive and persistent, mirroring challenges faced by low-income communities in the Missouri side of St. Louis.

According to 2015 ACS data, the median family income for the assessment area was \$73,474. In comparison, the median family income for the state of Illinois (\$71,546) and the state of Missouri (\$60,809) were below the assessment area. These levels represent declines over 2010 data.

The following table displays the distribution of assessment area families by income level compared to all Illinois and Missouri families.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
St. Louis	108,683	81,855	95,605	217,994	504,137
	21.6%	16.2%	19.0%	43.2%	100%
Illinois	706,235	526,032	608,217	1,284,199	3,124,683
	22.6%	16.8%	19.5%	41.1%	100%
Missouri	327,271	274,380	319,267	609,088	1,530,006
	21.4%	17.9%	20.9%	39.8%	100%

The data in the table above shows that the percentage of families who are LMI in the assessment area (37.8 percent) is less than that of the families living in the states of Illinois and Missouri (39.4 percent and 39.3 percent, respectively). Furthermore, the percentage of families living below the poverty level in the assessment area (9.9 percent) is slightly below the percentages in Illinois and Missouri (10.5 percent and 11.1 percent, respectively). This data indicates that the assessment area is slightly more affluent than the states of Illinois and Missouri. However, the level of affluence varies significantly among the assessment area's four counties and independent city when considering percentages of LMI families and those living below the poverty line. For example, the city of St. Louis and St. Clair County have the highest levels of LMI families (58.2 percent and 44.2 percent, respectively) and families living below the poverty level (21.7 percent and 14.7 percent, respectively).

Housing Demographics

The following table displays key housing demographics for the assessment area and the states of Illinois and Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)	Housing Cost Burden (Renters Owners)
St. Louis	\$165,901	33.8%	\$836	43.5% 19.3%
Illinois	\$173,800	33.1%	\$907	43.8% 23.4%
Missouri	\$138,400	34.8%	\$746	40.6% 18.0%

Based on affordability ratios and housing cost burden figures, housing is less affordable in the assessment area compared to the state of Missouri. These same ratios suggest that housing in the assessment area is less burdensome for homeowners and similarly affordable for both owners and renters compared to the state of Illinois. As with income levels, housing affordability varies by county and city. Affordability ratios suggest that when considering income levels, St. Clair County and St. Charles County (41.4 percent and 38.5 percent, respectively) offer the most affordable housing in the assessment area, while the city of St. Louis and St. Louis County (29.6 percent and 34.5 percent, respectively) are less affordable. However, community contacts indicated that St. Clair County, namely East St. Louis, is an area where LMI families find it especially challenging

to own a home. Though home prices are low, contacts explained that it is still unaffordable for LMI residents due to lack of income and credit. In addition, a portion of the housing stock in this area is old, vacant, or in disrepair, requiring significant investment in home improvement. Therefore, the strongest housing demand is for affordable housing, home improvement loans and grants, and affordable rental units.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. According to Dun & Bradstreet, 89.5 percent of businesses in the assessment area have revenues under \$1 million. Community contacts note that small businesses are concentrated on the Missouri side of the St. Louis assessment area where there is a growing entrepreneurship ecosystem with biotech and agrotechnology leading the way. Small businesses are primarily concentrated in the city and county of St. Louis, and expanding to St. Charles County. County business patterns indicate that there are 1,024,805 paid employees in the assessment area. By percentage of employees, the largest job category in the assessment area is healthcare and social assistance (17.5 percent), followed by government (10.0 percent) and retail trade (9.9 percent).

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Missouri.

Unemployment Data			
Dataset	2019 Annual Average	2020 Annual Average	2021 Annual Average
St. Louis	3.2%	6.7%	4.7%
Illinois	4.0%	9.5%	6.1%
Missouri	3.3%	6.1%	4.4%

As shown in the preceding table, unemployment levels in the assessment area were significantly lower than the state of Illinois and similar to those of the state of Missouri during the review period. Again, the levels varied by county with St. Clair and St. Louis City having the highest levels and St. Charles and Monroe counties having the lowest levels both years. Across all counties, unemployment levels significantly increased in 2020 in line with the national unemployment trend resulting from the impact of the pandemic. The largest increase was in St. Clair County and St. Louis City, where small businesses concentrated in that county were forced to lay off employees or close. As shown in the table, unemployment levels in 2021 declined, trending down toward their pre-pandemic levels.

Community Contact Information

For this assessment area, two community contact interviews were used to ascertain specific credit needs, opportunities, and local market conditions. One contact represented an organization that promotes community development in the assessment area, and the other was from an economic and workforce development organization.

According to community contacts, St. Louis is one of the three largest economic engines in the state of Missouri. There are several multinational companies, large regional corporations, and elite universities in the area who serve as the largest employers. However, the wealth and opportunity are not evenly spread throughout the area. Contacts indicated North St. Louis City, North County, and East St. Louis combined have the highest concentrated poverty rate in the state and among the highest in the country. They also noted that the large, rural portions of St. Clair County, Illinois, also faces poverty challenges due to lack of economic opportunities. Regarding COVID-19, contacts explained that the impact further deteriorated the economic fabric of these areas.

Regarding small businesses, contacts identified the Missouri side of the assessment area as the center of the area's market, with most small businesses concentrated in St. Louis City, St. Louis County, and eastern portions of St. Charles County. They indicated many of the start-ups need loans for operating capital and inventory, making lower-rate, small dollar small business loans a top need in the area. Along with providing more flexible products, banks also have the opportunity to build stronger relationships with local small business owners, namely those located in the underserved areas of St. Louis, as many of them are unbanked. According to contacts, banks focus solely on providing financial literacy to meet CRA obligations but need to take a more holistic approach to outreach programs and credit access to better align resources and partnerships. Furthering the point, they indicated credit eligibility and a lack of trust in traditional banks are the two main reasons most LMI individuals choose nonbank financial providers.

Regarding affordable housing, contacts identified challenges that LMI residents face to obtaining affordable housing. On the Illinois side of the assessment area, contacts explain that although prices are low, they are still unaffordable for the residents in LMI census tracts area due to lack of income and credit. This situation yields a high demand for affordable rental units, which carries its own challenges. Many rental properties in LMI areas are aging, and poorly maintained, while the housing stock is newer and better maintained in middle- and upper- income areas. On the Missouri side of the assessment area, contacts described how housing trends have impacted the affordable housing options in the city of St. Louis. The city of St. Louis has lost a significant amount of population as more people are moving to St. Louis County through the Department of Housing and Urban Development (HUD) Section 8 Voucher Programs. The main reason for outward migration is the availability of higher-quality affordable housing. A priority for these areas is more affordable housing options, small dollar mortgage loans, home improvement loans, and innovative programs through which individuals may improve their credit scores.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. LOUIS ASSESSMENT AREA**LENDING TEST**

The bank's Lending Test rating in the St. Louis assessment area is High Satisfactory. Lending levels reflect excellent responsiveness to the credit needs of the St. Louis assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects adequate penetration throughout the assessment area. The bank makes a relatively high level of community development loans in this assessment area. Lastly, the bank makes extensive use of flexible and/or innovative lending practices in meeting the credit needs of the St. Louis assessment area.

Lending Activity

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume.

Summary of Lending Activity				
January 1, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	11	0.2%	1,267	0.1%
Home Purchase	1,389	26.5%	354,953	31.3%
Multifamily Housing	20	0.4%	10,110	0.9%
Refinancing	1,704	32.5%	437,839	38.7%
Other	17	0.3%	2,412	0.2%
TOTAL HMDA	3,141	59.8%	806,581	71.2%
Small Business	2,089	39.8%	322,237	28.5%
Small Farm	20	0.4%	3,506	0.3%
TOTAL LOANS	5,250	100.0%	1,132,324	100.0%

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 15.3 percent by number and 13.2 percent by dollar were made in the St. Louis assessment area in 2019 and 13.4 percent by number and 18.5 percent by dollar in 2020. These percentages are higher than the percentage of total bank deposits held in the assessment area (11.8 percent by dollar) and the percentage of total bank branches located in the St. Louis assessment area (10.4 percent). Additionally, the bank's lending levels were compared to those of the other lenders in the assessment area. The bank ranked 27th in originations out of 585 HMDA aggregate lenders and 16th out of 154 CRA aggregate lenders. Finally, community contacts noted that both of these loan types are needed in the area, further demonstrating excellent responsiveness to assessment area credit needs.

Loan Distribution by Borrower's Profile

The bank's borrower distribution of loans in the St. Louis assessment area is considered good overall based on the performance of each of the two loan products reviewed. When determining overall conclusions, HMDA loans are given the most weight, followed by small business loans.

HMDA Lending

The bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals. In 2019, the percentage of loans to low-income borrowers (8.6 percent) was above the percentage of aggregate HMDA loans (7.6 percent) and below the percentage of families in the assessment area that are low income (21.6 percent), reflecting good performance. This is especially significant given the challenges low-income individuals have in achieving homeownership as described by community contacts. The distribution of loans to moderate-income borrowers (14.7 percent) was slightly under the aggregate (16.8 percent) and demographic (16.2 percent) figures, which is considered adequate. Given the high percentage of low-income families in the assessment area, more weight is given to the bank's performance relative to borrowers with that income level; therefore, overall distribution in 2019 is good.

In 2020, the bank's distribution of loans to low-income borrowers (3.6 percent) fell slightly under the aggregate level (5.8 percent) and remained below the demographic figure (21.6 percent), demonstrating adequate performance. The distribution of loans to moderate-income borrowers (15.3 percent) increased to a level in line with the aggregate performance (15.5 percent) and remained under the demographic figure (16.2 percent). This performance is especially impactful at the product level, which shows that the distribution of home purchase loans (22.2 percent) was above both the aggregate (21.7 percent) and demographic (16.2 percent), reflecting good performance. As a larger percentage of families are low income versus moderate income, more weight is given to performance with respect to low-income borrowers. Therefore, overall distribution in 2020 is considered adequate.

Due to the unique circumstance surrounding COVID-19 and the housing boom in 2020, more weight is given to performance in 2019, as it is considered more reflective of the bank's typical performance. Therefore, overall distribution for the review period is considered good.

Small Business Lending

The bank's small business lending reflects good distribution to businesses of different sizes overall. In 2019, the bank's distribution of small business loans to businesses with annual revenues of \$1 million or less (49.0 percent) exceeded that of peer institutions (47.2 percent) but was significantly below the estimated percentage of businesses with this revenue profile (89.2 percent) in this assessment area, reflecting good performance.

In 2020, the percentage of the bank's small business loans made to businesses with annual revenues of \$1 million or less (21.2 percent) was below both the aggregate (40.1 percent) and demographic

(89.5 percent) figures. Initially, this portrays a significant decline in the bank's lending performance. A further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 83.5 percent of total PPP loans had loan sizes of \$100,00 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community, as community contacts noted the need for small dollar, small business loans.. Therefore, distribution of loans to businesses of different revenue sizes is adequate in 2020.

Given the impact of PPP lending in 2020, more weight is given to the bank's performance in 2019; therefore, overall performance for the review period is considered good.

Geographic Distribution of Loans

The bank's geographic distribution of loans in the St. Louis assessment area is considered adequate overall based on the performance of each of the two loan products reviewed. When determining overall conclusions, HMDA loans are given the most weight, followed by small business loans.

HMDA Lending

The geographic distribution of HMDA loans during the review period is considered adequate in both years. In 2019 and 2020, the percentage of the HMDA loans that the bank originated in low-income census tracts (1.7 percent and 0.8 percent, respectively) was marginally lower than the aggregate level (2.0 percent and 1.5 percent, respectively) and lower than the percentage of families living in low-income census tracts (6.4 percent in both years). Considering that a low percentage of housing in low-income areas is owner occupied (29.4 percent), the bank's lending level reflects adequate performance. In moderate-income census tracts, the bank's distribution of HMDA loans in 2019 (11.2 percent) was above the aggregate (10.5 percent) and below the demographic (15.4 percent), which is considered good. In 2020, distribution in moderate-income census tracts (6.5 percent) fell slightly below the aggregate level (8.5 percent) and remained under the demographic figure (15.4 percent), reflecting adequate performance. With adequate performance in LMI census tracts over 2019 and 2020, the bank's HMDA lending performance is adequate overall.

Small Business Lending

The distribution of small business loans by geography income level is good overall. In 2019, the bank's level of small business lending in LMI census tracts (10.1 percent and 17.2 percent, respectively) was higher than the aggregate level (6.1 percent and 15.8 percent, respectively), as well as the percentage of small businesses located in low-income census tracts (6.9 percent and 16.5 percent, respectively), reflecting excellent performance. In 2020, the bank's percentage of loans originated in LMI census tracts (5.8 percent and 12.4 percent, respectively) was slightly under the aggregate (6.2 percent and 15.5 percent, respectively) and the demographic (7.1 percent

and 16.7 percent, respectively), reflecting adequate performance. Considering performance in both years, overall distribution is good.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. The bank made loans in 46.4 percent of assessment area census tracts in 2019 and 64.9 percent in 2020. Concentrations of census tracts with no lending are located in the northern portion of the city of St. Louis in Missouri and the western portions of St. Clair and Madison Counties in Illinois. These census tracts are mostly LMI where community contacts noted significant lending challenges exist. In addition, aggregate HMDA and CRA small business lending data also indicate that lending in these areas is difficult. In 2019, only 2.0 percent of aggregate HMDA loans and 5.4 percent of aggregate CRA small business loans in the St. Louis assessment area were made in those areas. Aggregate penetration in these areas was similar in 2020. While it is clear that lending in these areas is difficult, there is opportunity for the bank to increase its level of lending; thus, overall geographic distribution of loans is considered adequate.

Community Development Lending Activities

The Central Trust Bank makes a relatively high level of community development loans in the St. Louis assessment area. During the review period, the bank originated or renewed 43 community development loans for \$29.3 million, including five PPP loans totaling \$2.2 million. This level is within range of peer banks in the assessment area. Noteworthy loans are discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		TOTAL	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Community Development Loans	27	14,163	6	3,800	4	9,112	1	50	38	27,125
PPP Loans	1	185	3	629	1	1,383	-	-	5	2,196
TOTAL	28	14,348	9	4,429	5	10,495	1	50	43	29,321

- Thirteen originations for \$10.0 million for affordable rental properties located in LMI census tracts in the city of St. Louis and St. Clair County where community contacts identified the need for affordable rental housing.
- Four non-PPP loans totaling \$9.1 million that fund revitalization and stabilization efforts in moderate-income census tracts in the city of St. Louis that are also designated as empowerment zones.
- Five PPP loans totaling \$2.2 million qualified as community development and helped sustain businesses and nonprofits during the pandemic.
- Participation in a microloan program, funding small businesses in the city of St. Louis and St. Louis County impacted by COVID-19, totaling \$50 thousand.

Product Innovation

The bank makes extensive use of flexible lending practices in serving the credit needs of the St. Louis assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance Tests* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in St. Louis is described below:

- Through the SBA's PPP, the bank originated 1,517 PPP loans totaling \$207.5 million in its St. Louis assessment area and nearby geographies. According to metrics provided by the SBA, the bank ranked 11th in 2020 and 25th in 2021 in number of originations among all lenders participating in the program. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those in St. Louis.
- Specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas, the bank's Home Turf Program allows eligible borrowers to make a reduced minimum down payment using flexible sources of payment. From January 1, 2019, to December 31, 2021, the bank originated 393 mortgage loans, totaling \$54.1 million in St. Louis.
- Through the Missouri Housing Development Commission Loan Program, which helps LMI families with closing cost and down payment assistance, the bank originated 28 loans totaling \$3.2 million in St. Louis.
- The bank originated a significant volume of mortgage loans through the Fannie Mae HomeReady Loan Program and the Freddie Mac HomePossible Loan Program. Each program is targeted to LMI individuals and offers lower down payment requirements than traditional conventional loans. From 2019 through 2021, the bank originated 131 HomeReady loans, totaling \$21.4 million, and 36 HomePossible loans, totaling \$5.8 million in St. Louis.
- From 2019 through 2021, the bank originated a total of five loans totaling \$1.5 million through the SBA-CDC/504 Loan Program and the SBA 7(a) Loan Program. Through these programs, the bank offered small business loans that support small business operations and/or expansion.
- The bank also originated a significant volume of mortgage loans through government loan programs, including 186 FHA loans, totaling \$32.1 million, two RD home loans, totaling \$598,856, and 137 VA loans, totaling \$43.5 million.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

INVESTMENT TEST

The bank's Investment Test rating in the St. Louis assessment area is High Satisfactory. The Central Trust Bank makes a significant level of qualified community development investments and grants in the St. Louis assessment area. During the review period, the bank had 39 investments and 50 donations totaling \$9.1 million. Of that total, \$3.4 million were current-period investments, \$5.5 million were prior-period investments still outstanding, and \$217,550 were donations to various community development organizations. Overall investments and donations were within range of peer banks in the area. Noteworthy investments are discussed following the table below.

Community Development Investments										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		TOTAL	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Investments	32	6,510	7	2,325	-	-	-	-	39	8,835
Donations	10	26	40	192	-	-	-	-	50	218
TOTAL	42	6,536	47	2,517	-	-	-	-	89	9,053

- Two MBS investments totaling \$1.3 million for affordable, multi- and single-family housing.
- Seven municipal bonds totaling \$2.3 million that fund a school district where majority of the students are LMI.

SERVICE TEST

The bank's Service Test rating in the St. Louis assessment area is High Satisfactory. Service delivery systems are unreasonably inaccessible to portions of the St. Louis assessment area. However, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the area, particularly LMI geographies and LMI individuals. Lastly, the bank provides a relatively high level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 16 branches in the St. Louis assessment area, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of assessment area census tracts and household population by income level of geography.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	0 0.0%	2 12.5%	3 18.8%	11 68.8%	0 0.0%	16 100%
Census Tracts	16.4%	19.3%	29.1%	34.2%	0.9%	100%
Household Population	10.8%	18.5%	33.3%	37.1%	0.3%	100%

The bank's distribution of branches in LMI areas is well below demographic data used for comparison, and none of the bank's 16 branches are located in a low-income geography. Conversely, the substantial majority of bank branches are in upper-income census tracts, as are the bank's only LPO and two stand-alone ATMs in this assessment area. Therefore, the bank's service delivery systems are unreasonably inaccessible to portions of this assessment area.

Changes in Branch Locations

The bank added this assessment area and all branches therein as part of a merger with its affiliate banks during the review period. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. In the St. Louis assessment area, an affiliate bank opened one new, limited-service branch in an upper-income geography prior to the merger. No branch closures were completed by the bank or its affiliates in this assessment area during the review period. Therefore, the bank's record of opening and closing branches in the assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours, products, and services are generally consistent across all branches in the St. Louis assessment area with the exception of a limited-service branch in an upper-income census tract that only provides access to residents of a senior living community. Branches are typically open from 9:00 a.m. to 5:00 p.m., Monday through Friday, or similar. Fourteen branches have open lobby hours on Saturday mornings, 15 branches have drive-up access, and 10 branches have loan officers on site, all of which include the two branches in moderate-income census tracts. In addition, three branches have ITM access with extended hours Monday through Saturday. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. In total, 75 employees provided 3,165 hours of community development services to 28 different organizations benefitting the assessment area. Despite challenges posed by the pandemic, bank employees provided services to organizations promoting local economic development as well as affordable housing and education services for LMI families, children, and individuals with intellectual and developmental disabilities. Impactful services are described below the following table:

Community Development Services					
	Affordable Housing	Community Services	Revitalization/ Stabilization	Economic Development	TOTAL
Service Hours	308	2,719	0	139	3,165
Organizations Benefitted	7	19	0	2	28

- Sixty-one employees lent their financial expertise by delivering 313 hours of financial education sessions to children in LMI school districts.
- Two bank officers provided 1,037 hours of service providing income tax preparation and support services to LMI individuals.
- Thirteen employees dedicated 1,449 hours serving as board members of 18 organizations that provide affordable housing, community services, and economic development services to the assessment area.

OKLAHOMA

CRA RATING FOR OKLAHOMA:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

Satisfactory

Low Satisfactory

Low Satisfactory

Low Satisfactory

Major factors supporting the institution's Oklahoma rating include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.
- The distribution of borrowers' income/revenue profile reflects adequate penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good dispersion throughout the assessment areas.
- The bank makes an adequate level of community development loans.
- The bank makes limited use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes an adequate level of qualified community development investments and grants.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals.
- The bank provides an adequate level of community development services.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Oklahoma assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. However, small farm lending was not analyzed and did not play a role in assessing the lending performance in the Oklahoma assessment areas due to lack of volume.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Small business lending carried the most weight in this evaluation as it was the strategic focus for the bank and comprised the majority of the bank's loan portfolio.

Through the merger with its affiliate banks on October 1, 2021, The Central Trust Bank added two assessment areas in Oklahoma and all of the branches therein. When developing ratings, consideration was given to the bank's historical affiliation with the acquired banks and its associated operations. The two assessment areas are located in MSAs, one of which was reviewed under full-scope procedures.

To augment the evaluation of the full-scope review assessment area, one community contact interview was leveraged. The interview was used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from this interview is included in the *Description of Institution's Operations* sections, as applicable to the assessment area in which the community contact was made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OKLAHOMA

The Central Trust Bank operates nine offices (5.8 percent of total branches) in its two CRA assessment areas in Oklahoma. The following table gives additional detail regarding the bank's operations in the state.

Assessment Area	Offices		Deposits As of June 30, 2021		Review Procedures
	#	%	\$	%	
Tulsa	6	66.7%	\$567,153	95.2%	Full Scope
Oklahoma City	3	33.3%	\$28,442	4.8%	Limited Scope
TOTAL	9	100.0%	\$595,595	100.0%	1 – Full Scope

As shown above, the bank's deposits in Oklahoma total \$595.6 million, which represent 3.9 percent of total bank deposits. The bank's operations in the state are heavily concentrated in the Tulsa MSA, which drove the statewide rating as the lone full-scope review.

Through the merger with its affiliates, The Central Trust Bank added eight branches and two assessment areas in Oklahoma. Prior to the merger, the bank's affiliates opened one branch in Oklahoma City, and post-merger, the bank opened an additional branch in the same assessment area. The information in the table above is discussed in more detail within each of the respective assessment area sections.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

The bank's Lending Test performance in Oklahoma is rated Low Satisfactory. The test considers the following criteria.

Lending Activity

Full-Scope Review Areas	Lending Activity
Tulsa	Good

Limited-Scope Review Areas	Lending Activity
Oklahoma City	Consistent

The bank's overall level of lending reflects good responsiveness to the credit needs of the Oklahoma assessment areas. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

Borrower and Geographic Distribution

As displayed in the following tables, the bank's performance by borrower's income and revenue profile is adequate in Oklahoma.

Full-Scope Review Areas	Loan Distribution by Borrower's Profile
Tulsa	Adequate

Limited-Scope Review Areas	Loan Distribution by Borrower's Profile
Oklahoma City	Exceeds

Overall, the bank's geographic distribution of loans reflects good penetration throughout Oklahoma.

Full-Scope Review Areas	Geographic Distribution of Loans
Tulsa	Good

Limited-Scope Review Areas	Geographic Distribution of Loans
Oklahoma City	Consistent

Community Development Lending Activities

Overall, the bank makes an adequate level of community development loans in its Oklahoma assessment areas, as displayed below.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Full-Scope Review Areas	Community Development Lending Activities
Tulsa	Adequate

Limited-Scope Review Areas	Community Development Lending Activities
Oklahoma City	Consistent

During the review period, the bank made ten community development loans totaling \$26.8 million, one of which was a PPP loan with a community development purpose for \$8.2 million.

Product Innovation

The bank makes limited use of flexible lending practices in serving the credit needs of the Oklahoma assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance Tests* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Oklahoma is described below:

- Through the SBA's PPP, the bank originated 488 PPP loans totaling \$50.9 million across the state. In 2020, the bank ranked 18th in Tulsa and 61st in Oklahoma City among all lenders that participated in the program. Its position fell in 2021; however, the bank remained above the 50th percentile in both assessment areas. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those located in the bank's Oklahoma assessment areas.
- From January 1, 2019, to December 31, 2021, the bank originated two HomeReady loans, totaling \$230,375 in its Oklahoma assessment areas. The HomeReady program is targeted to LMI individuals and offers lower down payment requirements than traditional conventional loans.
- The bank originated one small dollar farm loan for \$1,560 through the USDA FSA program in its Tulsa assessment area. Loans through this program are tailored to the needs of farmers and ranchers, including those who own small farms.
- The bank also originated mortgage loans through government loan programs, including two FHA loans, totaling \$455,436, and six VA loans, totaling \$1,534,061.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

INVESTMENT TEST

Overall, the bank's performance in Oklahoma is rated Low Satisfactory under the Investment Test. The following tables display investment and grant activity performance in Oklahoma.

Full-Scope Review Areas	Investment and Grant Activity
Tulsa	Adequate

Limited-Scope Review Areas	Investment and Grant Activity
Oklahoma City	Consistent

As shown in the table below, the bank's total investment and grant activity included \$1.7 million in qualified investments and grants and \$83,380 in donations. These activities consisted primarily of investments in MBS supporting affordable housing in the Oklahoma assessment areas as well as one investment supporting economic development at a statewide level. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

Oklahoma Assessment Area	Investments	Donations/Grants
Tulsa	\$566,560	\$80,910
Oklahoma City	\$133,242	\$2,470
Statewide	\$1,000,000	-
TOTAL	\$1,699,802	\$83,380

SERVICE TEST

The bank's performance in Oklahoma is rated Low Satisfactory under the Service Test. This test considers the following criteria:

Accessibility of Delivery Systems

As displayed in the following tables, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in Oklahoma.

Full-Scope Review Areas	Accessibility of Delivery Systems
Tulsa	Reasonably Accessible

Limited-Scope Review Areas	Accessibility of Delivery Systems
Oklahoma City	Consistent

Changes in Branch Locations

Through the merger with its affiliates, The Central Trust Bank added the two Oklahoma assessment areas and related branches. When determining performance with respect to branch location changes, consideration was given to the pre-existing affiliation with the acquired branches as well as changes in branch locations completed by the affiliates prior to the merger. The bank's

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

record of opening and closing branches in the Oklahoma assessment areas has not adversely affected accessibility to its service delivery systems.

Full-Scope Review Areas	Changes in Branch Locations
Tulsa	Not Adversely Affected

Limited-Scope Review Areas	Changes in Branch Locations
Oklahoma City	Exceeds

Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the Oklahoma assessment areas, particularly LMI geographies and individuals. The bank's performance under this criterion is displayed by assessment area in the following tables.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Tulsa	Do not vary in a way that inconveniences

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Oklahoma City	Exceeds

Community Development Services

The bank provides an adequate level of community development services in the Oklahoma assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the Oklahoma assessment areas.

Full-Scope Review Areas	Community Development Services
Tulsa	Adequate

Limited-Scope Review Areas	Community Development Services
Oklahoma City	Below

During the review period, 30 bank employees provided 1,374 hours of community development service activities to seven organizations throughout the Oklahoma assessment areas. Despite challenges posed by the pandemic, bank employees lent their expertise in various capacities, such as board member and financial literacy instructor, to local community service and economic development organizations. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

TULSA, OKLAHOMA METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TULSA ASSESSMENT AREA

Bank Structure

The bank added this assessment area and all branches therein as part of a merger with an affiliate bank during the review period. It now operates six of its offices in the Tulsa assessment area, representing 3.9 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Number of Delivery Systems by Census Tract Classification				
	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Offices	0	2	2	2

Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of its assessment area. However, it may experience challenges serving the outermost portions of its assessment area, namely northwest Osage County, given the geographical distance from the bank's nearest branch.

General Demographics

The bank's Tulsa assessment area includes the full counties of Tulsa, Rogers, Creek, and Osage, four of the seven counties that comprise the Tulsa – Broken Arrow – Owasso, Oklahoma MSA.

The assessment area's population as of the 2015 ACS and its land area are shown in the following table:

County	Population	Land Area
Tulsa County	623,335	587 square miles
Rogers County	89,190	711 square miles
Creek County	70,761	970 square miles
Osage County	48,054	2,304 square miles
TOTAL ASSESSMENT AREA	831,340	

Tulsa County is the largest county by population in the assessment area and the second largest in the state. Its county seat, the city of Tulsa, is the economic hub of the Tulsa MSA and is home to prominent energy, aerospace, telecommunications, and manufacturing companies. It also hosts several community colleges and universities, including the University of Tulsa, which serves as a pipeline of industry talent, according to the community contact. In contrast, Osage County is the smallest county by population in the assessment area but the largest county by land. It is coextensive with the Osage Nation Reservation and consists of mostly open prairies as well as a large lake. Rogers and Creek Counties are similar in population and land area and are largely residential in nature.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

The Tulsa assessment area is the bank's primary operating market in Oklahoma and contains six of the bank's nine branches in the state. According to the FDIC Market Share Report as of June 30, 2021, the bank had 1.6 percent of the deposit market share in the Tulsa assessment area, ranking 15th out of 53 financial institutions within the assessment area. The bank operates with significant competition in this assessment area from large, nationally recognized financial institutions, regional banks, and local banks and credit unions.

The assessment area has 47,150 businesses, 42,864 of which are small businesses (90.9 percent). As a result, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels. The community contact noted a substantive demand for small-dollar small business loans, especially in the more residential portions of the area where there is less access to small business credit and services.

Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census	17	67	88	63	0	235
Tracts	7.2%	28.5%	37.5%	26.8%	0.0%	100%
Family	10,765	49,667	84,514	68,104	0	213,050
Population	5.1%	23.3%	39.7%	32.0%	0.0%	100%

As shown above, 35.7 percent of census tracts in the assessment area are designated as LMI, and 28.4 percent of assessment area families reside within those tracts. Of the families living in LMI tracts, 23.8% are below the poverty line. All low-income census tracts are located in Tulsa County, primarily north and west of the city of Tulsa. Moderate-income census tracts are found in each county in the assessment area, most of which are also in Tulsa County.

According to 2015 ACS data, the median family income for the Tulsa assessment area was \$61,548, while the same figure for the state of Oklahoma as a whole was \$58,029. The following table displays the distribution of assessment area families by income level compared to all Oklahoma families.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Tulsa	45,660	37,178	42,911	87,301	213,050
	21.4%	17.5%	20.1%	41.0%	100 %
Oklahoma	208,222	170,327	195,424	392,036	966,009
	21.6%	17.6%	20.2%	40.6%	100 %

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (38.9 percent) than reside in LMI geographies (35.7 percent). As displayed in the second table, the percentage of assessment area families that are LMI is similar to the figure for the state of Oklahoma as a whole (39.2 percent). Poverty levels in the assessment area (11.5 percent) are slightly lower than statewide levels (12.4 percent). Therefore, considering these statistics, the assessment area is slightly more affluent than the state of Oklahoma as a whole.

Housing Demographics

The following table displays key housing demographics for the assessment area and state of Oklahoma. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area, and the housing cost burden, which reflects those households that pay greater than 30.0 percent of their income on housing costs, including utilities.

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)	Housing Cost Burden (Renters Owners)
Tulsa	\$133,881	37.4%	\$767	39.7% 17.4%
Oklahoma	\$117,900	39.8%	\$727	38.3% 16.7%

Housing in the assessment area is slightly less affordable than in the state of Oklahoma overall as evidenced by a lower affordability ratio. By county, housing in Tulsa County is least affordable (35.9 percent) and housing is most affordable in Osage County (45.4 percent). Rental costs in the assessment area are higher than in the state. The percentage of renters with rental costs exceeding 30.0 percent of their income in the assessment area (39.7 percent) is slightly above the statewide figure (38.3 percent). Of those renters, the highest percentage live in Tulsa County (40.7 percent), and the lowest percentage live in Creek County (32.9 percent). At an aggregate level, a community contact considers housing in Tulsa to be affordable, with more expensive homes located in the southern part of the MSA and more affordable housing in the northern and eastern parts of the area. The contact identified multifamily housing to be a need for the area.

Industry and Employment Demographics

The assessment area economy is diversified and supports a large business community, including a strong small business sector. County business patterns data indicates that there are 397,283 paid employees in the assessment area. The three largest sectors of the assessment area economy by number of paid employees are healthcare and social assistance (14.3 percent), retail trade (11.6 percent), and government (11.5 percent). The assessment area also hosts a prominent professional and technical services sector, which accounts for only 5.2 percent of paid employees but 13.3 percent of business establishments.

The following chart displays annual unemployment rates (not seasonally adjusted) for each county in the Tulsa assessment area, the assessment area as a whole, and the state of Oklahoma.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Unemployment Data			
Dataset	2019 Annual Average	2020 Annual Average	2021 Annual Average
Tulsa County	3.0%	6.6%	4.0%
Rogers County	2.9%	5.8%	3.5%
Creek County	3.5%	6.5%	4.2%
Osage County	3.6%	6.4%	4.2%
Tulsa Assessment Area	3.0%	6.5%	4.0%
Oklahoma	3.1%	6.1%	3.8%

As shown in the preceding table, the unemployment rates for Tulsa and Rogers Counties were comparable to the assessment area and state averages in 2019. Creek and Osage Counties generally had higher rates than the assessment area and state figures. These counties are more rural in nature and lack the level of manufacturing and industry that is most prevalent in the more densely populated assessment area counties. In 2020, unemployment levels significantly increased in line with the national unemployment trend resulting from the impact of the pandemic. Tulsa County experienced the greatest increase at 3.6 percent as the small businesses concentrated in that county were forced to lay off employees or close. As shown in the data, unemployment levels in 2021 trended back downward, nearing their 2019 annual averages by county and the state as a whole.

Community Contact Information

For this assessment area, a community contact interview was used to ascertain specific credit needs, opportunities, and local market conditions. The contact was a representative from an economic development organization that promotes affordable housing and small business development. According to the contact, oil/gas, energy technology, aerospace/aviation, education, and healthcare are the primary industries, which outside of energy technology, have had a long history in Tulsa. Major employers have invested time and energy into the area economy, and the city and local industries also work closely with area tribal nations, including the Osage, Creek, and Cherokee Nations. The contact states that the area benefits from a diverse intersection of people as the region has a substantive Native American population, with a portion of the region's land area being deemed tribal land.

Regarding small businesses, the community contact explained that opportunities for small businesses vary by county. According to the individual, the northern part of Tulsa is primarily residentially zoned and thus prevents the building of industrial parks where businesses and employment may be found. Additionally, most small business development resources are in the core of the city, requiring many individuals to have transportation to access them. In East Tulsa, the community contact described a very entrepreneurial area with many new restaurants and businesses in the service industry. The contact suggested that the population is very eager to start businesses and often seeks out business support services to accommodate the demand. Across the assessment area, the contact sees the need for banks to offer or fund technical assistance programs that equip entrepreneurs with the skills to run a business, as well as microloans and SBA products. According to the contact, housing in the area is generally affordable with differences by region. For example, in southern Tulsa, housing is generally more expensive, whereas in northern and eastern Tulsa, more affordable housing may be found. The contact mentioned that several

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

organizations offer homebuyer education, down payment assistance, and other things to make housing more accessible. The individual suggested banks fund or join coalitions aimed at building or redeveloping affordable housing in the region, namely workforce-centered multifamily properties for rent or purchase.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA ASSESSMENT AREA

LENDING TEST

Lending levels reflect good responsiveness to the credit needs of the Tulsa assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects good penetration throughout the assessment area. Additionally, the bank made an adequate level of community development loans in this assessment area.

Lending Activity

The following table displays the combined 2019 and 2020 lending volume in this assessment area by number and dollar volume.

Summary of Lending Activity				
January 1, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	4	0.4%	345	0.2%
Home Purchase	73	7.2%	17,958	10.8%
Multifamily Housing	4	0.4%	5942	3.6%
Refinancing	78	7.7%	16,425	9.9%
TOTAL HMDA	159	15.7%	40,670	24.4%
Small Business	845	83.6%	56,328	75.4%
Small Farm	7	0.7%	399	0.2%
TOTAL LOANS	1,011	100%	166,632	100%

The bank's lending levels reflect good responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 3.9 percent by number and 6.6 percent by dollar were made in the Tulsa assessment area in 2019, which is closely aligned with the percentage of total bank deposits held (3.7 percent by dollar) and branches located (3.9 percent) in the assessment area. In addition, the bank's lending levels were compared to those of the other lenders in the assessment area. Only HMDA-reported data was available and shows that the bank ranked 67th out of 428 HMDA aggregate lenders in 2019. In 2020, the bank's percentage of HMDA and CRA loans made in the assessment area (2.2 percent by number and 2.4 percent by dollar) dropped slightly below the percentage of deposits held and branches located in the area. When comparing the bank's lending levels to that of other lenders, data shows that the bank remained 67th out of 444 HMDA aggregate lenders and ranked 57th out of 158 CRA aggregate lenders. The bank's small business lending in the assessment area is considered especially responsive as the community contact cites small business loans as a key need in the area as identified by the community contact. Given the bank's relatively small share of deposits held and branches located in the Tulsa assessment area, its level of lending is considered good.

Loan Distribution by Borrower's Profile

The bank's borrower distribution of loans in the Tulsa assessment area is considered adequate overall based on the performance of both of the loan products reviewed. When determining overall conclusions, small business loans are given more weight than HMDA loans.

HMDA Lending

Overall, the bank's loan distribution of HMDA loans is poor for both years of data reviewed. In 2019, the bank made no HMDA loans to low-income borrowers compared to 21.4 percent of families with that income designation, and aggregate lenders made 6.6 percent of HMDA loans to low-income borrowers. HMDA volumes were low for the bank overall; therefore, distribution is considered poor. To moderate-income borrowers, the bank's percentage of loans (5.4 percent) was substantially below the aggregate level (17.3 percent) and the demographic figure (17.5 percent), also reflecting poor performance. A further review of the data showed that the majority of HMDA loans were made to borrowers with unknown income (57.1 percent), which significantly impacted the distribution analysis. This has been attributed to a high volume of nonowner-occupied investment properties, which are generally associated with rental properties. While these properties may meet housing needs, there are additional opportunities for the bank to enhance its responsiveness to LMI borrowers.

In 2020, the bank's distribution of HMDA loans to borrowers in low- and moderate-income census tracts (1.9 percent and 8.7 percent, respectively) were below the aggregate levels (4.1 percent and 14.8 percent, respectively) and the demographic figures (21.4 percent and 17.5 percent, respectively). The distribution of HMDA loans to borrowers with unknown revenues remained high (35.0 percent), thereby significantly impacting this analysis. However, lending in both low- and moderate-income census tracts remained poor, and overall distribution in 2020 is also considered poor.

Small Business Lending

Overall, the bank's loan distribution to businesses of different revenue sizes is good. In 2019, the bank's distribution of small business loans to businesses with annual revenues of \$1 million or less (56.3 percent) exceeded that of peer institutions (45.3 percent) but landed below the estimated percentage of businesses with this revenue profile (90.7 percent), demonstrating good performance.

In 2020, the percentage of the bank's small business loans made to businesses with annual revenues of \$1 million or less (31.4 percent) fell slightly below the aggregate level (33.3 percent) and further below demographic figure (90.9 percent). Additional review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 49.4

percent of total PPP loans had loan sizes of \$100,00 or less. This analysis revealed an adequate responsiveness to credit needs.

Given the substantial impact of PPP lending on bank performance, 2019 data is given more weight; therefore, overall distribution for the review period is considered good.

Geographic Distribution of Loans

Overall, the geographic distribution of loans in the assessment area is good based on the products reviewed, with small business lending receiving the most weight, followed by HMDA lending.

HMDA Lending

The geographic distribution of HMDA loans is good overall. The bank's performance lending in low-income census tracts in both 2019 and 2020 (1.8 percent and 1.9 percent, respectively) was above peer lending performance (0.9 percent and 0.8 percent, respectively) and below the demographic figure, which was 3.2 percent in both years, reflecting good performance in both years. In moderate-income areas, the bank's HMDA lending in 2019 (23.2 percent) exceeded that of the aggregate level (14.6 percent) and the demographic figure (19.4 percent), demonstrating excellent distribution. In 2020, the bank's lending level in moderate-income census tracts (11.7 percent) was in line with the aggregate level (11.8 percent) and under the demographic (19.4 percent), reflecting good distribution. Further consideration was given to the bank's performance in addressing credit needs noted by the community contact, who pointed to the need for affordable housing, particularly home purchase loans for 1–4 family units. In 2019, the bank originated 26.4 percent of its home purchase loans in LMI census tracts, exceeding that of the aggregate level (16.2 percent) and the demographic figure (22.6 percent), reinforcing the bank's excellent performance. In 2020, the bank's distribution of home purchase loans (12.8 percent) fell below both the aggregate level (14.9 percent) and the demographic figure (22.6 percent), demonstrating adequate responsiveness. Considering performance across both years, the bank's geographic distribution of HMDA loans is considered good.

Small Business Lending

The bank's small business lending reflects excellent distribution. In 2019, the bank's percentage of small business loans made in LMI census tracts (3.5 percent and 24.2 percent, respectively) was greater than that of the aggregate figures (2.7 percent and 20.1 percent, respectively) as well as the percentage of businesses located in these tracts (3.4 percent and 22.5 percent, respectively). This comparative performance was similar in 2020 where the bank's distribution in LMI census tracts (3.4 percent and 24.9 percent) was greater than the aggregate figures (2.6 percent and 20.9 percent) as well as the demographic figures (3.3 percent and 22.5 percent, respectively). Therefore, the bank's lending performance to small businesses in both low- and moderate-income geographies in both years is excellent.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. The bank made loans in 50.2 percent of assessment area census tracts in 2019 and

63.8 percent in 2020. Concentrations of census tracts with no lending are located in the northern portion of Tulsa County where there are several LMI census tracts. A detailed review of the area and the bank's lending patterns showed that several factors contributed to this result. The community contact noted that this area is zoned as a residential area, which reduced the opportunities for the bank to originate small business loans—its strategic focus in this assessment area during the review period. In addition, contacts note that residents face transportation constraints, making it difficult for them to reach The Central Trust Bank's nearest branch, which is nearly 15 miles away. While challenges exist, the analysis revealed an opportunity for the bank to increase its level of lending in LMI areas. As small business loans reflect excellent distribution and carried the most weight toward overall conclusions, the gaps noted in the dispersion analysis bring overall geographic distribution of loans to good.

Community Development Lending Activities

The bank's community development performance demonstrates adequate responsiveness to the community development needs within the Tulsa assessment area. As detailed in the table below, the bank made five community development loans totaling \$6.8 million. The most impactful of these loans is discussed following the table below.

Community Development Lending										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		TOTAL	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Community Development Loans	3	\$1,680	1	\$1,604	1	\$3,477	-	-	5	\$6,760

- One loan qualifying as revitalization/stabilization totaling \$3.5 million was made to refinance an existing loan on and fund improvements to a large industrial building located in a moderate-income census tract that is designated as an Oklahoma Priority Enterprise Zone.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

INVESTMENT TEST

The Central Trust Bank makes an adequate level of qualified community development investments and grants in the Tulsa assessment area. During the review period, the bank had five⁴ investments and 24 donations totaling \$647 thousand. Of that total, \$565,560 were prior-period investments still outstanding and \$80,910 were donations to various community development organizations. Noteworthy loans are discussed following the table below.

Community Development Investments										
	Affordable Housing		Community Services		Revitalization/ Stabilization		Economic Development		TOTAL	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)
Investments	5	566	-	-	-	-	-	-	5	566
Donations	1	15	18	63	-	-	5	3	24	81
TOTAL	6	581	18	63	-	-	5	3	29	646

- Five investments in MBS that fund affordable housing to LMI individuals.
- A \$15,000 donation was made to an organization that provides housing to LMI individuals.

SERVICE TEST

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area, and the bank did not open or close any branches during this review period. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and LMI individuals. Lastly, the bank provides an adequate level of community development services in the Tulsa assessment area.

Accessibility of Delivery Systems

The bank operates six branches in the Tulsa assessment area, and the following table illustrates the distribution of these offices by geography income level compared to the distribution of assessment area census tracts and household population by income level of geography.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	0	2	2	2	0	6
	0.0%	33.3%	33.3%	33.3%	0.0%	100%
Census Tracts	7.2%	28.5%	37.4%	26.8%	0.0%	100%
Household Population	5.9%	25.7%	39.7%	28.8%	0.0%	100%

As shown in the previous table, the bank operates two branches (33.3 percent) in moderate-income geographies, which is above the demographic data used for comparison. While the bank does not

⁴ Three of the investments were MBS benefitting LMI borrowers in the Tulsa and Oklahoma City assessment areas. The pro-rata values of the MBS benefitting Tulsa are included in the total dollar value.

have any branches located in low-income geographies, only 5.9 percent of assessment area households live in low-income census tracts. Overall, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank added this assessment area and all branches therein as part of a merger with its affiliate banks during the review period. Otherwise, there were no branches opened or closed in this assessment area during the review period. Therefore, changes in branch locations have not adversely affected the accessibility of delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours, products, and services are consistent across all branches in the Tulsa assessment area. Branches are open from 9:00 a.m. to 5:00 p.m., Monday through Friday, and branches have drive-up access 8:00 a.m. to 6:00 p.m., Monday through Friday, and Saturdays from 9:00 a.m. to noon. All branches have ITMs with availability Monday through Saturday from 7:00 a.m. to 7:00 p.m., and four branches have loan officers on site, including one moderate-income branch. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and individuals.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. In total, 27 employees provided 1,298 hours of community development services to four different organizations benefitting the bank's assessment areas. Despite challenges posed by the pandemic, services were provided to organizations promoting financial literacy and employment services, and all qualified under the community service community development purpose. Impactful services are described below:

- Twenty-six employees lent their financial expertise by delivering 522 hours of financial education sessions to children in LMI school districts.
- One bank officer dedicated 632 hours, serving as a board member of three organizations that promote financial literacy to underserved LMI individuals.

OKLAHOMA CITY, OKLAHOMA METROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE OKLAHOMA CITY ASSESSMENT AREA

This assessment area and all branches therein were added during the review period as part of a merger with its affiliate banks. The assessment area includes the entirety of Oklahoma County, one of the seven counties that make up the Oklahoma City, Oklahoma MSA. Its branch network consists of three offices; all of which are full-service facilities. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	44,754	32,453	34,687	69,537	181,431
	24.7%	17.9%	19.1%	38.3%	100%
Household Population	76,183	51,469	51,029	112,709	291,390
	26.1%	17.7%	17.5%	38.7%	100%

Assessment Area Demographics by Geography Income Level						
Demographic Type	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	28	85	70	50	8	241
	11.6%	35.3%	29.1%	20.8%	3.3%	100%
Family Population	17,042	54,259	54,266	55,524	340	181,431
	9.4%	29.9%	29.9%	30.6%	0.2%	100%
Household Population	27,968	96,111	88,352	77,701	1,258	291,390
	9.6%	33.0%	30.3%	26.7%	0.4%	100%
Business Institutions	2,806	11,251	12,690	13,125	1,939	41,811
	6.7%	26.9%	30.4%	31.4%	4.6%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OKLAHOMA CITY ASSESSMENT AREA**LENDING TEST**

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Oklahoma full-scope assessment area, as displayed in the following table. For this review period, a significant amount of retail lending data and community development activity was excluded as it had already been evaluated in an affiliate bank's CRA examination. This limitation was taken into consideration when evaluating the bank's performance. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Loan Distribution by Borrower's Profile	Exceeds
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Consistent
OVERALL	Consistent

During the review period, the bank made five community development loans totaling \$20.0 million, including one PPP loan for \$8.2 million. These loans qualified for a community development purpose of affordable housing (4) and revitalization/stabilization (1). Noteworthy is that the two of the loans funded the purchase and remodel of large rental housing complexes offering affordable housing in LMI areas.

INVESTMENT TEST

The bank's Investment Test performance in the Oklahoma City assessment area is consistent with the investment performance in the full-scope assessment area. The bank's qualified investments included three⁵ MBS supporting affordable housing, totaling \$133,242. These investments were made prior to the review period but are still outstanding. The bank also made six qualified donations with a community service purpose, totaling \$2,470. Though this level of investment is lower than in the full-scope assessment area, it is considered consistent as the bank's presence is smaller in the Oklahoma City assessment area.

⁵ The three MBS investments benefitted LMI borrowers in the Tulsa and Oklahoma City assessment areas. The pro-rata values of the MBS benefitting Tulsa are included in the total dollar value.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with performance in the Oklahoma full-scope assessment area, as detailed in the following table:

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Exceeds
Reasonableness of Business Hours and Services	Exceeds
Community Development Services	Below
OVERALL	Consistent

During the review period, three bank employees provided 77 hours of community development service activities to three different organizations in the assessment area. Despite challenges posed by the pandemic, services were provided to organizations promoting financial literacy and holistic services to LMI individuals, and all qualified under the community Service Test.

COLORADO

CRA RATING FOR COLORADO:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

Satisfactory

Low Satisfactory

Needs to Improve

High Satisfactory

Major factors supporting the institution's Colorado rating include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.
- The distribution of borrowers' income/revenue profile reflects good penetration among individuals of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate dispersion throughout the assessment areas.
- The bank makes a low level of community development loans.
- The bank makes limited use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes a poor level of qualified community development investments and grants.
- Delivery systems are readily accessible to geographies and individuals of different income levels, and services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.
- The bank's record of opening and closing branches has improved the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals
- The bank provides a limited level of community development services.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Colorado assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. However, small farm lending was not analyzed and did not play a role in assessing the lending performance in the Colorado assessment areas due to lack of volume. For all three assessment areas, HMDA lending carried the most weight in this evaluation, as it was the strategic focus for the bank and comprised the majority of the bank's loan portfolio.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

The bank operates three assessment areas in Colorado; two of which are located in MSAs and one that is located in the nonMSA portion of the state. All three assessment areas were added during the review period upon the opening of one branch per area. The Colorado Springs assessment area was reviewed under full-scope examination procedures as it was the only one established throughout the review period. As such, performance conclusions for the state of Colorado are a reflection of the bank's performance in Colorado Springs.

To augment the evaluation of the full-scope review assessment area, one community contact interview was leveraged. The interview was used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Details from this interview is included in the *Description of Institution's Operations* sections, as applicable to the assessment area in which the community contact was made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLORADO

The Central Trust Bank operates three offices (0.6 percent of total branches) in its three CRA assessment areas in Colorado. The following table gives additional detail regarding the bank's operations in the state.

Assessment Area	Offices		Deposits As of June 30, 2021		Review Procedures
	#	%	\$	%	
Colorado Springs	1	33.3%	\$5,499	0.04%	Full Scope
Denver MSA	1	33.3%	\$3,149	0.02%	Limited Scope
Durango nonMSA	1	33.3%	\$5,623	0.04%	Limited Scope
TOTAL	3	100.0%	\$14,271	100.0%	1 - Full Scope

The bank's deposits in Colorado total \$14.3 million, which represent 0.1 percent of total bank deposits. Given this low relative level, performance in Colorado carries minimal weight when determining institutional level ratings.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's Lending Test performance in Colorado is rated Low Satisfactory. The test considers the following criteria.

Lending Activity

Full-Scope Review Areas	Lending Activity
Colorado Springs	Good

Limited-Scope Review Areas	Lending Activity
Denver	Consistent
Durango	Consistent

Lending levels in the Colorado assessment areas reflect good responsiveness to the credit needs. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

Borrower and Geographic Distribution

As displayed in the following tables, the bank's performance by borrower's income and revenue profile is good in Colorado.

Full-Scope Review Areas	Loan Distribution by Borrower's Profile
Colorado Springs	Good

Limited-Scope Review Areas	Loan Distribution by Borrower's Profile
Denver	Consistent
Durango	Consistent

Overall, the bank's geographic distribution of loans reflects adequate penetration throughout Colorado.

Full-Scope Review Areas	Geographic Distribution of Loans
Colorado Springs	Adequate

Limited-Scope Review Areas	Geographic Distribution of Loans
Denver	Exceeds
Durango	Consistent

Community Development Lending Activities

The bank entered its Colorado assessment areas during the review period where it planned to operate as a small bank under the affiliate model. Until the merger with its affiliates in October 2021, the requirement to conduct community development activity was not applicable. In addition, the bank was unable to conduct significant community outreach and marketing in the assessment area due to external constraints and the absence of a local CRA specialist. As such, community development activities were limited in Colorado during the review period and are given little weight in this performance evaluation.

Overall, the bank makes a low level of community development loans in its Colorado assessment areas, as displayed below.

Full-Scope Review Areas	Community Development Lending Activities
Colorado Springs	Low Level

Limited-Scope Review Areas	Community Development Lending Activities
Denver	Consistent
Durango	Consistent

During the review period, the bank made one community development loan totaling \$660,000 for the purpose of affordable housing. Additional details regarding the composition of the bank's community development lending can be found in the *Lending Test* section for each of the respective assessment areas.

Product Innovation

The bank makes limited use of flexible lending practices in serving the credit needs of the Colorado assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. The bank's use of flexible and/or innovative lending products in Colorado is described below:

- Through the SBA's PPP, the bank originated 212 PPP loans totaling \$10.5 million across the state. A significant majority of these loans were sized under \$100,000, further demonstrating the bank's responsiveness to small business needs.
- In response to the pandemic, the bank offered payment accommodations to consumer and commercial borrowers impacted by the pandemic, including those located in the bank's Colorado assessment areas.

- Specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas, the bank's Home Turf Program allows eligible borrowers to make a reduced minimum down payment, using flexible sources of payment. The bank introduced this product to its Colorado assessment areas during the review period where it originated one mortgage loan, totaling \$385,000.
- From January 1, 2019, to December 31, 2021, the bank originated 36 HomeReady loans, totaling \$9.6 million in its Colorado assessment areas. The HomeReady program is targeted to LMI individuals and offers lower down payment requirements than traditional conventional loans.
- From 2019 to 2021, the bank originated five loans totaling \$5.6 million through the SBA-CDC/504 Loan Program. Through this program, the bank offered small business loans that support small business operations and/or expansion.
- The bank also originated a significant volume of mortgage loans through government loan programs, including 97 FHA loans, totaling \$28.0 million, seven RD home loans, totaling \$2.6 million, and 258 VA loans, totaling \$106.3 million.

INVESTMENT TEST

Overall, the bank's performance in Colorado is rated Needs to Improve under the Investment Test. The following tables display investment and grant activity performance in Colorado.

Full-Scope Review Areas	Investment and Grant Activity
Colorado Springs	Poor

Limited-Scope Review Areas	Investment and Grant Activity
Denver	Consistent
Durango	Consistent

The bank's total investment and grant activity included one donation for \$5 thousand. Consideration was given to the constraints described under the Colorado *Community Development Lending Activities* section; however, performance in the Colorado assessment areas needs to improve. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective assessment areas.

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

SERVICE TEST

The bank's performance in Colorado is rated High Satisfactory under the Service Test. This test considers the following criteria:

Accessibility of Delivery Systems

As displayed in the following tables, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels in Colorado.

Full-Scope Review Areas	Accessibility of Delivery Systems
Colorado Springs	Readily Accessible

Limited-Scope Review Areas	Accessibility of Delivery Systems
Denver	Below
Durango	Below

Changes in Branch Locations

The bank's record of opening and closing branches in Colorado has improved access to its service delivery systems, particularly to LMI geographies and individuals. The tables below display the bank's performance under this criterion.

Full-Scope Review Areas	Changes in Branch Locations
Colorado Springs	Improved Access

Limited-Scope Review Areas	Changes in Branch Locations
Denver	Below
Durango	Below

Reasonableness of Business Hours and Services in Meeting Assessment Area Credit Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the Colorado assessment areas, particularly LMI geographies and individuals. The bank's performance under this criterion is displayed by assessment area in the following tables.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Colorado Springs	Do not vary in a way that inconveniences

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Denver	Below
Durango	Below

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

Community Development Services

The bank provides a limited level of community development services in the Colorado assessment areas. Performance under this Service Test criteria is displayed in the following tables for each of the Colorado assessment areas.

Full-Scope Review Areas	Community Development Services
Colorado Springs	Limited Level

Limited-Scope Review Areas	Community Development Services
Denver	Consistent
Durango	Consistent

During the review period, two bank employees provided 38 hours of community development service activities to two organizations in two of the assessment areas. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

COLORADO SPRINGS, COLORADO METROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLORADO SPRINGS ASSESSMENT AREA

Bank Structure

During the review period, the bank opened its single branch in this assessment area. The bank now operates one full-service office with an ITM onsite in the Colorado Springs assessment area, representing 0.6 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Number of Delivery Systems by Census Tract Classification				
	Low-Income	Moderate-Income	Middle-Income	Upper-Income
Offices	1	0	0	0

Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

General Demographics

The assessment area includes El Paso County, the largest of the two counties comprising the Colorado Springs, Colorado MSA. ACS data shows that the county has experienced significant population growth and is home to 655,024 residents. Contributing to the population are current and former military personnel linked to the five military bases situated throughout the city. Along with the population figures shown in the preceding table, the assessment area has 36,306 businesses; 34,289 of which are small businesses (94.4 percent). As a result, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels.

The Colorado Springs assessment area is the bank's primary operating market in Colorado and contains one of the bank's three branches in the state. According to the FDIC Market Share Report as of June 30, 2021, there are 38 FDIC-insured depository institutions that operate 125 offices in the assessment area. The Central Trust Bank has a small footprint with one office location and a very limited share of the deposit market at 0.05 percent. The bank operates with significant competition in this assessment area from large, nationally recognized financial institutions, regional banks, and local banks and credit unions.

Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	7	40	50	31	2	130
	5.4%	30.8%	38.5%	23.9%	1.5%	100%
Family Population	6,804	41,729	68,668	50,821	81	168,103
	4.1%	24.8%	40.9%	30.2%	0.1%	100%

As shown in the preceding table, a significant portion of the geography census tracts are LMI (36.2 percent), primarily moderate-income census tracts (30.8 percent). These areas are concentrated in the city of Colorado Springs, namely the southeastern and central parts of the city. According to 2015 ACS data, the median family income for the assessment area was \$70,838. In comparison, the median family income for the state of Colorado as a whole was above the assessment area at \$74,826. The following table displays the distribution of assessment area families by income level compared to all Colorado families.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Colorado Springs	34,246	31,046	34,169	68,642	168,103
	20.4%	18.5%	20.3%	40.8%	100%
Colorado	274,235	231,523	266,407	528,807	1,300,972
	21.1%	17.8%	20.5%	40.7%	100%

The table above reveals that 38.9 percent of the families in the assessment area are considered LMI, which is identical to the state of Colorado. Furthermore, the percentage of families living below the poverty level in the assessment area (8.4 percent) is similar to the percentage of Colorado families (8.5 percent). Though the median family income in the Colorado Springs assessment area is slightly below that of the state of Colorado, the comparative data indicates that overall the assessment area is similar in affluence.

Housing Demographics

The following table provides details of the housing demographics of the assessment area compared to the state of Colorado as a whole.

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)	Housing Cost Burden (Renters Owners)
Colorado Springs	\$218,303	26.8%	\$976	47.3% 21.7%
Colorado	\$247,800	24.5%	\$1,002	46.4% 21.8%

Based on affordability ratios, housing values, and rent prices, housing in the assessment area is slightly more affordable than the state of Colorado as a whole. A review of housing cost burden reveals that renters find it marginally less affordable in the assessment area compared to that of the state of Colorado due to a slightly higher median family income at the state level. The community contact indicated that a low inventory of affordable housing coupled with a large number of unbanked LMI families has contributed to the demand for rental properties. In addition, military personnel living in the area tend to rent rather than purchase a home, thereby increasing the rental housing demand. To address housing needs in the area, contacts recommend additional affordable housing properties be constructed in the area and for financial institutions to conduct outreach to LMI families so that they feel more comfortable accessing credit to purchase homes.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. According to Dun & Bradstreet, 34,289, or 94.4 percent, of businesses in the assessment area have annual revenues under \$1 million. The community contact asserted that the area has a positive environment for small businesses with small business development councils and nonprofits that offer mentorships and zero-interest start-up loans. County business patterns indicate that there are 279,473 paid employees in the assessment area. By percentage of employees, the largest job category in the assessment area is the government (18.5 percent), resulting primarily from the presence of five military bases. The next largest job categories are healthcare and social assistance (13.3 percent) and retail trade (11.6 percent). The community contact pointed out that there are pockets of the county where employment opportunities are limited, such as the southeastern and central parts of the city where there are few businesses, restaurants, and tourist attractions.

The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Colorado.

Unemployment Data			
Dataset	2019 Annual Average	2020 Annual Average	May 2021 YTD Average
Colorado Springs	3.2%	7.3%	5.6%
Colorado	2.7%	7.3%	5.4%

As shown in the preceding table, unemployment levels were slightly higher than the state of Colorado in 2019 and the same as the state in 2020. In 2020, unemployment levels significantly increased in line with the national unemployment trend resulting from the impact of the pandemic. As shown in the table, unemployment levels in the assessment area and the state declined to a similar level in 2021.

Community Contact Information

For this assessment area, a community contact interview was used to ascertain specific credit needs, opportunities, and local market conditions. The contact represented an organization that

provides families with community development services such as food, shelter, and education. The contact characterized the economy as good and growing. The largest employers in the region are military and defense contracting companies due to the high concentration of military bases and the absence of any major industrial or corporate headquarters. According to the contact, wages in the area have slowly increased, and unemployment has kept pace with the rest of the country overall. However, southeastern and central parts of Colorado Springs have maintained a lower comparative level of economic prosperity as they host fewer businesses, restaurants, and tourist attractions. As such, residents in these areas tend to have a harder time finding work with a sufficient income.

The contact believes Colorado Springs fared better than other areas during the pandemic as a large percentage of the labor force are members of military and, therefore, retained their jobs. In addition, the city reacted very quickly and put in place programs and financial assistance to help community members who were struggling the most.

Specific to affordable housing, the contact describes housing in the area as good. According to the contact, the majority of affordable housing is concentrated in the southeast and central parts of Colorado Springs, and there is currently a shortage of stock. Though some new affordable housing is in the process of being built, more is needed to adequately serve LMI residents. In addition to owner-occupied housing, affordable rental properties are also in high demand. The contact indicated that there is a high portion of renters in the area due to the high percentage of military members who tend to rent housing. Overall, the low inventories and the rising cost of housing are the primary obstacles for residents to obtain affordable housing.

Regarding small businesses, the contact describes the community as having a positive environment for small businesses and start-ups.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLORADO SPRINGS ASSESSMENT AREA**LENDING TEST**

Lending levels reflect good responsiveness to the credit needs of the Colorado Springs assessment area. The overall distribution of loans by borrowers' income and revenue profiles reflects good penetration among borrowers of different income levels and businesses of different revenue sizes. Further, the bank's overall geographic distribution of loans reflects adequate penetration throughout the assessment area. Lastly, the bank makes a low level of community development loans in this assessment area.

Lending Activity

The following table displays the bank's 2019 and 2020 lending volume in this assessment area by number and dollar volume.

Summary of Lending Activity				
January 1, 2019, through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	0	0.0%	0	0.0%
Home Purchase	471	55.0%	156,061	59.2%
Multifamily Housing	0	0.0%	0	0.0%
Refinancing	358	41.8%	105,665	40.1%
Other	4	0.5%	791	0.3%
TOTAL HMDA	833	97.2%	262,517	99.7%
Small Business	24	2.8%	880	0.3%
Small Farm	0	0.0%	0	0.0%
TOTAL LOANS	857	100.0%	263,397	100.0%

The bank's lending levels reflect good responsiveness to assessment area credit needs. Of the bank's total HMDA and CRA loans made in its combined assessment areas, 3.0 percent by number and 11.0 percent by dollar were made in the Colorado Springs MSA in 2019 and 2.0 percent by number and 4.1 percent by dollar in 2020. These percentages are higher than the percentage of total bank deposits held (0.04 percent by dollar) and total bank branches located (0.6 percent) in the Colorado Springs assessment area. Contributing to this lending level was the presence of an LPO in this assessment area prior to the establishment of a full-service branch during the review period. This level was compared to those of the other lenders in the assessment area. Among the HMDA aggregate lenders, the bank ranked 38th out of 587 lenders in 2019 and 35th out of 641 lenders in 2020. Regarding CRA lending, the bank did not report data in this assessment area in 2019 and appeared 38th out of 165 CRA aggregate lenders in 2020. This comparative data demonstrates that bank's good responsiveness to the area's credit needs.

Loan Distribution by Borrower's Profile

The bank's borrower distribution of loans in the Colorado Springs assessment area is considered good overall based on the performance of each of the two loan products reviewed. When determining overall conclusions, HMDA loans are given the greatest weight, followed by small business loans. Small farm lending is not assessed due to the lack of originations.

HMDA Lending

The bank's HMDA lending reflects good penetration among individuals of different income levels in the assessment area overall, particularly LMI individuals. The percentage of loans made to low-income borrowers in 2019 and 2020 (5.6 percent and 4.0 percent, respectively) was greater than the percentage of aggregate HMDA loans (5.4 percent and 3.7 percent, respectively) and less than the percentage of families in the assessment area that are low income (20.4 percent in both years), representing good distribution. The percentage of loans made to moderate-income borrowers in 2019 and 2020 (21.6 percent and 17.6 percent, respectively) was above the aggregate level (17.7 percent and 15.2 percent, respectively) and above or near the demographic figure (18.5 percent in both years), reflecting excellent distribution. As the primary mortgage loan product needed in the area, according to the community contact, home purchase loan data was analyzed and showed that bank performance was consistent, further solidifying the bank's performance among LMI individuals. Given the higher percentage of low-income families in the assessment area, the bank's related performance is given more weight. Therefore, overall distribution was good overall during the review period.

Small Business Lending

The bank's small business lending reflects an adequate distribution to businesses of different sizes overall. As the bank did not make any small business loans in 2019, only 2020 data was reviewed. The percentage of small business loans made to businesses with annual revenues of \$1 million or less (8.3 percent) was significantly lower than the aggregate level (43.9 percent) as well as the demographic estimate of assessment area businesses with this revenue profile (94.4 percent). Initially, this portrays a poor level of lending; however, a further review of the data shows that the volume of small business lending substantially increased due to the bank's PPP lending. As the program's guidelines did not require the bank to collect revenue information for PPP loans, the majority of small business loans were reported with unknown revenue. Given the limited revenue information, an evaluation of PPP loans using loan size as a proxy was conducted. Analysis revealed that 90.2 percent of total PPP had loan sizes of \$100,00 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community; therefore, overall distribution of loans to businesses of different revenue sizes is adequate.

Geographic Distribution of Loans

Overall, the geographic distribution of loans in the assessment area is adequate based on the two products reviewed. As noted previously, the assessment area includes seven low-income and 40 moderate-income census tracts, representing 36.2 percent of all assessment area census tracts.

HMDA Lending

The geographic distribution of HMDA loans during the review period is considered adequate overall in both years. In 2019, the bank originated 2.3 percent of HMDA loans in low-income census tracts, which is near the aggregate (2.5 percent) and below the percentage of owner-occupied units (3.3 percent), demonstrating adequate performance. The bank's distribution in moderate-income census tracts (17.6 percent) is near the aggregate percentage (18.2 percent) and under the demographic figure (20.7 percent) and is also considered adequate.

In 2020, the percentage of HMDA loans made in low-income census tracts (1.5 percent) fell below the aggregate (2.1 percent) and remained under the demographic figure (3.3 percent). Home purchase data shows that the bank's distribution (2.4 percent) met the aggregate level (2.4 percent) and remained under the demographic (3.3 percent); therefore, performance in low-income census tracts remained adequate. In moderate-income census tracts, bank distribution (13.9 percent) decreased in 2020, placing it under the aggregate (16.1 percent) and demographic figures (20.7 percent). A review of home purchase loan data for moderate-income census tracts displays a similar comparative performance; therefore, distribution is considered adequate.

Small Business Lending

The distribution of small business loans by geography income level is considered adequate. As the bank did not make any small business loans in 2019, only 2020 data was reviewed. The bank's level of small business lending in low-income census tracts (8.3 percent) was near the aggregate lending level (8.6 percent) and above the demographic figure (7.8 percent); therefore, distribution is considered good. The percentage of small business loans made in moderate-income census tracts (12.5 percent) was significantly under the aggregate level (24.0 percent) and the demographic figure (23.8 percent); therefore, distribution is considered poor. Combined performance in LMI areas is adequate.

Lastly, a review of lending dispersion throughout the assessment area was conducted as part of this analysis. Loans were dispersed throughout the assessment area consistent with branching structure, and no conspicuous lending gaps in LMI areas were noted.

Community Development Lending Activities

The Central Trust Bank makes a low level of community development loans in the Colorado Springs assessment area. During the review period, the bank did not make any qualified community development loans in this assessment area. As described in the Colorado *Community Development Lending Activities* section, the bank faced several constraints during the review period, which were considered when evaluating its performance in Colorado Springs.

INVESTMENT TEST

The Central Trust Bank makes a poor level of community development investments in the Colorado Springs assessment area, having made no qualified investments or donations during the review period. When determining the bank's performance, consideration was given to the constraints described in the Colorado *Community Development Lending Activities* section.

SERVICE TEST

Service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has improved access of its delivery systems, particularly to LMI geographies and LMI individuals. Moreover, business hours and services do not vary in a way that inconveniences certain portions of the Colorado Springs assessment area, particularly LMI geographies and LMI individuals. Lastly, the bank provides a limited level of community development services in the Colorado Springs assessment area.

Accessibility of Delivery Systems

The bank operates one branch in the Colorado Springs assessment area, which is in a low-income census tract. In comparison, the following table illustrates the distribution of assessment area census tracts and household population by income level of geography.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	1 100%	0 0.0%	0 0.0%	0 0.0%	0 0.0%	1 100%
Census Tracts	5.4%	30.8%	38.5%	23.9%	1.5%	100%
Household Population	5.1%	28.5%	39.5%	26.9%	0.0%	100%

As shown in the previous table, the bank's only branch in this assessment area is located in a low-income census tract, which demonstrates a branching strategy in place to promote service delivery systems that are readily accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank did not operate in this assessment area at the start of the review period, during which the only branch office in this assessment area was opened in a low-income census tract; no branches were closed during the review period. Therefore, the bank's record of opening and closing branches in the assessment area has improved the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The only branch in this assessment has a loan officer on site and standard lobby business hours, which are Monday through Friday from 9:00 a.m. to 5:00 p.m.; there is also ITM access with extended hours Monday through Saturday. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

Community Development Services

The Central Trust Bank provides a limited level of community development services in the Colorado Springs assessment area. During the review period, bank employees provided no community development services in the area. When determining the bank's performance, consideration was given to the constraints described in the Colorado *Community Development Lending Activities* section.

DENVER, COLORADO METROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DENVER ASSESSMENT AREA

The bank's Denver assessment area is composed of Adams, Arapahoe, Denver, and Jefferson Counties, four of the 10 counties that make up the Denver–Aurora–Lakewood, Colorado MSA. The bank operates one full-service branch in a middle-income census tract with an ITM on site. This assessment area was added in February 2020 when the single branch was opened. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to most of its assessment area. It may experience challenges serving the outermost portions of its assessment area, namely western Adams and Arapahoe counties; however, it is accessible to the counties' LMI areas.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	127,785 23.6%	100,982 18.7%	111,333 20.6%	200,965 37.1%	541,065 100%
Household Population	223,816 25.3%	155,044 17.5%	164,350 18.6%	341,706 38.6%	884,916 100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	51 9.7%	147 28.0%	173 32.9%	150 28.5%	5 1.0%	526 100%
Family Population	47,570 8.8%	143,321 26.5%	185,398 34.3%	1647,59 30.5%	17 0.0%	541,065 100%
Household Population	84,395 9.5%	241,619 27.3%	311,535 35.2%	247,308 28.0%	59 0.0%	884,916 100%
Business Institutions	12,372 8.3%	32,939 22.0%	48,961 32.7%	55,040 36.7%	578 0.4%	149,890 100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER, COLORADO MSA ASSESSMENT AREA**LENDING TEST**

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Colorado full-scope assessment area, as displayed in the following table. As the bank opened a branch in this assessment area during the latter end of the review period, a reduced level of retail lending data and community development activity is available for evaluation. These limitations were taken into consideration when evaluating the bank's performance. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Exceeds
Community Development Lending Activity	Consistent
OVERALL	Consistent

During the review period, the bank made one community development loan for \$660,000 for the purpose of affordable housing. Given the limitations described above and in the Colorado *Community Development Lending Activities* section, this level of lending is considered consistent with the level in the full scope assessment area.

INVESTMENT TEST

The bank's Investment Test performance in the Denver assessment area is consistent with the investment performance in the full-scope assessment area where the bank made no community development investments. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

SERVICE TEST

The bank's service performance in this assessment area is below the service performance in the Colorado full-scope assessment area, as detailed in the following table:

Service Test Criteria	Performance
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Below
Reasonableness of Business Hours and Services	Below
Community Development Services	Consistent
OVERALL	Below

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

During the review period, one bank employee provided two hours of community development service activities to an organization supporting area small businesses. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

DURANGO, COLORADO NONMETROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DURANGO, COLORADO NONMSA ASSESSMENT AREA

The bank's Durango nonMSA assessment area is composed of La Plata County where it has one full-service branch in a middle-income census tract with an ITM on site. This assessment area was added in May 2021 when the single branch was opened. Based on its branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to its assessment area.

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	1,645 12.7%	1,924 14.9%	2,696 20.9%	6,660 51.5%	12,925 100%
Household Population	3,827 17.8%	2,997 13.9%	3,764 17.5%	10,925 50.8%	21,513 100%

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0 0.0%	0 0.0%	3 30.0%	7 70.0%	0 0.0%	10 100%
Family Population	0 0.0%	0 0.0%	3,203 24.8%	9,722 75.2%	0 0.0%	12,925 100%
Household Population	0 0.0%	0 0.0%	6,083 28.3%	15,430 71.7%	0 0.0%	21,513 100%
Business Institutions	0 0.0%	0 0.0%	1,957 43.3%	2,563 56.7%	0 0.0%	4,233 100%

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DURANGO ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the Colorado full-scope assessment area, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Consistent
OVERALL	Consistent

During the review period, the bank originated zero community development loans in Durango. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance in the Colorado full-scope assessment area. During the review period, the bank made one qualified community development donation for \$5,000 to an organization that provides community services to LMI children. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

SERVICE TEST

The bank's service performance in this assessment area is below the service performance in the Colorado full-scope assessment area, as detailed in the following table:

Service Test Criteria	Performance
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Below
Reasonableness of Business Hours and Services	Below
Community Development Services	Consistent
OVERALL	Below

The Central Trust Bank
Jefferson City, Missouri

CRA Performance Evaluation
May 16, 2022

During the review period, one bank employee provided 36 hours of community development service activities to an organization supporting area small businesses. When determining the bank's performance, consideration was given to the constraints described above and in the Colorado *Community Development Lending Activities* section.

SCOPE OF EXAMINATION TABLES

TIME PERIOD REVIEWED		
Assessment Area	Small Business, HMDA, and Small Farm Lending	Community Development Activities
Jefferson City	1/1/2019 – 12/31/2020	10/1/2018 – 12/31/2021
Springfield	1/1/2019 – 12/31/2020	10/1/2018 – 12/31/2021
Mid-Missouri	<ul style="list-style-type: none"> 1/1/2020 – 12/31/2020 (Pettis, Randolph, and Audrain Counties) 1/1/2019 – 12/31/2020 (Camden, Miller, Morgan, and Johnson Counties) 	<ul style="list-style-type: none"> 11/5/2018 – 12/31/2021 (Camden, Miller, and Morgan Counties) 7/27/2020 – 12/31/2021 (Pettis County) 10/7/2020 – 12/31/2021 (Randolph and Audrain Counties) 10/1/2018 – 12/31/2021 (Johnson County)
Columbia	1/1/2020 – 12/31/2020	12/6/2020 – 12/31/2021
Branson	1/1/2019 – 12/31/2020	7/15/2019 – 12/31/2021
Kansas City	1/1/2020 – 12/31/2020	11/2/2020 – 12/31/2021
St. Louis	1/1/2019 – 12/31/2020	10/1/2018 – 12/31/2021
Tulsa	1/1/2019 – 12/31/2020	3/11/2019 – 12/31/2021
Oklahoma City	1/1/2019 – 12/31/2020	3/11/2019 – 12/31/2021
Colorado Springs	1/1/2019 – 12/31/2020	10/18/2018 – 12/31/2021
Denver	1/1/2019 – 2/25/2020	2/25/2020 – 12/31/2021
Durango	1/1/2019 – 12/31/2020	5/21/2021 – 12/31/2021
FINANCIAL INSTITUTION		PRODUCTS REVIEWED
The Central Trust Bank		Small Business HMDA Small Farm Loans
AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
	Not Applicable	

Assessment Area – Examination Scope Details					
Assessment Area	Rated Area	# of Offices	Deposits (\$ 000s)	Branches Visited	CRA Review Procedures
			(as of June 30, 2021)		
Jefferson City	Missouri	16	\$3,049,070	1	Full-Scope
Springfield	Missouri	21	\$1,573,455	-	Full-Scope
Mid-Missouri	Missouri	20	\$2,138,947	-	Limited-Scope
Columbia	Missouri	15	\$2,251,623	-	Limited-Scope
Branson	Missouri	5	\$471,246	-	Limited-Scope
Kansas City	Kansas City	49	\$3,391,976	-	Full-Scope
St. Louis	St. Louis	16	\$1,812,063	-	Full-Scope
Tulsa	Oklahoma	6	\$567,153	-	Full-Scope
Oklahoma City	Oklahoma	3	\$28,442	-	Limited-Scope
Colorado Springs	Colorado	1	\$5,499	-	Full-Scope
Denver	Colorado	1	\$3,149	-	Limited-Scope
Durango	Colorado	1	\$5,623	-	Limited-Scope
OVERALL		154	\$15,298,246	1	6 Full-Scope

Appendix B

**SUMMARY OF STATE AND MULTISTATE METROPOLITAN STATISTICAL
AREA RATINGS**

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Missouri	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Kansas City	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
St. Louis	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Oklahoma	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Colorado	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each rated area for large banks. Summing the points from the Lending, Investment, and Service Tests, each rated area is given a total point value, which equates to an overall rating in accordance with the FFIEC's *Interagency Large Institution CRA Examination Procedures*.

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Total Points	Overall Rating
Missouri	9	4	4	17	Satisfactory
Kansas City	9	3	3	15	Satisfactory
St. Louis	9	4	4	17	Satisfactory
Oklahoma	6	3	3	12	Satisfactory
Colorado	6	1	4	11	Satisfactory

LENDING PERFORMANCE TABLES BY ASSESSMENT AREA

MISSOURI

Jefferson City

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	8	1.2%	473	0.5%	0.4%	0.6%	0.2%
Moderate	37	5.6%	3,668	3.6%	6.9%	7.2%	5.4%
Middle	427	64.8%	64,319	62.9%	71.2%	70.0%	67.3%
Upper	187	28.4%	33,831	33.1%	21.4%	22.2%	27.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	659	100.0%	102,291	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	0.8%	209	0.3%	0.4%	0.3%	0.1%
Moderate	10	2.6%	1,115	1.6%	6.9%	4.5%	2.9%
Middle	236	61.0%	38,431	56.9%	71.2%	67.0%	64.0%
Upper	138	35.7%	27,834	41.2%	21.4%	28.1%	32.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.0%
TOTAL	387	100.0%	67,589	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	4.0%	50	4.1%	0.4%	1.9%	1.2%
Moderate	1	4.0%	225	18.5%	6.9%	3.7%	5.8%
Middle	15	60.0%	446	36.6%	71.2%	71.3%	68.7%
Upper	8	32.0%	497	40.8%	21.4%	22.2%	21.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.9%	2.4%
TOTAL	25	100.0%	1,218	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	11.1%	6.7%	3.7%
Moderate	4	40.0%	3,758	61.5%	29.8%	11.1%	17.7%
Middle	6	60.0%	2,349	38.5%	37.6%	73.3%	69.1%
Upper	0	0.0%	0	0.0%	21.5%	8.9%	9.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	10	100.0%	6,107	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	6.9%	25.0%	34.5%
Middle	0	0.0%	0	0.0%	71.2%	56.3%	51.5%
Upper	0	0.0%	0	0.0%	21.4%	18.8%	14.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
Moderate	1	4.2%	14	0.5%	6.9%	3.1%	1.1%
Middle	16	66.7%	1,392	44.9%	71.2%	72.3%	58.7%
Upper	7	29.2%	1,696	54.7%	21.4%	24.6%	40.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	24	100.0%	3,102	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	6.9%	2.5%	1.5%
Middle	0	0.0%	0	0.0%	71.2%	77.5%	77.1%
Upper	0	0.0%	0	0.0%	21.4%	20.0%	21.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	12	1.1%	732	0.4%	0.4%	0.6%	0.3%
Moderate	53	4.8%	8,780	4.9%	6.9%	6.2%	4.9%
Middle	700	63.3%	106,937	59.3%	71.2%	69.1%	66.1%
Upper	340	30.8%	63,858	35.4%	21.4%	24.1%	28.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	1,105	100.0%	180,307	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans			% of Owner- Occupied Units	Aggregate HMDA Data		
	#	##%	\$ (000s)		\$ %	# %	\$ %
Home Purchase Loans							
Low	3	0.4%	166	0.1%	0.4%	0.7%	0.3%
Moderate	46	6.0%	5,335	3.9%	6.9%	6.2%	5.2%
Middle	491	63.9%	83,281	61.6%	71.2%	69.1%	66.1%
Upper	228	29.7%	46,329	34.3%	21.4%	24.0%	28.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	768	100.0%	135,111	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	0.2%	307	0.1%	0.4%	0.1%	0.1%
Moderate	40	2.9%	5,485	2.2%	6.9%	4.1%	3.1%
Middle	819	59.8%	144,597	57.7%	71.2%	65.4%	63.3%
Upper	507	37.0%	100,084	40.0%	21.4%	30.4%	33.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1,369	100.0%	250,473	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.4%	1.2%	1.0%
Moderate	2	11.8%	66	5.0%	6.9%	13.6%	12.4%
Middle	10	58.8%	722	54.9%	71.2%	70.4%	72.3%
Upper	5	29.4%	526	40.0%	21.4%	14.8%	14.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	17	100.0%	1,314	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	1	11.1%	191	5.7%	11.1%	14.3%	3.0%
Moderate	2	22.2%	460	13.7%	29.8%	16.7%	6.2%
Middle	4	44.4%	1,166	34.7%	37.6%	61.9%	80.4%
Upper	2	22.2%	1,541	45.9%	21.5%	7.1%	10.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	9	100.0%	3,358	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	6.9%	28.6%	31.8%
Middle	0	0.0%	0	0.0%	71.2%	71.4%	68.2%
Upper	0	0.0%	0	0.0%	21.4%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
Moderate	1	6.3%	75	5.9%	6.9%	11.1%	16.3%
Middle	11	68.8%	755	59.4%	71.2%	63.0%	60.7%
Upper	4	25.0%	442	34.7%	21.4%	25.9%	23.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	16	100.0%	1,272	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0.4%	2.2%	1.6%
Moderate	0	0.0%	0	0.0%	6.9%	7.7%	7.7%
Middle	0	0.0%	0	0.0%	71.2%	70.3%	68.7%
Upper	0	0.0%	0	0.0%	21.4%	19.8%	22.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	7	0.3%	664	0.2%	0.4%	0.5%	0.2%
Moderate	91	4.2%	11,421	2.9%	6.9%	5.2%	4.1%
Middle	1,335	61.3%	230,521	58.9%	71.2%	66.9%	64.7%
Upper	746	34.2%	148,922	38.0%	21.4%	27.5%	31.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2,179	100.0%	391,528	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		%	\$ %
Low	74	6.3%	8,669	8.3%	8.1%	6.2%	7.7%
Moderate	176	15.0%	13,077	12.5%	13.2%	12.0%	13.3%
Middle	612	52.1%	47,743	45.6%	52.5%	54.6%	47.8%
Upper	312	26.6%	35,322	33.7%	26.2%	24.6%	30.7%
Unknown	0	0.0%	0	0.0%	0.0%	2.6%	0.5%
TOTAL	1,174	100.0%	104,811	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		%	\$ %
Low	134	6.3%	13,836	7.0%	8.3%	6.6%	8.9%
Moderate	275	12.9%	29,623	15.0%	12.8%	12.2%	14.5%
Middle	1,073	50.3%	83,656	42.5%	52.7%	54.6%	46.6%
Upper	653	30.6%	69,909	35.5%	26.2%	26.2%	29.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.4%	0.1%
TOTAL	2,135	100.0%	197,024	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Low	1	0.5%	150	1.0%	1.2%	0.0%	0.0%
Moderate	7	3.3%	344	2.3%	12.8%	10.0%	5.5%
Middle	184	86.0%	12,285	80.9%	75.7%	86.2%	90.5%
Upper	22	10.3%	2,401	15.8%	10.4%	3.9%	4.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	214	100.0%	15,180	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	1.3%	0.0%	0.0%
Moderate	9	4.3%	668	4.2%	13.5%	8.9%	6.7%
Middle	178	85.2%	13,363	83.3%	75.1%	86.0%	86.8%
Upper	22	10.5%	2,018	12.6%	10.2%	5.0%	6.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	209	100.0%	16,049	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	85	12.9%	8,131	7.9%	18.3%	13.9%	8.6%
Moderate	139	21.1%	17,746	17.3%	17.4%	22.3%	18.4%
Middle	142	21.5%	22,217	21.7%	25.2%	21.5%	22.7%
Upper	203	30.8%	41,878	40.9%	39.0%	22.3%	31.5%
Unknown	90	13.7%	12,319	12.0%	0.0%	20.0%	18.8%
TOTAL	659	100.0%	102,291	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	26	6.7%	2,349	3.5%	18.3%	8.7%	4.5%
Moderate	68	17.6%	8,068	11.9%	17.4%	17.0%	12.2%
Middle	94	24.3%	15,212	22.5%	25.2%	22.1%	20.2%
Upper	154	39.8%	33,609	49.7%	39.0%	29.7%	37.0%
Unknown	45	11.6%	8,351	12.4%	0.0%	22.5%	26.1%
TOTAL	387	100.0%	67,589	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.3%	14.8%	11.3%
Moderate	9	36.0%	439	36.0%	17.4%	27.8%	25.0%
Middle	3	12.0%	187	15.4%	25.2%	17.6%	19.4%
Upper	6	24.0%	445	36.5%	39.0%	26.9%	37.3%
Unknown	7	28.0%	147	12.1%	0.0%	13.0%	7.0%
TOTAL	25	100.0%	1,218	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	18.3%	0.0%	0.0%
Moderate	1	10.0%	258	4.2%	17.4%	4.4%	1.7%
Middle	0	0.0%	0	0.0%	25.2%	0.0%	0.0%
Upper	1	10.0%	314	5.1%	39.0%	6.7%	6.7%
Unknown	8	80.0%	5,535	90.6%	0.0%	88.9%	91.6%
TOTAL	10	100.0%	6,107	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	18.3%	6.3%	2.2%
Moderate	0	0.0%	0	0.0%	17.4%	6.3%	4.0%
Middle	0	0.0%	0	0.0%	25.2%	37.5%	38.8%
Upper	0	0.0%	0	0.0%	39.0%	50.0%	54.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	4	16.7%	161	5.2%	18.3%	20.0%	8.7%
Moderate	3	12.5%	92	3.0%	17.4%	16.9%	6.9%
Middle	4	16.7%	725	23.4%	25.2%	15.4%	17.8%
Upper	12	50.0%	2,106	67.9%	39.0%	41.5%	55.6%
Unknown	1	4.2%	18	0.6%	0.0%	6.2%	11.0%
TOTAL	24	100.0%	3,102	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	18.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	25.2%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	39.0%	2.5%	3.7%
Unknown	0	0.0%	0	0.0%	0.0%	97.5%	96.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	115	10.4%	10,641	5.9%	18.3%	12.0%	6.8%
Moderate	220	19.9%	26,603	14.8%	17.4%	20.1%	15.4%
Middle	243	22.0%	38,341	21.3%	25.2%	21.1%	20.8%
Upper	376	34.0%	78,352	43.5%	39.0%	24.9%	32.8%
Unknown	151	13.7%	26,370	14.6%	0.0%	21.8%	24.2%
TOTAL	1,105	100.0%	180,307	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	68	8.9%	6,988	5.2%	18.3%	10.1%	6.5%
Moderate	181	23.6%	23,900	17.7%	17.4%	24.7%	19.6%
Middle	168	21.9%	28,349	21.0%	25.2%	22.1%	22.5%
Upper	230	29.9%	56,955	42.2%	39.0%	25.2%	35.0%
Unknown	121	15.8%	18,918	14.0%	0.0%	17.8%	16.4%
TOTAL	768	100.0%	135,111	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	72	5.3%	6,899	2.8%	18.3%	4.6%	2.5%
Moderate	229	16.7%	29,000	11.6%	17.4%	15.7%	11.1%
Middle	313	22.9%	49,663	19.8%	25.2%	21.6%	18.5%
Upper	609	44.5%	135,224	54.0%	39.0%	39.9%	49.1%
Unknown	146	10.7%	29,687	11.9%	0.0%	18.2%	18.9%
TOTAL	1,369	100.0%	250,473	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.3%	11.1%	7.5%
Moderate	1	5.9%	16	1.2%	17.4%	13.6%	9.2%
Middle	4	23.5%	364	27.7%	25.2%	21.0%	14.5%
Upper	6	35.3%	344	26.2%	39.0%	34.6%	42.7%
Unknown	6	35.3%	590	44.9%	0.0%	19.8%	26.1%
TOTAL	17	100.0%	1,314	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	18.3%	2.4%	0.7%
Moderate	0	0.0%	0	0.0%	17.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	25.2%	4.8%	2.2%
Upper	0	0.0%	0	0.0%	39.0%	9.5%	5.2%
Unknown	9	100.0%	3,358	100.0%	0.0%	83.3%	91.8%
TOTAL	9	100.0%	3,358	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	18.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.4%	14.3%	9.9%
Middle	0	0.0%	0	0.0%	25.2%	14.3%	6.2%
Upper	0	0.0%	0	0.0%	39.0%	71.4%	83.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	5	31.3%	246	19.3%	18.3%	14.8%	8.8%
Moderate	2	12.5%	274	21.5%	17.4%	11.1%	10.7%
Middle	2	12.5%	181	14.2%	25.2%	14.8%	8.5%
Upper	5	31.3%	298	23.4%	39.0%	51.9%	61.3%
Unknown	2	12.5%	273	21.5%	0.0%	7.4%	10.7%
TOTAL	16	100.0%	1,272	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	18.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	25.2%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	39.0%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	145	6.7%	14,133	3.6%	18.3%	6.7%	3.9%
Moderate	413	19.0%	53,190	13.6%	17.4%	18.7%	13.9%
Middle	487	22.3%	78,557	20.1%	25.2%	21.3%	19.5%
Upper	850	39.0%	192,821	49.2%	39.0%	33.7%	42.8%
Unknown	284	13.0%	52,826	13.5%	0.0%	19.5%	19.8%
TOTAL	2,179	100.0%	391,528	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$(000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	822	70.0%	50.1%	55,468	52.9%	40.1%	89.1%
	Over \$1 Million/ Unknown	352	30.0%	49.9%	49,343	47.1%	59.9%	10.9%
	TOTAL	1174	100.0%	100.0%	104,811	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	923	78.6%	86.8%	31,834	30.4%	26.6%	
	\$100,001–\$250,000	165	14.1%	7.6%	28,619	27.3%	22.2%	
	\$250,001–\$1 Million	86	7.3%	5.6%	44,358	42.3%	51.2%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	1174	100.0%	100.0%	104,811	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	685	83.3%		23,567	42.5%		
	\$100,001–\$250,000	104	12.7%		17,831	32.1%		
	\$250,001–\$1 Million	33	4.0%		14,070	25.4%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	822	100.0%		55,468	100.0%		

Appendix C (continued)

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	863	40.4%	42.3%	80,663	40.9%	35.9%	89.1%
	Over \$1 Million/ Unknown	1272	59.6%	57.7%	116,361	59.1%	64.1%	10.9%
	TOTAL	2135	100.0%	100.0%	197,024	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1622	76.0%	82.1%	49,828	25.3%	24.6%	
	\$100,001–\$250,000	319	14.9%	9.8%	51,227	26.0%	21.2%	
	\$250,001–\$1 Million	194	9.1%	8.1%	95,969	48.7%	54.2%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	2135	100.0%	100.0%	197,024	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	625	72.4%		22,325	27.7%		
	\$100,001–\$250,000	168	19.5%		26,760	33.2%		
	\$250,001–\$1 Million	70	8.1%		31,578	39.1%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	863	100.0%		80,663	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	193	90.2%	76.4%	14,189	93.5%	81.2%	98.8%
	Over \$1 Million/ Unknown	21	9.8%	23.6%	991	6.5%	18.8%	1.2%
	TOTAL	214	100.0%	100.0%	15,180	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	171	79.9%	80.3%	6,144	40.5%	34.9%	
	\$100,001–\$250,000	34	15.9%	12.2%	5,788	38.1%	27.7%	
	\$250,001–\$500,000	9	4.2%	7.5%	3,248	21.4%	37.4%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	214	100.0%	100.0%	15,180	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	152	78.8%		5,498	38.7%		
	\$100,001–\$250,000	32	16.6%		5,443	38.4%		
	\$250,001–\$1 Million	9	4.7%		3,248	22.9%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	193	100.0%		14,189	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	168	80.4%	72.9%	14,080	87.7%	81.3%	98.7%
	Over \$1 Million/ Unknown	41	19.6%	27.1%	1,969	12.3%	18.7%	1.3%
	TOTAL	209	100.0%	100.0%	16,049	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	159	76.1%	71.3%	5,592	34.8%	26.1%	
	\$100,001–\$250,000	38	18.2%	17.9%	6,023	37.5%	30.9%	
	\$250,001–\$500,000	12	5.7%	10.8%	4,434	27.6%	43.0%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	209	100.0%	100.0%	16,049	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	125	74.4%		4,551	32.3%		
	\$100,001–\$250,000	31	18.5%		5,095	36.2%		
	\$250,001–\$1 Million	12	7.1%		4,434	31.5%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	168	100.0%		14,080	100.0%		

Springfield

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	6	1.6%	434	0.7%	2.2%	2.4%	1.1%
Moderate	49	13.3%	4,607	7.3%	14.7%	12.8%	8.0%
Middle	229	62.1%	37,692	59.5%	62.4%	65.7%	65.7%
Upper	85	23.0%	20,567	32.5%	20.7%	19.2%	25.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	369	100.0%	63,300	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	6	3.0%	602	1.7%	2.2%	1.4%	0.7%
Moderate	10	5.1%	1,373	3.8%	14.7%	9.5%	5.7%
Middle	117	59.1%	18,597	51.2%	62.4%	65.1%	62.7%
Upper	65	32.8%	15,720	43.3%	20.7%	23.9%	30.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	198	100.0%	36,292	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.2%	2.3%	4.0%
Moderate	1	10.0%	28	3.3%	14.7%	13.1%	8.8%
Middle	6	60.0%	422	49.9%	62.4%	63.8%	59.4%
Upper	3	30.0%	396	46.8%	20.7%	20.8%	27.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	10	100.0%	846	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	8.2%	12.7%	8.2%
Moderate	1	20.0%	350	11.2%	40.0%	25.3%	37.9%
Middle	3	60.0%	2,526	80.9%	42.4%	52.0%	40.0%
Upper	1	20.0%	248	7.9%	7.2%	8.0%	10.0%
Unknown	0	0.0%	0	0.0%	2.3%	2.0%	4.0%
TOTAL	5	100.0%	3,124	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	14.7%	6.7%	4.1%
Middle	0	0.0%	0	0.0%	62.4%	60.2%	55.4%
Upper	0	0.0%	0	0.0%	20.7%	33.1%	40.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.2%	1.5%	1.7%
Moderate	0	0.0%	0	0.0%	14.7%	14.6%	11.7%
Middle	2	66.7%	105	39.6%	62.4%	63.2%	60.3%
Upper	1	33.3%	160	60.4%	20.7%	20.7%	26.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	265	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	2.2%	4.7%	3.0%
Moderate	0	0.0%	0	0.0%	14.7%	17.6%	12.3%
Middle	0	0.0%	0	0.0%	62.4%	66.1%	71.6%
Upper	0	0.0%	0	0.0%	20.7%	11.6%	13.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans							
Low	12	2.1%	1,036	1.0%	2.2%	2.1%	1.4%
Moderate	61	10.4%	6,358	6.1%	14.7%	11.8%	9.1%
Middle	357	61.0%	59,342	57.2%	62.4%	65.2%	63.1%
Upper	155	26.5%	37,091	35.7%	20.7%	20.8%	26.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.2%
TOTAL	585	100.0%	103,827	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	10	2.2%	971	1.1%	2.2%	2.3%	1.2%
Moderate	44	9.6%	4,847	5.3%	14.7%	11.9%	7.8%
Middle	297	65.1%	56,494	61.2%	62.4%	66.1%	65.4%
Upper	105	23.0%	29,925	32.4%	20.7%	19.7%	25.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	456	100.0%	92,237	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	4	0.7%	405	0.4%	2.2%	0.8%	0.4%
Moderate	45	8.2%	5,270	4.8%	14.7%	7.7%	4.8%
Middle	335	60.9%	60,841	55.6%	62.4%	64.1%	60.9%
Upper	166	30.2%	42,886	39.2%	20.7%	27.4%	33.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	550	100.0%	109,402	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	33.3%	38	12.6%	2.2%	3.5%	1.9%
Moderate	0	0.0%	0	0.0%	14.7%	13.5%	11.5%
Middle	2	66.7%	263	87.4%	62.4%	55.8%	49.9%
Upper	0	0.0%	0	0.0%	20.7%	27.2%	36.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	301	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	4	22.2%	2,066	12.9%	8.2%	12.7%	11.8%
Moderate	5	27.8%	2,604	16.3%	40.0%	23.9%	18.2%
Middle	5	27.8%	3,359	21.1%	42.4%	51.4%	56.1%
Upper	3	16.7%	6,548	41.0%	7.2%	9.2%	13.3%
Unknown	1	5.6%	1,378	8.6%	2.3%	2.8%	0.6%
TOTAL	18	100.0%	15,955	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.2%	0.8%	0.6%
Moderate	0	0.0%	0	0.0%	14.7%	5.4%	4.3%
Middle	0	0.0%	0	0.0%	62.4%	66.9%	58.3%
Upper	0	0.0%	0	0.0%	20.7%	26.9%	36.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.2%	0.7%	0.4%
Moderate	0	0.0%	0	0.0%	14.7%	8.3%	5.0%
Middle	1	50.0%	201	57.3%	62.4%	62.9%	58.4%
Upper	1	50.0%	150	42.7%	20.7%	28.1%	36.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	351	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	2.2%	3.3%	2.2%
Moderate	0	0.0%	0	0.0%	14.7%	13.8%	8.5%
Middle	0	0.0%	0	0.0%	62.4%	70.5%	74.4%
Upper	0	0.0%	0	0.0%	20.7%	12.4%	14.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	19	1.8%	3,480	1.6%	2.2%	1.7%	2.0%
Moderate	94	9.1%	12,721	5.8%	14.7%	10.0%	7.6%
Middle	640	62.2%	121,158	55.5%	62.4%	64.8%	62.3%
Upper	275	26.7%	79,509	36.4%	20.7%	23.4%	28.1%
Unknown	1	0.1%	1,378	0.6%	0.0%	0.0%	0.1%
TOTAL	1,029	100.0%	218,246	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		%	\$ %
Low	27	3.2%	4,985	5.5%	2.2%	1.6%	2.0%
Moderate	214	25.1%	29,374	32.3%	24.4%	23.6%	32.5%
Middle	459	53.9%	43,251	47.6%	56.8%	55.3%	47.7%
Upper	148	17.4%	13,054	14.4%	16.3%	18.2%	17.4%
Unknown	4	0.5%	216	0.2%	0.3%	1.4%	0.4%
TOTAL	852	100.0%	90,880	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		%	\$ %
Low	46	2.4%	6,024	3.7%	2.2%	1.8%	2.0%
Moderate	485	25.5%	54,942	33.6%	24.5%	23.6%	32.1%
Middle	1,044	54.9%	76,370	46.7%	56.5%	57.1%	49.7%
Upper	317	16.7%	25,200	15.4%	16.5%	17.0%	15.9%
Unknown	10	0.5%	1,139	0.7%	0.3%	0.5%	0.3%
TOTAL	1,902	100.0%	163,675	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	0.4%	0.2%	0.0%
Moderate	38	16.7%	2,723	14.6%	16.4%	17.2%	14.8%
Middle	182	79.8%	14,722	78.7%	73.6%	77.6%	76.1%
Upper	8	3.5%	1,251	6.7%	9.7%	4.9%	8.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	228	100.0%	18,696	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Low	2	0.9%	46	0.3%	0.4%	0.2%	0.1%
Moderate	34	15.2%	2,235	13.4%	14.1%	15.8%	14.9%
Middle	178	79.8%	13,445	80.6%	75.4%	79.6%	78.1%
Upper	9	4.0%	951	5.7%	10.1%	4.3%	6.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	223	100.0%	16,677	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	31	8.4%	2,976	4.7%	20.3%	6.4%	3.5%
Moderate	80	21.7%	9,157	14.5%	18.7%	19.6%	14.5%
Middle	79	21.4%	11,290	17.8%	21.1%	21.7%	20.3%
Upper	142	38.5%	35,175	55.6%	39.8%	32.5%	43.0%
Unknown	37	10.0%	4,702	7.4%	0.0%	19.7%	18.6%
TOTAL	369	100.0%	63,300	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	8	4.0%	565	1.6%	20.3%	6.2%	3.1%
Moderate	32	16.2%	3,541	9.8%	18.7%	14.2%	8.8%
Middle	35	17.7%	4,187	11.5%	21.1%	17.8%	14.0%
Upper	99	50.0%	23,511	64.8%	39.8%	39.0%	49.4%
Unknown	24	12.1%	4,488	12.4%	0.0%	22.8%	24.6%
TOTAL	198	100.0%	36,292	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.3%	7.2%	3.9%
Moderate	4	40.0%	349	41.3%	18.7%	14.9%	11.7%
Middle	1	10.0%	28	3.3%	21.1%	23.2%	19.5%
Upper	3	30.0%	415	49.1%	39.8%	47.2%	59.8%
Unknown	2	20.0%	54	6.4%	0.0%	7.6%	5.1%
TOTAL	10	100.0%	846	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.7%	0.7%	0.1%
Middle	0	0.0%	0	0.0%	21.1%	1.3%	0.2%
Upper	2	40.0%	325	10.4%	39.8%	9.3%	1.9%
Unknown	3	60.0%	2,799	89.6%	0.0%	88.7%	97.8%
TOTAL	5	100.0%	3,124	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.3%	4.9%	2.2%
Moderate	0	0.0%	0	0.0%	18.7%	12.7%	9.0%
Middle	0	0.0%	0	0.0%	21.1%	22.2%	20.7%
Upper	0	0.0%	0	0.0%	39.8%	54.0%	63.4%
Unknown	0	0.0%	0	0.0%	0.0%	6.2%	4.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	33.3%	68	25.7%	20.3%	5.4%	3.4%
Moderate	0	0.0%	0	0.0%	18.7%	16.1%	13.8%
Middle	0	0.0%	0	0.0%	21.1%	26.1%	19.5%
Upper	2	66.7%	197	74.3%	39.8%	39.5%	47.9%
Unknown	0	0.0%	0	0.0%	0.0%	13.0%	15.4%
TOTAL	3	100.0%	265	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	20.3%	0.4%	0.1%
Moderate	0	0.0%	0	0.0%	18.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.1%	2.1%	2.3%
Upper	0	0.0%	0	0.0%	39.8%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	97.4%	97.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	40	6.8%	3,609	3.5%	20.3%	6.2%	3.2%
Moderate	116	19.8%	13,047	12.6%	18.7%	17.2%	11.8%
Middle	115	19.7%	15,505	14.9%	21.1%	20.2%	17.1%
Upper	248	42.4%	59,623	57.4%	39.8%	34.8%	42.6%
Unknown	66	11.3%	12,043	11.6%	0.0%	21.5%	25.3%
TOTAL	585	100.0%	103,827	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	29	6.4%	3,131	3.4%	20.3%	7.8%	4.4%
Moderate	91	20.0%	13,438	14.6%	18.7%	21.2%	16.5%
Middle	96	21.1%	16,870	18.3%	21.1%	21.6%	20.8%
Upper	186	40.8%	48,478	52.6%	39.8%	30.0%	39.7%
Unknown	54	11.8%	10,320	11.2%	0.0%	19.4%	18.5%
TOTAL	456	100.0%	92,237	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	43	7.8%	4,016	3.7%	20.3%	4.9%	2.4%
Moderate	70	12.7%	9,434	8.6%	18.7%	13.0%	8.7%
Middle	102	18.5%	14,885	13.6%	21.1%	17.9%	14.9%
Upper	234	42.5%	58,663	53.6%	39.8%	38.4%	47.7%
Unknown	101	18.4%	22,404	20.5%	0.0%	25.8%	26.3%
TOTAL	550	100.0%	109,402	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.3%	7.1%	4.4%
Moderate	0	0.0%	0	0.0%	18.7%	14.8%	10.1%
Middle	0	0.0%	0	0.0%	21.1%	21.6%	22.1%
Upper	2	66.7%	251	83.4%	39.8%	49.4%	58.5%
Unknown	1	33.3%	50	16.6%	0.0%	7.1%	4.8%
TOTAL	3	100.0%	301	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.7%	0.4%	0.0%
Middle	0	0.0%	0	0.0%	21.1%	0.4%	0.0%
Upper	2	11.1%	617	3.9%	39.8%	6.0%	1.6%
Unknown	16	88.9%	15,338	96.1%	0.0%	93.2%	98.4%
TOTAL	18	100.0%	15,955	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.3%	5.0%	1.9%
Moderate	0	0.0%	0	0.0%	18.7%	15.0%	8.9%
Middle	0	0.0%	0	0.0%	21.1%	18.1%	12.2%
Upper	0	0.0%	0	0.0%	39.8%	49.6%	62.1%
Unknown	0	0.0%	0	0.0%	0.0%	12.3%	15.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.3%	6.1%	3.4%
Moderate	1	50.0%	150	42.7%	18.7%	18.4%	13.3%
Middle	0	0.0%	0	0.0%	21.1%	23.9%	20.4%
Upper	0	0.0%	0	0.0%	39.8%	46.7%	58.6%
Unknown	1	50.0%	201	57.3%	0.0%	4.8%	4.3%
TOTAL	2	100.0%	351	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	20.3%	0.2%	0.1%
Moderate	0	0.0%	0	0.0%	18.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.1%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	39.8%	0.2%	0.5%
Unknown	0	0.0%	0	0.0%	0.0%	99.6%	99.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	72	7.0%	7,147	3.3%	20.3%	6.1%	3.0%
Moderate	162	15.7%	23,022	10.5%	18.7%	16.5%	11.0%
Middle	198	19.2%	31,755	14.6%	21.1%	19.3%	15.7%
Upper	424	41.2%	108,009	49.5%	39.8%	34.1%	39.2%
Unknown	173	16.8%	48,313	22.1%	0.0%	24.0%	31.2%
TOTAL	1,029	100.0%	218,246	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars		Total Businesses %	
		Bank		Aggregate	Bank			Aggregate
		#	%	%	\$ (000s)	\$ %		\$ %
Business Revenue	\$1 Million or Less	617	72.4%	47.4%	50,058	55.1%	39.4%	90.9%
	Over \$1 Million/ Unknown	235	27.6%	52.6%	40,822	44.9%	60.6%	
	TOTAL	852	100.0%	100.0%	90,880	100.0%	100.0%	
Loan Size	\$100,000 or Less	624	73.2%	88.4%	19,643	21.6%	26.9%	
	\$100,001–\$250,000	122	14.3%	6.3%	21,335	23.5%	20.1%	
	\$250,001–\$1 Million	106	12.4%	5.3%	49,902	54.9%	53.0%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	852	100.0%	100.0%	90,880	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	490	79.4%		14,113	28.2%		
	\$100,001–\$250,000	72	11.7%		11,669	23.3%		
	\$250,001–\$1 Million	55	8.9%		24,276	48.5%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	617	100.0%		50,058	100.0%		

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	580	30.5%	36.2%	52,981	32.4%	29.0%	91.2%
	Over \$1 Million/ Unknown	1322	69.5%	63.8%	110,694	67.6%	71.0%	8.8%
	TOTAL	1902	100.0%	100.0%	163,675	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1496	78.7%	85.6%	41,655	25.4%	28.1%	
	\$100,001–\$250,000	247	13.0%	8.1%	39,303	24.0%	21.1%	
	\$250,001–\$1 Million	159	8.4%	6.3%	82,717	50.5%	50.8%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	1902	100.0%	100.0%	163,675	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	451	77.8%		13,613	25.7%		
	\$100,001–\$250,000	67	11.6%		10,387	19.6%		
	\$250,001–\$1 Million	62	10.7%		28,981	54.7%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	580	100.0%		52,981	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	216	94.7%	80.2%	16,705	89.4%	88.6%	98.9%
	Over \$1 Million/ Unknown	12	5.3%	19.8%	1,991	10.6%	11.4%	1.1%
	TOTAL	228	100.0%	100.0%	18,696	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	170	74.6%	82.8%	6,329	33.9%	40.7%	
	\$100,001–\$250,000	45	19.7%	13.3%	7,494	40.1%	35.6%	
	\$250,001–\$500,000	13	5.7%	3.8%	4,873	26.1%	23.7%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	228	100.0%	100.0%	18,696	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	163	75.5%		5,928	35.5%		
	\$100,001–\$250,000	42	19.4%		6,904	41.3%		
	\$250,001–\$1 Million	11	5.1%		3,873	23.2%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	216	100.0%		16,705	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	190	85.2%	79.3%	14,514	87.0%	87.2%	98.7%
	Over \$1 Million/ Unknown	33	14.8%	20.7%	2,163	13.0%	12.8%	1.3%
	TOTAL	223	100.0%	100.0%	16,677	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	171	76.7%	81.2%	6,037	36.2%	40.4%	
	\$100,001–\$250,000	41	18.4%	14.8%	6,493	38.9%	37.0%	
	\$250,001–\$500,000	11	4.9%	4.0%	4,147	24.9%	22.6%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	223	100.0%	100.0%	16,677	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	145	76.3%		5,366	37.0%		
	\$100,001–\$250,000	36	18.9%		5,821	40.1%		
	\$250,001–\$1 Million	9	4.7%		3,327	22.9%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	190	100.0%		14,514	100.0%		

Mid-Missouri

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.6%	0.4%	0.2%
Moderate	77	12.0%	10,014	8.8%	8.2%	6.8%	5.4%
Middle	323	50.2%	55,730	48.8%	61.4%	55.2%	49.8%
Upper	243	37.8%	48,449	42.4%	29.8%	37.6%	44.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.1%
TOTAL	643	100.0%	114,193	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.6%	0.1%	0.1%
Moderate	3	4.6%	245	1.9%	8.2%	5.9%	4.9%
Middle	23	35.4%	4,223	32.4%	61.4%	51.7%	47.3%
Upper	39	60.0%	8,547	65.7%	29.8%	42.2%	47.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	65	100.0%	13,015	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.6%	0.5%	0.4%
Moderate	0	0.0%	0	0.0%	8.2%	6.9%	6.0%
Middle	3	60.0%	95	65.5%	61.4%	56.6%	60.0%
Upper	2	40.0%	50	34.5%	29.8%	36.0%	33.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	145	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	1.5%	1.4%	6.1%
Moderate	0	0.0%	0	0.0%	4.0%	5.7%	6.0%
Middle	1	50.0%	1,427	73.0%	62.5%	42.9%	57.8%
Upper	1	50.0%	529	27.0%	32.0%	50.0%	30.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	1,956	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.6%	0.9%	0.2%
Moderate	0	0.0%	0	0.0%	8.2%	8.3%	10.9%
Middle	0	0.0%	0	0.0%	61.4%	47.2%	47.4%
Upper	0	0.0%	0	0.0%	29.8%	43.5%	41.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.2%	5.6%	4.5%
Middle	1	25.0%	52	17.6%	61.4%	57.9%	44.1%
Upper	3	75.0%	244	82.4%	29.8%	34.9%	49.6%
Unknown	0	0.0%	0	0.0%	0.0%	1.6%	1.8%
TOTAL	4	100.0%	296	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.2%	5.3%	3.3%
Middle	0	0.0%	0	0.0%	61.4%	61.8%	56.4%
Upper	0	0.0%	0	0.0%	29.8%	32.9%	40.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	0.6%	0.3%	0.3%
Moderate	80	11.1%	10,259	7.9%	8.2%	6.5%	5.2%
Middle	351	48.8%	61,527	47.5%	61.4%	54.1%	49.3%
Upper	288	40.1%	57,819	44.6%	29.8%	39.0%	45.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	719	100.0%	129,605	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.6%	0.2%	0.1%
Moderate	128	11.2%	21,786	9.5%	8.2%	7.4%	6.1%
Middle	605	53.0%	118,872	51.8%	61.4%	52.0%	46.6%
Upper	409	35.8%	88,951	38.7%	29.8%	40.4%	47.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1,142	100.0%	229,609	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.6%	0.1%	0.0%
Moderate	16	7.2%	2,082	4.5%	8.2%	5.9%	5.3%
Middle	90	40.5%	17,596	38.0%	61.4%	51.8%	47.8%
Upper	116	52.3%	26,631	57.5%	29.8%	42.2%	46.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	222	100.0%	46,309	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.2%	3.8%	2.7%
Middle	3	60.0%	1,294	86.9%	61.4%	54.7%	56.9%
Upper	2	40.0%	195	13.1%	29.8%	41.5%	40.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	1,489	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	1.5%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	4.0%	14.9%	8.9%
Middle	2	66.7%	333	31.2%	62.5%	57.4%	76.8%
Upper	1	33.3%	735	68.8%	32.0%	27.7%	14.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	1,068	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.2%	8.1%	7.0%
Middle	0	0.0%	0	0.0%	61.4%	56.5%	54.8%
Upper	0	0.0%	0	0.0%	29.8%	35.5%	38.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.2%	8.5%	6.6%
Middle	2	66.7%	143	53.4%	61.4%	49.2%	41.2%
Upper	1	33.3%	125	46.6%	29.8%	42.4%	52.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	268	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.2%	3.4%	2.2%
Middle	0	0.0%	0	0.0%	61.4%	60.8%	59.0%
Upper	0	0.0%	0	0.0%	29.8%	35.8%	38.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	0.6%	0.1%	0.1%
Moderate	144	10.5%	23,868	8.6%	8.2%	6.6%	5.7%
Middle	702	51.1%	138,238	49.6%	61.4%	52.1%	47.9%
Upper	529	38.5%	116,637	41.8%	29.8%	41.2%	46.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1,375	100.0%	278,743	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ (000s)	\$ %		%	\$ %
Low	0	0.0%	0	0.0%	0.6%	0.6%	0.4%
Moderate	205	15.6%	18,403	16.3%	11.7%	9.4%	10.0%
Middle	788	60.1%	69,966	61.9%	61.8%	59.3%	60.5%
Upper	318	24.3%	24,715	21.9%	25.9%	28.3%	28.3%
Unknown	0	0.0%	0	0.0%	0.0%	2.5%	0.8%
TOTAL	1,311	100.0%	113,084	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ (000s)	\$ %		%	\$ %
Low	18	0.6%	1,303	0.6%	0.5%	0.5%	0.2%
Moderate	346	11.4%	29,557	13.0%	11.8%	9.7%	10.3%
Middle	1,942	64.1%	145,876	64.0%	61.8%	60.5%	61.6%
Upper	723	23.9%	51,073	22.4%	25.8%	28.4%	27.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.9%	0.3%
TOTAL	3,029	100.0%	227,809	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	1.5%	87	0.4%	2.6%	0.4%	0.4%
Middle	237	59.7%	13,465	66.7%	71.8%	67.3%	67.7%
Upper	154	38.8%	6,626	32.8%	25.6%	31.4%	31.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.9%	0.1%
TOTAL	397	100.0%	20,178	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Low	1	0.1%	6	0.0%	0.0%	0.1%	0.0%
Moderate	9	1.0%	341	0.5%	2.7%	0.5%	0.1%
Middle	619	67.4%	44,516	69.1%	73.2%	65.6%	69.4%
Upper	289	31.5%	19,595	30.4%	24.1%	33.8%	30.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	918	100.0%	64,458	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	27	4.2%	2,177	1.9%	18.2%	3.1%	1.4%
Moderate	82	12.8%	7,956	7.0%	16.8%	12.0%	7.0%
Middle	126	19.6%	16,847	14.8%	20.2%	18.4%	15.2%
Upper	387	60.2%	84,086	73.6%	44.9%	49.9%	60.2%
Unknown	21	3.3%	3,127	2.7%	0.0%	16.6%	16.3%
TOTAL	643	100.0%	114,193	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.5%	56	0.4%	18.2%	4.0%	1.8%
Moderate	9	13.8%	922	7.1%	16.8%	7.6%	4.2%
Middle	6	9.2%	1,065	8.2%	20.2%	12.9%	8.6%
Upper	42	64.6%	9,397	72.2%	44.9%	53.3%	61.5%
Unknown	7	10.8%	1,575	12.1%	0.0%	22.2%	24.0%
TOTAL	65	100.0%	13,015	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	20.0%	15	10.3%	18.2%	7.9%	4.6%
Moderate	0	0.0%	0	0.0%	16.8%	9.0%	7.4%
Middle	0	0.0%	0	0.0%	20.2%	20.6%	16.8%
Upper	4	80.0%	130	89.7%	44.9%	55.0%	59.7%
Unknown	0	0.0%	0	0.0%	0.0%	7.4%	11.5%
TOTAL	5	100.0%	145	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	18.2%	1.4%	2.6%
Moderate	0	0.0%	0	0.0%	16.8%	1.4%	0.3%
Middle	0	0.0%	0	0.0%	20.2%	0.0%	0.0%
Upper	2	100.0%	1,956	100.0%	44.9%	47.1%	19.3%
Unknown	0	0.0%	0	0.0%	0.0%	50.0%	77.7%
TOTAL	2	100.0%	1,956	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	18.2%	2.8%	1.0%
Moderate	0	0.0%	0	0.0%	16.8%	11.1%	8.0%
Middle	0	0.0%	0	0.0%	20.2%	21.3%	17.1%
Upper	0	0.0%	0	0.0%	44.9%	61.1%	67.3%
Unknown	0	0.0%	0	0.0%	0.0%	3.7%	6.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	25.0%	52	17.6%	18.2%	4.8%	2.6%
Moderate	2	50.0%	144	48.6%	16.8%	13.5%	8.8%
Middle	0	0.0%	0	0.0%	20.2%	15.1%	7.2%
Upper	1	25.0%	100	33.8%	44.9%	57.1%	64.0%
Unknown	0	0.0%	0	0.0%	0.0%	9.5%	17.4%
TOTAL	4	100.0%	296	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	18.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.8%	1.3%	1.2%
Middle	0	0.0%	0	0.0%	20.2%	1.3%	0.7%
Upper	0	0.0%	0	0.0%	44.9%	2.6%	8.7%
Unknown	0	0.0%	0	0.0%	0.0%	94.7%	89.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	30	4.2%	2,300	1.8%	18.2%	3.5%	1.6%
Moderate	93	12.9%	9,022	7.0%	16.8%	10.4%	5.9%
Middle	132	18.4%	17,912	13.8%	20.2%	16.4%	12.4%
Upper	436	60.6%	95,669	73.8%	44.9%	50.8%	59.3%
Unknown	28	3.9%	4,702	3.6%	0.0%	18.8%	20.8%
TOTAL	719	100.0%	129,605	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	47	4.1%	4,707	2.0%	18.2%	3.1%	1.3%
Moderate	107	9.4%	11,887	5.2%	16.8%	11.9%	7.0%
Middle	183	16.0%	27,590	12.0%	20.2%	16.3%	12.9%
Upper	778	68.1%	179,225	78.1%	44.9%	53.9%	64.4%
Unknown	27	2.4%	6,201	2.7%	0.0%	14.7%	14.4%
TOTAL	1,142	100.0%	229,609	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	0.9%	74	0.2%	18.2%	1.8%	0.8%
Moderate	17	7.7%	2,053	4.4%	16.8%	6.5%	3.7%
Middle	23	10.4%	3,177	6.9%	20.2%	12.0%	8.5%
Upper	150	67.6%	31,881	68.8%	44.9%	54.3%	60.3%
Unknown	30	13.5%	9,124	19.7%	0.0%	25.3%	26.8%
TOTAL	222	100.0%	46,309	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.2%	3.8%	3.2%
Moderate	0	0.0%	0	0.0%	16.8%	13.2%	7.1%
Middle	0	0.0%	0	0.0%	20.2%	17.6%	11.0%
Upper	1	20.0%	1,200	80.6%	44.9%	54.7%	68.1%
Unknown	4	80.0%	289	19.4%	0.0%	10.7%	10.6%
TOTAL	5	100.0%	1,489	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	18.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.8%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.2%	2.1%	0.1%
Upper	1	33.3%	148	13.9%	44.9%	31.9%	13.0%
Unknown	2	66.7%	920	86.1%	0.0%	66.0%	86.9%
TOTAL	3	100.0%	1,068	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	18.2%	1.6%	1.2%
Moderate	0	0.0%	0	0.0%	16.8%	9.7%	6.8%
Middle	0	0.0%	0	0.0%	20.2%	17.7%	13.3%
Upper	0	0.0%	0	0.0%	44.9%	67.7%	76.6%
Unknown	0	0.0%	0	0.0%	0.0%	3.2%	2.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	18.2%	0.8%	0.7%
Moderate	1	33.3%	43	16.0%	16.8%	11.0%	6.1%
Middle	2	66.7%	225	84.0%	20.2%	21.2%	12.5%
Upper	0	0.0%	0	0.0%	44.9%	62.7%	73.4%
Unknown	0	0.0%	0	0.0%	0.0%	4.2%	7.3%
TOTAL	3	100.0%	268	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	18.2%	0.6%	0.1%
Moderate	0	0.0%	0	0.0%	16.8%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.2%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	44.9%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	99.4%	99.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	49	3.6%	4,781	1.7%	18.2%	2.4%	1.0%
Moderate	125	9.1%	13,983	5.0%	16.8%	9.1%	5.2%
Middle	208	15.1%	30,992	11.1%	20.2%	14.0%	10.4%
Upper	930	67.6%	212,454	76.2%	44.9%	53.4%	61.0%
Unknown	63	4.6%	16,534	5.9%	0.0%	21.0%	22.4%
TOTAL	1,375	100.0%	278,743	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	1,057	80.6%	49.8%	78,423	69.3%	41.1%	91.8%
	Over \$1 Million/ Unknown	254	19.4%	50.2%	34,661	30.7%	58.9%	8.2%
	TOTAL	1,311	100.0%	100.0%	113,084	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1,004	76.6%	93.6%	29,638	26.2%	38.0%	
	\$100,001–\$250,000	207	15.8%	3.5%	34,728	30.7%	16.3%	
	\$250,001–\$1 Million	100	7.6%	2.9%	48,718	43.1%	45.7%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	1,311	100.0%	100.0%	113,084	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	830	78.5%		23,079	29.4%		
	\$100,001–\$250,000	168	15.9%		27,854	35.5%		
	\$250,001–\$1 Million	59	5.6%		27,490	35.1%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	1,057	100.0%		78,423	100.0%		

Appendix C (continued)

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	1,120	37.0%	43.0%	98,505	43.2%	38.6%	91.9%
	Over \$1 Million/ Unknown	1,909	63.0%	57.0%	129,304	56.8%	61.4%	8.1%
	TOTAL	3,029	100.0%	100.0%	227,809	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	2,431	80.3%	88.3%	68,783	30.2%	32.1%	
	\$100,001–\$250,000	391	12.9%	7.2%	62,213	27.3%	23.0%	
	\$250,001–\$1 Million	207	6.8%	4.5%	96,813	42.5%	44.9%	
	Over \$1 Million	-	0.0%	0.0%	-	0.0%	0.0%	
	TOTAL	3,029	100.0%	100.0%	227,809	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	850	75.9%		26,269	26.7%		
	\$100,001–\$250,000	172	15.4%		27,939	28.4%		
	\$250,001–\$1 Million	98	8.8%		44,297	45.0%		
	Over \$1 Million	-	0.0%		-	0.0%		
	TOTAL	1,120	100.0%		98,505	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	363	91.4%	71.0%	18,594	92.1%	80.2%	99.1%
	Over \$1 Million/ Unknown	34	8.6%	29.0%	1,584	7.9%	19.8%	0.9%
	TOTAL	397	100.0%	100.0%	20,178	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	342	86.1%	78.7%	9,602	47.6%	30.1%	
	\$100,001–\$250,000	43	10.8%	14.0%	6,621	32.8%	32.5%	
	\$250,001–\$500,000	12	3.0%	7.3%	3,955	19.6%	37.4%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	397	100.0%	100.0%	20,178	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	311	85.7%		8,654	46.5%		
	\$100,001–\$250,000	41	11.3%		6,310	33.9%		
	\$250,001–\$1 Million	11	3.0%		3,630	19.5%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	363	100.0%		18,594	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	686	74.7%	65.5%	48,657	75.5%	79.5%	98.9%
	Over \$1 Million/ Unknown	232	25.3%	34.5%	15,801	24.5%	20.5%	1.1%
	TOTAL	918	100.0%	100.0%	64,458	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	747	81.4%	76.9%	23,845	37.0%	28.1%	
	\$100,001–\$250,000	108	11.8%	14.3%	16,994	26.4%	30.3%	
	\$250,001–\$500,000	63	6.9%	8.8%	23,619	36.6%	41.6%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	918	100.0%	100.0%	64,458	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	553	80.6%		19,048	39.1%	
		\$100,001–\$250,000	89	13.0%		13,843	28.5%	
		\$250,001–\$1 Million	44	6.4%		15,766	32.4%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	686	100.0%		48,657	100.0%	

Columbia

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	4	6.2%	379	2.9%	1.4%	1.5%	0.7%
Moderate	6	9.2%	899	6.9%	9.9%	12.1%	8.6%
Middle	39	60.0%	8,257	63.4%	60.5%	57.0%	54.9%
Upper	16	24.6%	3,482	26.8%	28.0%	28.6%	35.2%
Unknown	0	0.0%	0	0.0%	0.4%	0.8%	0.6%
TOTAL	65	100.0%	13,016	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.4%	0.8%	0.4%
Moderate	3	9.1%	526	7.1%	9.9%	8.1%	5.4%
Middle	19	57.6%	3,991	54.2%	60.5%	56.6%	54.2%
Upper	11	33.3%	2,848	38.7%	28.0%	32.9%	38.8%
Unknown	0	0.0%	0	0.0%	0.4%	1.6%	1.1%
TOTAL	33	100.0%	7,365	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.4%	1.1%	0.3%
Moderate	0	0.0%	0	0.0%	9.9%	8.0%	5.8%
Middle	0	0.0%	0	0.0%	60.5%	54.0%	50.6%
Upper	0	0.0%	0	0.0%	28.0%	35.1%	40.6%
Unknown	0	0.0%	0	0.0%	0.4%	1.7%	2.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	7.9%	4.7%	6.9%
Moderate	1	25.0%	310	10.0%	18.4%	18.8%	8.7%
Middle	2	50.0%	2,468	79.5%	31.4%	57.8%	61.5%
Upper	1	25.0%	328	10.6%	27.0%	14.1%	10.4%
Unknown	0	0.0%	0	0.0%	15.3%	4.7%	12.4%
TOTAL	4	100.0%	3,106	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	1.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	9.9%	13.4%	9.7%
Middle	0	0.0%	0	0.0%	60.5%	59.7%	51.8%
Upper	0	0.0%	0	0.0%	28.0%	26.9%	38.6%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	1.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	9.9%	10.4%	6.7%
Middle	0	0.0%	0	0.0%	60.5%	62.3%	54.4%
Upper	0	0.0%	0	0.0%	28.0%	24.7%	38.0%
Unknown	0	0.0%	0	0.0%	0.4%	2.6%	0.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	1.4%	3.0%	1.8%
Moderate	0	0.0%	0	0.0%	9.9%	16.7%	14.7%
Middle	0	0.0%	0	0.0%	60.5%	71.2%	72.4%
Upper	0	0.0%	0	0.0%	28.0%	9.1%	11.1%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	4	3.9%	379	1.6%	1.4%	1.2%	1.1%
Moderate	10	9.8%	1,735	7.4%	9.9%	10.8%	7.5%
Middle	60	58.8%	14,716	62.7%	60.5%	57.0%	55.2%
Upper	28	27.5%	6,658	28.3%	28.0%	29.8%	34.5%
Unknown	0	0.0%	0	0.0%	0.4%	1.1%	1.7%
TOTAL	102	100.0%	23,487	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	14	2.2%	1,223	0.9%	1.4%	1.5%	0.9%
Moderate	63	10.0%	8,684	6.5%	9.9%	11.4%	8.1%
Middle	344	54.8%	68,339	50.9%	60.5%	59.4%	56.3%
Upper	203	32.3%	54,527	40.6%	28.0%	27.1%	34.1%
Unknown	4	0.6%	1,479	1.1%	0.4%	0.5%	0.6%
TOTAL	628	100.0%	134,252	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	9	1.2%	809	0.5%	1.4%	0.7%	0.4%
Moderate	44	5.6%	5,764	3.5%	9.9%	7.8%	5.4%
Middle	448	57.3%	90,066	54.7%	60.5%	57.0%	54.7%
Upper	279	35.7%	67,847	41.2%	28.0%	34.3%	39.2%
Unknown	2	0.3%	306	0.2%	0.4%	0.3%	0.3%
TOTAL	782	100.0%	164,792	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.4%	3.1%	1.4%
Moderate	1	12.5%	34	2.0%	9.9%	10.6%	8.5%
Middle	4	50.0%	1,047	60.4%	60.5%	53.8%	49.1%
Upper	3	37.5%	652	37.6%	28.0%	32.5%	41.0%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	8	100.0%	1,733	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	4	18.2%	7,431	9.8%	7.9%	15.1%	12.8%
Moderate	6	27.3%	3,129	4.1%	18.4%	17.4%	7.0%
Middle	8	36.4%	3,862	5.1%	31.4%	40.7%	19.9%
Upper	4	18.2%	61,280	80.9%	27.0%	17.4%	45.4%
Unknown	0	0.0%	0	0.0%	15.3%	9.3%	14.9%
TOTAL	22	100.0%	75,702	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	1.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	9.9%	8.5%	2.5%
Middle	0	0.0%	0	0.0%	60.5%	55.9%	46.9%
Upper	0	0.0%	0	0.0%	28.0%	35.6%	50.6%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	1.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	9.9%	3.4%	0.4%
Middle	5	62.5%	1,475	80.1%	60.5%	54.2%	50.8%
Upper	3	37.5%	366	19.9%	28.0%	42.4%	48.8%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	8	100.0%	1,841	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	1.4%	1.5%	0.9%
Moderate	0	0.0%	0	0.0%	9.9%	11.8%	8.2%
Middle	0	0.0%	0	0.0%	60.5%	70.3%	67.5%
Upper	0	0.0%	0	0.0%	28.0%	16.4%	23.3%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	27	1.9%	9,463	2.5%	1.4%	1.2%	1.6%
Moderate	114	7.9%	17,611	4.7%	9.9%	9.5%	6.6%
Middle	809	55.9%	164,789	43.6%	60.5%	58.0%	52.8%
Upper	492	34.0%	184,672	48.8%	28.0%	30.8%	37.5%
Unknown	6	0.4%	1,785	0.5%	0.4%	0.5%	1.5%
TOTAL	1,448	100.0%	378,320	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	11	6.5%	1,630	13.8%	9.9%	9.0%	11.4%
Moderate	7	4.1%	820	7.0%	12.0%	9.9%	12.7%
Middle	133	78.2%	6,804	57.8%	47.8%	49.3%	45.8%
Upper	17	10.0%	2,191	18.6%	25.0%	27.0%	25.5%
Unknown	2	1.2%	330	2.8%	5.2%	4.7%	4.6%
TOTAL	170	100.0%	11,775	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	222	11.2%	21,524	11.1%	9.9%	10.3%	13.5%
Moderate	188	9.5%	25,343	13.1%	12.4%	9.5%	11.4%
Middle	950	48.0%	86,888	44.9%	47.4%	46.2%	42.9%
Upper	517	26.1%	47,380	24.5%	25.3%	29.5%	26.3%
Unknown	101	5.1%	12,275	6.3%	5.0%	4.4%	5.9%
TOTAL	1,978	100.0%	193,410	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	0.8%	1.2%	0.6%
Moderate	0	0.0%	0	0.0%	7.3%	2.0%	0.5%
Middle	29	100.0%	1,464	100.0%	81.4%	93.0%	95.1%
Upper	0	0.0%	0	0.0%	10.6%	3.9%	3.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	29	100.0%	1,464	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	1	0.8%	20	0.2%	0.8%	0.3%	0.1%
Moderate	4	3.1%	737	6.3%	7.3%	2.6%	3.0%
Middle	121	92.4%	10,711	91.5%	83.9%	90.4%	90.1%
Upper	5	3.8%	237	2.0%	8.1%	6.7%	6.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	131	100.0%	11,705	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	21.1%	8.2%	4.7%
Moderate	17	26.2%	2,266	17.4%	16.6%	19.8%	15.0%
Middle	9	13.8%	1,652	12.7%	21.8%	21.3%	20.4%
Upper	34	52.3%	8,618	66.2%	40.5%	31.6%	41.7%
Unknown	5	7.7%	481	3.7%	0.0%	19.1%	18.3%
TOTAL	65	100.0%	13,016	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	3.0%	125	1.7%	21.1%	6.3%	3.2%
Moderate	2	6.1%	312	4.2%	16.6%	14.8%	9.7%
Middle	6	18.2%	799	10.8%	21.8%	19.1%	15.6%
Upper	23	69.7%	5,941	80.7%	40.5%	35.9%	46.3%
Unknown	1	3.0%	188	2.6%	0.0%	23.9%	25.1%
TOTAL	33	100.0%	7,365	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.1%	8.0%	5.4%
Moderate	0	0.0%	0	0.0%	16.6%	16.7%	11.9%
Middle	0	0.0%	0	0.0%	21.8%	27.0%	25.1%
Upper	0	0.0%	0	0.0%	40.5%	42.0%	54.1%
Unknown	0	0.0%	0	0.0%	0.0%	6.3%	3.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.6%	1.6%	0.0%
Middle	0	0.0%	0	0.0%	21.8%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.5%	10.9%	2.1%
Unknown	4	100.0%	3,106	100.0%	0.0%	87.5%	97.9%
TOTAL	4	100.0%	3,106	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.1%	6.0%	3.0%
Moderate	0	0.0%	0	0.0%	16.6%	23.9%	16.4%
Middle	0	0.0%	0	0.0%	21.8%	29.9%	28.9%
Upper	0	0.0%	0	0.0%	40.5%	34.3%	43.6%
Unknown	0	0.0%	0	0.0%	0.0%	6.0%	8.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.1%	9.1%	5.2%
Moderate	0	0.0%	0	0.0%	16.6%	15.6%	10.4%
Middle	0	0.0%	0	0.0%	21.8%	13.0%	5.5%
Upper	0	0.0%	0	0.0%	40.5%	49.4%	59.1%
Unknown	0	0.0%	0	0.0%	0.0%	13.0%	19.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	21.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.6%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.8%	1.5%	0.0%
Upper	0	0.0%	0	0.0%	40.5%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	98.5%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	1	1.0%	125	0.5%	21.1%	7.4%	3.8%
Moderate	19	18.6%	2,578	11.0%	16.6%	17.7%	12.0%
Middle	15	14.7%	2,451	10.4%	21.8%	20.3%	17.2%
Upper	57	55.9%	14,559	62.0%	40.5%	33.0%	40.3%
Unknown	10	9.8%	3,775	16.1%	0.0%	21.6%	26.7%
TOTAL	102	100.0%	23,487	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	51	8.1%	6,011	4.5%	21.1%	9.8%	5.8%
Moderate	139	22.1%	21,214	15.8%	16.6%	21.6%	16.7%
Middle	108	17.2%	21,507	16.0%	21.8%	20.0%	19.0%
Upper	227	36.1%	66,898	49.8%	40.5%	31.2%	42.0%
Unknown	103	16.4%	18,622	13.9%	0.0%	17.4%	16.4%
TOTAL	628	100.0%	134,252	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	35	4.5%	3,761	2.3%	21.1%	4.5%	2.3%
Moderate	106	13.6%	14,910	9.0%	16.6%	13.7%	9.2%
Middle	167	21.4%	29,042	17.6%	21.8%	19.2%	15.8%
Upper	368	47.1%	92,886	56.4%	40.5%	40.9%	49.7%
Unknown	106	13.6%	24,193	14.7%	0.0%	21.8%	23.0%
TOTAL	782	100.0%	164,792	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	12.5%	34	2.0%	21.1%	6.3%	3.7%
Moderate	1	12.5%	400	23.1%	16.6%	17.5%	12.1%
Middle	2	25.0%	230	13.3%	21.8%	25.6%	19.6%
Upper	4	50.0%	1,069	61.7%	40.5%	43.1%	56.7%
Unknown	0	0.0%	0	0.0%	0.0%	7.5%	7.9%
TOTAL	8	100.0%	1,733	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.1%	1.2%	0.1%
Moderate	1	4.5%	255	0.3%	16.6%	2.3%	0.3%
Middle	0	0.0%	0	0.0%	21.8%	0.0%	0.0%
Upper	1	4.5%	133	0.2%	40.5%	4.7%	0.6%
Unknown	20	90.9%	75,314	99.5%	0.0%	91.9%	98.9%
TOTAL	22	100.0%	75,702	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.1%	3.4%	0.5%
Moderate	0	0.0%	0	0.0%	16.6%	10.2%	4.1%
Middle	0	0.0%	0	0.0%	21.8%	25.4%	23.3%
Upper	0	0.0%	0	0.0%	40.5%	59.3%	70.1%
Unknown	0	0.0%	0	0.0%	0.0%	1.7%	2.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	12.5%	45	2.4%	21.1%	5.1%	1.5%
Moderate	2	25.0%	280	15.2%	16.6%	27.1%	20.7%
Middle	1	12.5%	115	6.2%	21.8%	25.4%	18.2%
Upper	3	37.5%	977	53.1%	40.5%	27.1%	38.0%
Unknown	1	12.5%	424	23.0%	0.0%	15.3%	21.6%
TOTAL	8	100.0%	1,841	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	21.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.6%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.8%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.5%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	88	6.1%	9,851	2.6%	21.1%	6.6%	3.5%
Moderate	249	17.2%	37,059	9.8%	16.6%	16.8%	11.4%
Middle	278	19.2%	50,894	13.5%	21.8%	19.2%	15.8%
Upper	603	41.6%	161,963	42.8%	40.5%	35.8%	42.4%
Unknown	230	15.9%	118,553	31.3%	0.0%	21.6%	26.9%
TOTAL	1,448	100.0%	378,320	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	56	32.9%	51.9%	5,571	47.3%	45.9%	91.6%
	Over \$1 Million/ Unknown	114	67.1%	48.1%	6,204	52.7%	54.1%	8.4%
	TOTAL	170	100.0%	100.0%	11,775	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	150	88.2%	89.4%	3,707	31.5%	28.6%	
	\$100,001–\$250,000	7	4.1%	5.7%	1,175	10.0%	18.7%	
	\$250,001–\$1 Million	13	7.6%	5.0%	6,893	58.5%	52.7%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	170	100.0%	100.0%	11,775	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	44	78.6%		1,657	29.7%		
	\$100,001–\$250,000	5	8.9%		846	15.2%		
	\$250,001–\$1 Million	7	12.5%		3,068	55.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	56	100.0%		\$5,571	100.0%		

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	758	38.3%	38.4%	92,100	47.6%	37.6%	91.7%
	Over \$1 Million/ Unknown	1,220	61.7%	61.6%	101,310	52.4%	62.4%	8.3%
	TOTAL	1,978	100.0%	100.0%	193,410	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1,476	74.6%	82.0%	46,166	23.9%	24.0%	
	\$100,001–\$250,000	290	14.7%	9.5%	45,671	23.6%	19.5%	
	\$250,001–\$1 Million	212	10.7%	8.5%	101,573	52.5%	56.5%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	1,978	100.0%	100.0%	193,410	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	510	67.3%		17,814	19.3%		
	\$100,001–\$250,000	133	17.5%		21,296	23.1%		
	\$250,001–\$1 Million	115	15.2%		52,990	57.5%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	758	100.0%		92,100	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	27	93.1%	55.1%	1,203	82.2%	68.8%	99.0%
	Over \$1 Million/ Unknown	2	6.9%	44.9%	261	17.8%	31.2%	1.0%
	TOTAL	29	100.0%	100.0%	1,464	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	25	86.2%	80.5%	762	52.0%	31.2%	
	\$100,001–\$250,000	4	13.8%	12.9%	702	48.0%	34.7%	
	\$250,001–\$500,000	0	0.0%	6.6%	0	0.0%	34.1%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	29	100.0%	100.0%	1,464	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	25	92.6%		762	63.3%		
	\$100,001–\$250,000	2	7.4%		441	36.7%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	27	100.0%		1,203	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	91	69.5%	55.4%	9,134	78.0%	73.3%	99.0%
	Over \$1 Million/ Unknown	40	30.5%	44.6%	2,571	22.0%	26.7%	1.0%
	TOTAL	131	100.0%	100.0%	11,705	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	94	71.8%	76.9%	3,257	27.8%	24.1%	
	\$100,001–\$250,000	23	17.6%	12.5%	3,511	30.0%	26.7%	
	\$250,001–\$500,000	14	10.7%	10.6%	4,937	42.2%	49.2%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	131	100.0%	100.0%	11,705	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	62	68.1%		2,475	27.1%		
	\$100,001–\$250,000	17	18.7%		2,577	28.2%		
	\$250,001–\$1 Million	12	13.2%		4,082	44.7%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	91	100.0%		9,134	100.0%		

Branson

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	17	8.2%	2,702	8.0%	7.0%	6.3%	5.8%
Middle	181	87.0%	28,907	85.9%	87.3%	86.6%	84.7%
Upper	10	4.8%	2,023	6.0%	5.8%	7.2%	9.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	208	100.0%	33,633	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	9.1%	72	3.3%	7.0%	6.0%	5.2%
Middle	8	72.7%	1,739	78.6%	87.3%	87.4%	88.1%
Upper	2	18.2%	401	18.1%	5.8%	6.6%	6.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	11	100.0%	2,212	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	3.4%	1.5%
Middle	0	0.0%	0	0.0%	87.3%	92.0%	96.3%
Upper	0	0.0%	0	0.0%	5.8%	4.5%	2.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	5.6%	21.1%	12.6%
Middle	0	0.0%	0	0.0%	87.7%	63.2%	63.2%
Upper	0	0.0%	0	0.0%	6.7%	15.8%	24.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	3.2%	3.3%
Middle	0	0.0%	0	0.0%	87.3%	96.8%	96.7%
Upper	0	0.0%	0	0.0%	5.8%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	6.1%	8.3%
Middle	1	100.0%	484	100.0%	87.3%	89.8%	83.4%
Upper	0	0.0%	0	0.0%	5.8%	4.1%	8.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	484	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	8.1%	5.5%
Middle	0	0.0%	0	0.0%	87.3%	89.2%	87.4%
Upper	0	0.0%	0	0.0%	5.8%	2.7%	7.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	18	8.2%	2,774	7.6%	7.0%	6.2%	5.8%
Middle	190	86.4%	31,130	85.7%	87.3%	87.1%	85.3%
Upper	12	5.5%	2,424	6.7%	5.8%	6.7%	8.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	220	100.0%	36,329	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	33	10.4%	4,908	7.9%	7.0%	5.8%	4.6%
Middle	263	83.2%	52,542	84.6%	87.3%	85.2%	84.2%
Upper	20	6.3%	4,654	7.5%	5.8%	9.0%	11.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	316	100.0%	62,104	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	4.5%	3.6%
Middle	25	100.0%	5,292	100.0%	87.3%	87.4%	87.3%
Upper	0	0.0%	0	0.0%	5.8%	8.0%	9.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	25	100.0%	5,292	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	5.3%	4.9%
Middle	0	0.0%	0	0.0%	87.3%	88.2%	85.4%
Upper	0	0.0%	0	0.0%	5.8%	6.6%	9.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	5.6%	5.3%	10.3%
Middle	0	0.0%	0	0.0%	87.7%	78.9%	78.9%
Upper	0	0.0%	0	0.0%	6.7%	15.8%	10.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	6.4%	3.6%
Middle	0	0.0%	0	0.0%	87.3%	87.2%	91.3%
Upper	0	0.0%	0	0.0%	5.8%	6.4%	5.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	8.9%	10.0%
Middle	0	0.0%	0	0.0%	87.3%	87.5%	87.6%
Upper	0	0.0%	0	0.0%	5.8%	3.6%	2.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.0%	8.0%	7.4%
Middle	0	0.0%	0	0.0%	87.3%	90.3%	89.5%
Upper	0	0.0%	0	0.0%	5.8%	1.8%	3.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	33	9.7%	4,908	7.3%	7.0%	5.3%	4.4%
Middle	288	84.5%	57,834	85.8%	87.3%	86.4%	85.7%
Upper	20	5.9%	4,654	6.9%	5.8%	8.3%	9.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	341	100.0%	67,396	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		%	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	23	8.9%	4,365	13.2%	6.5%	6.2%	7.6%
Middle	180	70.0%	21,033	63.6%	87.7%	84.9%	82.9%
Upper	54	21.0%	7,667	23.2%	5.8%	6.7%	8.9%
Unknown	0	0.0%	0	0.0%	0.0%	2.2%	0.7%
TOTAL	257	100.0%	33,065	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		%	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	49	0.0%	4,086	0.0%	6.6%	6.2%	5.6%
Middle	416	0.0%	39,679	0.0%	87.8%	87.2%	86.6%
Upper	46	0.0%	5,872	0.0%	5.6%	6.2%	7.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.3%	0.2%
TOTAL	511	0.0%	49,637	0.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	3.1%	3.7%	8.7%
Middle	12	100.0%	709	100.0%	96.9%	90.8%	86.2%
Upper	0	0.0%	0	0.0%	0.0%	1.8%	4.2%
Unknown	0	0.0%	0	0.0%	0.0%	3.7%	0.9%
TOTAL	12	100.0%	709	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.8%	2.7%	6.6%
Middle	23	100.0%	1,073	100.0%	98.2%	94.7%	88.0%
Upper	0	0.0%	0	0.0%	0.0%	1.8%	4.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.9%	0.4%
TOTAL	23	100.0%	1,073	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	15	7.2%	967	2.9%	18.1%	2.7%	1.3%
Moderate	28	13.5%	2,773	8.2%	20.3%	12.1%	8.1%
Middle	47	22.6%	6,019	17.9%	23.5%	19.5%	16.4%
Upper	117	56.3%	23,423	69.6%	38.1%	50.1%	58.7%
Unknown	1	0.5%	450	1.3%	0.0%	15.7%	15.5%
TOTAL	208	100.0%	33,633	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	18.1%	5.4%	2.6%
Moderate	1	9.1%	198	9.0%	20.3%	11.8%	7.7%
Middle	3	27.3%	284	12.8%	23.5%	16.1%	13.1%
Upper	7	63.6%	1,730	78.2%	38.1%	45.4%	54.7%
Unknown	0	0.0%	0	0.0%	0.0%	21.2%	22.0%
TOTAL	11	100.0%	2,212	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.1%	10.2%	5.6%
Moderate	0	0.0%	0	0.0%	20.3%	12.5%	12.3%
Middle	0	0.0%	0	0.0%	23.5%	25.0%	27.1%
Upper	0	0.0%	0	0.0%	38.1%	48.9%	50.4%
Unknown	0	0.0%	0	0.0%	0.0%	3.4%	4.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	18.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	23.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	38.1%	15.8%	13.6%
Unknown	0	0.0%	0	0.0%	0.0%	84.2%	86.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	18.1%	6.3%	3.0%
Moderate	0	0.0%	0	0.0%	20.3%	4.8%	1.0%
Middle	0	0.0%	0	0.0%	23.5%	23.8%	16.6%
Upper	0	0.0%	0	0.0%	38.1%	57.1%	73.7%
Unknown	0	0.0%	0	0.0%	0.0%	7.9%	5.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	18.1%	6.1%	2.7%
Moderate	0	0.0%	0	0.0%	20.3%	10.2%	5.4%
Middle	0	0.0%	0	0.0%	23.5%	26.5%	20.6%
Upper	1	100.0%	484	100.0%	38.1%	49.0%	58.7%
Unknown	0	0.0%	0	0.0%	0.0%	8.2%	12.6%
TOTAL	1	100.0%	484	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	18.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	23.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	38.1%	5.4%	10.5%
Unknown	0	0.0%	0	0.0%	0.0%	94.6%	89.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	15	6.8%	967	2.7%	18.1%	3.9%	1.7%
Moderate	29	13.2%	2,971	8.2%	20.3%	11.6%	7.5%
Middle	50	22.7%	6,303	17.4%	23.5%	18.4%	14.7%
Upper	125	56.8%	25,637	70.6%	38.1%	48.0%	55.3%
Unknown	1	0.5%	450	1.2%	0.0%	18.1%	20.7%
TOTAL	220	100.0%	36,329	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	14	4.4%	1,359	2.2%	18.1%	3.8%	2.0%
Moderate	49	15.5%	5,644	9.1%	20.3%	12.9%	8.1%
Middle	65	20.6%	9,088	14.6%	23.5%	18.2%	15.3%
Upper	182	57.6%	44,415	71.5%	38.1%	51.8%	60.5%
Unknown	6	1.9%	1,598	2.6%	0.0%	13.3%	14.1%
TOTAL	316	100.0%	62,104	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	18.1%	2.8%	1.2%
Moderate	4	16.0%	352	6.7%	20.3%	9.4%	5.7%
Middle	1	4.0%	78	1.5%	23.5%	15.2%	11.9%
Upper	13	52.0%	2,971	56.1%	38.1%	47.7%	53.0%
Unknown	7	28.0%	1,891	35.7%	0.0%	24.8%	28.1%
TOTAL	25	100.0%	5,292	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.1%	5.3%	2.0%
Moderate	0	0.0%	0	0.0%	20.3%	13.2%	8.4%
Middle	0	0.0%	0	0.0%	23.5%	19.7%	15.5%
Upper	0	0.0%	0	0.0%	38.1%	53.9%	65.8%
Unknown	0	0.0%	0	0.0%	0.0%	7.9%	8.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	18.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	23.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	38.1%	5.3%	1.3%
Unknown	0	0.0%	0	0.0%	0.0%	94.7%	98.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	18.1%	4.3%	1.2%
Moderate	0	0.0%	0	0.0%	20.3%	6.4%	2.9%
Middle	0	0.0%	0	0.0%	23.5%	14.9%	11.5%
Upper	0	0.0%	0	0.0%	38.1%	59.6%	65.9%
Unknown	0	0.0%	0	0.0%	0.0%	14.9%	18.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	18.1%	12.5%	6.3%
Moderate	0	0.0%	0	0.0%	20.3%	14.3%	6.7%
Middle	0	0.0%	0	0.0%	23.5%	14.3%	11.2%
Upper	0	0.0%	0	0.0%	38.1%	50.0%	68.5%
Unknown	0	0.0%	0	0.0%	0.0%	8.9%	7.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	18.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	23.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	38.1%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	14	4.1%	1,359	2.0%	18.1%	3.4%	1.6%
Moderate	53	15.5%	5,996	8.9%	20.3%	10.9%	6.6%
Middle	66	19.4%	9,166	13.6%	23.5%	16.3%	12.9%
Upper	195	57.2%	47,386	70.3%	38.1%	48.6%	54.4%
Unknown	13	3.8%	3,489	5.2%	0.0%	20.9%	24.5%
TOTAL	341	100.0%	67,396	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	139	54.1%	47.9%	16,419	49.7%	49.1%	93.1%
	Over \$1 Million/ Unknown	118	45.9%	52.1%	16,646	50.3%	50.9%	6.9%
	TOTAL	257	100.0%	100.0%	33,065	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	172	66.9%	91.9%	7,226	21.9%	172	
	\$100,001–\$250,000	51	19.8%	4.4%	8,404	25.4%	51	
	\$250,001–\$1 Million	34	13.2%	3.7%	17,435	52.7%	34	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0	
	TOTAL	257	100.0%	100.0%	33,065	100.0%	257	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	92	66.2%		2,918	17.8%		
	\$100,001–\$250,000	28	20.1%		4,707	28.7%		
	\$250,001–\$1 Million	19	13.7%		8,794	53.6%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	139	100.0%		16,419	100.0%		

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	164	32.1%	39.7%	20,679	41.7%	41.2%	93.2%
	Over \$1 Million/ Unknown	347	67.9%	60.3%	28,958	58.3%	58.8%	6.8%
	TOTAL	511	100.0%	100.0%	49,637	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	374	73.2%	88.5%	11,525	23.2%	29.5%	
	\$100,001–\$250,000	85	16.6%	5.8%	13,405	27.0%	17.4%	
	\$250,001–\$1 Million	52	10.2%	5.7%	24,707	49.8%	53.1%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	511	100.0%	100.0%	49,637	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	99	60.4%		3,741	18.1%		
	\$100,001–\$250,000	44	26.8%		7,055	34.1%		
	\$250,001–\$1 Million	21	12.8%		9,883	47.8%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	164	100.0%		20,679	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	12	100.0%	78.9%	709	100.0%	85.4%	100.0%
	Over \$1 Million/ Unknown	0	0.0%	21.1%	0	0.0%	14.6%	0.0%
	TOTAL	12	100.0%	100.0%	709	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	10	83.3%	79.8%	245	34.6%	31.0%	
	\$100,001–\$250,000	1	8.3%	13.8%	104	14.7%	35.7%	
	\$250,001–\$500,000	1	8.3%	6.4%	360	50.8%	33.3%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	12	100.0%	100.0%	709	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	10	83.3%		245	34.6%		
	\$100,001–\$250,000	1	8.3%		104	14.7%		
	\$250,001–\$1 Million	1	8.3%		360	50.8%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	12	100.0%		709	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	20	87.0%	79.6%	943	87.9%	83.0%	100.0%
	Over \$1 Million/ Unknown	3	13.0%	20.4%	130	12.1%	17.0%	0.0%
	TOTAL	23	100.0%	100.0%	1,073	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	21	91.3%	82.3%	603	56.2%	40.1%	
	\$100,001–\$250,000	1	4.3%	13.3%	110	10.3%	36.3%	
	\$250,001–\$500,000	1	4.3%	4.4%	360	33.6%	23.6%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	23	100.0%	100.0%	1,073	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	19	95.0%		583	61.8%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	1	5.0%		360	38.2%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	20	100.0%		943	100.0%		

KANSAS CITY

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	3	6.4%	425	4.6%	5.7%	3.3%	1.7%
Moderate	6	12.8%	1,015	11.0%	18.0%	17.4%	10.8%
Middle	22	46.8%	3,643	39.5%	39.9%	39.9%	35.2%
Upper	16	34.0%	4,139	44.9%	36.2%	39.2%	52.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	47	100.0%	9,222	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	5.7%	1.7%	1.0%
Moderate	0	0.0%	0	0.0%	18.0%	11.7%	7.3%
Middle	11	78.6%	1,794	61.8%	39.9%	38.2%	32.5%
Upper	3	21.4%	1,110	38.2%	36.2%	48.2%	59.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.2%
TOTAL	14	100.0%	2,904	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	5.7%	2.7%	1.9%
Moderate	1	50.0%	120	44.9%	18.0%	11.5%	8.4%
Middle	1	50.0%	147	55.1%	39.9%	35.0%	31.1%
Upper	0	0.0%	0	0.0%	36.2%	50.6%	58.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.1%
TOTAL	2	100.0%	267	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	2	66.7%	313	55.2%	14.3%	15.8%	8.5%
Moderate	1	33.3%	254	44.8%	27.5%	34.4%	22.1%
Middle	0	0.0%	0	0.0%	36.3%	33.7%	42.9%
Upper	0	0.0%	0	0.0%	20.3%	15.1%	26.3%
Unknown	0	0.0%	0	0.0%	1.5%	1.0%	0.2%
TOTAL	3	100.0%	567	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	5.7%	1.4%	1.1%
Moderate	0	0.0%	0	0.0%	18.0%	10.4%	6.3%
Middle	0	0.0%	0	0.0%	39.9%	33.7%	27.9%
Upper	0	0.0%	0	0.0%	36.2%	54.4%	64.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	5.7%	3.6%	2.2%
Moderate	0	0.0%	0	0.0%	18.0%	17.5%	10.8%
Middle	1	50.0%	120	44.3%	39.9%	37.9%	31.5%
Upper	1	50.0%	151	55.7%	36.2%	41.0%	55.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	2	100.0%	271	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	5.7%	6.3%	3.4%
Moderate	0	0.0%	0	0.0%	18.0%	25.3%	17.7%
Middle	0	0.0%	0	0.0%	39.9%	46.2%	46.7%
Upper	0	0.0%	0	0.0%	36.2%	22.1%	32.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	5	7.4%	738	5.6%	5.7%	2.7%	2.0%
Moderate	8	11.8%	1,389	10.5%	18.0%	15.0%	10.4%
Middle	35	51.5%	5,704	43.1%	39.9%	38.9%	34.8%
Upper	20	29.4%	5,400	40.8%	36.2%	43.2%	52.7%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.2%
TOTAL	68	100.0%	13,231	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans			% of Owner- Occupied Units	Aggregate HMDA Data		
	#	##%	\$ (000s)		\$ %	# %	\$ %
Home Purchase Loans							
Low	23	6.1%	2,090	2.6%	5.7%	3.7%	1.9%
Moderate	64	17.1%	9,056	11.2%	18.0%	17.2%	10.9%
Middle	141	37.7%	28,782	35.7%	39.9%	38.9%	34.2%
Upper	145	38.8%	40,263	50.0%	36.2%	40.1%	52.8%
Unknown	1	0.3%	360	0.4%	0.2%	0.2%	0.2%
TOTAL	374	100.0%	80,551	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	6	1.0%	1,043	0.8%	5.7%	1.2%	0.7%
Moderate	49	8.3%	7,214	5.4%	18.0%	9.6%	5.9%
Middle	259	44.1%	52,042	39.2%	39.9%	35.4%	29.8%
Upper	273	46.5%	72,529	54.6%	36.2%	53.7%	63.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	587	100.0%	132,828	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	7.7%	33	2.4%	5.7%	2.5%	1.7%
Moderate	4	30.8%	307	22.7%	18.0%	9.8%	6.7%
Middle	5	38.5%	300	22.2%	39.9%	33.7%	30.5%
Upper	3	23.1%	714	52.7%	36.2%	54.0%	61.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	13	100.0%	1,354	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	2	13.3%	2,434	5.0%	14.3%	17.0%	14.3%
Moderate	6	40.0%	11,612	23.7%	27.5%	32.2%	15.1%
Middle	6	40.0%	34,364	70.2%	36.3%	33.8%	50.3%
Upper	1	6.7%	573	1.2%	20.3%	16.8%	20.2%
Unknown	0	0.0%	0	0.0%	1.5%	0.3%	0.1%
TOTAL	15	100.0%	48,983	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	5.7%	1.4%	0.7%
Moderate	0	0.0%	0	0.0%	18.0%	10.8%	6.3%
Middle	0	0.0%	0	0.0%	39.9%	33.2%	27.1%
Upper	0	0.0%	0	0.0%	36.2%	54.4%	65.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	5.7%	3.8%	2.0%
Moderate	1	14.3%	90	5.4%	18.0%	13.2%	6.0%
Middle	2	28.6%	155	9.3%	39.9%	38.4%	26.9%
Upper	4	57.1%	1,430	85.4%	36.2%	44.5%	65.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	7	100.0%	1,675	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	5.7%	4.4%	2.3%
Moderate	0	0.0%	0	0.0%	18.0%	24.1%	15.9%
Middle	0	0.0%	0	0.0%	39.9%	44.5%	44.0%
Upper	0	0.0%	0	0.0%	36.2%	27.0%	37.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	32	3.2%	5,600	2.1%	5.7%	2.3%	1.8%
Moderate	124	12.4%	28,279	10.7%	18.0%	12.8%	8.3%
Middle	413	41.5%	115,643	43.6%	39.9%	36.8%	32.5%
Upper	426	42.8%	115,509	43.5%	36.2%	48.0%	57.2%
Unknown	1	0.1%	360	0.1%	0.2%	0.1%	0.2%
TOTAL	996	100.0%	265,391	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	3	3.9%	931	16.4%	7.0%	6.5%	8.6%
Moderate	9	11.8%	927	16.4%	20.1%	18.1%	19.2%
Middle	54	71.1%	2,861	50.5%	35.7%	32.3%	29.3%
Upper	10	13.2%	944	16.7%	35.5%	39.6%	36.8%
Unknown	0	0.0%	0	0.0%	1.8%	3.6%	6.1%
TOTAL	76	100.0%	5,663	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	142	4.1%	25,002	6.5%	7.0%	6.5%	8.3%
Moderate	789	22.8%	98,216	25.6%	20.2%	18.9%	20.0%
Middle	1,321	38.2%	122,203	31.9%	35.5%	32.4%	29.8%
Upper	1,169	33.8%	126,023	32.9%	35.5%	39.5%	36.1%
Unknown	40	1.2%	11,541	3.0%	1.8%	2.7%	5.8%
TOTAL	3,461	100.0%	382,985	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	1.4%	1.2%	0.3%
Moderate	20	17.5%	1,396	21.2%	12.4%	11.9%	12.5%
Middle	91	79.8%	4,942	75.1%	57.8%	63.4%	60.7%
Upper	3	2.6%	245	3.7%	28.3%	22.3%	26.3%
Unknown	0	0.0%	0	0.0%	0.1%	1.2%	0.2%
TOTAL	114	100.0%	6,583	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	1	0.5%	17	0.1%	1.3%	0.8%	0.4%
Moderate	21	10.1%	1,190	7.9%	12.2%	10.6%	9.3%
Middle	160	76.9%	11,915	78.9%	58.1%	66.5%	64.7%
Upper	26	12.5%	1,980	13.1%	28.4%	22.0%	25.6%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	208	100.0%	15,102	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	4	8.5%	599	6.5%	21.3%	9.7%	5.0%
Moderate	10	21.3%	1,736	18.8%	17.6%	21.9%	16.1%
Middle	5	10.6%	859	9.3%	20.4%	22.8%	21.5%
Upper	22	46.8%	5,157	55.9%	40.8%	33.7%	46.1%
Unknown	6	12.8%	870	9.4%	0.0%	11.9%	11.2%
TOTAL	47	100.0%	9,222	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	14.3%	100	3.4%	21.3%	6.8%	3.4%
Moderate	2	14.3%	384	13.2%	17.6%	15.4%	10.4%
Middle	5	35.7%	682	23.5%	20.4%	21.1%	18.3%
Upper	5	35.7%	1,738	59.8%	40.8%	38.5%	49.5%
Unknown	0	0.0%	0	0.0%	0.0%	18.2%	18.3%
TOTAL	14	100.0%	2,904	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.3%	6.3%	4.4%
Moderate	1	50.0%	120	44.9%	17.6%	13.4%	10.8%
Middle	1	50.0%	147	55.1%	20.4%	21.2%	18.1%
Upper	0	0.0%	0	0.0%	40.8%	53.8%	59.7%
Unknown	0	0.0%	0	0.0%	0.0%	5.1%	7.1%
TOTAL	2	100.0%	267	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.6%	0.5%	0.0%
Middle	0	0.0%	0	0.0%	20.4%	0.8%	0.2%
Upper	0	0.0%	0	0.0%	40.8%	3.6%	1.0%
Unknown	3	100.0%	567	100.0%	0.0%	95.2%	98.9%
TOTAL	3	100.0%	567	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.3%	4.9%	2.9%
Moderate	0	0.0%	0	0.0%	17.6%	13.6%	9.0%
Middle	0	0.0%	0	0.0%	20.4%	22.5%	16.5%
Upper	0	0.0%	0	0.0%	40.8%	56.0%	68.5%
Unknown	0	0.0%	0	0.0%	0.0%	3.0%	3.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.3%	10.8%	7.7%
Moderate	1	50.0%	120	44.3%	17.6%	17.0%	11.1%
Middle	0	0.0%	0	0.0%	20.4%	22.8%	17.5%
Upper	1	50.0%	151	55.7%	40.8%	43.7%	55.8%
Unknown	0	0.0%	0	0.0%	0.0%	5.7%	7.9%
TOTAL	2	100.0%	271	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	21.3%	0.4%	0.2%
Moderate	0	0.0%	0	0.0%	17.6%	1.0%	0.9%
Middle	0	0.0%	0	0.0%	20.4%	0.9%	1.3%
Upper	0	0.0%	0	0.0%	40.8%	1.7%	4.8%
Unknown	0	0.0%	0	0.0%	0.0%	96.1%	92.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	6	8.8%	699	5.3%	21.3%	8.2%	4.0%
Moderate	14	20.6%	2,360	17.8%	17.6%	18.4%	12.5%
Middle	11	16.2%	1,688	12.8%	20.4%	21.7%	18.4%
Upper	28	41.2%	7,046	53.3%	40.8%	36.6%	43.9%
Unknown	9	13.2%	1,437	10.9%	0.0%	15.1%	21.1%
TOTAL	68	100.0%	13,231	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	48	12.8%	5,524	6.9%	21.3%	10.1%	5.3%
Moderate	58	15.5%	9,052	11.2%	17.6%	23.1%	17.5%
Middle	77	20.6%	16,762	20.8%	20.4%	22.3%	21.8%
Upper	147	39.3%	40,906	50.8%	40.8%	32.0%	44.0%
Unknown	44	11.8%	8,307	10.3%	0.0%	12.5%	11.4%
TOTAL	374	100.0%	80,551	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	37	6.3%	4,444	3.3%	21.3%	4.4%	2.2%
Moderate	86	14.7%	14,420	10.9%	17.6%	15.0%	10.3%
Middle	149	25.4%	28,821	21.7%	20.4%	21.2%	18.5%
Upper	228	38.8%	62,362	46.9%	40.8%	40.9%	50.4%
Unknown	87	14.8%	22,781	17.2%	0.0%	18.4%	18.6%
TOTAL	587	100.0%	132,828	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	15.4%	155	11.4%	21.3%	5.9%	3.6%
Moderate	2	15.4%	220	16.2%	17.6%	12.0%	8.8%
Middle	2	15.4%	40	3.0%	20.4%	21.5%	17.8%
Upper	2	15.4%	214	15.8%	40.8%	55.7%	63.0%
Unknown	5	38.5%	725	53.5%	0.0%	4.8%	6.8%
TOTAL	13	100.0%	1,354	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.3%	0.3%	0.0%
Moderate	0	0.0%	0	0.0%	17.6%	2.0%	0.1%
Middle	0	0.0%	0	0.0%	20.4%	0.3%	0.0%
Upper	0	0.0%	0	0.0%	40.8%	5.8%	0.5%
Unknown	15	100.0%	48,983	100.0%	0.0%	91.6%	99.3%
TOTAL	15	100.0%	48,983	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.3%	4.2%	2.3%
Moderate	0	0.0%	0	0.0%	17.6%	15.1%	9.5%
Middle	0	0.0%	0	0.0%	20.4%	21.6%	16.2%
Upper	0	0.0%	0	0.0%	40.8%	56.5%	69.2%
Unknown	0	0.0%	0	0.0%	0.0%	2.6%	2.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	14.3%	90	5.4%	21.3%	8.1%	3.4%
Moderate	1	14.3%	35	2.1%	17.6%	18.4%	11.4%
Middle	3	42.9%	540	32.2%	20.4%	22.8%	17.4%
Upper	2	28.6%	1,010	60.3%	40.8%	45.2%	62.2%
Unknown	0	0.0%	0	0.0%	0.0%	5.5%	5.7%
TOTAL	7	100.0%	1,675	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	21.3%	0.1%	0.0%
Moderate	0	0.0%	0	0.0%	17.6%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.4%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.8%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	99.8%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	88	8.8%	10,213	3.8%	21.3%	6.5%	3.2%
Moderate	147	14.8%	23,727	8.9%	17.6%	17.6%	12.3%
Middle	231	23.2%	46,163	17.4%	20.4%	21.2%	18.7%
Upper	379	38.1%	104,492	39.4%	40.8%	37.4%	45.5%
Unknown	151	15.2%	80,796	30.4%	0.0%	17.4%	20.3%
TOTAL	996	100.0%	265,391	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	62	81.6%	46.2%	4,279	75.6%	31.9%	90.2%
	Over \$1 Million/ Unknown	14	18.4%	53.8%	1,384	24.4%	68.1%	9.8%
	TOTAL	76	100.0%	100.0%	5,663	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	61	80.3%	91.5%	2,061	36.4%	28.9%	
	\$100,001–\$250,000	12	15.8%	3.9%	2,517	44.4%	14.8%	
	\$250,001–\$1 Million	3	3.9%	4.7%	1,085	19.2%	56.3%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	76	100.0%	100.0%	5,663	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	51	82.3%		1,501	35.1%		
	\$100,001–\$250,000	8	12.9%		1,693	39.6%		
	\$250,001–\$1 Million	3	4.8%		1,085	25.4%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	62	100.0%		4,279	100.0%		

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	763	22.0%	37.4%	91,041	23.8%	21.6%	90.4%
	Over \$1 Million/ Unknown	2698	78.0%	62.6%	291,944	76.2%	78.4%	9.6%
	TOTAL	3461	100.0%	100.0%	382,985	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	2484	71.8%	84.0%	77,795	20.3%	24.6%	
	\$100,001–\$250,000	557	16.1%	8.4%	92,674	24.2%	19.2%	
	\$250,001–\$1 Million	420	12.1%	7.7%	212,516	55.5%	56.3%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	3461	100.0%	100.0%	382,985	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	521	68.3%		18,434	20.2%		
	\$100,001–\$250,000	142	18.6%		24,064	26.4%		
	\$250,001–\$1 Million	100	13.1%		48,543	53.3%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	763	100.0%		91,041	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	10 7	93.9%	57.5%	5,727	87.0%	77.5%	98.8%
	Over \$1 Million/ Unknown	7	6.1%	42.5%	856	13.0%	22.5%	1.2%
	TOTAL	11 4	100.0%	100.0%	6,583	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	99	86.8%	85.2%	3,264	49.6%	34.1%	
	\$100,001–\$250,000	11	9.6%	9.8%	1,769	26.9%	31.9%	
	\$250,001–\$500,000	4	3.5%	5.0%	1,550	23.5%	34.1%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	11 4	100.0%	100.0%	6,583	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	95	88.8%		3,083	53.8%		
	\$100,001–\$250,000	9	8.4%		1,444	25.2%		
	\$250,001–\$1 Million	3	2.8%		1,200	21.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	10 7	100.0%		5,727	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	154	74.0%	56.6%	11,491	76.1%	68.7%	97.6%
	Over \$1 Million/ Unknown	54	26.0%	43.4%	3,611	23.9%	31.3%	2.4%
	TOTAL	208	100.0%	100.0%	15,102	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	161	77.4%	78.4%	5,337	35.3%	28.7%	
	\$100,001–\$250,000	36	17.3%	15.1%	5,669	37.5%	37.8%	
	\$250,001–\$500,000	11	5.3%	6.6%	4,096	27.1%	33.5%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	208	100.0%	100.0%	15,102	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	120	77.9%		4,089	35.6%		
	\$100,001–\$250,000	25	16.2%		3,936	34.3%		
	\$250,001–\$1 Million	9	5.8%		3,466	30.2%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	154	100.0%		11,491	100.0%		

ST. LOUIS

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	12	2.0%	1,004	0.7%	6.4%	2.4%	1.1%
Moderate	93	15.2%	14,527	10.0%	15.4%	13.2%	7.4%
Middle	171	28.0%	30,485	21.0%	33.8%	36.7%	30.5%
Upper	333	54.5%	98,797	68.1%	44.2%	47.5%	60.8%
Unknown	2	0.3%	343	0.2%	0.2%	0.2%	0.2%
TOTAL	611	100.0%	145,156	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	0.9%	335	0.3%	6.4%	1.1%	0.5%
Moderate	12	3.4%	1,902	1.9%	15.4%	6.8%	3.6%
Middle	87	24.7%	17,446	17.7%	33.8%	31.4%	24.4%
Upper	249	70.7%	78,459	79.8%	44.2%	60.5%	71.4%
Unknown	1	0.3%	238	0.2%	0.2%	0.1%	0.1%
TOTAL	352	100.0%	98,380	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	33.3%	60	18.7%	6.4%	1.9%	1.2%
Moderate	1	33.3%	72	22.4%	15.4%	9.0%	5.3%
Middle	1	33.3%	189	58.9%	33.8%	32.0%	27.0%
Upper	0	0.0%	0	0.0%	44.2%	56.9%	66.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.4%
TOTAL	3	100.0%	321	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	1	10.0%	15	0.4%	14.3%	16.0%	3.2%
Moderate	5	50.0%	1,832	43.9%	19.7%	35.1%	22.2%
Middle	3	30.0%	763	18.3%	34.0%	30.5%	43.0%
Upper	1	10.0%	1,562	37.4%	31.0%	18.1%	29.9%
Unknown	0	0.0%	0	0.0%	1.0%	0.2%	1.7%
TOTAL	10	100.0%	4,172	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	6.4%	0.9%	0.4%
Moderate	0	0.0%	0	0.0%	15.4%	5.9%	3.1%
Middle	0	0.0%	0	0.0%	33.8%	30.3%	22.7%
Upper	0	0.0%	0	0.0%	44.2%	62.8%	73.7%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	6.4%	1.9%	0.9%
Moderate	0	0.0%	0	0.0%	15.4%	10.5%	5.8%
Middle	2	16.7%	105	6.1%	33.8%	32.4%	21.7%
Upper	10	83.3%	1,608	93.9%	44.2%	55.0%	71.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	12	100.0%	1,713	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	6.4%	8.5%	4.3%
Moderate	0	0.0%	0	0.0%	15.4%	27.1%	25.6%
Middle	0	0.0%	0	0.0%	33.8%	36.9%	31.5%
Upper	0	0.0%	0	0.0%	44.2%	27.5%	38.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	17	1.7%	1,414	0.6%	6.4%	2.0%	1.0%
Moderate	111	11.2%	18,333	7.3%	15.4%	10.5%	6.6%
Middle	264	26.7%	48,988	19.6%	33.8%	34.1%	28.3%
Upper	593	60.0%	180,426	72.2%	44.2%	53.3%	64.0%
Unknown	3	0.3%	581	0.2%	0.2%	0.1%	0.2%
TOTAL	988	100.0%	249,742	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	12	1.5%	1,779	0.8%	6.4%	2.5%	1.2%
Moderate	69	8.9%	10,942	5.2%	15.4%	13.0%	7.4%
Middle	208	26.7%	44,317	21.1%	33.8%	37.3%	31.6%
Upper	485	62.3%	151,750	72.3%	44.2%	47.0%	59.5%
Unknown	4	0.5%	1,010	0.5%	0.2%	0.2%	0.3%
TOTAL	778	100.0%	209,798	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	0.4%	745	0.2%	6.4%	0.7%	0.4%
Moderate	64	4.7%	10,879	3.2%	15.4%	5.7%	3.3%
Middle	313	23.2%	66,900	19.7%	33.8%	30.9%	24.9%
Upper	970	71.7%	260,935	76.9%	44.2%	62.5%	71.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.2%
TOTAL	1,352	100.0%	339,459	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	12.5%	196	20.7%	6.4%	1.7%	1.1%
Moderate	1	12.5%	20	2.1%	15.4%	7.0%	4.2%
Middle	2	25.0%	230	24.3%	33.8%	29.2%	24.6%
Upper	4	50.0%	500	52.9%	44.2%	62.1%	70.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	8	100.0%	946	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	14.3%	17.2%	4.1%
Moderate	5	50.0%	2,226	37.5%	19.7%	29.4%	14.7%
Middle	3	30.0%	1,681	28.3%	34.0%	30.8%	26.2%
Upper	2	20.0%	2,031	34.2%	31.0%	22.1%	51.8%
Unknown	0	0.0%	0	0.0%	1.0%	0.5%	3.1%
TOTAL	10	100.0%	5,938	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	6.4%	0.7%	0.3%
Moderate	0	0.0%	0	0.0%	15.4%	5.5%	3.2%
Middle	0	0.0%	0	0.0%	33.8%	28.1%	19.6%
Upper	0	0.0%	0	0.0%	44.2%	65.7%	77.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	6.4%	2.1%	0.7%
Moderate	1	20.0%	45	6.4%	15.4%	11.7%	5.2%
Middle	1	20.0%	37	5.3%	33.8%	33.4%	21.9%
Upper	3	60.0%	617	88.3%	44.2%	52.7%	72.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	5	100.0%	699	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	6.4%	5.7%	3.0%
Moderate	0	0.0%	0	0.0%	15.4%	23.4%	14.7%
Middle	0	0.0%	0	0.0%	33.8%	41.6%	39.6%
Upper	0	0.0%	0	0.0%	44.2%	29.3%	42.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%

Appendix C (continued)

TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	18	0.8%	2,720	0.5%	6.4%	1.5%	0.8%
Moderate	140	6.5%	24,112	4.3%	15.4%	8.5%	5.0%
Middle	527	24.5%	113,165	20.3%	33.8%	33.1%	27.2%
Upper	1,464	68.0%	415,833	74.7%	44.2%	56.7%	66.8%
Unknown	4	0.2%	1,010	0.2%	0.2%	0.2%	0.3%
TOTAL	2,153	100.0%	556,840	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ (000s)	\$ %		%	\$ %
Low	57	10.1%	9,868	8.9%	6.9%	6.1%	7.1%
Moderate	97	17.2%	13,575	12.2%	16.5%	15.8%	16.3%
Middle	120	21.2%	23,002	20.7%	30.1%	29.3%	27.9%
Upper	277	49.0%	58,554	52.8%	45.4%	47.1%	45.6%
Unknown	14	2.5%	5,993	5.4%	1.1%	1.7%	3.1%
TOTAL	565	100.0%	110,992	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ (000s)	\$ %		%	\$ %
Low	88	5.8%	11,808	5.6%	7.1%	6.2%	6.4%
Moderate	189	12.4%	28,707	13.6%	16.7%	15.5%	16.5%
Middle	326	21.4%	41,737	19.8%	30.1%	29.2%	28.6%
Upper	904	59.3%	123,105	58.3%	45.1%	47.7%	46.0%
Unknown	17	1.1%	5,888	2.8%	1.1%	1.3%	2.5%
TOTAL	1,524	100.0%	211,245	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	#%	\$ (000s)	\$ %		#%	\$ %
Low	0	0.0%	0	0.0%	2.1%	1.6%	0.5%
Moderate	0	0.0%	0	0.0%	6.4%	3.3%	0.6%
Middle	5	55.6%	630	40.0%	41.7%	45.1%	57.4%
Upper	4	44.4%	945	60.0%	49.4%	48.1%	41.1%
Unknown	0	0.0%	0	0.0%	0.3%	1.9%	0.4%
TOTAL	9	100.0%	1,575	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	#%	\$ (000s)	\$ %		#%	\$ %
Low	0	0.0%	0	0.0%	1.9%	1.9%	0.2%
Moderate	0	0.0%	0	0.0%	7.2%	2.9%	2.0%
Middle	7	63.6%	1	57.1%	42.2%	47.8%	54.8%
Upper	4	36.4%	1	42.9%	48.4%	47.1%	43.0%
Unknown	0	0.0%	0	0.0%	0.3%	0.3%	0.0%
TOTAL	11	100.0%	2	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	67	11.0%	6,714	4.6%	21.6%	9.6%	4.6%
Moderate	108	17.7%	16,779	11.6%	16.2%	20.1%	13.9%
Middle	105	17.2%	21,367	14.7%	19.0%	20.9%	19.0%
Upper	305	49.9%	97,332	67.1%	43.2%	33.7%	47.8%
Unknown	26	4.3%	2,964	2.0%	0.0%	15.8%	14.7%
TOTAL	611	100.0%	145,156	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	18	5.1%	2,032	2.1%	21.6%	5.5%	2.7%
Moderate	36	10.2%	5,916	6.0%	16.2%	14.0%	8.7%
Middle	72	20.5%	15,803	16.1%	19.0%	20.4%	16.4%
Upper	198	56.3%	64,812	65.9%	43.2%	42.6%	55.1%
Unknown	28	8.0%	9,817	10.0%	0.0%	17.6%	17.2%
TOTAL	352	100.0%	98,380	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.6%	7.9%	4.4%
Moderate	0	0.0%	0	0.0%	16.2%	15.7%	11.2%
Middle	1	33.3%	189	58.9%	19.0%	22.0%	19.2%
Upper	0	0.0%	0	0.0%	43.2%	49.4%	58.7%
Unknown	2	66.7%	132	41.1%	0.0%	5.0%	6.5%
TOTAL	3	100.0%	321	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.6%	0.5%	0.0%
Moderate	0	0.0%	0	0.0%	16.2%	0.2%	0.0%
Middle	0	0.0%	0	0.0%	19.0%	0.7%	0.1%
Upper	0	0.0%	0	0.0%	43.2%	3.1%	0.6%
Unknown	10	100.0%	4,172	100.0%	0.0%	95.5%	99.2%
TOTAL	10	100.0%	4,172	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.6%	7.8%	4.7%
Moderate	0	0.0%	0	0.0%	16.2%	15.9%	10.5%
Middle	0	0.0%	0	0.0%	19.0%	22.2%	16.3%
Upper	0	0.0%	0	0.0%	43.2%	51.1%	65.5%
Unknown	0	0.0%	0	0.0%	0.0%	3.0%	3.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.6%	9.4%	4.9%
Moderate	1	8.3%	35	2.0%	16.2%	17.6%	11.3%
Middle	2	16.7%	144	8.4%	19.0%	20.8%	13.8%
Upper	7	58.3%	1,264	73.8%	43.2%	45.9%	61.6%
Unknown	2	16.7%	270	15.8%	0.0%	6.2%	8.5%
TOTAL	12	100.0%	1,713	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	21.6%	0.2%	0.1%
Moderate	0	0.0%	0	0.0%	16.2%	0.3%	0.2%
Middle	0	0.0%	0	0.0%	19.0%	0.2%	0.1%
Upper	0	0.0%	0	0.0%	43.2%	0.6%	1.6%
Unknown	0	0.0%	0	0.0%	0.0%	98.7%	98.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	85	8.6%	8,746	3.5%	21.6%	7.6%	3.5%
Moderate	145	14.7%	22,730	9.1%	16.2%	16.8%	10.7%
Middle	180	18.2%	37,503	15.0%	19.0%	20.3%	16.7%
Upper	510	51.6%	163,408	65.4%	43.2%	37.9%	48.7%
Unknown	68	6.9%	17,355	6.9%	0.0%	17.3%	20.4%
TOTAL	988	100.0%	249,742	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	38	4.9%	4,658	2.2%	21.6%	9.9%	5.0%
Moderate	173	22.2%	30,413	14.5%	16.2%	21.7%	15.6%
Middle	156	20.1%	35,124	16.7%	19.0%	19.9%	18.4%
Upper	358	46.0%	124,690	59.4%	43.2%	33.2%	46.5%
Unknown	53	6.8%	14,913	7.1%	0.0%	15.2%	14.5%
TOTAL	778	100.0%	209,798	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	39	2.9%	4,588	1.4%	21.6%	3.9%	1.8%
Moderate	155	11.5%	24,913	7.3%	16.2%	13.0%	8.4%
Middle	284	21.0%	61,239	18.0%	19.0%	19.5%	15.9%
Upper	668	49.4%	193,780	57.1%	43.2%	45.0%	55.5%
Unknown	206	15.2%	54,939	16.2%	0.0%	18.7%	18.3%
TOTAL	1,352	100.0%	339,459	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.6%	6.9%	3.8%
Moderate	1	12.5%	20	2.1%	16.2%	13.3%	9.8%
Middle	1	12.5%	20	2.1%	19.0%	21.1%	17.9%
Upper	1	12.5%	250	26.4%	43.2%	53.7%	60.7%
Unknown	5	62.5%	656	69.3%	0.0%	5.0%	7.8%
TOTAL	8	100.0%	946	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.2%	0.5%	0.0%
Middle	0	0.0%	0	0.0%	19.0%	0.2%	0.0%
Upper	1	10.0%	806	13.6%	43.2%	3.7%	0.7%
Unknown	9	90.0%	5,132	86.4%	0.0%	95.6%	99.2%
TOTAL	10	100.0%	5,938	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.6%	7.1%	3.8%
Moderate	0	0.0%	0	0.0%	16.2%	14.5%	9.7%
Middle	0	0.0%	0	0.0%	19.0%	19.0%	14.9%
Upper	0	0.0%	0	0.0%	43.2%	55.9%	68.4%
Unknown	0	0.0%	0	0.0%	0.0%	3.5%	3.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.6%	10.0%	4.5%
Moderate	0	0.0%	0	0.0%	16.2%	17.8%	9.3%
Middle	1	20.0%	50	7.2%	19.0%	18.7%	11.0%
Upper	2	40.0%	151	21.6%	43.2%	47.2%	66.4%
Unknown	2	40.0%	498	71.2%	0.0%	6.3%	8.7%
TOTAL	5	100.0%	699	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	21.6%	0.1%	0.1%
Moderate	0	0.0%	0	0.0%	16.2%	0.1%	0.1%
Middle	0	0.0%	0	0.0%	19.0%	0.1%	0.0%
Upper	0	0.0%	0	0.0%	43.2%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	99.7%	99.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	77	3.6%	9,246	1.7%	21.6%	5.8%	2.8%
Moderate	329	15.3%	55,346	9.9%	16.2%	15.5%	10.4%
Middle	442	20.5%	96,433	17.3%	19.0%	19.1%	16.0%
Upper	1,030	47.8%	319,677	57.4%	43.2%	40.6%	50.7%
Unknown	275	12.8%	76,138	13.7%	0.0%	19.0%	20.1%
TOTAL	2,153	100.0%	556,840	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	277	49.0%	47.2%	46,853	42.2%	29.5%	89.2%
	Over \$1 Million/ Unknown	288	51.0%	52.8%	64,139	57.8%	70.5%	10.8%
	TOTAL	565	100.0%	100.0%	110,992	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	300	53.1%	91.2%	8,312	7.5%	300	
	\$100,001–\$250,000	116	20.5%	4.0%	20,952	18.9%	116	
	\$250,001–\$1 Million	149	26.4%	4.7%	81,728	73.6%	149	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0	
	TOTAL	565	100.0%	100.0%	110,992	100.0%	565	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	159	57.4%		3,720	7.9%		
	\$100,001–\$250,000	55	19.9%		10,155	21.7%		
	\$250,001–\$1 Million	63	22.7%		32,978	70.4%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	277	100.0%		46,853	100.0%		

Appendix C (continued)

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	323	21.2%	40.1%	53,835	25.5%	23.4%	89.5%
	Over \$1 Million/ Unknown	1,201	78.8%	59.9%	157,410	74.5%	76.6%	10.5%
	TOTAL	1,524	100.0%	100.0%	211,245	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	985	64.6%	83.8%	30,269	14.3%	24.0%	
	\$100,001–\$250,000	268	17.6%	8.5%	46,379	22.0%	19.8%	
	\$250,001–\$1 Million	271	17.8%	7.8%	134,597	63.7%	56.2%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	1,524	100.0%	100.0%	211,245	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	179	55.4%		4,604	8.6%		
	\$100,001–\$250,000	63	19.5%		10,831	20.1%		
	\$250,001–\$1 Million	81	25.1%		38,400	71.3%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	323	100.0%		53,835	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	8	88.9%	56.6%	1,108	70.3%	65.0%	97.0%
	Over \$1 Million/ Unknown	1	11.1%	43.4%	467	29.7%	35.0%	3.0%
	TOTAL	9	100.0%	100.0%	1,575	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	5	55.6%	84.7%	221	14.0%	5	
	\$100,001–\$250,000	1	11.1%	9.0%	200	12.7%	1	
	\$250,001–\$500,000	3	33.3%	6.3%	1,154	73.3%	3	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0	
	TOTAL	9	100.0%	100.0%	1575	100.0%	9	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	5	62.5%		221	19.9%		
	\$100,001–\$250,000	1	12.5%		200	18.1%		
	\$250,001–\$1 Million	2	25.0%		687	62.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	8	100.0%		1,108	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	8	72.7%	51.9%	1,230	63.7%	8	97.1%
	Over \$1 Million/ Unknown	3	27.3%	48.1%	701	36.3%	3	2.9%
	TOTAL	11	100.0%	100.0%	1,931	100.0%	11	100.0%
Loan Size	\$100,000 or Less	5	45.5%	74.2%	241	12.5%	5	
	\$100,001–\$250,000	3	27.3%	17.2%	654	33.9%	3	
	\$250,001–\$500,000	3	27.3%	8.6%	1,036	53.7%	3	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0	
	TOTAL	11	100.0%	100.0%	1,931	100.0%	11	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	4	50.0%		213	17.3%		
	\$100,001–\$250,000	2	25.0%		448	36.4%		
	\$250,001–\$1 Million	2	25.0%		569	46.3%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	8	100.0%		1,230	100.0%		

OKLAHOMA

Tulsa

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	1	2.9%	264	3.1%	3.2%	0.8%	0.4%
Moderate	8	23.5%	851	10.1%	19.4%	15.3%	9.6%
Middle	7	20.6%	3,511	41.8%	42.2%	41.6%	38.5%
Upper	18	52.9%	3,777	44.9%	35.3%	42.3%	51.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	34	100.0%	8,403	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	3.2%	0.7%	0.3%
Moderate	4	22.2%	293	9.0%	19.4%	11.5%	6.8%
Middle	8	44.4%	1,454	44.9%	42.2%	38.8%	33.5%
Upper	6	33.3%	1,491	46.0%	35.3%	48.9%	59.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	18	100.0%	3,238	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	3.2%	1.6%	0.9%
Moderate	0	0.0%	0	0.0%	19.4%	13.6%	10.2%
Middle	1	50.0%	30	23.1%	42.2%	37.9%	34.9%
Upper	1	50.0%	100	76.9%	35.3%	46.9%	54.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	130	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	9.8%	9.7%	3.8%
Moderate	1	50.0%	297	80.9%	36.9%	41.8%	17.6%
Middle	1	50.0%	70	19.1%	31.7%	31.5%	59.6%
Upper	0	0.0%	0	0.0%	21.5%	17.0%	19.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	367	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	3.2%	0.8%	0.1%
Moderate	0	0.0%	0	0.0%	19.4%	10.8%	6.2%
Middle	0	0.0%	0	0.0%	42.2%	30.3%	23.4%
Upper	0	0.0%	0	0.0%	35.3%	58.2%	70.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3.2%	1.3%	0.9%
Moderate	0	0.0%	0	0.0%	19.4%	15.5%	10.1%
Middle	0	0.0%	0	0.0%	42.2%	40.2%	38.5%
Upper	0	0.0%	0	0.0%	35.3%	42.9%	50.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	3.2%	2.1%	2.1%
Moderate	0	0.0%	0	0.0%	19.4%	21.3%	12.0%
Middle	0	0.0%	0	0.0%	42.2%	43.0%	39.8%
Upper	0	0.0%	0	0.0%	35.3%	33.6%	46.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans							
Low	1	1.8%	264	2.2%	3.2%	0.9%	0.7%
Moderate	13	23.2%	1,441	11.9%	19.4%	14.6%	9.8%
Middle	17	30.4%	5,065	41.7%	42.2%	40.5%	39.3%
Upper	25	44.6%	5,368	44.2%	35.3%	43.9%	50.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	56	100.0%	12,138	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	3.2%	1.1%	0.4%
Moderate	5	12.8%	276	2.9%	19.4%	13.8%	8.7%
Middle	16	41.0%	2,712	28.4%	42.2%	40.0%	35.6%
Upper	18	46.2%	6,567	68.7%	35.3%	45.2%	55.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	39	100.0%	9,555	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.7%	50	0.4%	3.2%	0.4%	0.2%
Moderate	6	10.0%	570	4.3%	19.4%	8.4%	5.1%
Middle	21	35.0%	3,941	29.9%	42.2%	35.8%	31.1%
Upper	32	53.3%	8,626	65.4%	35.3%	55.5%	63.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	60	100.0%	13,187	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	3.2%	1.1%	0.5%
Moderate	1	50.0%	71	33.0%	19.4%	14.4%	11.5%
Middle	0	0.0%	0	0.0%	42.2%	35.4%	31.4%
Upper	1	50.0%	144	67.0%	35.3%	49.0%	56.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	215	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	1	50.0%	80	1.4%	9.8%	12.8%	4.3%
Moderate	0	0.0%	0	0.0%	36.9%	43.9%	48.9%
Middle	1	50.0%	5,495	98.6%	31.7%	35.1%	39.4%
Upper	0	0.0%	0	0.0%	21.5%	8.1%	7.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	5,575	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	3.2%	0.4%	0.0%
Moderate	0	0.0%	0	0.0%	19.4%	8.3%	4.3%
Middle	0	0.0%	0	0.0%	42.2%	30.9%	25.4%
Upper	0	0.0%	0	0.0%	35.3%	60.4%	70.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3.2%	1.1%	0.5%
Moderate	0	0.0%	0	0.0%	19.4%	14.7%	8.3%
Middle	0	0.0%	0	0.0%	42.2%	40.8%	30.6%
Upper	0	0.0%	0	0.0%	35.3%	43.4%	60.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	3.2%	1.4%	0.6%
Moderate	0	0.0%	0	0.0%	19.4%	20.3%	12.0%
Middle	0	0.0%	0	0.0%	42.2%	45.0%	38.7%
Upper	0	0.0%	0	0.0%	35.3%	33.3%	48.8%

Appendix C (continued)

Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	2	1.9%	130	0.5%	3.2%	0.8%	0.5%
Moderate	12	11.7%	917	3.2%	19.4%	11.8%	8.6%
Middle	38	36.9%	12,148	42.6%	42.2%	38.1%	33.7%
Upper	51	49.5%	15,337	53.8%	35.3%	49.3%	57.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	103	100.0%	28,532	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	12	3.5%	1,199	2.1%	3.4%	2.7%	3.8%
Moderate	82	24.2%	10,093	17.9%	22.5%	20.1%	23.7%
Middle	118	34.8%	25,404	45.2%	38.5%	38.5%	40.7%
Upper	127	37.5%	19,563	34.8%	35.6%	36.1%	31.1%
Unknown	0	0.0%	0	0.0%	0.0%	2.6%	0.7%
TOTAL	339	100.0%	56,259	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	17	3.4%	1,750	2.5%	3.3%	2.6%	3.3%
Moderate	126	24.9%	14,901	21.5%	22.5%	20.9%	23.6%
Middle	190	37.5%	28,795	41.5%	38.5%	39.8%	41.9%
Upper	173	34.2%	23,858	34.4%	35.6%	36.1%	30.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.6%	0.2%
TOTAL	506	100.0%	69,304	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		#	\$ %
Low	0	0.0%	0	0.0%	0.5%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	12.1%	7.4%	4.6%
Middle	1	33.3%	57	36.3%	50.8%	64.7%	74.2%
Upper	2	66.7%	100	63.7%	36.6%	26.6%	21.1%
Unknown	0	0.0%	0	0.0%	0.0%	1.4%	0.2%
TOTAL	3	100.0%	157	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		#	\$ %
Low	0	0.0%	0	0.0%	1.3%	0.3%	0.0%
Moderate	0	0.0%	0	0.0%	12.1%	8.2%	6.1%
Middle	1	25.0%	32	13.2%	49.8%	65.4%	74.9%
Upper	3	75.0%	210	86.8%	36.7%	25.2%	18.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.9%	0.1%
TOTAL	4	100.0%	242	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	21.4%	7.0%	3.8%
Moderate	2	5.9%	432	5.1%	17.5%	20.1%	14.5%
Middle	6	17.6%	859	10.2%	20.1%	21.0%	18.9%
Upper	10	29.4%	2,562	30.5%	41.0%	34.4%	47.6%
Unknown	16	47.1%	4,550	54.1%	0.0%	17.5%	15.1%
TOTAL	34	100.0%	8,403	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.4%	6.3%	2.9%
Moderate	1	5.6%	102	3.2%	17.5%	12.8%	7.7%
Middle	0	0.0%	0	0.0%	20.1%	18.6%	13.5%
Upper	3	16.7%	576	17.8%	41.0%	44.2%	55.1%
Unknown	14	77.8%	2,560	79.1%	0.0%	18.1%	20.8%
TOTAL	18	100.0%	3,238	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.4%	6.1%	4.4%
Moderate	0	0.0%	0	0.0%	17.5%	12.9%	9.0%
Middle	0	0.0%	0	0.0%	20.1%	19.7%	14.8%
Upper	2	100.0%	130	100.0%	41.0%	50.5%	57.4%
Unknown	0	0.0%	0	0.0%	0.0%	10.9%	14.5%
TOTAL	2	100.0%	130	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.4%	0.6%	0.0%
Moderate	0	0.0%	0	0.0%	17.5%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.1%	2.4%	0.1%
Upper	0	0.0%	0	0.0%	41.0%	4.8%	0.4%
Unknown	2	100.0%	367	100.0%	0.0%	92.1%	99.4%
TOTAL	2	100.0%	367	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.4%	4.7%	2.8%
Moderate	0	0.0%	0	0.0%	17.5%	13.7%	9.4%
Middle	0	0.0%	0	0.0%	20.1%	17.1%	13.8%
Upper	0	0.0%	0	0.0%	41.0%	58.7%	68.6%
Unknown	0	0.0%	0	0.0%	0.0%	5.8%	5.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.4%	10.2%	7.3%
Moderate	0	0.0%	0	0.0%	17.5%	20.6%	15.6%
Middle	0	0.0%	0	0.0%	20.1%	15.0%	10.1%
Upper	0	0.0%	0	0.0%	41.0%	47.2%	58.2%
Unknown	0	0.0%	0	0.0%	0.0%	7.0%	8.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	21.4%	0.4%	0.2%
Moderate	0	0.0%	0	0.0%	17.5%	0.6%	0.5%
Middle	0	0.0%	0	0.0%	20.1%	0.3%	0.3%
Upper	0	0.0%	0	0.0%	41.0%	0.8%	1.6%
Unknown	0	0.0%	0	0.0%	0.0%	97.9%	97.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	21.4%	6.6%	3.2%
Moderate	3	5.4%	534	4.4%	17.5%	17.3%	11.1%
Middle	6	10.7%	859	7.1%	20.1%	19.6%	15.3%
Upper	15	26.8%	3,268	26.9%	41.0%	36.9%	44.1%
Unknown	32	57.1%	7,477	61.6%	0.0%	19.7%	26.3%
TOTAL	56	100.0%	12,138	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	1	2.6%	119	1.2%	21.4%	5.3%	2.8%
Moderate	3	7.7%	374	3.9%	17.5%	19.6%	14.1%
Middle	3	7.7%	586	6.1%	20.1%	20.7%	18.9%
Upper	18	46.2%	4,607	48.2%	41.0%	37.5%	49.2%
Unknown	14	35.9%	3,869	40.5%	0.0%	17.0%	15.0%
TOTAL	39	100.0%	9,555	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.4%	2.9%	1.4%
Moderate	6	10.0%	755	5.7%	17.5%	10.5%	6.2%
Middle	7	11.7%	1,332	10.1%	20.1%	16.5%	12.3%
Upper	28	46.7%	6,891	52.3%	41.0%	48.3%	58.1%
Unknown	19	31.7%	4,209	31.9%	0.0%	21.8%	21.9%
TOTAL	60	100.0%	13,187	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.4%	5.0%	3.2%
Moderate	0	0.0%	0	0.0%	17.5%	12.5%	9.5%
Middle	0	0.0%	0	0.0%	20.1%	18.2%	14.8%
Upper	0	0.0%	0	0.0%	41.0%	55.0%	61.2%
Unknown	2	100.0%	215	100.0%	0.0%	9.2%	11.4%
TOTAL	2	100.0%	215	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	1	50.0%	80	1.4%	21.4%	0.7%	0.0%
Moderate	0	0.0%	0	0.0%	17.5%	0.7%	0.2%
Middle	0	0.0%	0	0.0%	20.1%	1.4%	0.2%
Upper	0	0.0%	0	0.0%	41.0%	9.5%	1.9%
Unknown	1	50.0%	5,495	98.6%	0.0%	87.8%	97.7%
TOTAL	2	100.0%	5,575	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.4%	5.0%	2.1%
Moderate	0	0.0%	0	0.0%	17.5%	11.2%	5.9%
Middle	0	0.0%	0	0.0%	20.1%	15.8%	11.1%
Upper	0	0.0%	0	0.0%	41.0%	60.4%	71.5%
Unknown	0	0.0%	0	0.0%	0.0%	7.6%	9.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.4%	5.3%	1.9%
Moderate	0	0.0%	0	0.0%	17.5%	21.1%	16.8%
Middle	0	0.0%	0	0.0%	20.1%	12.8%	5.9%
Upper	0	0.0%	0	0.0%	41.0%	49.1%	63.8%
Unknown	0	0.0%	0	0.0%	0.0%	11.7%	11.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	21.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.5%	0.2%	0.2%
Middle	0	0.0%	0	0.0%	20.1%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	41.0%	0.2%	0.2%
Unknown	0	0.0%	0	0.0%	0.0%	99.6%	99.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	2	1.9%	199	0.7%	21.4%	4.1%	2.0%
Moderate	9	8.7%	1,129	4.0%	17.5%	14.8%	9.8%
Middle	10	9.7%	1,918	6.7%	20.1%	18.0%	14.9%
Upper	46	44.7%	11,498	40.3%	41.0%	41.6%	50.8%
Unknown	36	35.0%	13,788	48.3%	0.0%	21.6%	22.5%
TOTAL	103	100.0%	28,532	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	191	56.3%	45.3%	28,521	50.7%	33.8%	90.7%
	Over \$1 Million/ Unknown	148	43.7%	54.7%	27,738	49.3%	66.2%	9.3%
	TOTAL	339	100.0%	100.0%	56,259	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	199	58.7%	92.3%	8,034	14.3%	32.8%	
	\$100,001–\$250,000	75	22.1%	3.8%	13,706	24.4%	16.0%	
	\$250,001–\$1 Million	65	19.2%	3.9%	34,519	61.4%	51.2%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	339	100.0%	100.0%	56,259	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	118	61.8%		4,810	16.9%		
	\$100,001–\$250,000	43	22.5%		7,773	27.3%		
	\$250,001–\$1 Million	30	15.7%		15,938	55.9%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	191	100.0%		28,521	100.0%		

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	159	31.4%	33.3%	21,211	30.6%	23.1%	90.9%
	Over \$1 Million/ Unknown	347	68.6%	66.7%	48,093	69.4%	76.9%	9.1%
	TOTAL	506	100.0%	100.0%	69,304	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	334	66.0%	87.3%	12,458	18.0%	28.6%	
	\$100,001–\$250,000	90	17.8%	6.5%	15,758	22.7%	17.7%	
	\$250,001–\$1 Million	82	16.2%	6.2%	41,088	59.3%	53.7%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	506	100.0%	100.0%	69,304	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	106	66.7%		4,269	20.1%		
	\$100,001–\$250,000	31	19.5%		5,635	26.6%		
	\$250,001–\$1 Million	22	13.8%		11,307	53.3%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	159	100.0%		21,211	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	2	66.7%	80.8%	100	63.7%	88.3%	97.0%
	Over \$1 Million/ Unknown	1	33.3%	19.2%	57	36.3%	11.7%	3.0%
	TOTAL	3	100.0%	100.0%	157	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	81.9%	0	0.0%	31.8%	
	\$100,001–\$250,000	0	0.0%	11.0%	0	0.0%	27.6%	
	\$250,001–\$500,000	0	0.0%	7.1%	0	0.0%	40.5%	
	Over \$500,000	3	100.0%	0.0%	157	100.0%	0.0%	
	TOTAL	3	100.0%	100.0%	157	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	2	100.0%		100	100.0%		
	TOTAL	2	100.0%		100	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	2	50.0%	78.3%	200	82.6%	85.7%	98.5%
	Over \$1 Million/ Unknown	2	50.0%	21.7%	42	17.4%	14.3%	1.5%
	TOTAL	4	100.0%	100.0%	242	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	3	75.0%	80.6%	92	38.0%	34.4%	
	\$100,001–\$250,000	1	25.0%	12.9%	150	62.0%	32.8%	
	\$250,001–\$500,000	0	0.0%	6.5%	0	0.0%	32.9%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	4	100.0%	100.0%	242	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	1	50.0%		50	25.0%		
	\$100,001–\$250,000	1	50.0%		150	75.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	2	100.0%		200	100.0%		

Oklahoma City

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	6.1%	3.6%	2.0%
Moderate	5	17.2%	567	10.1%	25.8%	19.1%	11.9%
Middle	6	20.7%	598	10.6%	32.5%	30.8%	25.5%
Upper	18	62.1%	4,457	79.3%	35.4%	46.2%	60.3%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.3%
TOTAL	29	100.0%	5,622	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	4.5%	107	3.4%	6.1%	3.0%	1.5%
Moderate	9	40.9%	787	24.7%	25.8%	17.5%	9.5%
Middle	6	27.3%	995	31.2%	32.5%	30.0%	22.7%
Upper	6	27.3%	1,296	40.7%	35.4%	49.4%	66.0%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.4%
TOTAL	22	100.0%	3,185	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	6.1%	4.0%	2.8%
Moderate	0	0.0%	0	0.0%	25.8%	18.8%	13.3%
Middle	1	100.0%	20	100.0%	32.5%	29.2%	22.7%
Upper	0	0.0%	0	0.0%	35.4%	47.7%	60.9%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.3%
TOTAL	1	100.0%	20	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	11.4%	17.6%	8.2%
Moderate	3	100.0%	9,846	100.0%	43.7%	47.6%	44.2%
Middle	0	0.0%	0	0.0%	28.7%	20.9%	32.9%
Upper	0	0.0%	0	0.0%	14.4%	12.8%	14.1%
Unknown	0	0.0%	0	0.0%	1.8%	1.1%	0.5%
TOTAL	3	100.0%	9,846	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	6.1%	1.5%	0.8%
Moderate	0	0.0%	0	0.0%	25.8%	11.2%	6.2%
Middle	0	0.0%	0	0.0%	32.5%	26.0%	15.2%
Upper	0	0.0%	0	0.0%	35.4%	61.1%	72.6%
Unknown	0	0.0%	0	0.0%	0.1%	0.3%	5.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	6.1%	2.6%	1.1%
Moderate	0	0.0%	0	0.0%	25.8%	17.5%	10.0%
Middle	0	0.0%	0	0.0%	32.5%	31.5%	17.9%
Upper	0	0.0%	0	0.0%	35.4%	48.5%	71.0%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	6.1%	4.9%	2.6%
Moderate	0	0.0%	0	0.0%	25.8%	30.5%	17.9%
Middle	0	0.0%	0	0.0%	32.5%	33.4%	29.1%
Upper	0	0.0%	0	0.0%	35.4%	31.2%	50.3%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	1	1.8%	107	0.6%	6.1%	3.6%	2.4%
Moderate	17	30.9%	11,200	60.0%	25.8%	19.2%	14.2%
Middle	13	23.6%	1,613	8.6%	32.5%	30.5%	25.4%
Upper	24	43.6%	5,753	30.8%	35.4%	46.5%	57.7%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.4%
TOTAL	55	100.0%	18,673	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	1	4.0%	213	3.3%	6.1%	3.6%	2.0%
Moderate	6	24.0%	695	10.9%	25.8%	18.9%	12.0%
Middle	4	16.0%	373	5.8%	32.5%	28.8%	23.9%
Upper	14	56.0%	5,104	79.9%	35.4%	48.6%	61.8%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.3%
TOTAL	25	100.0%	6,385	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	9	25.7%	759	14.9%	6.1%	1.8%	0.8%
Moderate	9	25.7%	644	12.7%	25.8%	12.0%	6.9%
Middle	6	17.1%	784	15.4%	32.5%	26.2%	19.6%
Upper	11	31.4%	2,903	57.0%	35.4%	59.8%	72.2%
Unknown	0	0.0%	0	0.0%	0.1%	0.3%	0.4%
TOTAL	35	100.0%	5,090	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	6.1%	5.1%	3.6%
Moderate	1	100.0%	29	100.0%	25.8%	16.8%	12.0%
Middle	0	0.0%	0	0.0%	32.5%	33.1%	24.4%
Upper	0	0.0%	0	0.0%	35.4%	44.8%	59.3%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.7%
TOTAL	1	100.0%	29	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	11.4%	13.8%	5.7%
Moderate	0	0.0%	0	0.0%	43.7%	50.0%	32.1%
Middle	1	33.3%	2,360	8.2%	28.7%	20.5%	29.4%
Upper	2	66.7%	26,435	91.8%	14.4%	14.7%	32.0%
Unknown	0	0.0%	0	0.0%	1.8%	0.9%	0.8%
TOTAL	3	100.0%	28,795	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	6.1%	2.4%	0.9%
Moderate	0	0.0%	0	0.0%	25.8%	15.5%	7.7%
Middle	0	0.0%	0	0.0%	32.5%	24.2%	18.0%
Upper	0	0.0%	0	0.0%	35.4%	57.9%	73.4%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	6.1%	3.1%	1.2%
Moderate	0	0.0%	0	0.0%	25.8%	17.6%	9.7%
Middle	0	0.0%	0	0.0%	32.5%	29.1%	18.8%
Upper	0	0.0%	0	0.0%	35.4%	50.3%	70.3%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	6.1%	6.0%	3.1%
Moderate	0	0.0%	0	0.0%	25.8%	27.8%	16.2%
Middle	0	0.0%	0	0.0%	32.5%	34.8%	31.3%
Upper	0	0.0%	0	0.0%	35.4%	31.3%	49.1%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	10	15.6%	972	2.4%	6.1%	3.0%	1.8%
Moderate	16	25.0%	1,368	3.4%	25.8%	16.4%	11.4%
Middle	11	17.2%	3,517	8.7%	32.5%	27.9%	22.6%
Upper	27	42.2%	34,442	85.5%	35.4%	52.5%	63.9%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.4%
TOTAL	64	100.0%	40,299	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	15	12.5%	2,519	10.5%	6.6%	6.3%	8.1%
Moderate	30	25.0%	5,189	21.6%	26.7%	22.8%	24.1%
Middle	26	21.7%	5,157	21.5%	30.5%	29.3%	30.0%
Upper	49	40.8%	11,126	46.4%	31.6%	35.2%	31.2%
Unknown	0	0.0%	0	0.0%	4.5%	6.3%	6.5%
TOTAL	120	100.0%	23,991	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	10	5.7%	2,098	7.2%	6.7%	6.3%	7.6%
Moderate	35	19.9%	4,534	15.5%	26.9%	24.3%	27.0%
Middle	47	26.7%	8,333	28.5%	30.4%	29.2%	28.7%
Upper	81	46.0%	14,133	48.3%	31.4%	35.9%	30.2%
Unknown	3	1.7%	158	0.5%	4.6%	4.2%	6.5%
TOTAL	176	100.0%	29,256	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	3.9%	0.5%	2.8%
Moderate	0	0.0%	0	0.0%	15.0%	7.4%	5.8%
Middle	0	0.0%	0	0.0%	27.2%	34.5%	27.9%
Upper	0	0.0%	0	0.0%	53.2%	54.7%	51.0%
Unknown	0	0.0%	0	0.0%	0.7%	3.0%	12.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	4.1%	1.8%	2.4%
Moderate	0	0.0%	0	0.0%	15.0%	10.8%	7.7%
Middle	0	0.0%	0	0.0%	26.2%	44.6%	41.9%
Upper	0	0.0%	0	0.0%	53.9%	42.2%	42.5%
Unknown	0	0.0%	0	0.0%	0.8%	0.6%	5.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	24.7%	7.4%	4.0%
Moderate	0	0.0%	0	0.0%	17.9%	19.1%	14.3%
Middle	0	0.0%	0	0.0%	19.1%	18.5%	17.4%
Upper	3	10.3%	392	7.0%	38.3%	33.5%	46.2%
Unknown	26	89.7%	5,230	93.0%	0.0%	21.5%	18.0%
TOTAL	29	100.0%	5,622	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	24.7%	6.8%	2.8%
Moderate	0	0.0%	0	0.0%	17.9%	12.8%	7.3%
Middle	0	0.0%	0	0.0%	19.1%	15.3%	11.3%
Upper	2	9.1%	251	7.9%	38.3%	37.5%	49.1%
Unknown	20	90.9%	2,934	92.1%	0.0%	27.6%	29.5%
TOTAL	22	100.0%	3,185	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	24.7%	6.6%	3.6%
Moderate	0	0.0%	0	0.0%	17.9%	16.4%	9.7%
Middle	0	0.0%	0	0.0%	19.1%	17.2%	13.1%
Upper	0	0.0%	0	0.0%	38.3%	49.2%	56.2%
Unknown	1	100.0%	20	100.0%	0.0%	10.6%	17.4%
TOTAL	1	100.0%	20	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	24.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	0.5%	0.1%
Middle	0	0.0%	0	0.0%	19.1%	2.1%	0.3%
Upper	0	0.0%	0	0.0%	38.3%	6.4%	1.7%
Unknown	3	100.0%	9,846	100.0%	0.0%	90.9%	97.9%
TOTAL	3	100.0%	9,846	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	24.7%	5.3%	2.3%
Moderate	0	0.0%	0	0.0%	17.9%	10.3%	5.0%
Middle	0	0.0%	0	0.0%	19.1%	23.9%	13.8%
Upper	0	0.0%	0	0.0%	38.3%	56.6%	69.9%
Unknown	0	0.0%	0	0.0%	0.0%	3.8%	9.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	24.7%	9.8%	5.0%
Moderate	0	0.0%	0	0.0%	17.9%	18.4%	10.1%
Middle	0	0.0%	0	0.0%	19.1%	19.8%	13.7%
Upper	0	0.0%	0	0.0%	38.3%	44.8%	54.5%
Unknown	0	0.0%	0	0.0%	0.0%	7.2%	16.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	24.7%	0.9%	0.3%
Moderate	0	0.0%	0	0.0%	17.9%	0.5%	0.5%
Middle	0	0.0%	0	0.0%	19.1%	0.4%	0.3%
Upper	0	0.0%	0	0.0%	38.3%	0.5%	1.5%
Unknown	0	0.0%	0	0.0%	0.0%	97.8%	97.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	24.7%	7.0%	3.3%
Moderate	0	0.0%	0	0.0%	17.9%	16.6%	10.9%
Middle	0	0.0%	0	0.0%	19.1%	17.0%	14.0%
Upper	5	9.1%	643	3.4%	38.3%	34.3%	42.5%
Unknown	50	90.9%	18,030	96.6%	0.0%	25.2%	29.3%
TOTAL	55	100.0%	18,673	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	2	8.0%	189	3.0%	24.7%	6.9%	3.8%
Moderate	0	0.0%	0	0.0%	17.9%	18.7%	13.9%
Middle	0	0.0%	0	0.0%	19.1%	18.2%	17.3%
Upper	13	52.0%	3,419	53.5%	38.3%	33.8%	45.9%
Unknown	10	40.0%	2,777	43.5%	0.0%	22.4%	19.0%
TOTAL	25	100.0%	6,385	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	24.7%	3.7%	1.5%
Moderate	1	2.9%	160	3.1%	17.9%	10.7%	6.1%
Middle	0	0.0%	0	0.0%	19.1%	14.8%	11.1%
Upper	5	14.3%	1,198	23.5%	38.3%	43.4%	53.7%
Unknown	29	82.9%	3,732	73.3%	0.0%	27.5%	27.6%
TOTAL	35	100.0%	5,090	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	24.7%	7.3%	3.6%
Moderate	0	0.0%	0	0.0%	17.9%	13.8%	9.8%
Middle	0	0.0%	0	0.0%	19.1%	19.8%	13.2%
Upper	0	0.0%	0	0.0%	38.3%	46.1%	58.8%
Unknown	1	100.0%	29	100.0%	0.0%	13.1%	14.7%
TOTAL	1	100.0%	29	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	24.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	0.4%	0.0%
Middle	0	0.0%	0	0.0%	19.1%	0.9%	0.1%
Upper	0	0.0%	0	0.0%	38.3%	4.5%	1.1%
Unknown	3	100.0%	28,795	100.0%	0.0%	94.2%	98.8%
TOTAL	3	100.0%	28,795	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	24.7%	7.1%	3.5%
Moderate	0	0.0%	0	0.0%	17.9%	15.1%	7.4%
Middle	0	0.0%	0	0.0%	19.1%	19.0%	9.6%
Upper	0	0.0%	0	0.0%	38.3%	54.4%	69.7%
Unknown	0	0.0%	0	0.0%	0.0%	4.4%	9.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	24.7%	7.8%	3.3%
Moderate	0	0.0%	0	0.0%	17.9%	18.2%	10.1%
Middle	0	0.0%	0	0.0%	19.1%	18.7%	13.6%
Upper	0	0.0%	0	0.0%	38.3%	46.1%	64.9%
Unknown	0	0.0%	0	0.0%	0.0%	9.2%	8.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	24.7%	0.1%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	0.2%	0.2%
Middle	0	0.0%	0	0.0%	19.1%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	38.3%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	99.7%	99.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	2	3.1%	189	0.5%	24.7%	5.3%	2.5%
Moderate	1	1.6%	160	0.4%	17.9%	14.4%	9.3%
Middle	0	0.0%	0	0.0%	19.1%	16.0%	13.0%
Upper	18	28.1%	4,617	11.5%	38.3%	36.9%	45.3%
Unknown	43	67.2%	35,333	87.7%	0.0%	27.5%	29.9%
TOTAL	64	100.0%	40,299	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	92	76.7%	44.2%	16,987	70.8%	39.0%	90.5%
	Over \$1 Million/ Unknown	28	23.3%	55.8%	7,004	29.2%	61.0%	9.5%
	TOTAL	120	100.0%	100.0%	23,991	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	55	45.8%	92.1%	2,598	10.8%	33.1%	
	\$100,001–\$250,000	30	25.0%	3.7%	4,681	19.5%	14.9%	
	\$250,001–\$1 Million	35	29.2%	4.2%	16,712	69.7%	52.0%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	120	100.0%	100.0%	23,991	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	47	51.1%		2,369	13.9%		
	\$100,001–\$250,000	22	23.9%		3,162	18.6%		
	\$250,001–\$1 Million	23	25.0%		11,456	67.4%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	92	100.0%		16,987	100.0%		

Appendix C (continued)

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	84	47.7%	28.8%	16,561	56.6%	24.6%	90.5%
	Over \$1 Million/ Unknown	92	52.3%	71.2%	12,695	43.4%	75.4%	9.5%
	TOTAL	176	100.0%	100.0%	29,256	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	90	51.1%	85.5%	3,887	13.3%	28.2%	
	\$100,001–\$250,000	51	29.0%	7.8%	8,811	30.1%	19.4%	
	\$250,001–\$1 Million	35	19.9%	6.7%	16,558	56.6%	52.4%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	176	100.0%	100.0%	29,256	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	41	48.8%		2,002	12.1%		
	\$100,001–\$250,000	21	25.0%		3,541	21.4%		
	\$250,001–\$1 Million	22	26.2%		11,018	66.5%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	84	100.0%		16,561	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	0	0.0%	65.0%	0	0.0%	69.7%	97.0%
	Over \$1 Million/ Unknown	0	0.0%	35.0%	0	0.0%	30.3%	3.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	92.6%	0	0.0%	48.5%	
	\$100,001–\$250,000	0	0.0%	4.9%	0	0.0%	24.6%	
	\$250,001–\$500,000	0	0.0%	2.5%	0	0.0%	26.9%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	0	100.0%		100	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	0	0.0%	67.5%	0	0.0%	76.4%	97.5%
	Over \$1 Million/ Unknown	0	0.0%	32.5%	0	0.0%	23.6%	2.5%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	88.6%	0	0.0%	37.0%	
	\$100,001–\$250,000	0	0.0%	4.8%	0	0.0%	16.0%	
	\$250,001–\$500,000	0	0.0%	6.6%	0	0.0%	47.1%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	0	0.0%		0	0.0%		

COLORADO

Colorado Springs

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	4	1.8%	947	1.4%	3.3%	2.8%	2.0%
Moderate	39	17.8%	9,599	14.5%	20.7%	18.9%	15.0%
Middle	102	46.6%	28,563	43.1%	42.2%	45.5%	42.3%
Upper	74	33.8%	27,188	41.0%	33.8%	32.8%	40.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	219	100.0%	66,297	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	3.4%	678	2.5%	3.3%	2.2%	1.5%
Moderate	15	17.2%	3,920	14.4%	20.7%	17.1%	12.9%
Middle	31	35.6%	8,596	31.5%	42.2%	44.8%	40.9%
Upper	38	43.7%	14,067	51.6%	33.8%	35.8%	44.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	87	100.0%	27,261	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	3.3%	2.0%	1.7%
Moderate	0	0.0%	0	0.0%	20.7%	17.2%	16.1%
Middle	0	0.0%	0	0.0%	42.2%	40.2%	37.4%
Upper	0	0.0%	0	0.0%	33.8%	40.6%	44.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	11.7%	10.1%	7.9%
Moderate	0	0.0%	0	0.0%	45.5%	36.7%	25.4%
Middle	0	0.0%	0	0.0%	27.9%	29.1%	24.8%
Upper	0	0.0%	0	0.0%	14.9%	24.1%	41.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	3.3%	2.2%	1.6%
Moderate	0	0.0%	0	0.0%	20.7%	19.1%	15.7%
Middle	0	0.0%	0	0.0%	42.2%	42.0%	34.4%
Upper	0	0.0%	0	0.0%	33.8%	36.8%	48.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3.3%	2.2%	1.6%
Moderate	0	0.0%	0	0.0%	20.7%	19.1%	15.7%
Middle	0	0.0%	0	0.0%	42.2%	42.0%	34.4%
Upper	0	0.0%	0	0.0%	33.8%	36.8%	48.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	3.3%	2.2%	1.6%
Moderate	0	0.0%	0	0.0%	20.7%	19.1%	15.7%
Middle	0	0.0%	0	0.0%	42.2%	42.0%	34.4%
Upper	0	0.0%	0	0.0%	33.8%	36.8%	48.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	7	2.3%	1,625	1.7%	3.3%	2.5%	2.1%
Moderate	54	17.6%	13,519	14.4%	20.7%	18.2%	14.7%
Middle	133	43.5%	37,159	39.7%	42.2%	44.9%	40.6%
Upper	112	36.6%	41,255	44.1%	33.8%	34.5%	42.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	306	100.0%	93,558	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	6	2.4%	1,478	1.6%	3.3%	2.4%	1.6%
Moderate	38	15.1%	12,674	14.1%	20.7%	18.2%	14.2%
Middle	97	38.5%	31,852	35.5%	42.2%	45.1%	42.0%
Upper	111	44.0%	43,760	48.8%	33.8%	34.3%	42.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	252	100.0%	89,764	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	0.7%	348	0.4%	3.3%	1.9%	1.2%
Moderate	33	12.2%	8,894	11.3%	20.7%	14.8%	11.3%
Middle	99	36.5%	25,603	32.7%	42.2%	41.9%	37.7%
Upper	137	50.6%	43,559	55.6%	33.8%	41.4%	49.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	271	100.0%	78,404	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	3.3%	2.0%	1.8%
Moderate	0	0.0%	0	0.0%	20.7%	15.5%	13.2%
Middle	0	0.0%	0	0.0%	42.2%	37.1%	30.8%
Upper	0	0.0%	0	0.0%	33.8%	45.3%	54.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	11.7%	13.2%	10.5%
Moderate	0	0.0%	0	0.0%	45.5%	47.4%	41.4%
Middle	0	0.0%	0	0.0%	27.9%	27.6%	34.6%
Upper	0	0.0%	0	0.0%	14.9%	11.8%	13.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	3.3%	2.2%	1.7%
Moderate	0	0.0%	0	0.0%	20.7%	15.9%	12.8%
Middle	0	0.0%	0	0.0%	42.2%	40.8%	35.0%
Upper	0	0.0%	0	0.0%	33.8%	41.1%	50.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3.3%	1.6%	0.8%
Moderate	2	50.0%	227	28.7%	20.7%	13.4%	6.8%
Middle	1	25.0%	125	15.8%	42.2%	38.3%	28.3%
Upper	1	25.0%	439	55.5%	33.8%	46.6%	64.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	791	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	3.3%	5.4%	2.9%
Moderate	0	0.0%	0	0.0%	20.7%	26.8%	18.4%
Middle	0	0.0%	0	0.0%	42.2%	48.2%	48.0%
Upper	0	0.0%	0	0.0%	33.8%	19.6%	30.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	8	1.5%	1,826	1.1%	3.3%	2.1%	1.6%
Moderate	73	13.9%	21,795	12.9%	20.7%	16.1%	13.1%
Middle	197	37.4%	57,580	34.1%	42.2%	42.9%	39.1%
Upper	249	47.2%	87,758	51.9%	33.8%	39.0%	46.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	527	100.0%	168,959	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	0	0.0%	0	0.0%	7.7%	7.1%	9.9%
Moderate	0	0.0%	0	0.0%	24.0%	22.7%	26.2%
Middle	0	0.0%	0	0.0%	33.2%	32.1%	25.8%
Upper	0	0.0%	0	0.0%	35.0%	36.9%	37.0%
Unknown	0	0.0%	0	0.0%	0.2%	1.3%	1.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	2	8.3%	45	5.1%	7.8%	8.6%	12.8%
Moderate	3	12.5%	50	5.7%	23.8%	24.0%	26.9%
Middle	5	20.8%	491	55.8%	33.1%	29.7%	24.7%
Upper	14	58.3%	294	33.4%	35.2%	37.1%	35.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.6%	0.5%
TOTAL	24	100.0%	880	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	4.9%	1.9%	0.5%
Moderate	0	0.0%	0	0.0%	16.3%	6.6%	22.4%
Middle	0	0.0%	0	0.0%	45.3%	49.1%	30.8%
Upper	0	0.0%	0	0.0%	33.5%	40.6%	45.0%
Unknown	0	0.0%	0	0.0%	0.0%	1.9%	1.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	3.2%	2.7%	4.6%
Moderate	0	0.0%	0	0.0%	15.7%	9.3%	24.4%
Middle	0	0.0%	0	0.0%	47.9%	53.3%	49.3%
Upper	0	0.0%	0	0.0%	33.1%	33.3%	20.5%
Unknown	0	0.0%	0	0.0%	0.0%	1.3%	1.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	15	6.8%	2,843	4.3%	20.4%	4.0%	2.3%
Moderate	53	24.2%	12,904	19.5%	18.5%	22.0%	17.3%
Middle	61	27.9%	18,105	27.3%	20.3%	26.1%	24.9%
Upper	90	41.1%	32,445	48.9%	40.8%	32.3%	39.4%
Unknown	0	0.0%	0	0.0%	0.0%	15.5%	16.1%
TOTAL	219	100.0%	66,297	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	2.3%	270	1.0%	20.4%	6.1%	3.6%
Moderate	13	14.9%	3,112	11.4%	18.5%	13.6%	10.1%
Middle	21	24.1%	5,363	19.7%	20.3%	18.0%	16.1%
Upper	32	36.8%	11,946	43.8%	40.8%	25.6%	29.7%
Unknown	19	21.8%	6,570	24.1%	0.0%	36.7%	40.5%
TOTAL	87	100.0%	27,261	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.4%	8.9%	6.3%
Moderate	0	0.0%	0	0.0%	18.5%	16.3%	14.1%
Middle	0	0.0%	0	0.0%	20.3%	22.2%	19.8%
Upper	0	0.0%	0	0.0%	40.8%	50.5%	55.5%
Unknown	0	0.0%	0	0.0%	0.0%	2.2%	4.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.5%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.8%	2.5%	0.1%
Unknown	0	0.0%	0	0.0%	0.0%	97.5%	99.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.4%	11.5%	8.4%
Moderate	0	0.0%	0	0.0%	18.5%	16.4%	12.3%
Middle	0	0.0%	0	0.0%	20.3%	23.2%	20.2%
Upper	0	0.0%	0	0.0%	40.8%	48.5%	58.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.5%	0.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.4%	8.0%	5.8%
Moderate	0	0.0%	0	0.0%	18.5%	17.0%	10.6%
Middle	0	0.0%	0	0.0%	20.3%	22.3%	19.8%
Upper	0	0.0%	0	0.0%	40.8%	47.2%	53.8%
Unknown	0	0.0%	0	0.0%	0.0%	5.6%	10.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	20.4%	0.3%	0.0%
Moderate	0	0.0%	0	0.0%	18.5%	0.5%	0.4%
Middle	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.8%	2.3%	4.7%
Unknown	0	0.0%	0	0.0%	0.0%	96.9%	94.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	17	5.6%	3,113	20.4%	5.4%	2.8%	17
Moderate	66	21.6%	16,016	18.5%	17.7%	13.0%	66
Middle	82	26.8%	23,468	20.3%	22.0%	19.4%	82
Upper	122	39.9%	44,391	40.8%	30.5%	33.2%	122
Unknown	19	6.2%	6,570	0.0%	24.4%	31.4%	19
TOTAL	306	100.0%	93,558	100.0%	100.0%	100.0%	306

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	10	4.0%	2,131	2.4%	20.4%	3.2%	1.8%
Moderate	53	21.0%	15,213	16.9%	18.5%	21.4%	16.9%
Middle	70	27.8%	23,062	25.7%	20.3%	26.4%	24.9%
Upper	116	46.0%	48,681	54.2%	40.8%	34.2%	41.0%
Unknown	3	1.2%	677	0.8%	0.0%	14.8%	15.4%
TOTAL	252	100.0%	89,764	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	10	3.7%	1,500	1.9%	20.4%	4.0%	2.2%
Moderate	40	14.8%	9,171	11.7%	18.5%	12.2%	9.0%
Middle	81	29.9%	22,715	29.0%	20.3%	16.0%	14.1%
Upper	111	41.0%	35,935	45.8%	40.8%	27.2%	30.4%
Unknown	29	10.7%	9,083	11.6%	0.0%	40.6%	44.3%
TOTAL	271	100.0%	78,404	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.4%	3.7%	3.3%
Moderate	0	0.0%	0	0.0%	18.5%	14.0%	10.8%
Middle	0	0.0%	0	0.0%	20.3%	22.0%	17.9%
Upper	0	0.0%	0	0.0%	40.8%	57.6%	62.5%
Unknown	0	0.0%	0	0.0%	0.0%	2.8%	5.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.5%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.8%	9.2%	0.6%
Unknown	0	0.0%	0	0.0%	0.0%	90.8%	99.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.4%	5.4%	3.2%
Moderate	0	0.0%	0	0.0%	18.5%	15.8%	11.8%
Middle	0	0.0%	0	0.0%	20.3%	24.1%	20.6%
Upper	0	0.0%	0	0.0%	40.8%	54.3%	63.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.4%	0.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	25.0%	125	15.8%	20.4%	5.9%	3.0%
Moderate	0	0.0%	0	0.0%	18.5%	19.4%	16.2%
Middle	1	25.0%	81	10.2%	20.3%	23.3%	19.1%
Upper	1	25.0%	146	18.5%	40.8%	43.9%	54.0%
Unknown	1	25.0%	439	55.5%	0.0%	7.5%	7.7%
TOTAL	4	100.0%	791	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	20.4%	0.1%	0.1%
Moderate	0	0.0%	0	0.0%	18.5%	0.1%	0.1%
Middle	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.8%	0.2%	0.3%
Unknown	0	0.0%	0	0.0%	0.0%	99.5%	99.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	21	4.0%	3,756	2.2%	20.4%	3.7%	2.0%
Moderate	93	17.6%	24,384	14.4%	18.5%	15.2%	11.6%
Middle	152	28.8%	45,858	27.1%	20.3%	19.5%	17.6%
Upper	228	43.3%	84,762	50.2%	40.8%	30.7%	33.9%
Unknown	33	6.3%	10,199	6.0%	0.0%	30.8%	34.9%
TOTAL	527	100.0%	168,959	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		Count			Dollars		Total Businesses		
		Bank		Aggregate	Bank			Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%	
Business Revenue	\$1 Million or Less	0	0.0%	54.9%	0	0.0%	39.5%	94.2%	
	Over \$1 Million/ Unknown	0	0.0%	45.1%	0	0.0%	60.5%		5.8%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%		100.0%
Loan Size	\$100,000 or Less	0	0.0%	96.6%	0	0.0%	50.7%		
	\$100,001–\$250,000	0	0.0%	1.6%	0	0.0%	10.8%		
	\$250,001–\$1 Million	0	0.0%	1.8%	0	0.0%	38.5%		
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%		
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%		
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%			
	\$100,001–\$250,000	0	0.0%		0	0.0%			
	\$250,001–\$1 Million	0	0.0%		0	0.0%			
	Over \$1 Million	0	0.0%		0	0.0%			
	TOTAL	0	0.0%		0	0.0%			

Appendix C (continued)

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	2	8.3%	43.9%	385	43.8%	25.6%	94.4%
	Over \$1 Million/ Unknown	22	91.7%	56.1%	495	56.3%	74.4%	5.6%
	TOTAL	24	100.0%	100.0%	880	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	23	95.8%	90.6%	525	59.7%	38.0%	
	\$100,001–\$250,000	0	0.0%	5.7%	0	0.0%	20.2%	
	\$250,001–\$1 Million	1	4.2%	3.7%	355	40.3%	41.8%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	24	100.0%	100.0%	880	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	1	50.0%		30	7.8%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	1	50.0%		355	92.2%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	2	100.0%		385	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	0	0.0%	65.1%	0	0.0%	65.0%	98.7%
	Over \$1 Million/ Unknown	0	0.0%	34.9%	0	0.0%	35.0%	1.3%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	97.2%	0	0.0%	63.6%	
	\$100,001–\$250,000	0	0.0%	0.9%	0	0.0%	5.7%	
	\$250,001–\$500,000	0	0.0%	1.9%	0	0.0%	30.7%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	0	0.0%		0	0.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	0	0.0%	57.3%	0	0.0%	40.1%	98.6%
	Over \$1 Million/ Unknown	0	0.0%	42.7%	0	0.0%	59.9%	1.4%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	96.0%	0	0.0%	70.9%	
	\$100,001–\$250,000	0	0.0%	2.7%	0	0.0%	16.2%	
	\$250,001–\$500,000	0	0.0%	1.3%	0	0.0%	12.9%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	0	0.0%		0	0.0%		

Denver

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	2	13.3%	959	18.3%	5.6%	6.3%	5.2%
Moderate	0	0.0%	0	0.0%	22.6%	23.4%	18.7%
Middle	9	60.0%	3,132	59.8%	36.4%	35.8%	33.3%
Upper	4	26.7%	1,146	21.9%	35.5%	34.4%	42.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	15	100.0%	5,237	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	6.7%	179	3.6%	5.6%	5.1%	4.1%
Moderate	3	20.0%	715	14.5%	22.6%	22.8%	18.2%
Middle	4	26.7%	1,034	20.9%	36.4%	37.1%	34.6%
Upper	7	46.7%	3,015	61.0%	35.5%	34.9%	43.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	15	100.0%	4,943	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	5.6%	4.0%	3.2%
Moderate	0	0.0%	0	0.0%	22.6%	18.0%	14.0%
Middle	0	0.0%	0	0.0%	36.4%	36.6%	33.5%
Upper	0	0.0%	0	0.0%	35.5%	41.4%	49.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	14.7%	20.6%	13.1%
Moderate	0	0.0%	0	0.0%	32.3%	31.7%	27.3%
Middle	0	0.0%	0	0.0%	35.4%	33.0%	36.6%
Upper	0	0.0%	0	0.0%	17.6%	14.7%	23.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	5.6%	3.9%	3.1%
Moderate	0	0.0%	0	0.0%	22.6%	17.7%	12.2%
Middle	0	0.0%	0	0.0%	36.4%	37.5%	31.4%
Upper	0	0.0%	0	0.0%	35.5%	40.9%	53.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	5.6%	4.4%	2.4%
Moderate	1	100.0%	30	100.0%	22.6%	23.0%	14.3%
Middle	0	0.0%	0	0.0%	36.4%	36.5%	27.3%
Upper	0	0.0%	0	0.0%	35.5%	36.0%	55.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	30	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	5.6%	8.1%	4.4%
Moderate	0	0.0%	0	0.0%	22.6%	27.0%	28.8%
Middle	0	0.0%	0	0.0%	36.4%	37.7%	30.7%
Upper	0	0.0%	0	0.0%	35.5%	27.0%	35.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	3	9.7%	1,138	11.1%	5.6%	5.5%	5.1%
Moderate	4	12.9%	745	7.3%	22.6%	22.7%	18.9%
Middle	13	41.9%	4,166	40.8%	36.4%	36.6%	34.1%
Upper	11	35.5%	4,161	40.8%	35.5%	35.2%	41.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	31	100.0%	10,210	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	5.6%	6.5%	5.5%
Moderate	8	38.1%	2,326	34.8%	22.6%	23.6%	18.9%
Middle	4	19.0%	1,161	17.4%	36.4%	36.2%	33.9%
Upper	9	42.9%	3,201	47.9%	35.5%	33.7%	41.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	21	100.0%	6,688	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	8.6%	1,745	9.2%	5.6%	4.5%	3.8%
Moderate	7	12.1%	2,017	10.7%	22.6%	19.4%	15.8%
Middle	25	43.1%	7,387	39.0%	36.4%	35.9%	33.2%
Upper	21	36.2%	7,788	41.1%	35.5%	40.1%	47.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	58	100.0%	18,937	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	5.6%	4.0%	3.7%
Moderate	0	0.0%	0	0.0%	22.6%	16.5%	13.7%
Middle	0	0.0%	0	0.0%	36.4%	32.8%	27.8%
Upper	0	0.0%	0	0.0%	35.5%	46.6%	54.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	14.7%	16.1%	7.1%
Moderate	0	0.0%	0	0.0%	32.3%	29.4%	30.8%
Middle	0	0.0%	0	0.0%	35.4%	36.4%	46.9%
Upper	0	0.0%	0	0.0%	17.6%	18.1%	15.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	5.6%	4.3%	3.1%
Moderate	0	0.0%	0	0.0%	22.6%	14.7%	10.2%
Middle	0	0.0%	0	0.0%	36.4%	33.6%	28.1%
Upper	0	0.0%	0	0.0%	35.5%	47.4%	58.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	5.6%	4.3%	3.1%
Moderate	0	0.0%	0	0.0%	22.6%	14.7%	10.2%
Middle	0	0.0%	0	0.0%	36.4%	33.6%	28.1%
Upper	0	0.0%	0	0.0%	35.5%	47.4%	58.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	5.6%	4.3%	3.1%
Moderate	0	0.0%	0	0.0%	22.6%	14.7%	10.2%
Middle	0	0.0%	0	0.0%	36.4%	33.6%	28.1%
Upper	0	0.0%	0	0.0%	35.5%	47.4%	58.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	5	6.3%	1,745	6.8%	5.6%	5.1%	4.4%
Moderate	15	19.0%	4,343	16.9%	22.6%	20.6%	17.2%
Middle	29	36.7%	8,548	33.4%	36.4%	35.8%	33.7%
Upper	30	38.0%	10,989	42.9%	35.5%	38.5%	44.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	79	100.0%	25,625	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	1	10.0%	1,000	32.1%	8.2%	9.2%	12.2%
Moderate	3	30.0%	1,057	33.9%	22.0%	21.9%	23.0%
Middle	4	40.0%	1,036	33.2%	32.6%	30.7%	29.1%
Upper	2	20.0%	23	0.7%	36.7%	36.7%	34.1%
Unknown	0	0.0%	0	0.0%	0.4%	1.4%	1.6%
TOTAL	10	100.0%	3,116	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	4	4.2%	231	1.9%	8.3%	9.2%	12.4%
Moderate	24	25.0%	2,176	17.7%	22.0%	21.7%	23.4%
Middle	26	27.1%	1,614	13.1%	32.7%	31.0%	28.7%
Upper	41	42.7%	8,278	67.2%	36.7%	37.3%	34.2%
Unknown	1	1.0%	26	0.2%	0.4%	0.8%	1.2%
TOTAL	96	100.0%	12,325	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	8.8%	7.7%	8.3%
Moderate	0	0.0%	0	0.0%	15.9%	9.0%	5.3%
Middle	0	0.0%	0	0.0%	35.8%	41.3%	46.8%
Upper	0	0.0%	0	0.0%	38.2%	40.7%	38.5%
Unknown	0	0.0%	0	0.0%	1.3%	1.3%	1.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	7.8%	8.4%	5.3%
Moderate	0	0.0%	0	0.0%	16.3%	10.6%	9.1%
Middle	0	0.0%	0	0.0%	36.7%	43.4%	47.5%
Upper	0	0.0%	0	0.0%	38.0%	35.8%	36.9%
Unknown	0	0.0%	0	0.0%	1.3%	1.8%	1.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	23.6%	4.7%	2.4%
Moderate	1	6.7%	373	7.1%	18.7%	22.1%	16.0%
Middle	6	40.0%	1,767	33.7%	20.6%	24.2%	22.2%
Upper	7	46.7%	2,781	53.1%	37.1%	34.8%	44.7%
Unknown	1	6.7%	316	6.0%	0.0%	14.3%	14.8%
TOTAL	15	100.0%	5,237	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	23.6%	7.4%	4.2%
Moderate	0	0.0%	0	0.0%	18.7%	19.0%	14.3%
Middle	5	33.3%	1,609	32.6%	20.6%	22.4%	20.7%
Upper	6	40.0%	2,440	49.4%	37.1%	31.9%	40.1%
Unknown	4	26.7%	894	18.1%	0.0%	19.4%	20.6%
TOTAL	15	100.0%	4,943	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	23.6%	6.1%	4.5%
Moderate	0	0.0%	0	0.0%	18.7%	17.0%	13.4%
Middle	0	0.0%	0	0.0%	20.6%	24.8%	20.3%
Upper	0	0.0%	0	0.0%	37.1%	49.1%	56.6%
Unknown	0	0.0%	0	0.0%	0.0%	3.0%	5.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	23.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.6%	0.9%	0.1%
Upper	0	0.0%	0	0.0%	37.1%	1.6%	0.3%
Unknown	0	0.0%	0	0.0%	0.0%	97.5%	99.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	23.6%	7.3%	4.5%
Moderate	0	0.0%	0	0.0%	18.7%	19.1%	11.6%
Middle	0	0.0%	0	0.0%	20.6%	25.1%	19.2%
Upper	0	0.0%	0	0.0%	37.1%	46.8%	62.9%
Unknown	0	0.0%	0	0.0%	0.0%	1.6%	1.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	100.0%	30	100.0%	23.6%	10.1%	5.9%
Moderate	0	0.0%	0	0.0%	18.7%	19.6%	10.5%
Middle	0	0.0%	0	0.0%	20.6%	24.1%	13.3%
Upper	0	0.0%	0	0.0%	37.1%	40.5%	58.6%
Unknown	0	0.0%	0	0.0%	0.0%	5.7%	11.7%
TOTAL	1	100.0%	30	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	23.6%	0.3%	0.3%
Moderate	0	0.0%	0	0.0%	18.7%	1.1%	0.9%
Middle	0	0.0%	0	0.0%	20.6%	2.4%	2.9%
Upper	0	0.0%	0	0.0%	37.1%	3.6%	4.4%
Unknown	0	0.0%	0	0.0%	0.0%	92.5%	91.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	1	3.2%	30	0.3%	23.6%	6.3%	3.2%
Moderate	1	3.2%	373	3.7%	18.7%	19.9%	13.9%
Middle	11	35.5%	3,376	33.1%	20.6%	23.1%	19.7%
Upper	13	41.9%	5,221	51.1%	37.1%	34.3%	39.7%
Unknown	5	16.1%	1,210	11.9%	0.0%	16.4%	23.4%
TOTAL	31	100.0%	10,210	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	%	\$ (000s)	%		# %	\$ %
Home Purchase Loans							
Low	1	4.8%	305	4.6%	23.6%	6.1%	3.2%
Moderate	5	23.8%	1,657	24.8%	18.7%	25.1%	19.0%
Middle	6	28.6%	2,063	30.8%	20.6%	24.8%	23.8%
Upper	5	23.8%	1,633	24.4%	37.1%	33.6%	43.0%
Unknown	4	19.0%	1,030	15.4%	0.0%	10.4%	11.0%
TOTAL	21	100.0%	6,688	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	3.4%	347	1.8%	23.6%	6.7%	4.0%
Moderate	15	25.9%	4,482	23.7%	18.7%	18.8%	14.7%
Middle	20	34.5%	6,932	36.6%	20.6%	22.8%	21.6%
Upper	19	32.8%	6,476	34.2%	37.1%	34.9%	42.0%
Unknown	2	3.4%	700	3.7%	0.0%	16.7%	17.8%
TOTAL	58	100.0%	18,937	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	23.6%	6.0%	4.7%
Moderate	0	0.0%	0	0.0%	18.7%	16.0%	11.5%
Middle	0	0.0%	0	0.0%	20.6%	23.3%	19.5%
Upper	0	0.0%	0	0.0%	37.1%	50.6%	56.9%
Unknown	0	0.0%	0	0.0%	0.0%	4.0%	7.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	23.6%	0.3%	0.0%
Moderate	0	0.0%	0	0.0%	18.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.6%	0.3%	0.0%
Upper	0	0.0%	0	0.0%	37.1%	1.3%	0.2%
Unknown	0	0.0%	0	0.0%	0.0%	98.2%	99.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	23.6%	6.4%	3.9%
Moderate	0	0.0%	0	0.0%	18.7%	15.9%	10.6%
Middle	0	0.0%	0	0.0%	20.6%	23.5%	17.8%
Upper	0	0.0%	0	0.0%	37.1%	52.5%	65.4%
Unknown	0	0.0%	0	0.0%	0.0%	1.8%	2.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	23.6%	8.9%	3.5%
Moderate	0	0.0%	0	0.0%	18.7%	19.0%	9.5%
Middle	0	0.0%	0	0.0%	20.6%	21.0%	12.3%
Upper	0	0.0%	0	0.0%	37.1%	43.3%	60.5%
Unknown	0	0.0%	0	0.0%	0.0%	7.8%	14.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	23.6%	0.2%	0.1%
Moderate	0	0.0%	0	0.0%	18.7%	0.1%	0.0%
Middle	0	0.0%	0	0.0%	20.6%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	37.1%	0.0%	0.1%
Unknown	0	0.0%	0	0.0%	0.0%	99.7%	99.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	3	3.8%	652	2.5%	23.6%	6.4%	3.6%
Moderate	20	25.3%	6,139	24.0%	18.7%	20.2%	15.3%
Middle	26	32.9%	8,995	35.1%	20.6%	23.1%	21.3%
Upper	24	30.4%	8,109	31.6%	37.1%	35.0%	41.1%
Unknown	6	7.6%	1,730	6.8%	0.0%	15.3%	18.7%
TOTAL	79	100.0%	25,625	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		Count			Dollars		Total Businesses		
		Bank		Aggregate	Bank			Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%	
Business Revenue	\$1 Million or Less	7	70.0%	51.9%	1,309	42.0%	33.7%	92.0%	
	Over \$1 Million/ Unknown	3	30.0%	48.1%	1,807	58.0%	66.3%		8.0%
	TOTAL	10	100.0%	100.0%	3,116	100.0%	100.0%		100.0%
Loan Size	\$100,000 or Less	4	40.0%	94.6%	43	1.4%	40.5%		
	\$100,001–\$250,000	1	10.0%	2.4%	250	8.0%	12.0%		
	\$250,001–\$1 Million	5	50.0%	3.0%	2,823	90.6%	47.5%		
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%		
	TOTAL	10	100.0%	100.0%	3,116	100.0%	100.0%		
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	4	57.1%		43	3.3%			
	\$100,001–\$250,000	1	14.3%		250	19.1%			
	\$250,001–\$1 Million	2	28.6%		1,016	77.6%			
	Over \$1 Million	0	0.0%		0	0.0%			
	TOTAL	7	100.0%		1,309	100.0%			

Appendix C (continued)

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	15	15.6%	40.6%	6,883	55.8%	22.5%	92.3%
	Over \$1 Million/ Unknown	81	84.4%	59.4%	5,442	44.2%	77.5%	7.7%
	TOTAL	96	100.0%	100.0%	12,325	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	68	70.8%	87.2%	1,753	14.2%	31.6%	
	\$100,001–\$250,000	13	13.5%	7.1%	2,004	16.3%	19.5%	
	\$250,001–\$1 Million	15	15.6%	5.6%	8,568	69.5%	48.9%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	96	100.0%	100.0%	12,325	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	2	13.3%		23	0.3%		
	\$100,001–\$250,000	2	13.3%		350	5.1%		
	\$250,001–\$1 Million	11	73.3%		6,510	94.6%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	15	100.0%		6,883	100.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	0	0.0%	66.3%	0	0.0%	71.4%	97.4%
	Over \$1 Million/ Unknown	0	0.0%	33.7%	0	0.0%	28.6%	2.6%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	88.8%	0	0.0%	35.0%	
	\$100,001–\$250,000	0	0.0%	7.4%	0	0.0%	31.2%	
	\$250,001–\$500,000	0	0.0%	3.8%	0	0.0%	33.8%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	0	0.0%		0	0.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	0	0.0%	56.6%	0	0.0%	55.5%	97.5%
	Over \$1 Million/ Unknown	0	0.0%	43.4%	0	0.0%	44.5%	2.5%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	88.9%	0	0.0%	43.0%	
	\$100,001–\$250,000	0	0.0%	6.2%	0	0.0%	20.2%	
	\$250,001–\$500,000	0	0.0%	4.9%	0	0.0%	36.8%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%	
		\$100,001–\$250,000	0	0.0%		0	0.0%	
		\$250,001–\$1 Million	0	0.0%		0	0.0%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	0	0.0%		0	0.0%	

Durango

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	11	12.0%	3,873	12.5%	22.7%	17.2%	16.4%
Upper	81	88.0%	27,041	87.5%	77.3%	82.8%	83.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	92	100.0%	30,914	100.0%	100.0%	100.0%	100.0%
Refinance							
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	7	23.3%	2,329	21.3%	22.7%	20.3%	19.6%
Upper	23	76.7%	8,629	78.7%	77.3%	79.7%	80.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	30	100.0%	10,958	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	12.5%	9.7%
Upper	0	0.0%	0	0.0%	77.3%	87.5%	90.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	41.8%	41.7%	50.0%
Upper	0	0.0%	0	0.0%	58.2%	58.3%	50.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	8.2%	4.1%
Upper	0	0.0%	0	0.0%	77.3%	91.8%	95.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	15.6%	13.5%
Upper	1	100.0%	97	100.0%	77.3%	84.4%	86.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	97	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	30.8%	23.3%
Upper	0	0.0%	0	0.0%	77.3%	69.2%	76.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	18	14.6%	6,202	14.8%	22.7%	18.3%	18.7%
Upper	105	85.4%	35,767	85.2%	77.3%	81.7%	81.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	123	100.0%	41,969	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	14	12.6%	4,736	12.1%	22.7%	15.8%	14.2%
Upper	97	87.4%	34,463	87.9%	77.3%	84.2%	85.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	111	100.0%	39,199	100.0%	100.0%	100.0%	100.0%
Refinance							
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	24	19.0%	7,523	17.5%	22.7%	17.2%	16.7%
Upper	102	81.0%	35,577	82.5%	77.3%	82.8%	83.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	126	100.0%	43,100	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	1	25.0%	205	14.1%	22.7%	23.8%	24.1%
Upper	3	75.0%	1,247	85.9%	77.3%	76.3%	75.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	1,452	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	41.8%	37.5%	58.7%
Upper	0	0.0%	0	0.0%	58.2%	62.5%	41.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	15.7%	14.7%
Upper	0	0.0%	0	0.0%	77.3%	84.3%	85.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	9.5%	5.6%
Upper	4	100.0%	920	100.0%	77.3%	90.5%	94.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	920	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	30.2%	27.0%
Upper	0	0.0%	0	0.0%	77.3%	69.8%	73.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	39	15.9%	12,464	14.7%	22.7%	16.9%	16.4%
Upper	206	84.1%	72,207	85.3%	77.3%	83.1%	83.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	245	100.0%	84,671	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	43.0%	40.2%	43.5%
Upper	0	0.0%	0	0.0%	57.0%	55.2%	54.0%
Unknown	0	0.0%	0	0.0%	0.0%	4.6%	2.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		%	\$ %
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	5	41.7%	86	47.0%	43.3%	43.4%	53.2%
Upper	7	58.3%	97	53.0%	56.7%	55.0%	45.9%
Unknown	0	0.0%	0	0.0%	0.0%	1.6%	1.0%
TOTAL	12	100.0%	183	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	32.0%	48.2%	73.5%
Upper	1	100.0%	98	100.0%	68.0%	51.8%	26.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	98	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	%	\$ (000s)	\$ %		# %	\$ %
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	30.7%	50.0%	55.4%
Upper	0	0.0%	0	0.0%	69.3%	50.0%	44.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	##%	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	1	1.1%	40	0.1%	12.7%	2.0%	0.8%
Moderate	13	14.1%	3,114	10.1%	14.9%	11.9%	7.7%
Middle	20	21.7%	5,633	18.2%	20.9%	18.9%	15.2%
Upper	58	63.0%	22,127	71.6%	51.5%	56.5%	64.7%
Unknown	0	0.0%	0	0.0%	0.0%	10.6%	11.7%
TOTAL	92	100.0%	30,914	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	3.3%	140	1.3%	12.7%	3.9%	2.1%
Moderate	1	3.3%	200	1.8%	14.9%	9.6%	6.1%
Middle	4	13.3%	1,260	11.5%	20.9%	19.2%	16.3%
Upper	24	80.0%	9,358	85.4%	51.5%	53.9%	61.3%
Unknown	0	0.0%	0	0.0%	0.0%	13.4%	14.1%
TOTAL	30	100.0%	10,958	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	12.7%	1.0%	1.1%
Moderate	0	0.0%	0	0.0%	14.9%	5.8%	5.3%
Middle	0	0.0%	0	0.0%	20.9%	18.3%	13.3%
Upper	0	0.0%	0	0.0%	51.5%	67.3%	73.4%
Unknown	0	0.0%	0	0.0%	0.0%	7.7%	6.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	12.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	14.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.9%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	51.5%	8.3%	1.7%
Unknown	0	0.0%	0	0.0%	0.0%	91.7%	98.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	12.7%	8.2%	7.5%
Moderate	0	0.0%	0	0.0%	14.9%	12.3%	10.9%
Middle	0	0.0%	0	0.0%	20.9%	12.3%	4.9%
Upper	0	0.0%	0	0.0%	51.5%	65.8%	75.7%
Unknown	0	0.0%	0	0.0%	0.0%	1.4%	0.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	12.7%	9.4%	1.3%
Moderate	0	0.0%	0	0.0%	14.9%	9.4%	6.0%
Middle	0	0.0%	0	0.0%	20.9%	3.1%	1.7%
Upper	1	100.0%	97	100.0%	51.5%	65.6%	67.3%
Unknown	0	0.0%	0	0.0%	0.0%	12.5%	23.7%
TOTAL	1	100.0%	97	100.0%	100.0%	100.0%	100.0%
Purpose Not Applicable							
Low	0	0.0%	0	0.0%	12.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	14.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.9%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	51.5%	7.7%	12.2%
Unknown	0	0.0%	0	0.0%	0.0%	92.3%	87.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	2	1.6%	180	0.4%	12.7%	3.0%	1.5%
Moderate	14	11.4%	3,314	7.9%	14.9%	10.5%	6.7%
Middle	24	19.5%	6,893	16.4%	20.9%	18.5%	14.8%
Upper	83	67.5%	31,582	75.3%	51.5%	55.7%	61.3%
Unknown	0	0.0%	0	0.0%	0.0%	12.3%	15.7%
TOTAL	123	100.0%	41,969	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$ (000s)	\$ %		# %	\$ %
Home Purchase Loans							
Low	6	5.4%	888	2.3%	12.7%	2.0%	0.9%
Moderate	16	14.4%	4,033	10.3%	14.9%	11.4%	7.5%
Middle	23	20.7%	6,929	17.7%	20.9%	19.3%	15.5%
Upper	59	53.2%	24,436	62.3%	51.5%	58.5%	66.4%
Unknown	7	6.3%	2,913	7.4%	0.0%	8.7%	9.6%
TOTAL	111	100.0%	39,199	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	1.6%	291	0.7%	12.7%	2.4%	1.4%
Moderate	17	13.5%	4,139	9.6%	14.9%	11.5%	8.5%
Middle	29	23.0%	9,221	21.4%	20.9%	22.4%	19.6%
Upper	65	51.6%	25,450	59.0%	51.5%	49.9%	56.1%
Unknown	13	10.3%	3,999	9.3%	0.0%	13.8%	14.5%
TOTAL	126	100.0%	43,100	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	12.7%	3.8%	5.6%
Moderate	0	0.0%	0	0.0%	14.9%	6.3%	5.6%
Middle	2	50.0%	592	40.8%	20.9%	25.0%	23.3%
Upper	1	25.0%	350	24.1%	51.5%	61.3%	58.9%
Unknown	1	25.0%	510	35.1%	0.0%	3.8%	6.6%
TOTAL	4	100.0%	1,452	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	12.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	14.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.9%	12.5%	3.4%
Upper	0	0.0%	0	0.0%	51.5%	12.5%	1.0%
Unknown	0	0.0%	0	0.0%	0.0%	75.0%	95.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	12.7%	5.7%	5.6%
Moderate	0	0.0%	0	0.0%	14.9%	7.1%	4.8%
Middle	0	0.0%	0	0.0%	20.9%	14.3%	9.4%
Upper	0	0.0%	0	0.0%	51.5%	68.6%	76.0%
Unknown	0	0.0%	0	0.0%	0.0%	4.3%	4.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	12.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	14.9%	11.9%	6.7%
Middle	1	25.0%	150	16.3%	20.9%	16.7%	7.2%
Upper	2	50.0%	550	59.8%	51.5%	59.5%	72.8%
Unknown	1	25.0%	220	23.9%	0.0%	11.9%	13.3%
TOTAL	4	100.0%	920	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Purpose Not Applicable							
Low	0	0.0%	0	0.0%	12.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	14.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.9%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	51.5%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	8	3.3%	1,179	1.4%	12.7%	2.3%	1.2%
Moderate	33	13.5%	8,172	9.7%	14.9%	11.1%	7.9%
Middle	55	22.4%	16,892	20.0%	20.9%	21.1%	17.7%
Upper	127	51.8%	50,786	60.0%	51.5%	52.6%	58.8%
Unknown	22	9.0%	7,642	9.0%	0.0%	12.8%	14.3%
TOTAL	245	100.0%	84,671	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	0	0.0%	55.0%	0	0.0%	45.7%	93.6%
	Over \$1 Million/ Unknown	0	0.0%	45.0%	0	0.0%	54.3%	6.4%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	92.4%	0	0.0%	40.3%	
	\$100,001–\$250,000	0	0.0%	4.5%	0	0.0%	19.0%	
	\$250,001–\$1 Million	0	0.0%	3.0%	0	0.0%	40.6%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	0	0.0%		0	0.0%		

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		Count			Dollars			Total Businesses %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	0	0.0%	40.9%	0	0.0%	30.8%	93.8%
	Over \$1 Million/ Unknown	12	100.0%	59.1%	183	100.0%	69.2%	6.2%
	TOTAL	12	100.0%	100.0%	183	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	12	100.0%	86.9%	183	100.0%	35.7%	
	\$100,001–\$250,000	0	0.0%	8.5%	0	0.0%	23.9%	
	\$250,001–\$1 Million	0	0.0%	4.7%	0	0.0%	40.4%	
	Over \$1 Million	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	12	100.0%	100.0%	183	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	0	0.0%		0	0.0%		

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	1	100.0%	64.3%	98	100.0%	88.9%	98.7%
	Over \$1 Million/ Unknown	0	0.0%	35.7%	0	0.0%	11.1%	1.3%
	TOTAL	1	100.0%	100.0%	98	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	92.9%	0	0.0%	59.4%	
	\$100,001–\$250,000	0	0.0%	5.4%	0	0.0%	22.3%	
	\$250,001–\$500,000	0	0.0%	1.8%	0	0.0%	18.2%	
	Over \$500,000	1	100.0%	0.0%	98	100.0%	0.0%	
	TOTAL	1	100.0%	100.0%	98	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	1	100.0%		98	100.0%		
	TOTAL	1	100.0%		98	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		Count			Dollars			Farms %
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	0	0.0%	63.3%	0	0.0%	35.7%	99.3%
	Over \$1 Million/ Unknown	0	0.0%	36.7%	0	0.0%	64.3%	0.7%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	86.7%	0	0.0%	40.0%	
	\$100,001–\$250,000	0	0.0%	6.7%	0	0.0%	25.3%	
	\$250,001–\$500,000	0	0.0%	6.7%	0	0.0%	34.7%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		0	0.0%		
	\$100,001–\$250,000	0	0.0%		0	0.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	0	0.0%		0	0.0%		

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.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan 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 on 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 contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals (LMI); (2) community services targeted to LMI individuals; (3) 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; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate- and middle-income individuals and 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.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income, etc.) used especially to identify markets.

Appendix D (continued)

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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 under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 who 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 income of applicants; the amount of loan requested; and the disposition of the application (e.g., 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: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Appendix D (continued)

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.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an 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.

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Appendix D (continued)

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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 businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either 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): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports 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.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more, in the case of a geography.