PUBLIC DISCLOSURE

July 6, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Mainstreet Bank
RSSD# 894245

301 East Broadway
Ashland, Missouri 65010

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

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

Mainstreet Bank meets the criteria for a Satisfactory rating based on the evaluation of the bank's lending activity. The factors supporting the institution's rating include:

- The borrower's profile analysis reveals excellent penetration among individuals of different income levels, including low- and moderate-income (LMI) levels, and businesses of different sizes.

- The geographic distribution of loans analysis reflects poor dispersion throughout the bank's assessment areas.

- The bank's loan-to-deposit (LTD) ratio is less than reasonable given the bank's size, financial condition, and credit needs of the assessment areas.

- A majority of the bank's loans and other lending-related activities are in the bank's assessment areas.

- No CRA-related complaints were filed against the bank for this review period.

SCOPE OF EXAMINATION

The bank's CRA performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC) *Interagency CRA Procedures for Small Institutions.* The period of review spanned from the date of the bank's previous CRA evaluation on March 28, 2011 to July 6, 2015. Lending performance was based on the loan products and corresponding time periods displayed in the following table:

Loan Product	Time Period
Home Mortgage Disclosure Act (HMDA)	January 1, 2012 – December 31, 2013
Small Business	January 1, 2012 – December 31, 2013
Consumer Motor Vehicle	January 1, 2012 – December 31, 2013

These loan categories are considered the bank's primary lines of business, based on lending volume by number and dollar amounts and in light of the bank's stated business strategy. Loan activity represented by these credit products is deemed indicative of the bank's overall lending performance.

Mainstreet Bank operates in two assessment areas, both located in the state of Missouri. The bank's primary assessment area consists of Boone County, which is part of the Columbia, Missouri, metropolitan statistical area (MSA). This assessment area was analyzed using full-scope review procedures. The second assessment area consists of Cooper County, which is in a nonmetropolitan statistical area (nonMSA) portion of the state of Missouri. This assessment area, with minimal lending, was analyzed using limited-scope procedures. Therefore, the bank's overall CRA rating is based on performance in the Boone County assessment area.

Under the small bank CRA performance criteria, analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2010 U.S. Census data; certain business geodemographics are based on 2013 Dun & Bradstreet data, which are applicable to the two years of loan data being evaluated. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an assessment area. Aggregate lending datasets are also updated annually and are therefore expected to predict more relevant comparisons. In addition, the bank's lending levels were evaluated in relation to those of comparable financial institutions operating within the same general region. Four other banks were identified as similarly situated peers, with asset sizes ranging from $52.7 million to $102.0 million.

To augment this evaluation, four community contact interviews were conducted with members of the local community. These community contacts were used to ascertain specific credit needs, opportunities, and local market conditions within the bank's assessment areas. Key details from these interviews are included in the *Description of Assessment Area* sections for each assessment area.

DESCRIPTION OF INSTITUTION

Mainstreet Bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by Calvert Financial Corporation, a one-bank holding company headquartered in Ashland, Missouri. The bank's current retail network consists of three full-service offices in Missouri: one in Ashland (main office), one in Prairie Home, and one in Bunceton. The main office, located in Boone County, offers a full-service automated teller machine (ATM). Both of the branch offices, located in Cooper County, offer cash-dispensing-only ATMs. Additionally, the main office and the Prairie Home branch both offer drive-up accessibility. During the review period, the bank did not open or close any offices. Based on this branch network and other service delivery systems, such as online banking, the bank is well positioned to deliver financial services to the majority of its 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, and the bank appeared capable of meeting assessment area credit needs based on its available resources and financial products.

As of March 31, 2015, the bank reported total assets of $47.5 million. As of the same date, total loans and leases outstanding were $23.4 million (49.2 percent of total assets), and deposits totaled $36.5 million. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of March 31, 2015		
Credit Category	**Amount ($000s)**	**Percentage of Total Loans**
Construction and Development	$533	2.3%
Commercial Real Estate	$4,611	19.7%
1–4 Family Residential	$10,059	43.1%
Farmland	$3,565	15.3%
Farm Loans	$751	3.2%
Commercial and Industrial	$3,142	13.5%
Loans to Individuals	$611	2.6%
Total Other Loans	$81	0.3%
TOTAL	**$23,353**	**100%**

As indicated in the previous table, a significant portion of the bank's lending resources is directed towards 1–4 family residential, commercial real estate, and farmland loans.

The bank received a Satisfactory rating at its previous CRA evaluation conducted on March 28, 2011, by this Reserve Bank.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Mainstreet Bank meets the standards for a Satisfactory rating under CRA small bank evaluation procedures, which evaluate bank performance under the following five criteria, as applicable.

- Loan distribution by borrower's profile (applicant income or business revenue profile).
- The geographic distribution of loans.
- The bank's average LTD ratio.
- The concentration of lending within the assessment area.
- A review of the bank's response to written CRA complaints.

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

Loan Distribution by Borrower's Profile

This performance criterion focuses on the bank's lending penetration among borrowers of different income levels, with a specific emphasis on lending to LMI borrowers and businesses with gross annual revenues of $1 million or less. As displayed in the following table, the bank's overall loan distribution by borrower's profile reflects reasonable penetration throughout the bank's assessment areas.

Assessment Area	Loan Distribution by Borrower's Profile
Boone County	Reasonable
Cooper County	Consistent
OVERALL	**Reasonable**

Additional details regarding the loan distribution by borrower's profile are included later in this evaluation, under the sections applicable to individual assessment area analyses.

Geographic Distribution of Loans

This performance criterion focuses on the bank's lending penetration among geographies of different income levels, with a specific emphasis placed on lending in LMI geographies. As displayed in the following table, the bank's overall geographic distribution of loans reflects poor penetration through the bank's assessment areas.

Assessment Area	Loan Distribution by Geography
Boone County	Poor
Cooper County	Consistent
OVERALL	**Poor**

Additional details regarding the loan distribution by geography are included later in this evaluation, under the sections applicable to individual assessment area analyses.

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The table below displays the bank's quarterly average LTD ratio compared to those of regional peers. The quarterly average LTD ratio represents a 17-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	**Asset Size ($000s) as of March 31, 2015**	**Headquarters**	**Average LTD Ratio**
Mainstreet Bank	$47,496	Ashland, Missouri	48.9%
Regional Banks	$52,738	Glasgow, Missouri	72.1%
	$85,230	Sedalia, Missouri	82.4%
	$85,490	Fulton, Missouri	84.2%
	$102,014	Moberly, Missouri	71.5%

Based on data in the previous table, the bank's level of lending is below that of peer banks in the region. During the review period, the bank's quarterly LTD ratio ranged from a low of 43.0 percent (June 2012) to a high of 60.9 percent (March 2015), and represents a slightly increasing trend. The quarterly LTD ratio for peer banks ranged from 61.6 percent to 91.2 percent. In comparison to data from regional banks, Mainstreet Bank's average quarterly LTD ratio is less than reasonable given the bank's size, financial condition, and assessment area credit needs.

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, 2012 through December 31, 2013						
Loan Type	**Inside Assessment Areas**		**Outside Assessment Areas**		**TOTAL**	
HMDA Loans	23	79.3%	6	20.7%	**29**	**100%**
	$3,491	89.8%	$398	10.2%	**$3,889**	**100%**
Small Business Loans	18	66.7%	9	33.3%	**27**	**100%**
	$2,291	68.0%	$1,076	32.0%	**$3,367**	**100%**
Consumer Motor Vehicle Loans	13	61.9%	8	38.1%	**21**	**100%**
	$176	69.0%	$80	31.4%	**$256**	**100%**
TOTAL LOANS	**54**	**70.1%**	**23**	**29.9%**	**77**	**100%**
	$5,958	**79.3%**	**$1,554**	**20.7%**	**$7,512**	**100%**

As shown in the preceding table, a majority of the bank's loans were extended to borrowers or businesses that reside or operate in the bank's assessment areas. In total, 70.1 percent of the total loans were made inside the assessment areas, accounting for 79.3 percent of the dollar volume of total loans.

Review of Complaints

No CRA-related complaints were filed against the bank during this review period (March 28, 2011 through July 6, 2015).

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

BOONE COUNTY ASSESSMENT AREA

(Full-Scope Review)

DESCRIPTION OF BOONE COUNTY ASSESSMENT AREA

General Demographics

As previously stated, the bank's primary assessment area is Boone County, which is part of the Columbia, Missouri, MSA. Based on 2010 U.S. Census data, the assessment area has a population of 162,642 and is comprised of 4 low-, 6 moderate-, 12 middle-, and 7 upper-income census tracts. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2014, the bank ranked 11th out of the 30 FDIC-insured depository institutions with a branch presence in the assessment area, encompassing 1.0 percent of the total assessment area deposit dollars. Credit needs in the area are varied and include a blend of consumer, business, and farm loan products. However, the community contacts did not specify any particular credit needs that were not being met.

Income and Wealth Demographics

As previously noted, this assessment area consists of 29 census tracts. The following table reflects the number and population of these census tracts in each income category.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown**	**TOTAL**
Census Tracts	4	6	12	7	0	**29**
	13.8%	20.7%	41.4%	24.1%	0.0%	**100%**
Family Population	1,099	5,274	18,256	11,644	0	**36,273**
	3.0%	14.5%	50.3%	32.1%	0.0%	**100%**

The previous table reveals that significant portions (34.5 percent) of assessment area census tracts are LMI and that 17.5 percent of the family population lives in LMI tracts. All of the low- and five of the moderate-income census tracts are located in the city of Columbia. The remaining moderate-income census tract is located farther north, in the city of Centralia.

Based on 2010 U.S. Census data, the median family income for the assessment area was $64,616, compared to the state figure of $57,661. More recently, the FFIEC estimates the 2012 and 2013 median family income for the Columbia, Missouri MSA to be $66,000 and $65,300, respectively. The following table displays population percentages of assessment area families by income level compared to the Missouri family population as a whole.

Family Population by Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Assessment Area	7,436	6,098	8,076	14,663	**36,273**
	20.5%	16.8%	22.3%	40.4%	**100%**
Missouri	320,448	280,559	335,455	610,047	**1,546,509**
	20.9%	17.0%	22.5%	39.6%	**100%**

While the first table in this section indicates that 17.5 percent of assessment area families live in LMI tracts, this table reveals that a significantly higher percentage (37.3 percent) of families are considered LMI. Additionally, the table indicates that family population income levels in the assessment area are comparable with the state as a whole. Additionally, the level of assessment area families living below the poverty level, 9.5 percent, is slightly lower than that of all Missouri families, 10.0 percent. Based on the data, the assessment area appears to be slightly more affluent than the state.

Housing Demographics

Based on housing values, rental costs, and income levels, assessment area housing appears to be less affordable than that of the state. The median housing value for the assessment area is $153,900, well above the statewide median housing value of $137,700. The affordability ratio for the assessment area of 29.8 percent is lower than the state figure of 33.6 percent, indicating the purchase of a home is less affordable in the assessment area than in the state when considering income levels. Lastly, median gross rent for the assessment area is $729 per month and is higher compared to the $667 per month for the state of Missouri.

Industry and Employment Demographics

The assessment area economy is supported primarily by service-oriented sectors. According to the U.S. Census Bureau 2013 County Business Patterns, by number of paid employees in the assessment area, health care and social assistance leads with 16,923, followed by retail trade with 11,278 and accommodation and food services with 9,247. Together, these three industries comprise 52.4 percent of the 71,502-employee total in the assessment area. Furthermore, business demographic estimates indicate that there were 7,683 businesses in the assessment area (90.1 percent with gross annual revenues of $1 million or less). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state.

Unemployment Levels for Assessment Area		
Time Period	**Missouri**	**Assessment Area**
2012 Annual Average	7.0%	4.7%
2013 Annual Average	6.7%	4.6%
2014 Annual Average	6.1%	4.1%
2015 (3-Month Average)	6.2%	4.1%

As shown in the table above, unemployment levels for the assessment area are significantly lower than the state of Missouri figures.

Community Contact Information

Information from two community contacts was used to help shape the performance context in which the bank's activities in this assessment area were evaluated. Of these interviews, one was with an individual specializing in housing, and the other was with an individual working in an economic development role. Both contacts categorized the economy as relatively stable with moderate growth. Also, both contacts stated that there was a significant amount of banking competition in the area. Neither of the contacts specified any unmet credit needs in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE BOONE COUNTY ASSESSMENT AREA

The overall distribution of loans by borrower's income/revenue profile reflects excellent penetration among borrowers of different income levels and businesses of different revenue sizes. Furthermore, the bank's overall geographic distribution of loans reflects poor penetration throughout the assessment area.

Loan Distribution by Borrower's Profile

Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figures as estimated by the FFIEC ($66,000 and $65,300 for the Columbia, Missouri MSA as of 2012 and 2013, respectively). The following table shows the distribution of HMDA loans by borrower income level compared to family population income characteristics and 2012 and 2013 aggregate data for the assessment area.

Distribution of Loans Inside Assessment Area by Borrower Income

January 1, 2012 through December 31, 2013

	Borrower Income Level										TOTAL	
	Low-		Moderate-		Middle-		Upper-		Unknown			
Home Purchase	0	0.0%	0	0.0%	0	0.0%	0	0.0%	4	100.0%	**4**	**100%**
Refinance	2	11.1%	2	11.1%	1	5.6%	0	0.0%	13	72.2%	**18**	**100%**
Home Improvement	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
Multifamily	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
TOTAL HMDA	**2**	**9.1%**	**2**	**9.1%**	**1**	**4.5%**	**0**	**0.0%**	**17**	**77.3%**	**22**	**100%**
Family Population	20.5%		16.8%		22.3%		40.4%		0.0%		**100%**	
2012 HMDA Aggregate	7.2%		17.4%		23.5%		38.5%		13.4%		**100%**	
2013 HMDA Aggregate	8.3%		20.2%		22.3%		36.3%		12.9%		**100%**	

The bank's percentage of lending to low-income borrowers (9.1 percent) is significantly below the percentage of low-income families within the assessment area (20.5 percent). The aggregate data for 2012 and 2013 is 7.2 percent and 8.3 percent, respectively. The difference between aggregate and bank lending data compared to family population is partially explained by the level of poverty. In the assessment area, 9.5 percent of families live below the poverty line, indicating that they are not likely to qualify for traditional mortgage lending products due to income constraints. This context, combined with the bank's performance in relation to aggregate data, results in a reasonable rating for its borrower distribution of HMDA loans to low-income borrowers.

Conversely, bank performance with regard to moderate-income borrowers (9.1 percent) is below the family population (16.8 percent). The aggregate data for 2012 and 2013 is 17.4 percent and 20.2 percent, respectively. Considering these factors, the bank's HMDA lending performance to moderate income borrowers is poor.

As stated previously, the bank is 1 of 30 financial institutions competing in the assessment area. Competitors include three large banking organizations that have multistate branch networks and account for 12.3 percent of the assessment area's deposit market share. Therefore, given the factors discussed above, the bank's overall HMDA lending performance by borrower's profile is reasonable.

Similar to the distribution of HMDA loans, an analysis was conducted of the bank's lending to businesses of differing sizes within the assessment area. The following table reflects Mainstreet Bank's distribution of small business loans by gross annual business revenue compared to Dun & Bradstreet and 2012 and 2013 CRA aggregate data for businesses with revenues less than or equal to $1 million.

Distribution of Loans Inside Assessment Area by Business Revenue

January 1, 2012 through December 31, 2013

Gross Revenue	Loan Amounts in $000s						TOTAL	
	<$100		>$100 and ≤$250		>$250 and ≤$1,000			
$1 Million or Less	13	81.3%	1	6.3%	2	12.5%	**16**	**100%**
Greater than $1 Million/Unknown	0	0.0%	0	0.0%	0	0.0%	**0**	**0.0%**
TOTAL	**13**	**81.3%**	**1**	**6.3%**	**2**	**12.5%**	**16**	**100%**
Dun & Bradstreet Businesses ≤ $1 Million							**90.1%**	
2012 CRA Aggregate Data ≤ $1 Million							**44.2%**	
2013 CRA Aggregate Data ≤ $1 Million							**48.8%**	

Based on this analysis of small business loans, the bank is doing an excellent job of meeting the credit needs of small businesses. The table above demonstrates that all 16 loans reviewed were made to businesses with gross annual revenues of $1 million or less. In comparison, business geodemographic data from Dun & Bradstreet indicate that 90.1 percent of small businesses in the assessment area have gross annual revenues of $1 million or less. The aggregate percentages for 2012 and 2013 are 44.2 percent and 48.8 percent, respectively.

As with the previous two loan categories, the borrower distribution of consumer motor vehicle loans was also analyzed by borrower's income profile. The following table shows the distribution of consumer motor vehicle loans by income level of the borrower compared to household population income characteristics.

Distribution of Loans Inside Assessment Area by Income Level of Borrower January 1, 2012 through December 31, 2013												
	Borrower Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Consumer Motor Vehicle Loans	6	50.0%	4	33.3%	0	0.0%	1	8.3%	1	8.3%	**12**	**100%**
Household Population	24.4%		15.8%		17.2%		42.7%		0.0%		**100%**	

The overall analysis revealed excellent penetration to LMI borrowers. Reviewed separately, the bank's performance by number of motor vehicle loans made to low-income borrowers and moderate-income borrowers, 50.0 percent and 33.3 percent, respectively, significantly exceeds the household population comparisons (24.4 percent for low-income and 15.8 percent for moderate-income) and is considered excellent in both categories.

When considering performance in all three loan categories, the bank's overall borrower distribution is considered excellent.

Geographic Distribution of Loans

As previously noted, the bank's assessment area contains 4 low-, 6 moderate-, 12 middle-, and 7 upper-income census tracts. The analysis in this section illustrates the distribution of the bank's loan activity across these geographies. The following table displays the results of this review compared to owner-occupied housing and 2012 and 2013 aggregate data for the assessment area.

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2012 through December 31, 2013												
	Geography Income Level										TOTAL	
	Low-		Moderate-		Middle-		Upper-		Unknown			
Home Purchase	1	25.0%	1	25.0%	2	50.0%	0	0.0%	0	0.0%	**4**	**100%**
Refinance	2	11.1%	3	16.7%	11	61.1%	2	11.1%	0	0.0%	**18**	**100%**
Home Improvement	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
Multifamily	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
TOTAL HMDA	**3**	**13.6%**	**4**	**18.2%**	**13**	**59.1%**	**2**	**9.1%**	**0**	**0.0%**	**22**	**100%**
Owner-Occupied Housing	1.5%		12.8%		52.9%		32.9%		0.0%		**100%**	
2012 HMDA Aggregate	0.9%		10.9%		50.3%		37.8%		0.0%		**100%**	
2013 HMDA Aggregate	1.3%		11.8%		52.8%		34.1%		0.0%		**100%**	

The analysis of HMDA loans revealed lending performance that is well above data used for comparison purposes; therefore, overall geographic distribution of HMDA loans is excellent. The bank's penetration of low-income census tracts by number of loans (13.6 percent) is higher than the percentage of owner-occupied housing units in low-income census tracts (1.5 percent). Furthermore, the aggregate performance in low-income tracts for 2012 and 2013 is 0.9 percent and 1.3 percent, respectively. This reflects excellent performance.

Bank performance in moderate-income census tracts was also above comparison data. The bank's total penetration of moderate-income tracts by number of loans (18.2 percent) is above the percentage of owner-occupied housing units in moderate-income tracts (12.8 percent). The aggregate performance in moderate-income tracts for 2012 and 2013 is 10.9 percent and 11.8 percent, respectively. This reflects excellent performance.

As with the bank's HMDA lending activity, the geographic distribution of small business loans was also reviewed. The following table displays the geographic distribution of small business loans compared to the estimated percentages of small business institutions located in each geography income category, along with the 2012 and 2013 aggregate statistics for the assessment area.

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2012 through December 31, 2013												
	Geography Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Small Business Loans	1	6.3%	1	6.3%	13	81.3%	1	6.3%	0	0.0%	**16**	**100%**
Business Institutions	15.9%		16.2%		39.7%		28.3%		0.0%		**100%**	
2012 CRA Aggregate	14.5%		14.2%		39.6%		29.0%		2.7%		**100%**	
2013 CRA Aggregate	17.3%		16.8%		38.3%		26.5%		1.1%		**100%**	

The analysis of small business loans revealed lending performance below data used for comparison purposes. The bank's penetration of low-income census tracts by number of loans (6.3 percent) is significantly below the percentage of business institutions in low-income tracts (15.9 percent). Aggregate performance for 2012 and 2013 was 14.5 percent and 17.3 percent, respectively. This is considered poor performance.

Bank performance in moderate-income tracts is also below that of comparison data. The bank's total penetration of moderate-income tracts by number of loans (6.3 percent) is below the percentage of small business institutions in moderate-income tracts (16.2 percent). Aggregate performance for 2012 and 2013 was 14.2 percent and 16.8 percent, respectively. This reflects poor performance. Therefore, the bank's overall geographic distribution of small business loans is poor.

As with the previous two loan categories, the geographic distribution of consumer motor vehicle loans was also reviewed. The following table displays the results of this review.

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2012 through December 31, 2013												
	Geography Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Consumer Motor Vehicle Loans	1	8.3%	0	0.0%	11	91.7%	0	0.0%	0	0.0%	**12**	**100%**
Household Population	6.4%		19.5%		45.1%		28.9%		0.0%		**100%**	

This analysis revealed poor loan distribution throughout the assessment area. The bank's performance in low-income census tracts is 8.3 percent, which exceeds the low-income household population of 6.4 percent, reflecting reasonable performance. Conversely, the bank's performance in moderate-income tracts is very poor, as none of the bank's consumer motor vehicle loans were originated in moderate-income tracts. In total, of the 12 motor vehicle loans reviewed, just 1 was made to borrowers in LMI census tracts, which is significantly below the LMI household population of 25.9 percent. Based on this data, the geographic distribution of consumer motor vehicle loans reflects poor performance.

While the geographic distribution of HMDA loans analysis reflected excellent performance, poor performance was revealed in both small business and consumer motor vehicle categories. Therefore, the bank's overall geographic distribution of loans reflects poor dispersion throughout the assessment area based on activity analyzed from all three loan categories.

COOPER COUNTY ASSESSMENT AREA

(Limited-Scope Review)

DESCRIPTION OF COOPER COUNTY ASSESSMENT AREA

This assessment area consists of the entirety of Cooper County, which is part of nonMSA Missouri. The bank operates two full-service branches within this assessment area. No branch opening or closing activity occurred in this assessment area during the review period. This assessment area was analyzed using a limited-scope review because it is not considered the bank's primary assessment area, had minimal lending activity, and had no LMI census tracts. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Geography Income Classification**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown**	
Census Tracts	0 0.0%	0 0.0%	4 80.0%	1 20.0%	0 0.0%	**5** **100%**
Household Population	0 0.0%	0 0.0%	4,761 74.4%	1,636 25.6%	0 0.0%	**6,397** **100%**
Family Population	0 0.0%	0 0.0%	3,343 77.9%	947 22.1%	0 0.0%	**4,290** **100%**
Business Institutions	0 0.0%	0 0.0%	579 70.5%	242 29.5%	0 0.0%	**821** **100%**

Assessment Area Demographics by Population Income Level					
Demographic Type	**Population Income Classification**				**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	
Family Population	750 17.5%	585 13.6%	927 21.6%	2,028 47.3%	**4,290** **100%**
Household Population	1,265 19.8%	976 15.3%	1,134 17.7%	3,022 47.2%	**6,397** **100%**

<u>Community Contact Information</u>

Information from two community contacts was used to obtain assessment area background information, including information relating to credit needs and the local economy. Of these interviews, one was with an individual specializing in housing, and another was with an individual working in a government planning and economic development role. Both contacts categorized the economy as weak, with only incremental growth. Neither of the contacts noted any unmet credit needs for the assessment area.

CONCLUSIONS WITH REPSPECT TO PERFORMANCE CRITERIA IN THE COOPER COUNTY ASSESSMENT AREA

Mainstreet Bank's overall lending performance in this assessment area is consistent. For more detailed information relating to the bank's performance in this assessment area, see the tables in *Appendix A.*

LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE REVIEW AREA

Distribution of Loans Inside Assessment Area by Borrower Income January 1, 2012 through December 31, 2013												
	Borrower Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Home Purchase	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
Refinance	0	0.0%	0	0.0%	0	0.0%	1	100.0%	0	0.0%	**1**	**100%**
Home Improvement	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
Multifamily	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
TOTAL HMDA	**0**	**0.0%**	**0**	**0.0%**	**0**	**0.0%**	**1**	**100.0%**	**0**	**0.0%**	**1**	**100%**
Family Population	17.5%		13.6%		21.6%		47.3%		0.0%		**100%**	
2012 HMDA Aggregate	2.9%		18.0%		19.3%		44.5%		15.3%		**100%**	
2013 HMDA Aggregate	5.1%		19.5%		21.9%		41.0%		12.5%		**100%**	

Distribution of Loans Inside Assessment Area by Business Revenue January 1, 2012 through December 31, 2013								
Gross Revenue	**Loan Amounts in $000s**						**TOTAL**	
	<$100		**>$100 and ≤$250**		**>$250 and ≤$1,000**			
$1 Million or Less	1	50.0%	1	50.0%	0	0.0%	**2**	**100.0%**
Greater than $1 Million/Unknown	0	0.0%	0	0.0%	0	0.0%	**0**	**0.0%**
TOTAL	**1**	**50.0%**	**1**	**50.0%**	**0**	**0.0%**	**2**	**100%**
Dun & Bradstreet Businesses ≤ $1 Million							**89.4%**	
2012 CRA Aggregate Data ≤ $1 Million							**41.1%**	
2013 CRA Aggregate ≤ $1 Million							**49.1%**	

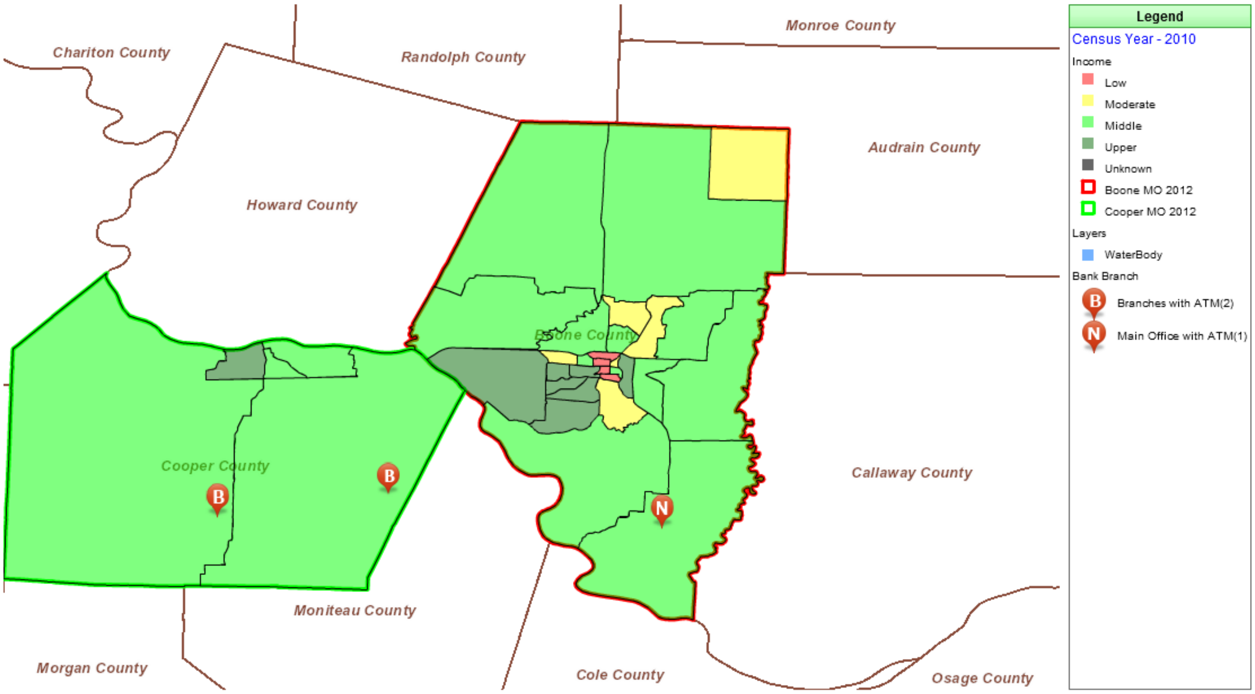
Distribution of Loans Inside Assessment Area by Income Level of Borrower January 1, 2012 through December 31, 2013												
	Borrower Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Consumer Loans	0	0.0%	0	0.0%	0	0.0%	1	100.0%	0	0.0%	**1**	**100%**
Household Population	19.8%		15.3%		17.7%		47.2%		0.0%		**100%**	

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2012 through December 31, 2013												
	Geography Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Home Purchase	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
Refinance	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%	**1**	**100%**
Home Improvement	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
Multifamily	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
TOTAL HMDA	**0**	**0.0%**	**0**	**0.0%**	**1**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**	**1**	**100%**
Owner Occupied Housing	0.0%		0.0%		77.8%		22.2%		0.0%		**100%**	
2012 HMDA Aggregate	0.0%		0.0%		66.8%		29.7%		3.4%		**100%**	
2013 HMDA Aggregate	0.0%		0.0%		71.3%		27.3%		1.3%		**100%**	

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2012 through December 31, 2013												
	Geography Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Small Business Loans	0	0.0%	0	0.0%	2	100.0%	0	0.0%	0	0.0%	**2**	**100%**
Business Institutions	0.0%		0.0%		70.5%		29.5%		0.0%		**100%**	
2012 CRA Aggregate Data	0.0%		0.0%		75.8%		19.9%		4.2%		**100%**	
2013 CRA Aggregate Data	0.0%		0.0%		72.4%		27.0%		0.6%		**100%**	

Distribution of Loans Inside Assessment Area by Income Level of Geography January 1, 2012 through December 31, 2013												
	Geography Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Consumer Loans	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%	**1**	**100%**
Household Population	0.0%		0.0%		74.4%		25.6%		0.0%		**100%**	

ASSESSMENT AREA DETAIL



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- and moderate-income individuals; (2) community services targeted to low- and moderate-income 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- and 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 (such as age, race, sex, income, etc.) used especially to identify markets.

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 the income of applications, 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: Is calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the 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).

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.

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 by either 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.