PUBLIC DISCLOSURE

April 23, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Old Missouri Bank
RSSD #2785646

3570 South National Avenue
Springfield, Missouri 65807

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.

The Lending Test is rated:	**Satisfactory**
The Community Development Test is rated:	**Satisfactory**

Old Missouri Bank (OMB) meets the criteria for a Satisfactory rating based on the evaluation of the bank's lending and community development activities. The factors supporting the institution's rating are as follows:

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area credit needs.

- A majority of loans and other lending-related activities are in the assessment area.

- The distribution of loans to borrowers reflects reasonable penetration among individuals of different income levels (including low- and moderate-income [LMI] levels) and businesses and farms of different sizes.

- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.

- No CRA-related complaints were filed against the bank since the previous CRA evaluation.

The bank's overall community development performance demonstrates adequate responsiveness to the community development needs of its assessment area, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area. The bank has responded to these needs through community development loans, qualified donations, and community development services.

SCOPE OF EXAMINATION

The bank's CRA performance was evaluated using the Federal Financial Institutions Examination Council's (FFIEC's) intermediate small bank procedures. The intermediate small bank examination procedures entail two performance tests: the Lending Test and the Community Development Test. Small farm, Home Mortgage Disclosure Act (HMDA), and small business loans were used to evaluate the bank's lending performance, as these loan categories are considered the bank's core business lines based on lending volume and the bank's stated business strategy.[1] The loan activity represented by these credit products is deemed indicative of the bank's overall lending performance. However, as the bank has a particular emphasis on agricultural lending, performance based on the small farm loan category carried the most significance toward overall performance conclusions. The following table details the performance criterion and the corresponding time periods used in each analysis.

[1] Small farm and small business loan types were sampled for this review according to CA Letter 01-8, "CRA Sampling Procedures."

Performance Criterion	Time Period
LTD Ratio	March 31, 2014 – December 31, 2017
Assessment Area Concentration	January 1, 2016 – December 31, 2016
Loan Distribution by Borrower's Profile	January 1, 2016 – December 31, 2016
Geographic Distribution of Loans	January 1, 2016 – December 31, 2016
Response to Written CRA Complaints	February 10, 2014 – April 22, 2018
Community Development Activities	February 10, 2014 – April 22, 2018

Lending Test 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 and farm demographics are based on 2016 Dun & Bradstreet data. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally 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. Three other banks were identified as similarly situated peers, with asset sizes ranging from $449.5 million to $614.2 million as of December 31, 2017.

As part of the Community Development Test, the bank's performance was evaluated using the following criteria, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

- The number and dollar amount of community development loans.
- The number and dollar amount of qualified investments and grants.
- The extent to which the bank provides community development services.

The review included community development activities initiated from the date of the bank's previous CRA evaluation to this review date.

To augment this evaluation, two community contact interviews were conducted with members of the local community to understand specific credit needs, opportunities, and local market conditions within the bank's assessment area. Information from these interviews also assisted in evaluating the bank's responsiveness to identified community credit needs and community development opportunities. Key details from these community contact interviews are included in the *Description of Assessment Area* section.

DESCRIPTION OF INSTITUTION

OMB is a full-service retail bank offering agricultural, consumer, and commercial loan and deposit products. The bank is wholly owned by Jamesmark Bancshares, Inc., a one-bank holding company headquartered in Springfield, Missouri. The bank's branch network has changed significantly since the prior CRA evaluation in 2014. Previously, the bank operated one main office and one branch location in Springfield, Missouri (Greene County). In December 2014, the bank acquired two additional branch locations in Ash Grove and Walnut Grove (both in Greene County) through the merger with Bank of Ash Grove. In March 2016, OMB purchased the Buffalo, Missouri, branch (Dallas County) from Great Southern Bank. OMB's main office and four branch locations are full-service with cash-only automated teller machines on site. The bank did not close any branch offices during this review period.[2]

Based on this branch network, OMB is well positioned to deliver financial services to nearly all of its assessment area. However, geographic constraints may hinder the bank from fully serving the entirety of Polk and Webster Counties, which are in the northwestern and eastern portions of the assessment area, respectively. Polk and Webster Counties contain three moderate-income census tracts, all of which are approximately 20 miles from the nearest OMB branch. Additionally, high banking competition in the assessment area offers residents in these counties closer banking alternatives than commuting to the nearest OMB branch location. Given that 19.1 percent of the assessment area LMI families reside in Polk and Webster Counties, the bank may have some difficulty serving the credit needs of these borrowers, given its current branch structure and these geographic constraints.

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 December 31, 2017, the bank reported total assets of $387.5 million. As of the same date, loans and leases outstanding were $340.9 million (88.0 percent of total assets) and deposits totaled $315.0 million. The bank's loan portfolio composition by credit category is displayed in the following table.

[2] As of the date of the evaluation, OMB operated one branch in a second assessment area, comprised of Lawrence County in nonmetropolitan statistical area (nonMSA) Missouri. However, the bank did not enter this assessment area until January 22, 2018, while most of the data for this evaluation is prior to 2018. As a result, meaningful conclusions could not be drawn about the bank's lending in this assessment area, and it was excluded from this analysis.

Distribution of Total Loans as of December 31, 2017		
Credit Category	**Amount ($000s)**	**Percentage of Total Loans**
Construction and Development	$14,969	4.4%
Commercial Real Estate	$59,470	17.4%
Multifamily Residential	$8,636	2.5%
1–4 Family Residential	$61,736	18.1%
Farmland	$105,202	30.9%
Farm Loans	$39,290	11.5%
Commercial and Industrial	$43,170	12.7%
Loans to Individuals	$6,480	1.9%
Total Other Loans	$2,003	0.6%
Less: Unearned Income	$(82)	0.0%
TOTAL	**$340,874**	**100%**

As indicated in the table above, a significant portion of the bank's lending resources is directed to agricultural lending (farmland and farm loans), loans secured by 1–4 family residential properties, and commercial real estate.

The bank received a Satisfactory rating using small bank procedures at its previous CRA evaluation conducted on February 10, 2014, by this Reserve Bank.

DESCRIPTION OF ASSESSMENT AREA

General Demographics

The bank has delineated the entire Springfield, Missouri, MSA (Springfield MSA) as its assessment area. Located in southwest Missouri, the MSA includes the counties of Christian, Dallas, Greene, Polk, and Webster. As of the 2010 U.S. Census, the assessment area population was 436,712. Greene County is the most populous county in the assessment area, with a population of 275,174. Although the assessment area is in an MSA, a significant portion of the MSA is rural, which is the catalyst for OMB's agricultural lending focus. Accordingly, agricultural loans represent an important credit need in the assessment area in addition to the need for a standard blend of consumer loans products. Community contacts specifically noted the need for down payment assistance programs for LMI individuals and capital loans for the startup of small farms.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2017, there are 38 FDIC-insured depository institutions in the assessment area that operate 190 offices. Of the 38 institutions, 5 combine to hold over half of the deposit market share. OMB (operating five, or 2.6 percent, offices in the assessment area) ranked tenth in terms of deposit market share, with 3.0 percent of the total assessment area deposit dollars.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area 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	3	22	50	16	0	**91**
	3.3%	24.2%	54.9%	17.6%	0.0%	**100%**
Family Population	1,015	18,602	70,171	23,432	0	**113,220**
	0.9%	16.4%	62.0%	20.7%	0.0%	**100%**

As shown above, the majority of assessment area families (62.0 percent) reside in middle-income census tracts. While 27.5 percent of assessment area census tracts are considered LMI, only 17.3 percent of assessment area families reside in these LMI census tracts. All three low-income census tracts are located within the city of Springfield. One of the low-income tracts is comprised largely of the Missouri State University campus. The low-income tract next to the campus is largely made up of multifamily housing that serves the college students. While the third low-income tract is comprised primarily of 1–4 family units, it has a low owner-occupancy rate (21.1 percent) compared to the overall assessment area occupancy rate of 61.1 percent. Additionally, the majority of the moderate-income census tracts (19 of 22) are located within the city of Springfield, and the remaining three moderate-income census tracts are located in Polk and Webster Counties. As previously noted, the bank does not operate any branches in Polk or Webster Counties.

Based on 2010 U.S. Census data, the median family income for the assessment area was $52,463. At the same time, the median family income was $57,661 for the state of Missouri. More recently, the FFIEC estimated the 2016 median family income for the Springfield MSA to be $53,200. The following table displays population percentages of assessment area families by income level compared to the state of Missouri family population as a whole.

Family Population by Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown**	**TOTAL**
Assessment Area	22,058	20,860	25,066	45,236	0	**113,220**
	19.5%	18.4%	22.1%	40.0%	0.0%	**100%**
Missouri	318,048	279,308	335,189	613,964	0	**1,546,509**
	20.6%	18.1%	21.7%	39.7%	0.0%	**100%**

As shown in the table above, 37.9 percent of families in the assessment area were considered LMI, which is comparable to LMI family percentage of 38.7 percent in the state of Missouri. The assessment area also has middle- and upper-income family populations comparable to the state of Missouri. Although not shown in the table above, the percentage of families living below the poverty threshold in the assessment area, 11.1 percent, exceeds the 10.0 percent level of Missouri families. Considering these factors, including the median family income figures, the assessment area appears less affluent than the state of Missouri as a whole.

Housing Demographics

Based on housing values and rental costs, housing in the assessment area is slightly more affordable than in the state of Missouri. The median housing value for the assessment area is $127,627, which is below the figure for the state, $137,700. However, the housing affordability ratio of 33.2 percent, which calculates the extent to which a family earning the median assessment area household income can afford a median-price home, is similar to the state figure of 33.6 percent. The low affordability ratio indicates that homeownership may be out of reach for LMI families.

In addition, one community contact indicated that for LMI individuals, finding rental property accepting housing choice vouchers (income-restricted programs) has become more difficult due to a combination of housing and economic factors. Due to the high demand for affordable rental properties, available housing for LMI individuals is limited. The median gross rent in the bank's assessment area ($630 per month) is lower than in the state of Missouri ($667 per month). However, a higher portion of residents' rental costs are greater than 30 percent of their income in the bank's assessment area (45.1 percent) than in the state of Missouri (43.2 percent), which indicates that rental units are less affordable in the bank's assessment area.

Industry and Employment Demographics

The assessment area supports a variety of economic sectors, the three largest of which are health care and social assistance, retail trade, and accommodation and food services, according to 2015 data from the U.S. Census Bureau County Business Patterns. Of the 179,168 paid employees in the assessment area, 33,180 (18.5 percent) are employed in health care and social assistance, 25,161 (14.0 percent) in retail trade, and 18,786 (10.5 percent) in accommodation and food services. County Business Patterns indicate that there are only 96 paid employees in the agricultural sector; however, this figure excludes agricultural production employees and thus does not capture the significant agriculture operations in the assessment area. The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for each county in the assessment area, the assessment area average, and the state of Missouri.

Unemployment Levels				
Dataset	**Time Period (Annual Average)**			
	2014	**2015**	**2016**	**2017**
Greene County	4.9%	4.1%	3.8%	3.1%
Christian County	4.9%	4.2%	3.9%	3.1%
Webster County	6.1%	5.1%	4.9%	3.9%
Dallas County	7.6%	6.2%	5.5%	4.7%
Polk County	6.4%	5.3%	4.8%	4.0%
Assessment Area Average	**5.2%**	**4.4%**	**4.0%**	**3.2%**
State of Missouri	6.2%	5.0%	4.5%	3.8%

As shown in the table above, unemployment levels for the assessment area vary by county, with the highest levels of unemployment generally in Dallas and Polk Counties and the lowest in Greene County. For each year of the review period, unemployment in each of the five counties was below that of the state of Missouri as a whole. Overall, unemployment rates have seen steady declines since 2014.

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 individual was with an organization that provides housing assistance, while the other represented an organization tasked with meeting the needs of farmers. Both contacts stated the region has experienced recent economic growth. One contact further specified that the growth of Missouri State University has fueled increased demand for new construction and new businesses. Both contacts stated that the majority of the region's economic activity has occurred in Greene County, in the city of Springfield, and that many of the residents in the surrounding counties commute to Greene County for work.

The individual working in agriculture stated that, although the agriculture community is strong, the startup costs for new farmers are very high. Major barriers to farm credit include credit history and lack of experience. Therefore, loan products to assist with startup costs are needed. Additionally, financial education and credit repair services are needed throughout the assessment area.

Although the region has experienced a decline in unemployment levels as shown earlier, the contact working in housing mentioned that the region still has a relatively high poverty rate. The contact attributed this to the prevalence of low-wage and low-skilled jobs. Specific needs noted include affordable childcare, low-interest loans for security deposits, and down payment assistance programs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

LENDING TEST

Loan-to-Deposit (LTD) Ratio

One indication of the bank's overall level of lending activity is its LTD ratio. The chart below displays the bank's average LTD ratio compared to those of regional peers. The average LTD ratio represents a 16-quarter average, dating back to the bank's last CRA evaluation.

LTD Ratio Analysis			
Name	**Headquarters**	**Asset Size ($000s) as of December 31, 2017**	**Average LTD Ratio**
OMB	Springfield, Missouri	$387,491	103.2%
Regional Banks	Springfield, Missouri	$614,207	86.7%
	Greenville, Missouri	$449,495	85.3%
	Cassville, Missouri	$270,997	91.3%

Based on data from the previous table, the bank's level of lending is above that of other banks in the region. During the review period, the LTD ratio was generally stable, with a 16-quarter average of 103.2 percent. In comparison, the average LTD ratios for the regional peers ranged from a low of 85.3 percent to a high of 91.3 percent. The bank's most recent LTD ratio for the quarter ending December 31, 2017, was 106.9 percent, and the bank's LTD ratio was consistently higher than peers. Therefore, the bank's average LTD ratio is more 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 area.

Lending Inside and Outside of Assessment Area January 1, 2016 through December 31, 2016						
Loan Type	**Inside Assessment Area**		**Outside Assessment Area**		**TOTAL**	
Small Farm	75	75.8%	24	24.2%	**99**	**100%**
	6,775	68.7%	3,081	31.3%	**$9,856**	**100%**
HMDA	157	80.9%	37	19.1%	**194**	**100%**
	33,215	76.7%	10,076	23.3%	**$43,291**	**100%**
Small Business	73	88.0%	10	12.0%	**83**	**100%**
	9,801	89.7%	1,121	10.3%	**$10,922**	**100%**
TOTAL LOANS	**305**	**81.1%**	**71**	**18.9%**	**376**	**100%**
	49,791	**77.7%**	**14,278**	**22.3%**	**$64,069**	**100%**

A majority of loans and other lending-related activities were made in the bank's assessment area. As shown above, 81.1 percent of the total loans were made inside the assessment area, accounting for 77.7 percent of the dollar volume of total loans.

Loan Distribution by Borrower's Profile

While the bank's distribution of loans to small farms is excellent, the bank's overall loan distribution by borrower's profile is reasonable, based on the HMDA and small business loan categories.

Small farms loans were reviewed to determine the bank's lending levels to farms of different sizes. The following table shows the distribution of 2016 small farm loans by loan amount and farm revenue size compared to Dun & Bradstreet and aggregate data.

Distribution of Loans Inside Assessment Area by Farm Revenue January 1, 2016 through December 31, 2016								
Gross Revenue	**Loan Amounts in $000s**						**TOTAL**	
	≤$100		**>$100 and ≤$250**		**>$250 and ≤$1,000**			
$1 Million or Less	35	63.6%	14	25.5%	4	7.3%	**53**	**96.4%**
Greater than $1 Million/Unknown	1	1.8%	0	0.0%	1	1.8%	**2**	**3.6%**
TOTAL	**36**	**65.5%**	**14**	**25.5%**	**5**	**9.1%**	**55**	**100%**
Dun & Bradstreet Farms ≤ $1MM							**99.0%**	
Small Farm Aggregate ≤ $1MM							**78.7%**	

The bank's performance in meeting the credit needs of small farms is excellent. All but two of the bank's small farm loans were made to farms with annual revenues of $1 million or less. The percentage of the bank's total small farm loans (96.4 percent) is well above the small farms aggregate lending level (78.7 percent) and slightly below the percentage of farms with annual revenues of $1 million or less (99.0 percent). As further evidence of the bank's ability to meet the credit needs of small farms, 63.6 percent of the bank's small farm loans were in amounts of $100,000 or less.

Next, HMDA lending was reviewed. Borrowers are classified into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure as estimated by the FFIEC ($53,200 for the Springfield MSA as of 2016). The following table shows the distribution of HMDA-reported loans by borrower income level compared to family population income demographics for the assessment area. Additionally, 2016 aggregate data for the assessment area is displayed.

Distribution of Loans Inside Assessment Area by Borrower Income

January 1, 2016 through December 31, 2016

	Borrower Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Home Purchase	6	14.3%	4	9.5%	7	16.7%	14	33.3%	11	26.2%	**42**	**100%**
Refinance	6	8.6%	4	5.7%	2	2.9%	38	54.3%	20	28.6%	**70**	**100%**
Home Improvement	1	3.7%	3	11.1%	1	3.7%	14	51.9%	8	29.6%	**27**	**100%**
Multifamily	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
TOTAL HMDA	**13**	**9.4%**	**11**	**7.9%**	**10**	**7.2%**	**66**	**47.5%**	**39**	**28.1%**	**139**	**100%**
Family Population	19.5%		18.4%		22.1%		40.0%		0.0%		**100%**	
2016 HMDA Aggregate	4.6%		15.3%		18.6%		36.3%		25.3%		**100%**	

As displayed in the preceding table, the bank's percentage of lending to low-income borrowers (9.4 percent) is substantially below the low-income family population figure (19.5 percent); however, it is more than twice the aggregate lending level to low-income borrowers (4.6 percent), reflecting reasonable performance. The bank's level of lending to moderate-income borrowers (7.9 percent) is below the moderate-income family population level (18.4 percent) and the aggregate lending level to moderate-income borrowers (15.3 percent), reflecting poor performance.

Demographic data for the assessment area indicates that the portion of families in the assessment area below the poverty line (11.1 percent) is higher than the statewide level (10.0 percent), which may negatively impact the bank's ability to make home loans to LMI borrowers. OMB is attempting to reach LMI borrowers in its assessment area by offering United States Department of Agriculture Rural Development loans that are typically beneficial to LMI borrowers, though the overall impact made in the assessment area is mitigated by the presence of nearby competitors offering the same products. Considering performance to both income categories, the bank's overall distribution of HMDA loans by borrower's profile is considered reasonable.

Lastly, small business loans were reviewed to determine the bank's lending levels to businesses of different sizes. The following table shows the distribution of 2016 small business loans by loan amount and business revenue size compared to Dun & Bradstreet and aggregate data.

Distribution of Loans Inside Assessment Area by Business Revenue

January 1, 2016 through December 31, 2016

Gross Revenue	Loan Amounts in $000s						TOTAL	
	≤$100		>$100 and ≤$250		>$250 and ≤$1,000			
$1 Million or Less	24	36.9%	11	16.9%	7	10.8%	**42**	**64.6%**
Greater than $1 Million/Unknown	14	21.5%	4	6.2%	5	7.7%	**23**	**35.4%**
TOTAL	**38**	**58.5%**	**15**	**23.1%**	**12**	**18.5%**	**65**	**100%**
Dun & Bradstreet Businesses ≤ $1MM							**90.0%**	
2016 CRA Aggregate Data							**48.1%**	

The bank's level of lending to small businesses is reasonable. The bank originated the majority of its small business loans (64.6 percent) to businesses with revenues of $1 million or less. Although this figure is below the percentage of assessment area businesses with annual revenues of $1 million or less (90.0 percent), it exceeds the aggregate lending level to small businesses (48.1 percent). The bank's willingness to meet the credit needs of small businesses is further demonstrated by the fact that 58.5 percent of the bank's small business loans were in amounts of $100,000 or less.

Geographic Distribution of Loans

As previously noted, the assessment area includes 3 low- and 22 moderate-income census tracts, representing 27.5 percent of all assessment area census tracts. Additionally, geographic constraints may hinder the bank from fully serving the northwestern portion of its assessment area in Polk County and the eastern portion of its assessment area in Webster County. Overall, the bank's geographic distribution of loans in this assessment area reflects reasonable penetration throughout these LMI census tracts, based on the small farm, HMDA, and small business loan categories.

The following table displays 2016 small farm loan activity by geography income level compared to the location of farms throughout the bank's assessment area and 2016 small farm aggregate data.

Distribution of Loans Inside Assessment Area by Geography Income Level January 1, 2016 through December 31, 2016											
	Geography Income Level										TOTAL
	Low-		Moderate-		Middle-		Upper-		Unknown		
Small Farm Loans	1	1.8%	2	3.6%	46	83.6%	6	10.9%	0	0.0%	**55** **100%**
Total Farms by Tract	0.3%		10.7%		81.4%		7.6%		0.0%		**100%**
2016 Small Farm Aggregate	0.0%		8.9%		85.7%		5.3%		0.2%		**100%**

The bank's lending level in low-income geographies is above comparison data and is considered excellent. As a portion of the bank's total small farm loans, 1.8 percent were made to farms in low-income census tracts, which is above the percentage of assessment area farms in those census tracts (0.3 percent). In addition, the bank's level of lending is above other lenders based on aggregate data, which indicated that no small farm loans were in low-income census tracts. Furthermore, all three low-income census tracts are located in the city of Springfield, Missouri. According to 2016 census data, only two farm institutions are located within the low-income census tracts of the Springfield MSA.

In contrast, although the bank's lending level in moderate-income geographies is well below comparison data, performance is considered reasonable. As previously mentioned, the bank faces difficulty serving its entire assessment area due to geographic constraints. The bank's total level of lending in moderate-income census tracts (3.6 percent) is below the percentage of farms operating inside those census tracts (10.7 percent) and 2016 aggregate lending levels (8.9 percent). However, of the 22 moderate-income census tracts located in the Springfield MSA, the 3 in Polk and Webster Counties include 80.3 percent of assessment area small farm institutions (53 of 66 small farms). As previously mentioned, these geographies are difficult to reach based on the bank's geographic footprint. Furthermore, high banking competition in the area offers residents a closer banking alternative than commuting to the nearest OMB branch location. Given this performance context, the bank's overall small farm level of lending in LMI census tracts is considered reasonable.

Second, the bank's geographic distribution of HMDA loans was reviewed. The following table displays the geographic distribution of 2016 HMDA loans compared to owner-occupied housing demographics and aggregate performance for the assessment area.

Distribution of Loans Inside Assessment Area by Geography Income Level January 1, 2016 through December 31, 2016												
	Geography Income Level										**TOTAL**	
	Low-		**Moderate-**		**Middle-**		**Upper-**		**Unknown**			
Home Purchase	0	0.0%	6	14.3%	29	69.0%	7	16.7%	0	0.0%	**42**	**100%**
Refinance	1	1.4%	14	20.0%	45	64.3%	10	14.3%	0	0.0%	**70**	**100%**
Home Improvement	0	0.0%	3	11.1%	22	81.5%	2	7.4%	0	0.0%	**27**	**100%**
Multifamily	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	**0**	**100%**
TOTAL HMDA	**1**	**0.7%**	**23**	**16.5%**	**96**	**69.1%**	**19**	**13.7%**	**0**	**0.0%**	**139**	**100%**
Owner-Occupied Housing	0.5%		16.0%		61.2%		22.4%		0.0%		**100%**	
2016 HMDA Aggregate	0.5%		11.2%		62.4%		25.9%		0.0%		**100%**	

The analysis of HMDA loans revealed reasonable lending performance to borrowers residing in low-income geographies. The bank's total penetration of low-income census tracts by number of loans (0.7 percent) is slightly above the percentage of owner-occupied housing units (0.5 percent) as well as 2016 aggregate data (0.5 percent). In light of the low volume of lending and opportunity to lend, the bank's lending performance to borrowers residing in low-income geographies is considered reasonable.

The bank's performance of HMDA loans revealed excellent lending performance to borrowers residing in moderate-income geographies. The bank's total penetration of moderate-income census tracts by number of loans (16.5 percent) is slightly higher than the percentage of owner-occupied housing units in moderate-income census tracts (16.0 percent). Similarly, the bank outperformed peers in this market based on aggregate lending data, which indicates that 11.2 percent of aggregate HMDA loans inside this assessment area were made to borrowers residing in moderate-income geographies. Combined, the bank's geographic distribution of HMDA loans in LMI geographies (17.2 percent) is considered excellent especially in light of the geographic constraints previously discussed.

Third, the bank's geographic distribution of small business loans was reviewed. The following table displays 2016 small business loan activity by geography income level compared to the location of businesses throughout the bank's assessment area and 2016 small business aggregate data.

Distribution of Loans Inside Assessment Area by Geography Income Level January 1, 2016 through December 31, 2016												
	Geography Income Level										TOTAL	
	Low-		Moderate-		Middle-		Upper-		Unknown			
Small Business Loans	0	0.0%	7	10.8%	48	73.8%	10	15.4%	0	0.0%	**65**	**100%**
Business Institutions	0.7%		24.9%		55.1%		19.3%		0.0%		**100%**	
2016 Small Business Aggregate	0.4%		24.1%		52.2%		22.4%		1.0%		**100%**	

The bank originated no small business loans in low-income census tracts compared to the percentage of businesses operating inside those census tracts (0.7 percent) and 2016 aggregate lending levels (0.4 percent). While the bank had no volume in the low-income census tracts, this is mitigated to some extent by the low number of reported business institutions in those tracts (115). Nevertheless, the bank's performance in low-income areas is poor. Similarly, the bank's percentage of loans in moderate-income census tracts (10.8 percent) is less than half of the 2016 aggregate lending percentage in moderate-income census tracts (24.1 percent), as well as the percentage of small businesses in moderate-income census tracts (24.9 percent), reflecting poor performance. Therefore, the bank's overall geographic distribution of small business loans is poor.

Lastly, based on reviews from all three loan categories, OMB had loan activity in 72.5 percent of all assessment area census tracts. In total, 25 of the assessment area tracts contained no loan activity, 2 of which were low- and 7 were moderate-income census tracts. The bank originated loans in the majority of LMI census tracts (64.0 percent). Furthermore, the bank's lending patterns are reflective of the bank's branching structure, as well as the assessment area's student population and limited demand for loans within several LMI census tracts. Therefore, no conspicuous lending gaps were identified, and the geographic distribution of loans in this assessment area is reasonable.

Responses to Complaints

No CRA-related complaints were filed against the bank during this review period (February 10, 2014 through April 22, 2018).

COMMUNITY DEVELOPMENT TEST

The bank's overall community development performance demonstrates adequate responsiveness to the community development needs of the assessment area, considering the bank's capacity and the need and availability of such opportunities for community development in the assessment area. The bank has addressed the community development needs of the assessment area through community development loans, qualified donations, and community development services. As previously noted, OMB has grown significantly since the previous CRA evaluation. In accordance with this growth, OMB only recently met the definition of an intermediate small institution based on the asset-size threshold as of January 1, 2018. Therefore, the bank's level of community development activities was considered in light of its recent change in designation.

During the review period, the bank made seven qualifying community development loans totaling \$5,798,394. Six loans were to a local hospital that serves as an anchor institution in a moderate-income census tract. The additional loan provided affordable housing for LMI individuals.

While the bank did not make any qualifying investments during this review period, 34 community development donations were made in the assessment area, totaling \$15,860. Furthermore, the 34 donations were to 21 separate organizations having a community development purpose. Noteworthy donations included:

- A \$1,000 donation to an organization that provides a free four-week basic budgeting program to individuals in the community. This donation shows responsiveness to the need for financial education noted by community contacts.

- Three donations totaling \$2,350 to an organization that provides affordable housing to LMI individuals in the community.

- Two donations totaling \$5,000 toward the revitalization and stabilization of an LMI area consistent with the City of Springfield's strategic action plan.

Lastly, 13 employees contributed community development services to 17 different agencies. The employees provided their financial expertise by teaching financial literacy to children and serving in the roles of secretary, treasurer, board member, and president for organizations that provide community services to LMI individuals and families.

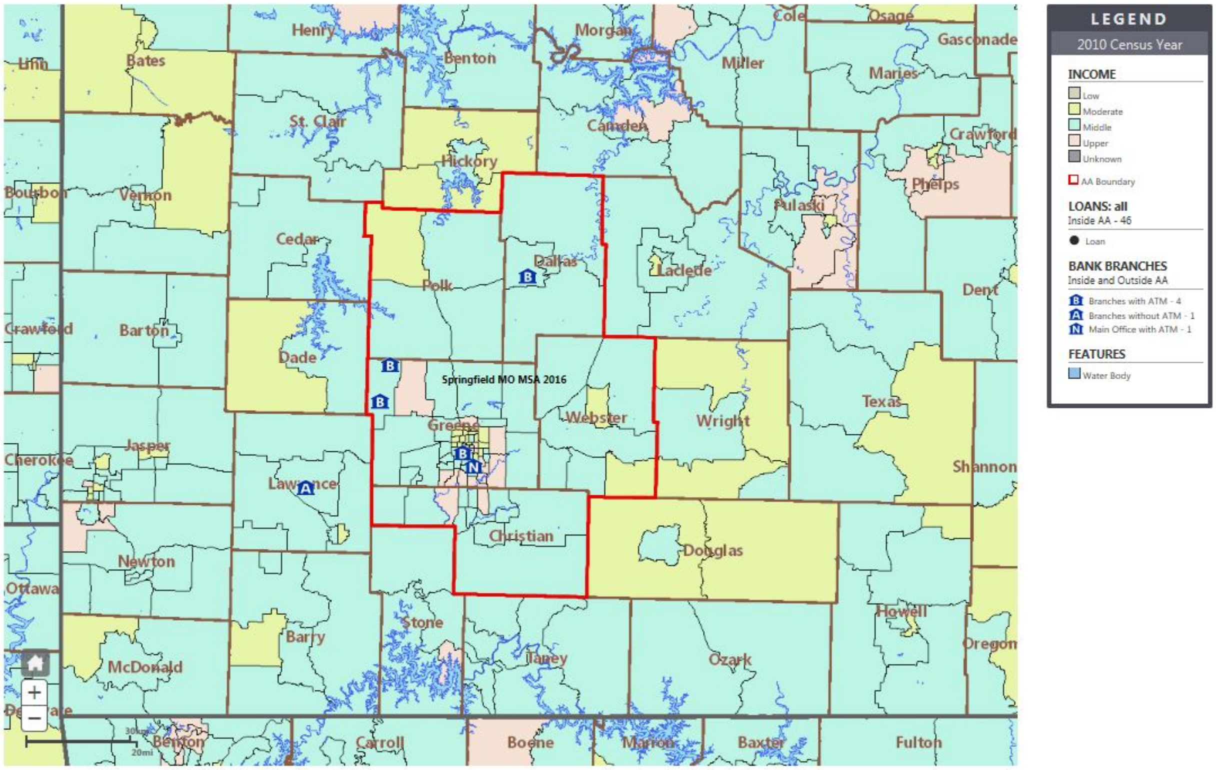
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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.

ASSESSMENT AREA DETAIL

Old MO Bank - Springfield, MO

Springfield MO MSA AA 2016



PE Map

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 (LMI) individuals; (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 LMI 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.