PUBLIC DISCLOSURE

SEPTEMBER 21, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

KCB BANK
RSSD# 701950

950 WEST HIGHWAY 92
KEARNEY, MISSOURI 64060

Federal Reserve Bank of Kansas City
1 Memorial Drive
Kansas City, Missouri 64198

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING: *This institution is rated* ***Satisfactory.***

KCB Bank (the bank) has a satisfactory record of meeting the credit needs of its assessment area (AA), consistent with its resources and operating philosophy.

Considering the bank's financial capacity, size, and economic environment, its net loan-to-deposit (NLTD) ratio indicates a reasonable effort to extend credit within its AA. A majority of the bank's loans were originated in the AA; and the bank's level of lending by income level of geography and borrower, and to businesses of different revenue size, is reasonable.

SCOPE OF EXAMINATION

The bank's Community Reinvestment Act (CRA) performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC's) Interagency Small Institution Examination Procedures. The examination included an evaluation of the bank's performance with consideration given to the demographic profile of the area in which the bank operates. Four of the five criteria used to evaluate a small bank's lending performance under the CRA were relevant to this review and are listed as follows:

- NLTD Ratio
- Lending Inside the AA
- Distribution of Loans by Income Level of Geography
- Lending to Businesses of Different Revenue Sizes and Borrowers of Different Income Levels

The bank's responsiveness to complaints under the CRA, the fifth core criterion used to assess small bank performance, was not evaluated as the bank has not received any CRA-related complaints since the previous examination. Due to branching changes since the previous examination, more weight was placed on the review of lending to businesses of different revenue sizes and borrowers of different income levels in assessing overall performance.

The examination included an evaluation of the bank's performance in the context of AA demographic information and the performance of aggregate lenders in the market. Conclusions about the four performance criteria were based on data compiled from the bank's major product lines, commercial and residential real estate loans. The major product lines were determined through discussions with bank management, a review of the Reports of Condition and Income, and a review of the number of loan originations since the bank's most recent CRA examination conducted in August 2011.

The bank's average NLTD ratio for the most recent 16 quarters ending June 30, 2015 was compared to five similarly situated competitor banks. Conclusions about the remaining performance criteria were based on a review of a statistically derived sample of 64 commercial loans originated between July 1, 2014 and December 31, 2014. In addition, the evaluation included a review of all loan originations reported on the bank's 2013 and 2014 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs), which included a universe of 239 loans.

For evaluative purposes, the bank's performance for commercial lending was compared to 2014 Dun & Bradstreet (D&B) demographic data, and its performance for HMDA lending was compared to 2010 American Community Survey (ACS) demographic data as well as 2014 aggregate lending data reported by all HMDA reporters with loan originations in the bank's AA. Further, interviews with community members within the AA were used to ascertain local market conditions, determine specific credit needs of the AA, and establish performance context for the institution.

DESCRIPTION OF INSTITUTION

The bank is headquartered in Kearney, Missouri, which is located approximately 25 miles northeast of downtown Kansas City, Missouri, and is included within the Kansas City Metropolitan Statistical Area (MSA). The bank operates three full-service branches in Liberty and Gladstone, Missouri, and Bonner Springs, Kansas. The Bonner Springs location, while offering both deposit and loan products to consumers, does not accept cash deposits. The bank also operates a drive-through location in Kearney, Missouri, and a commercial loan production office (LPO) in Lee's Summit, Missouri. Additionally, the bank operates four full-service automated teller machines (ATMs) and one cash-dispensing only ATM. The full-service ATMs are located at the bank headquarters and drive-through only location in Kearney, Missouri, the Liberty branch, and the Bonner Springs branch. The cash-dispensing only ATM is located at the Gladstone branch.

The bank is a $201 million institution and wholly owned subsidiary of Bancshares of Missouri, Inc., Kearney, Missouri, a one-bank holding company. The bank is primarily a commercial lender but also offers a variety of products to meet the credit needs of the AA. Table 1 provides a breakdown of the bank's loan portfolio by product type as of June 30, 2015.

TABLE 1 KCB BANK LOAN PORTFOLIO AS OF JUNE 30, 2015		
Loan Type	**Amount $(000)**	**Percent of Total**
Commercial	99,936	78.2
Residential Real Estate	20,874	16.3
Agriculture	4,747	3.7
Consumer	1,521	1.2
Other	776	0.6
Gross Loans	127,854	100.0

Since the previous examination in August 2011, the bank made several branching changes. The bank opened a branch in Merriam, Kansas, in February 2013, which was subsequently closed in January 2014. The bank also acquired its Gladstone, Missouri, branch in February 2013, which is currently in operation. In November 2013, the bank converted its Bonner Springs commercial LPO to a full-service branch and proceeded to close its Overland Park, Kansas, commercial LPO the following month. More recently, the bank opened its Lee's Summit LPO in May 2014. In addition to these branching changes, the Liberty branch moved to a new facility in May 2013, and the bank closed an off-site cash-dispensing only ATM.

There are no legal or financial factors that prevent the bank from meeting the credit needs of its AA. The bank received a Satisfactory rating at its previous CRA evaluation conducted by the Federal Reserve Bank of Kansas City on August 22, 2011.

DESCRIPTION OF THE BANK'S ASSESSMENT AREA

The bank's AA encompasses the following five counties in their entirety: Clay, Jackson, and Platte Counties in northwest Missouri and Johnson and Wyandotte Counties in eastern Kansas. This represents a change from the prior evaluation where the bank's AA consisted of Clay and Clinton Counties, Missouri, in their entirety. The AA remains entirely within the Kansas City MSA. According to 2014 FFIEC Census data, the AA is comprised of 65 low-, 111 moderate-, 133 middle-, 138 upper-, and 16 unknown-income census tracts. The area includes the urban core of Kansas City along with the immediately surrounding suburbs of the Kansas City MSA. The area contains the majority of LMI tracts located in Jackson County, Missouri, and Wyandotte County, Kansas.

Population and Income Characteristics

According to 2010 Census data, the AA's population is estimated at 1,687,103 and comprises 84.0 percent of the overall Kansas City MSA population. From 2000 to 2010, the population within the AA has grown at a slightly higher rate than the total MSA population, at 10.9 percent and 9.4 percent, respectively. This growth primarily occurred in Johnson, Clay, and Platte Counties, which all experienced growth over 20 percent. The population in Wyandotte and Jackson Counties remained stable over this time period.

Within the AA, 20.3 percent of families are considered low-income and 17.2 percent are moderate-income, while 21.0 percent are middle-income and 41.6 percent are upper-income. Wyandotte and Jackson Counties have a higher proportion of low-income families at 34.5 percent and 27.6 percent, respectively. The median family income for the AA is $70,033, which is slightly higher than the reported median family income for the MSA of $68,846. Johnson and Platte Counties have higher median family incomes at $90,380 and $79,472, respectively, while Wyandotte and Jackson Counties have lower median family incomes at $47,653 and $58,831, respectively. A slightly higher percentage of families are living under the poverty level within the AA at 8.2 percent compared to 8.0 percent for the MSA as a whole. Again, these percentages are higher within Wyandotte and Jackson Counties, at 16.5 percent and 11.9 percent, respectively.

Employment and Banking Characteristics

According to 2014 FFIEC Census data, the unemployment rate within the AA is estimated at 7.0 percent which is between the unemployment rates for the states of Missouri and Kansas at 7.4 percent and 6.0 percent, respectively, and comparable to the unemployment rate for the Kansas City MSA, at 6.8 percent. Wyandotte County has a significantly higher unemployment rate of 12.2 percent. According to contacts with local community members, the Kansas City area has benefited from expansion within the Ford Motor Company's Auto Assembly Plant, which has created a significant number of jobs for area residents. Additionally, the continued growth of Cerner Corporation and Burns and McDonnell, which are headquartered in the AA, has also contributed to area growth. Other top employers within the area are FedEx, Kraft Tool, Deffenbaugh, and local school districts and government.

The market for financial services in the AA and the broader Kansas City MSA is extremely competitive. According to the Federal Deposit Insurance Corporation's (FDIC's) Insured Institutions Deposit Market Share Report as of June 30, 2015, 138 insured institutions operate 715 facilities throughout the entire metropolitan area. Of these, 102 institutions operate 578 facilities within the bank's AA. The bank held 0.4 percent of deposits within the AA and ranked 35th out of the 102 institutions. According to community members, larger banks are extremely active in the area, especially within the moderate income tracts closest to the Kansas City urban core, making it difficult for smaller community banks to penetrate the market. This is illustrated by the fact that 82 of the institutions operating in the AA have less than one percent market share of deposits.

Housing Characteristics

According to 2014 FFIEC Census data, housing units in the AA totaled 730,311, representing 84.7 percent of the total housing stock in the MSA. This reflects a 13.6 percent increase in housing stock from the 2000 Census data. The median housing value within the AA is comparable to that of the MSA, at $160,949 and $158,603, respectively; however, it is significantly higher than the states of Missouri and Kansas, at $137,700 and $122,600, respectively. Johnson and Platte Counties have higher median housing values, at $209,900 and $185,100, while Wyandotte County has a significantly lower median housing value of

$97,600. The level of owner-occupied housing units in the AA, as a whole, is comparable to the level in the MSA and the individual states of Missouri and Kansas; however, Jackson and Wyandotte Counties have lower levels of owner-occupied housing units and higher levels of rental units and vacant units.

As previously mentioned, a substantial majority of the LMI tracts within the AA are located in the eastern portion of Wyandotte County and western portion of Jackson County. Table 2 summarizes the characteristics of the bank's AA based on the 2014 FFIEC Census data and 2014 D&B business information.

TABLE 2
ASSESSMENT AREA DEMOGRAPHICS

Income Categories	Tract Distribution		Families By Tract Income		Families < Poverty Level as a % of Families by Tract		Families By Family Income	
	#	%	#	%	#	%	#	%
Low	65	14.0	34,299	8.0	10,798	31.5	86,927	20.3
Moderate	111	24.0	91,004	21.2	13,155	14.5	73,539	17.2
Middle	133	28.7	142,769	33.3	7,569	5.3	89,872	21.0
Upper	138	29.8	160,693	37.5	3,694	2.3	178,427	41.6
Unknown	16	3.5	0	0.0	0	0.0	0	0.0
Total AA	**463**	**100.0**	**428,765**	**100.0**	**35,216**	**8.2**	**428,765**	**100.0**
	Housing Units By Tract	Housing Type By Tract						
		Owner-Occupied			Rental		Vacant	
		#	% By Tract	% By Unit	#	% By Unit	#	% By Unit
Low	78,624	26,125	5.9	33.2	35,583	45.3	16,916	21.5
Moderate	181,584	85,446	19.2	47.1	72,457	39.9	23,681	13.0
Middle	237,595	153,800	34.6	64.7	66,397	27.9	17,398	7.3
Upper	232,498	179,446	40.3	77.2	40,512	17.4	12,540	5.4
Unknown	10	0	0.0	0.0	10	100.0	0	0.0
Total AA	**730,311**	**444,817**	**100.0**	**60.9**	**214,959**	**29.4**	**70,535**	**9.7**
	Total Businesses by Tract		Businesses By Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	5,675	7.4	4,790	7.1	658	9.8	227	9.4
Moderate	15,286	19.9	13,165	19.4	1,628	24.1	493	20.5
Middle	23,425	30.5	21,009	31.0	1,703	25.2	713	29.6
Upper	31,266	40.7	28,089	41.5	2,252	33.4	925	38.4
Unknown	1,235	1.6	676	1.0	507	7.5	52	2.2
Total AA	**76,887**	**100.0**	**67,729**	**100.0**	**6,748**	**100.0**	**2,410**	**100.0**
Percent of Total Businesses:				**88.1**		**8.8**		**3.1**

Based on 2010 ACS five-year estimate data, 2014 FFIEC Census tract designations, and 2014 D&B Data.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Net Loan-to-Deposit Ratio:

The bank's average NLTD ratio is considered reasonable based on its size, financial condition, and AA credit needs. The bank's average NLTD ratio for the most recent 16 quarters ending June 30, 2015 was compared to five similarly situated competitor banks. The bank's NLTD ratio of 72.3 percent is comparable to other similarly situated banks in the area with ratios ranging from 45.7 percent to 97.5 percent. According to bank management, the institution strives to make loans whenever possible but the high degree of competition in the area serves as a hindering factor.

Lending within the Assessment Area:

This core performance criterion evaluates the bank's lending inside its AA. As illustrated in Table 3, a majority of the bank's loans were originated within the bank's AA at 84.2 percent by number and 83.5 percent by dollar volume. These figures reflect a reasonable effort to serve the credit needs of the communities in which the bank operates. For the remainder of the analysis, only the loans originated within the bank's AA were considered.

TABLE 3
LENDING INSIDE AND OUTSIDE THE BANK'S ASSESSMENT AREAS

Bank Loans	Inside				Outside			
	#	$(000)	#%	$%	#	$(000)	#%	$%
Small Business Loans	56	8,965	87.5	90.0	8	992	12.5	10.0
HMDA Related Loans	199	37,036	83.3	82.0	40	8,131	16.7	18.0
Total Loans	255	46,001	84.2	83.5	48	9,123	15.8	16.5

Distribution by Revenue Size of Businesses and Borrower Income

This performance criterion evaluates the bank's distribution of lending to businesses of different revenue sizes and distribution of lending to borrowers of different income levels.

Small Business Loans

This analysis focuses on lending to small businesses, defined as businesses with revenues of $1 million (MM) or less. The bank's commercial lending activity was compared to the percentage of small businesses inside the AA. As seen in Table 4, 88.1 percent of AA businesses are considered small according to 2014 D&B data. Comparably, the bank's lending to small businesses comprised 60.7 percent of its commercial loans by number and 56.4 percent by dollar volume. A smaller amount of the bank's business loans were made to businesses with revenues over $1MM, at 39.3 percent by number and 43.6 percent by dollar amount.

One community member stated that there is a struggle to draw small businesses into the Kearney and Liberty areas, where the bank's most established branches are located. Other community members stated that larger businesses have moved into parts of the AA or are expanding their presence. Most growth occurs within businesses that are already established in the area. This is consistent with the repeat business seen in the bank's loan portfolio. As noted in the description of the AA, there are a significant number of community banks competing against a small number of larger banks. In particular, four larger banks account for more than 50 percent of total market share. Given these mitigating factors, the bank's level of lending to small businesses is considered reasonable.

TABLE 4 DISTRIBUTION BY REVENUE SIZE OF BUSINESSES					
Business Revenue	Small Business Loans				% of Businesses by Revenue[1]
	#	$(000)	#%	$%	
$1MM or Less	34	5,056	60.7	56.4	88.1
Over $1MM	22	3,909	39.3	43.6	8.8
Income Not Known	0	0	0.0	0.0	3.1

[1] Based on 2014 D&B data.
(Note: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Home Mortgage Disclosure Act Loans

This analysis focuses on lending to borrowers of different income levels, including LMI individuals. The bank's HMDA lending activity was analyzed by the income level of the borrower compared to the percent of the population within the AA that falls into each income category.

As seen in Table 6 on page 10, the bank's lending to low- and moderate-income borrowers, at 7.4 percent and 14.8 percent, respectively, is lower than the number of LMI families within the AA, which is reported at 20.3 percent and 17.2 percent, respectively. Aggregate lenders faced similar challenges in its efforts to reach low-income borrowers, with 8.6 percent of its home mortgage lending to families in this income category. This supports statements made by a community member that not all LMI individuals within the AA are seeking financing. Additionally, the bank showed improvement in its lending to LMI borrowers since the previous year's HMDA data, signifying an effort to serve these LMI populations.

Based on information gained from discussions with community members and relative to performance by aggregate lenders, the bank's distribution of home mortgage lending reflects reasonable penetration among individuals of different income levels.

TABLE 5
DISTRIBUTION OF 2014 HOME MORTGAGE DISCLOSURE ACT LOANS BY BORROWER INCOME LEVELS

Borrower Income Level	Bank Loans				Aggregate HMDA Data[1]		% of Families[2]
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans[3]							
Low	6	559	7.4	3.4	8.6	4.0	20.3
Moderate	12	1,360	14.8	8.4	17.8	11.6	17.2
Middle	19	2,977	23.5	18.3	20.1	16.7	21.0
Upper	29	7,102	35.8	43.6	33.3	42.4	41.6
Unknown	15	4,273	18.5	26.3	20.2	25.3	0.0
Home Purchase Loans							
Low	6	559	11.8	6.8	9.1	4.4	20.3
Moderate	9	1,005	17.6	12.3	19.6	13.7	17.2
Middle	12	1,851	23.5	22.6	20.6	19.0	21.0
Upper	13	3,246	25.5	39.7	32.8	46.4	41.6
Unknown	11	1,515	21.6	18.5	17.9	16.5	0.0
Refinanced Loans							
Low	0	0	0.0	0.0	7.9	4.2	20.3
Moderate	3	355	11.1	7.0	14.9	10.2	17.2
Middle	6	1,036	22.2	20.3	19.3	16.1	21.0
Upper	15	3,456	55.6	67.7	33.7	44.5	41.6
Unknown	3	258	11.1	5.1	24.2	24.9	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	8.1	3.7	20.3
Moderate	0	0	0.0	0.0	15.6	10.1	17.2
Middle	1	90	50.0	18.4	21.1	18.3	21.0
Upper	1	400	50.0	81.6	40.9	56.5	41.6
Unknown	0	0	0.0	0.0	14.3	11.4	0.0
Multifamily Loans							
Unknown	1	2,500	100.0	100.0	100.0	100.0	0.0

[1] Aggregate loan data reflects all loan originations in the bank's AA reported by all HMDA filers.
[2] Based on 2010 five-year estimate data and 2010 FFIEC Census tract designations.
[3] Multifamily loans are not considered in the borrower analysis.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

Distribution by Income Level of Geographies

This performance criterion evaluates the bank's distribution of loans among geographies of various income levels. Emphasis is placed on the bank's level of lending to LMI tracts.

Small Business Loans

The bank's geographic distribution of small business loans reflects reasonable dispersion throughout the AA.

The bank's small business lending within low-income tracts, at 3.6 percent by number and 8.9 percent by dollar volume, and its' lending within moderate-income tracts, at 19.6 percent by number and 12.7 percent by dollar volume, is comparable to the percent of small businesses located within those tracts, at 7.4 percent and 19.9 percent, respectively.

TABLE 6
DISTRIBUTION OF SMALL BUSINESS LOANS BY INCOME LEVEL OF GEOGRAPHY

Census Tract Income Level	Small Business Loans				% of Businesses[1]
	#	$(000)	#%	$%	
Low	2	795	3.6	8.9	7.4
Moderate	11	1,135	19.6	12.7	19.9
Middle	15	1,910	26.8	21.3	30.5
Upper	28	5,126	50.0	57.2	40.7

[1] The percentage of businesses in the AA is based on 2014 D&B data.

Home Mortgage Disclosure Act Loans

The bank's geographic distribution of HMDA loans reflects poor dispersion throughout the AA.

The bank's HMDA loan activity was compared to the percentage of owner-occupied units located in each census tract income level. As seen in Table 7, the bank had no lending within low-income tracts and lending within moderate-income tracts was significantly lower by number volume, compared to both HMDA aggregate lending data and the number of owner-occupied units within the AA. In contract, lending within middle- and upper-income tracts exceeded that of aggregate lenders.

The distance of bank offices and competition are two factors contributing to the bank's low performance in LMI tracts. As discussed, the majority of LMI tracts are located in the urban core of Kansas City. The bank's strongest lending presence is around its headquarters in Kearney, Missouri, which is approximately 15 miles from the urban core. The bank's Liberty and Gladstone branches are closer to the urban core area; however, the Gladstone branch was only acquired in February 2013. According to community members, there is strong competition from other financial institutions in the Kansas City urban core, supporting the perspective that these areas are difficult for institutions without a nearby physical presence to penetrate.

TABLE 7
DISTRIBUTION OF 2014 HOME MORTGAGE DISCLOSURE ACT LOANS BY INCOME LEVEL OF GEOGRAPHY

Census Tract Income Level	Bank Loans				Aggregate HMDA Data[1]		% of Owner Occupied Units[2]
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	2.3	2.6	5.9
Moderate	5	2,845	6.2	17.5	13.6	9.0	19.2
Middle	30	4,810	37.0	29.6	34.6	27.2	34.6
Upper	43	7,904	53.1	48.6	49.5	61.2	40.3
Unknown	3	712	3.7	4.4	0.0	0.1	0.0
Home Purchase Loans							
Low	0	0	0.0	0.0	1.8	1.0	5.9
Moderate	3	205	5.9	2.5	12.8	7.2	19.2
Middle	22	3,584	43.1	43.8	35.0	27.6	34.6
Upper	26	4,387	51.0	53.7	50.4	64.1	40.3
Home Refinance Loans							
Low	0	0	0.0	0.0	2.8	1.7	5.9
Moderate	1	140	3.7	2.7	14.8	8.7	19.2
Middle	8	1,226	29.6	24.0	34.4	28.1	34.6
Upper	15	3,027	55.6	59.3	47.9	61.5	40.3
Unknown	3	712	11.1	13.9	0.1	0.1	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	4.1	1.5	5.9
Moderate	0	0	0.0	0.0	13.3	6.3	19.2
Middle	0	0	0.0	0.0	31.9	23.1	34.6
Upper	2	490	100.0	100.0	50.7	69.1	40.3
Multifamily Loans							
Low	0	0	0.0	0.0	18.8	19.3	5.9
Moderate	1	2,500	100.0	100.0	38.7	24.8	19.2
Middle	0	0	0.0	0.0	25.8	21.3	34.6
Upper	0	0	0.0	0.0	16.7	34.6	40.3

[1] Aggregate loan data reflects all loan originations in the bank's AA reported by all HMDA filers.
[2] The percentage of owner-occupied housing and multifamily units by tract are based on 2010 Census tract boundaries and 2010 ACS data.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act. A review of bank policies and procedures, credit applications, loans and denials, and staff interviews revealed no prohibited practices designed to discourage loan applicants. Also, the bank has not engaged in other illegal credit practices inconsistent with helping to meet the credit needs of its communities.

APPENDIX A

TABLE 1
DISTRIBUTION OF 2013 HOME MORTGAGE DISCLOSURE ACT LOANS BY BORROWER INCOME LEVELS

Borrower Income Level	Bank Loans				Aggregate HMDA Data[1]		% of Families[2]
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans[3]							
Low	4	365	3.4	1.8	7.4	3.5	20.5
Moderate	15	1,798	12.7	8.7	16.8	10.8	17.3
Middle	27	3,299	22.9	15.9	21.0	16.9	21.0
Upper	54	11,663	45.8	56.2	36.5	43.7	41.2
Unknown	18	3,640	15.3	17.5	18.2	25.1	0.0
Home Purchase Loans							
Low	3	270	5.6	3.3	8.9	4.4	20.5
Moderate	10	1,277	18.5	15.7	20.6	14.5	17.3
Middle	9	999	16.7	12.3	22.1	20.4	21.0
Upper	20	4,499	37.0	55.3	34.7	49.0	41.2
Unknown	12	1,096	22.2	13.5	13.6	11.7	0.0
Refinanced Loans							
Low	1	95	1.7	0.8	6.4	3.0	20.5
Moderate	5	521	8.5	4.6	14.1	8.8	17.3
Middle	17	2,289	28.8	20.1	20.2	15.4	21.0
Upper	31	6,871	52.5	60.4	37.3	42.0	41.2
Unknown	5	1,601	8.5	14.1	21.9	30.9	0.0
Home Improvement Loans							
Low	0	0	0.0	0.0	5.7	2.1	20.5
Moderate	0	0	0.0	0.0	16.1	10.7	17.3
Middle	1	11	25.0	3.6	23.4	17.4	21.0
Upper	3	293	75.0	96.4	47.0	60.1	41.2
Unknown	0	0	0.0	0.0	7.8	9.6	0.0
Multifamily Loans							
Unknown	1	943	100.0	100.0	100.0	100.0	0.0

1 Aggregate loan data reflects all loan originations in the bank's AA reported by all HMDA filers.
2 Based on 2010 five-year estimate data and 2010 FFIEC Census tract designations.
3 Multifamily loans are not considered in the borrower analysis.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)

TABLE 2
DISTRIBUTION OF 2013 HOME MORTGAGE DISCLOSURE ACT LOANS BY INCOME LEVEL OF GEOGRAPHY

Census Tract Income Level	Bank Loans				Aggregate HMDA Data[1]		% of Owner Occupied Units[2]
	#	$(000)	#%	$%	#%	$%	
Total Home Mortgage Loans							
Low	0	0	0.0	0.0	2.1	1.6	6.0
Moderate	16	1,866	13.6	9.0	12.5	7.7	19.1
Middle	38	6,365	32.2	30.7	34.0	28.3	34.9
Upper	64	12,534	54.2	60.4	51.5	62.4	40.0
Home Purchase Loans							
Low	0	0	0.0	0.0	1.8	1.1	6.0
Moderate	8	817	14.8	10.0	11.7	6.6	19.1
Middle	18	2,045	33.3	25.1	35.1	27.1	34.9
Upper	28	5,279	51.9	64.8	51.4	65.1	40.0
Home Refinance Loans							
Low	0	0	0.0	0.0	2.2	1.3	6.0
Moderate	7	981	11.9	8.6	13.0	8.0	19.1
Middle	18	3,193	30.5	28.1	33.2	29.8	34.9
Upper	34	7,203	57.6	63.3	51.6	60.9	40.0
Home Improvement Loans							
Low	0	0	0.0	0.0	2.4	1.0	6.0
Moderate	1	68	25.0	22.4	10.8	4.7	19.1
Middle	1	184	25.0	60.5	33.8	24.0	34.9
Upper	2	52	50.0	17.1	53.0	70.2	40.0
Multifamily Loans							
Low	0	0	0.0	0.0	18.7	13.0	6.0
Moderate	0	0	0.0	0.0	33.1	18.8	19.1
Middle	1	943	100.0	100.0	34.3	18.1	34.9
Upper	0	0	0.0	0.0	13.9	50.1	40.0

1 Aggregate loan data reflects all loan originations in the bank's AA reported by all HMDA filers.
2 The percentage of owner-occupied housing and multifamily units by tract are based on 2010 Census tract boundaries and 2010 ACS data.
(NOTE: Total percentages shown may vary by 0.1 percent due to automated rounding differences.)