PUBLIC DISCLOSURE

December 9, 2024

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

The Union State Bank of Everest
RSSD# 736550

545 Main Street
Everest, Kansas 66424

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

NOTE: This document is an evaluation of this bank'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 bank. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial bank.

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

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

The Union State Bank of Everest (the bank) is rated Satisfactory. This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests.

- The bank's net loan-to-deposit ratio (NLTD) is reasonable given the bank's size, financial condition, and assessment areas' (AA) credit needs.
- A majority of the bank's loans are originated inside its AAs.
- An excellent distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Neither the bank nor the Federal Reserve Bank of Kansas City (Reserve Bank) received any Community Reinvestment Act (CRA)-related complaints since the previous evaluation.
- Community development (CD) activity reflects adequate responsiveness to CD needs of the bank's AAs.

SCOPE OF EXAMINATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy and market competition, as well as the AAs' demographic and economic characteristics, and credit needs. In addition, available aggregate data for the most recent three years (2020, 2021, and 2022) was referenced for additional perspective to gauge credit demand within the bank's AAs. Performance was assessed within the bank's three AAs. The Northeast Kansas and Kansas City Metropolitan AAs were assessed using a full-scope review. The Jefferson County Metropolitan AA was assessed using a limited-scope review. Examiners reviewed the following data:

- The bank's 12-quarter average NLTD ratio;
- A statistical sample of 142 small farm loans selected from a universe of 470 loans and 120 small business loans selected from a universe of 291 loans originated between January 1, 2023, and December 31, 2023;

- The universe of 411 home mortgage loans reported on the bank's 2022 and 2023 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers (LARs);
- CD loans, qualified investments, and CD services from December 6, 2021, through June 30, 2024.

When determining the overall institution rating, greater weight was placed on the Kansas state rating based on higher lending and deposit volumes, as well as the number of branches. With respect to the lending analysis, more emphasis was placed on home mortgage lending due to the volume of loan originations.

DESCRIPTION OF INSTITUTION

The Union State Bank of Everest is a community bank headquartered in Everest, Kansas. The bank's characteristics include:

- The bank is a wholly owned subsidiary of Everest Bancshares, Inc.
- The bank has total assets of $413.0 million as of June 30, 2024.
- In addition to its main office in Everest, the bank has seven additional offices located in Kansas and Missouri. The bank operates five offices in Kansas and three offices in Missouri. Since the last examination, the bank added a full-service branch in Clay County, Missouri, and expanded its Kansas City Metropolitan AA accordingly.
- Each bank office operates a cash-only Automated Teller Machine (ATM).
- As shown in the table below, the bank's primary business focus is agricultural, commercial, and residential real estate lending.

Table 1

Composition of Loan Portfolio as of June 30, 2024		
Loan Type	**$(000)**	**%**
Construction and Land Development	18,849	6.3
Farmland	66,529	22.3
1- to 4-Family Residential Real Estate	82,904	27.8
Multifamily Residential Real Estate	1,522	0.5
Nonfarm Nonresidential Real Estate	51,991	17.4
Agricultural	44,337	14.9
Commercial and Industrial	24,568	8.2
Consumer	6,873	2.3
Other	732	0.2
Gross Loans	**298,305**	**100.0**
Note: *Percentages may not total 100.0 percent due to rounding.*		

The bank was rated Satisfactory under the CRA at its December 6, 2021, performance evaluation. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

This performance evaluation first discusses the bank's overall performance, followed by an in-depth evaluation of the bank's record of lending and CD activities in each state and specific AA.

LENDING TEST

The bank's overall lending test performance is Satisfactory based on the institution's reasonable NLTD ratio; originating a majority of loans inside its AAs; excellent distribution of loans throughout the bank's AAs; and reasonable distribution of loans to individuals of different income levels and to businesses and farms of different revenue sizes. In determining the overall lending test rating, equal weight was given to each of the performance criteria. Furthermore, the lending test performance was rated Satisfactory for the states of Kansas and Missouri.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA, and in comparison, to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions. The similarly situated institutions were selected based on asset size, product offerings, market share, and their locations within or near the bank's AAs. The bank's NLTD ratio is reasonable. The bank's 12-quarter average NLTD ratio was comparable to the range of the five similarly situated institutions with ratios ranging from 46.9 percent to 89.4 percent.

Table 2

			NLTD Ratio (%)
Comparative NLTD Ratios September 30, 2021 – June 30, 2024			
Institution	**Location**	**Asset Size $(000)**	**12-Quarter Average**
The Union State Bank of Everest	Everest, Kansas	413,006	75.9
Similarly Situated Institutions			
Verimore Bank	Brookfield, Missouri	453,186	89.4
Goppert Financial Bank	Lathrop, Missouri	260,519	60.0
Union State Bank	Clay Center, Kansas	188,666	70.1
Denison State Bank	Holton, Kansas	442,214	72.9
Citizens Bank & Trust Company	Rock Port, Missouri	111,896	46.9

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the AA. The bank originated a majority of loans, by number and dollar, inside its AAs.

Table 3

	Inside				Outside			
Lending Inside and Outside the Assessment Areas								
Loan Type	#	#%	$(000)	$%	#	#%	$(000)	$%
Home Improvement	34	82.9	$1,858	77.3	7	17.1	$545	22.7
Home Purchase -	102	60.7	$15,627	54.1	66	39.3	$13,265	45.9
Multi-Family Housing	9	56.3	$3,578	44.5	7	43.8	$4,468	55.5
Other Purpose Closed-End	24	77.4	$3,090	71.4	7	22.6	$1,240	28.6
Refinancing	130	83.9	$17,084	81.9	25	16.1	$3,767	18.1
Total HMDA related	**299**	**72.7**	**$41,237**	**63.9**	**112**	**27.3**	**$23,285**	**36.1**
Small Business	93	77.5	$7,435	70.5	27	22.5	$3,111	29.5
Small Farm	111	78.2	$7,541	79.1	31	21.8	$1,995	20.9
TOTAL LOANS	**503**	**74.7**	**$56,213**	**66.4**	**170**	**25.3**	**$28,392**	**33.6**

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

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AAs. This rating was primarily driven by an excellent rating for the state of Kansas where the highest volume of lending occurs. The geographic distribution of lending in the state of Missouri reflects reasonable distribution.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses and farms of different revenue sizes. The bank's lending has an overall reasonable penetration among individuals of different income levels and businesses and farms of different sizes. The state ratings for Kansas and Missouri are consistent with the overall conclusion of reasonable.

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank's responsiveness to CD needs of its AAs through CD loans, qualified investments, and CD services, considering the bank's capacity and the need and availability of such opportunities in the bank's AAs.

The bank's overall CD test performance is Satisfactory and demonstrates adequate responsiveness. The bank originated a total of two CD loans related to economic development, supporting the retention of jobs for LMI individuals. The bank made one qualified investment to support education through the purchase of a school bond at a district where greater than 50.0 percent of the students are on the free and reduced lunch program. The bank also made three qualified donations for local community service activities targeted to LMI individuals. The CD test performance state ratings for Missouri and Kansas were satisfactory.

Table 4

Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	$(000)	#	$(000)	#	$(000)	#	$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	0	0	1	308	3	6	4	314	14
Economic Development	2	825	0	0	0	0	0	0	6
Revitalization and Stabilization	0	0	0	0	0	0	0	0	0
Outside Activities	0	0	0	0	0	0	0	0	0
Totals	2	825	1	308	3	6	4	314	20

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

STATE OF KANSAS

CRA rating for Kansas: ***Satisfactory***
The Lending Test is rated: ***Satisfactory***
The Community Development Test is rated: ***Satisfactory***

This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- An excellent distribution of loans occurs throughout the bank's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses and farms of different sizes.
- Community development (CD) activity reflects adequate responsiveness to CD needs of its AAs.

SCOPE OF EXAMINATION

The scope of the review for the state of Kansas was consistent with the overall scope for the institution. A full-scope review was conducted for the Northeast Kansas AA. A limited-scope review was conducted for the Jefferson County Metropolitan AA to ascertain if the bank's performance in this area was generally consistent with its performance in the overall state evaluation.

A total of 375 loans was reviewed in the state of Kansas, including 208 home mortgage, 70 small business, and 97 small farm loans. The greatest weight was placed on the bank's home mortgage lending, with small business and small farm lending carrying lesser, but equal weight, based on loan volumes.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN KANSAS

The bank delineates two of its three AAs and operates five of its eight branches in the state of Kansas. Loan and deposit products and services offered in the state mirror those discussed in the overall Institution section of this report. To further augment the CRA performance evaluation, a community contact was conducted to help ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The contact represented an economic development organization that serves the Northeast Kansas AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's overall lending test performance in the state of Kansas is Satisfactory. Bank performance under the lending test in the Northeast Kansas AA is considered reasonable, and the bank's lending performance in the limited-scope Jefferson County Metropolitan AA is consistent with the state rating.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans within Kansas reflects excellent distribution among the different census tracts and dispersion throughout the AAs. The distribution of loans across geographies of different income levels is also excellent in the Northeast Kansas AA.

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

The bank's lending has an overall reasonable distribution among individuals of different income levels and businesses and farms of different sizes. The borrower distribution of loans is also reasonable in the Northeast Kansas AA.

COMMUNITY DEVELOPMENT TEST

The bank's overall CD test performance in the state of Kansas is Satisfactory and demonstrates adequate responsiveness. The bank originated two CD loans related to economic development and made three qualified donations in support of local community services. There were no qualifying investments in the state of Kansas.

Table 5

Community Development Purpose	Community Development Loans		Qualified Investments							Community Development Services
			Investments		Donations		Total Investments			
	#	$(000)	#	$(000)	#	$(000)	#	$(000)		#
Affordable Housing	0	0	0	0	0	0	0	0		0
Community Services	0	0	0	0	3	6	3	6		11
Economic Development	2	825	0	0	0	0	0	0		0
Revitalization and Stabilization	0	0	0	0	0	0	0	0		0
Outside Activities	0	0	0	0	0	0	0	0		0
Totals	2	825	0	0	3	6	3	6		11

Community Development Activity
Assessment Area: State of Kansas

NORTHEAST KANSAS ASSESSMENT AREA
NONMETROPOLITAN AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE NORTHEAST KANSAS AA

The bank's Northeast Kansas AA consists of Brown and Atchison Counties in their entirety, along with two census tracts in Doniphan County. See Appendix B for an AA map and Appendix C for additional demographic data.

- The delineation of the AA remains unchanged since the previous evaluation.
- The composition of the AA includes one moderate-, seven middle-, one upper-, and one unknown-income census tract. At the prior evaluation, the AA was comprised of nine middle-income census tracts. This change in tract income levels went into effect starting in 2022 due to updated 2016-2020 American Community Survey (ACS) data.
- The bank operates three offices in the AA, including its headquarters. Each office has a cash-only ATM. The offices are located in the cities of Everest, Horton, and Atchison. As of June 30, 2024, the bank held a 6.3 percent market share of deposits in the AA, ranking 9th out of 15 FDIC-insured institutions with 25 banking offices operating in the AA.
- To further augment the CRA performance evaluation, a community contact was conducted to help ascertain the credit needs of area communities, the responsiveness of area banks in meeting those credit needs, and the local economic conditions. The contact represented an economic development organization that serves the AA.

Table 6

Population Change			
Assessment Area: Northeast Kansas			
Area	2015 Population	2020 Population	Percent Change
Northeast Kansas	34,372	33,366	(2.9)
Atchison County, KS	16,633	16,348	(1.7)
Brown County, KS	9,880	9,508	(3.8)
Doniphan County, KS	7,859	7,510	(4.4)
Kansas	2,892,987	2,937,880	1.6
Source: 2020 U.S. Census Bureau Decennial Census			
2011-2015 U.S. Census Bureau: American Community Survey			
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.			

- According to the 2016-2020 ACS data, 54.4 percent of the AA's total population is located within Atchison County.
- From 2015 to 2020, the area saw an overall population decline, with declining population in each county of the AA. During the same period, the state of Kansas saw an increase in total population.
- The city of Atchison is the largest city in the AA with a population of 10,885 based on 2016-2020 ACS data.
- A community member noted that population in the area is relatively stable, with the local university, Benedictine College, drawing a student population of approximately 2,300.

Table 7

Median Family Income Change			
Assessment Area: Northeast Kansas			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Northeast Kansas	60,642	64,727	6.7
Atchison County, KS	61,274	63,560	3.7
Brown County, KS	57,580	61,535	6.9
Doniphan County, KS	64,548	66,168	2.5
Kansas	72,535	77,620	7.0

Source: *2011-2015 U.S. Census Bureau: American Community Survey*
2016-2020 U.S. Census Bureau: American Community Survey
Note: *Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- Median Family Income (MFI) for the area in the year 2020 was approximately 16.6 percent lower than the Kansas statewide figure.
- Growth in MFI from 2015 to 2020 in the area was marginally lower than in the state of Kansas for the same time period.
- Within the AA, 10.0 percent of families were below the poverty level, which was above the statewide rate for Kansas at 7.6 percent. The two tracts of Doniphan County included in the AA contained the highest rate of families below the poverty level in the AA at 15.1 percent. However, according to a community member, wages are strong, especially for manufacturing positions in the area.

Table 8

	Cost Burden – Renters			Cost Burden – Owners		
Area	**Low Income**	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Northeast Kansas	58.2	13.9	30.6	60.4	23.5	16.9
Atchison County, KS	52.9	17.4	27.0	64.2	21.9	18.0
Brown County, KS	70.2	8.2	35.6	47.8	23.6	12.5
Doniphan County, KS	53.5	21.7	31.5	63.5	26.6	20.0
Kansas	73.6	27.8	38.2	57.4	24.8	15.4

Housing Cost Burden
Assessment Area: Northeast Kansas

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- The percentage of homeowners considered cost burdened in the area was higher than the Kansas statewide figure.
- According to the 2016-2020 ACS, the median housing value for the AA was $98,496, which was below the median statewide value of $157,600. Median home values varied throughout the AA with a low in Brown County of $87,000 and a high in Atchison County of $108,700.
- Rent prices in the AA were generally lower than the Kansas state figure with 32.1 percent of renters paying rent greater than 30.0 percent of their incomes. This figure is below the Kansas statewide figure of 40.2 percent.
- A community member noted that the area is currently experiencing a shortage of affordable housing for first-time buyers, but that the housing market is beginning to see more improvement in available housing as compared to recent years.

Table 9

Area	**2018**	**2019**	**2020**	**2021**	**2022**
Northeast Kansas	3.8	4.2	5.5	3.3	2.9
Atchison County, KS	4.6	5.4	6.8	3.9	3.5
Brown County, KS	3.0	3.2	4.4	2.8	2.4
Doniphan County, KS	3.6	3.4	4.6	2.9	2.6
Kansas	3.4	3.3	5.8	3.3	2.7

Unemployment Rates
Assessment Area: Northeast Kansas

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- Area unemployment rates were relatively steady from 2018 to 2019 before experiencing an increase in 2020 due to the Coronavirus-19 Pandemic (pandemic). Unemployment rates have fallen since this time to below pre-pandemic levels and remain slightly above the statewide figure.

- The largest industries in the AA are manufacturing, retail trade, and healthcare.
- A community member noted that local retail businesses along with manufacturing plants in the area are challenged to find employees to fill open positions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHEAST KANSAS AA

LENDING TEST

The bank's overall lending test performance in the Northeast Kansas AA is reasonable. In determining the lending test conclusion, equal weight was given to each of the performance criteria. The review of this AA consisted of an evaluation of 156 home mortgage, 30 small business, and 32 small farm loans. Home improvement, multifamily, and home purchase loans were not evaluated at the product level due to lending volumes too low to render a meaningful analysis. Greater weight was placed on the bank's home mortgage lending based on origination volume, with small business and small farm lending carrying lesser, but equal weight, based on loan volumes.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects excellent distribution among the different census tracts and dispersion throughout the AA. The distribution of home mortgage lending was excellent, while the distribution of small business and small farm lending was reasonable.

Home Mortgage Lending

The geographic distribution of home mortgage lending is excellent. The distribution of 2023 home mortgage loans originated in the moderate-income census tract was above the aggregate lending data by number and dollar volume, and above the demographic figure, which represents the percentage of owner-occupied units in each census tract income level.

The geographic distribution of home mortgage lending in 2022 was consistent with 2023 performance.

An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion.

Home Refinance Loans

The geographic distribution of home refinance lending is excellent. Bank refinance lending in 2023 in the moderate-income census tract was comparable to the aggregate lending data by number and dollar, and the demographic figure.

The geographic distribution of home refinance lending in 2022 reflected performance above 2023 levels and included more originations, which supported the overall rating.

An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the conclusion

Table 10

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Northeast Kansas													
	Bank And Aggregate Loans By Year												Owner Occupied Units %
Geographic Income Level	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	8	29.6	15.8	902	28.1	13.3	5	21.7	10.0	899	30.1	9.2	8.8
Middle	19	70.4	76.9	2,303	71.9	78.7	16	69.6	79.6	1,780	59.6	79.8	81.0
Upper	0	0.0	4.0	0	0.0	3.3	1	4.3	7.4	88	2.9	7.0	7.8
Unknown	0	0.0	3.3	0	0.0	4.7	1	4.3	3.0	220	7.4	4.0	2.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	27	100.0	100.0	3,205	100.0	100.0	23	100.0	100.0	2,987	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	23.7	12.6	786	21.1	10.9	4	12.5	9.2	275	7.9	6.0	8.8
Middle	27	71.1	77.4	2,728	73.2	77.8	27	84.4	76.7	3,083	88.6	80.6	81.0
Upper	1	2.6	5.0	160	4.3	6.0	0	0.0	9.2	0	0.0	8.5	7.8
Unknown	1	2.6	5.0	52	1.4	5.3	1	3.1	4.9	120	3.5	4.9	2.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	38	100.0	100.0	3,726	100.0	100.0	32	100.0	100.0	3,478	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	20.0	7.9	65	18.3	5.3	2	14.3	16.0	77	9.5	18.2	8.8
Middle	7	70.0	76.3	239	67.1	78.3	11	78.6	76.0	635	78.2	73.3	81.0
Upper	0	0.0	5.3	0	0.0	6.1	0	0.0	4.0	0	0.0	2.7	7.8
Unknown	1	10.0	10.5	52	14.6	10.3	1	7.1	4.0	100	12.3	5.9	2.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	356	100.0	100.0	14	100.0	100.0	812	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	14.3	0	0.0	42.3	1	100.0	50.0	576	100.0	71.1	31.3
Middle	1	50.0	57.1	134	27.1	46.8	0	0.0	50.0	0	0.0	28.9	46.1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.9
Unknown	1	50.0	28.6	360	72.9	10.9	0	0.0	0.0	0	0.0	0.0	18.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	494	100.0	100.0	1	100.0	100.0	576	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	19	23.2	13.8	1,753	21.2	13.9	12	16.2	9.8	1,827	22.5	10.0	8.8
Middle	59	72.0	77.2	5,907	71.3	76.9	58	78.4	78.1	5,766	71.0	78.2	81.0
Upper	1	1.2	4.4	160	1.9	3.9	1	1.4	7.9	88	1.1	7.2	7.8
Unknown	3	3.7	4.6	464	5.6	5.3	3	4.1	4.2	440	5.4	4.5	2.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	82	100.0	100.0	8,284	100.0	100.0	74	100.0	100.0	8,121	100.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

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

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The geographic distribution of small business lending is reasonable. The distribution of loans in the moderate-income census tract was comparable to the demographic figure representing the total percentage of businesses located in this census tract.

An analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses.

Table 11

Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Northeast Kansas					
Geographic Income Level	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.0
Moderate	5	16.7	288	9.8	17.2
Middle	24	80.0	2,633	89.8	73.3
Upper	0	0.0	0	0.0	6.8
Unknown	1	3.3	10	0.3	2.7
Tract-Unk	0	0.0	0	0.0	
Total	30	100.0	2,931	100.0	100.0
Source: 2023 FFIEC Census Data					
2023 Dun & Bradstreet Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Small Farm Lending

The geographic distribution of small farm lending is reasonable. The bank originated one small farm loan in the moderate-income census tract, which was comparable to the demographic figure representing the total percentage of farms operating in this census tract. As noted by the demographic data, very few farms are located in the moderate-income tract.

An analysis of the dispersion of loans was conducted and revealed a conspicuous gap, but did not include LMI tracts and did not impact the conclusion.

Table 12

Geographic Income Level	Bank Loans				Total Farms %
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.0
Moderate	1	3.1	14	0.5	0.4
Middle	31	96.9	2,722	99.5	86.4
Upper	0	0.0	0	0.0	12.5
Unknown	0	0.0	0	0.0	0.8
Tract-Unk	0	0.0	0	0.0	
Total	32	100.0	2,736	100.0	100.0

Distribution of 2023 Small Farm Lending By Income Level of Geography
Assessment Area: Northeast Kansas

Source: 2023 FFIEC Census Data
          2023 Dun & Bradstreet Data
          2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

The bank's lending has a reasonable distribution among individuals of different income levels and businesses and farms of different sizes. For both small business and small farm lending, the data provided by the bank for review contained a large portion of loans for which revenue information was not collected. To supplement the analysis, aggregate data and loan size were used to support the ratings provided.

Home Mortgage Lending

The borrower distribution of home mortgage lending is reasonable. The distribution of 2023 loans to low-income borrowers was comparable to the aggregate lending data by number and dollar volume, but was below the demographic figure, which represents the percentage of families by income level. Lending to moderate-income borrowers was comparable to the aggregate lending data by number and dollar volume, and comparable to the demographic figure.

The borrower distribution of 2022 home mortgage lending was consistent with 2023 levels.

Home Refinance Loans

The borrower distribution of home refinance lending is reasonable. Lending in 2023 to low-income borrowers was comparable to the aggregate lending data by number and dollar volume, and below the demographic figure. Lending to moderate-income borrowers was above the aggregate lending data by number, comparable by dollar volume, and above the demographic figure.

The borrower distribution of 2022 home refinance lending was consistent with 2022 levels.

Table 13

Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %
	2022					2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	14.8	12.2	244	7.6	6.3	2	8.7	9.4	147	4.9	4.9	18.3
Moderate	4	14.8	24.6	165	5.1	18.7	3	13.0	22.1	553	18.5	18.8	18.9
Middle	4	14.8	20.4	692	21.6	20.2	3	13.0	21.4	569	19.0	23.1	23.3
Upper	11	40.7	27.4	1,761	54.9	39.7	12	52.2	24.4	1,408	47.1	31.6	39.6
Unknown	4	14.8	15.5	343	10.7	15.1	3	13.0	22.7	310	10.4	21.5	0.0
Total	27	100.0	100.0	3,205	100.0	100.0	23	100.0	100.0	2,987	100.0	100.0	100.0
Refinance Loans													
Low	3	7.9	9.4	83	2.2	5.0	2	6.3	8.0	114	3.3	4.7	18.3
Moderate	9	23.7	25.2	384	10.3	18.0	11	34.4	21.5	740	21.3	14.3	18.9
Middle	9	23.7	30.2	1,018	27.3	32.8	5	15.6	24.5	345	9.9	24.4	23.3
Upper	11	28.9	27.0	1,483	39.8	35.6	10	31.3	35.0	1,761	50.6	43.7	39.6
Unknown	6	15.8	8.2	758	20.3	8.5	4	12.5	11.0	518	14.9	12.9	0.0
Total	38	100.0	100.0	3,726	100.0	100.0	32	100.0	100.0	3,478	100.0	100.0	100.0
Home Improvement Loans													
Low	1	10.0	7.9	10	2.8	2.2	0	0.0	0.0	0	0.0	0.0	18.3
Moderate	2	20.0	26.3	92	25.8	24.7	3	21.4	16.0	157	19.3	10.0	18.9
Middle	0	0.0	7.9	0	0.0	5.2	2	14.3	8.0	58	7.1	3.4	23.3
Upper	4	40.0	50.0	164	46.1	61.3	4	28.6	52.0	227	28.0	57.0	39.6
Unknown	3	30.0	7.9	90	25.3	6.5	5	35.7	24.0	370	45.6	29.6	0.0
Total	10	100.0	100.0	356	100.0	100.0	14	100.0	100.0	812	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	9	11.3	11.1	377	4.8	5.9	5	6.8	9.5	291	3.9	5.2	18.3
Moderate	16	20.0	24.5	669	8.6	18.5	17	23.3	20.9	1,450	19.2	17.1	18.9
Middle	13	16.3	22.1	1,710	22.0	23.1	11	15.1	21.9	1,117	14.8	23.1	23.3
Upper	29	36.3	29.5	3,843	49.3	39.5	28	38.4	29.3	3,489	46.2	35.6	39.6
Unknown	13	16.3	12.7	1,191	15.3	13.0	12	16.4	18.4	1,198	15.9	19.1	0.0
Total	80	100.0	100.0	7,790	100.0	100.0	73	100.0	100.0	7,545	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
    2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
    Multifamily loans are not included in the borrower distribution analysis.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Small Business Lending

The borrower distribution of small business lending is reasonable. The bank's lending to businesses with revenues of $1 million (MM) or less was below the demographic figure which represents the percentage of businesses in the AA by revenue size. Of the loans reviewed for which the bank collected revenue (19 loans), 63.2 percent were originated to businesses with revenues of $1MM or less.

In addition, while aggregate CRA data is not a direct comparison as the bank is not a CRA reporter, aggregate lending volumes are reflective of the overall credit demand for business loans by small businesses within the AA. A review of aggregate lending data submitted by CRA reporters in the bank's AA from 2020-2022 noted an aggregate distribution of 50.3 percent of loans by number and 34.7 percent by dollar originated to small businesses, indicating a lower demand for credit than reflected in the demographic figure. Furthermore, 93.4 percent of business loans were made in amounts of $250,000 or less, which reflect loan amounts that are typically demanded by smaller business entities.

Table 14

Distribution of 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Northeast Kansas					
	Bank Loans				Total
	#	#%	$(000)	$%	Businesses %
By Revenue					
$1 Million or Less	12	40.0	678	23.1	88.9
Over $1 Million	7	23.3	1,973	67.3	8.2
Revenue Unknown	11	36.7	279	9.5	2.9
Total	30	100.0	2,931	100.0	100.0
By Loan Size					
$100,000 or Less	26	86.7	976	33.3	
$100,001 - $250,000	2	6.7	355	12.1	
$250,001 - $1 Million	2	6.7	1,600	54.6	
Total	30	100.0	2,931	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	11	91.7	493	72.7	
$100,001 - $250,000	1	8.3	185	27.3	
$250,001 - $1 Million	0	0.0	0	0.0	
Total	12	100.0	678	100.0	
Source: 2023 FFIEC Census Data					
2023 Dun & Bradstreet Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Small Farm Lending

The borrower distribution of small farm lending is reasonable. The bank's lending to farms with revenues of $1MM or less was below the demographic figure which represents the percentage of farms in the AA by revenue size. Of the small farm loans reviewed for which the bank collected revenue, 83.3 percent were originated to farms with revenues of $1MM or less.

In addition, while aggregate CRA data is not a direct comparison as the bank is not a CRA reporter, aggregate lending volumes are reflective of the overall credit demand for farm loans by small farms within the AA. A review of aggregate lending data submitted by CRA reporters in the bank's AA from 2020-2022 noted an aggregate distribution of 44.7 percent of loans originated to small farms, indicating a lower demand for credit than reflected in the demographic figure. Furthermore, 93.8 percent of farm loans were made in amounts of $250,000 or less, which reflect loan amounts that are typically demanded by smaller farm entities.

Table 15

Distribution of 2023 Small Farm Lending By Revenue Size of Farms Assessment Area: Northeast Kansas					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	20	62.5	1,737	63.5	98.9
Over $1 Million	4	12.5	581	21.2	0.8
Revenue Unknown	8	25.0	418	15.3	0.4
Total	32	100.0	2,736	100.0	100.0
By Loan Size					
$100,000 or Less	24	75.0	785	28.7	
$100,001 - $250,000	6	18.8	1,251	45.7	
$250,001 - $500,000	2	6.3	700	25.6	
Total	32	100.0	2,736	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	15	75.0	536	30.9	
$100,001 - $250,000	4	20.0	801	46.1	
$250,001 - $500,000	1	5.0	400	23.0	
Total	20	100.0	1,737	100.0	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates adequate responsiveness. The bank made two qualified CD loans related to economic development and three qualified donations related to community services targeted to LMI individuals. The loans supporting economic development were both to a lawncare business that qualifies as a small business and provides employment opportunities for LMI individuals.

Table 16

Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	$(000)	#	$(000)	#	$(000)	#	$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	3	6	3	6	11
Economic Development	2	825	0	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0	0
Totals	**2**	**825**	**0**	**0**	**3**	**6**	**3**	**6**	**11**

JEFFERSON COUNTY METROPOLITAN ASSESSMENT AREA
METROPOLITAN AREA
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE JEFFERSON COUNTY METROPOLITAN AA

The bank's Jefferson County Metropolitan AA is comprised of Jefferson County in its entirety, along with two census tracts in Leavenworth County. Jefferson County is one of five counties that comprises the Topeka, Kansas Metropolitan Statistical Area (MSA).

- The AA is comprised of three middle- and three upper-income census tracts. At the previous evaluation, the AA consisted of six middle-income tracts. This change in tract income levels went into effect starting in 2022 due to the release of 2016-2020 ACS data.
- The bank operates two branch offices in the AA with cash-only ATMs located at each branch.
- According to the June 30, 2024, FDIC Market Share Report, the bank had a 4.8 percent deposit market share, ranking 9th out of 13 FDIC-insured depository institutions operating from 32 offices in the AA.
- Based on 2020 ACS data, the AA population was 25,484.
- The percentage of AA families living below the poverty level, at 3.8 percent, is below the statewide figure of 7.6 percent.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JEFFERSON COUNTY METROPOLITAN AA

The institution's lending performance in the area is consistent with the institution's lending performance overall.

The institution's CD performance in this AA is below the institution's CD performance for the full-scope review AA; however, it does not change the rating for the institution.

STATE OF MISSOURI

CRA rating for Missouri: ***Satisfactory***
The Lending Test is rated: ***Satisfactory***
The Community Development Test is rated: ***Satisfactory***

This rating is based on the following conclusions with respect to the performance criteria under the Lending and Community Development Tests:

- A reasonable distribution of loans occurs throughout the bank's AA.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI).
- CD activity reflects adequate responsiveness to CD needs of the bank's AA.

SCOPE OF EXAMINATION

The scope of the review for the state of Missouri was generally consistent with the overall scope for the institution; however, an analysis of small business and small farm loans was not conducted due to the volume of loans being too limited to render a meaningful analysis. The volume of home mortgage lending by individual product was limited as well; therefore, the bank's total HMDA lending was reviewed collectively. A full-scope review was conducted for the Kansas City Metropolitan AA, which represents the only AA in the state of Missouri.

A total of 91 home mortgage loans was reviewed in the state of Missouri.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN MISSOURI

The bank delineates one of its three AAs and operates three of its eight branches in the state of Missouri. Since the last evaluation, the bank opened the Shoal Creek branch in Clay County. Loan and deposit products and services offered in the state mirror those discussed in the overall institution section of this report.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE KANSAS CITY METROPOLITAN AA

The bank's Kansas City Metropolitan AA consists of Clay and Clinton Counties in their entirety, along with portions of Platte and Buchanan Counties, which partly comprise the Kansas City, Kansas-Missouri MSA. See Appendix B for an AA map and Appendix C for additional demographic data.

- Since the previous evaluation, the AA was expanded to include Clay County in its entirety along with a portion of Platte County as a result of the opening of a new branch in Kansas City, Missouri.
- The composition of the AA includes 20 moderate-, 36 middle-, and 15 upper-income census tracts. At the prior evaluation, the AA was comprised of one moderate- and four middle-income census tracts.
- The bank operates three branch offices in the AA with cash-only ATMs at each location. Branches are located in Kansas City, Gower, and Plattsburg.
- As of June 30, 2024, the bank held a 0.8 percent market share of deposits in the AA, ranking 25th out of 36 FDIC-insured financial institutions operating from 132 banking offices in the AA.
- To further augment the CRA performance evaluation, a member of the community was interviewed to help ascertain the credit needs of area communities, the local responsiveness of area banks in meeting those credit needs, and the local economic conditions. The community member represented an economic development organization that serves the AA.

Table 17

Population Change Assessment Area: Kansas City Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Kansas City Metropolitan	433,814	466,030	7.4
Buchanan County, MO	89,561	84,793	(5.3)
Clay County, MO	230,361	253,335	10.0
Clinton County, MO	20,498	21,184	3.3
Platte County, MO	93,394	106,718	14.3
St. Joseph, MO-KS MSA	127,530	121,467	(4.8)
Missouri	6,045,448	6,154,913	1.8
Source: 2020 U.S. Census Bureau Decennial Census 2011-2015 U.S. Census Bureau: American Community Survey *All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.*			

- Population growth in the area was well above the Missouri statewide rate.
- According to a community member, Clay County is one of the fastest growing counties in the Kansas City area. The community member expected growth to continue with the support of major industrial facilities being constructed in the area.

Table 18

	Median Family Income Change Assessment Area: Kansas City Metropolitan		
Area	**2015 Median Family Income**	**2020 Median Family Income**	**Percent Change**
Kansas City Metropolitan	78,447	83,364	6.3
Buchanan County, MO	63,757	63,176	(0.9)
Clay County, MO	82,057	85,961	4.8
Clinton County, MO	70,755	73,936	4.5
Platte County, MO	92,114	100,420	9.0
St. Joseph, MO-KS MSA	65,358	66,409	1.6
Missouri	66,438	72,834	9.6

Source: 2011-2015 U.S. Census Bureau: American Community Survey
2016-2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- The increase in MFI in the area was lower than the growth seen in the state of Missouri.
- The AA had a lower rate of families below poverty, at 5.6 percent, than the state of Missouri, at 8.9 percent.
- Within the AA, 37.4 percent of families are LMI, which is similar to the percent in the state of Missouri, at 38.9 percent.
- A community member noted the high demand for laborers, both skilled and unskilled, is driving strong wages in the AA.

Table 19

	Housing Cost Burden Assessment Area: Kansas City Metropolitan					
	Cost Burden – Renters			**Cost Burden – Owners**		
Area	**Low Income**	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Kansas City Metropolitan	76.4	30.6	37.7	63.2	24.2	15.0
Buchanan County, MO	72.5	29.2	38.3	57.2	24.4	14.2
Clay County, MO	79.7	32.5	40.7	62.8	22.7	14.7
Clinton County, MO	60.0	18.3	30.7	55.8	20.8	18.1
Platte County, MO	76.0	28.9	31.3	74.3	30.0	15.4
St. Joseph, MO-KS MSA	70.2	27.5	36.1	57.8	23.4	14.8
Missouri	72.9	27.2	39.2	57.0	25.3	16.1

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2016-2020 Comprehensive Housing Affordability Strategy
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.

- According to the 2016-2020 ACS five-year average, the median housing value in the AA, at $189,551, was above the Missouri statewide figure of $163,600.

- The percentage of owner-occupied housing units in the AA, at 63.4 percent, was also above the statewide Missouri rate of 58.4 percent.
- Rental cost burden in the AA was comparable to the state of Missouri with 40.1 percent of renters having rents that exceed 30.0 percent of their monthly income, compared to 40.9 percent statewide.
- According to a community member, input costs for new homes in the AA have dramatically increased in recent years and forced the costs of new builds to start between $300,000 and $350,000.

Table 20

Unemployment Rates					
Assessment Area: Kansas City Metropolitan					
Area	2018	2019	2020	2021	2022
Kansas City Metropolitan	2.9	2.8	5.7	4.3	2.4
Buchanan County, MO	3.0	3.0	5.0	3.6	2.4
Clay County, MO	2.9	2.8	6.1	4.6	2.5
Clinton County, MO	3.3	3.0	5.9	5.0	2.8
Platte County, MO	2.6	2.6	5.4	3.8	2.2
St. Joseph, MO-KS MSA	3.0	3.0	4.8	3.4	2.4
Missouri	3.2	3.2	6.1	4.1	2.5
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					
All data presented is at the county level and some values may be different than expected for this AA which includes a partial county.					

- Unemployment rates in the area remained in line with statewide figures for Missouri, with an increase during 2020 and 2021 as the result of the pandemic, before decreasing to below pre-pandemic levels in 2022.
- The largest industries in the AA are healthcare, retail trade, and manufacturing.
- According to a community member, major employers in the area include Ford Motor Company, North Kansas City and Liberty Hospitals, and casinos including Harrah's and Ameristar.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY METROPOLITAN AA

LENDING TEST

The bank's overall lending test performance in Missouri is Satisfactory and performance in the Kansas City Metropolitan AA is reasonable. In determining the lending test rating, equal weight was given to each of the performance criteria.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AA.

<u>Home Mortgage Lending</u>

The geographic distribution of home mortgage lending is reasonable. The 2023 distribution of loans in moderate-income census tracts was below the aggregate lending data by number, comparable by dollar volume, and below the demographic figure of the percentage of owner-occupied units in each census tract income level. Since the last examination, the bank opened a new branch in Clay County and expanded its AA to include the entirety of Clay County and portions of Platte County. The bank faces strong competition in this area and holds 0.8 percent market share with 35 additional institutions operating 129 locations in the AA. Given strong competition in the AA along with the opening of the Clay County branch during the evaluation period, the bank's performance is considered reasonable.

The geographic distribution of home mortgage lending in 2022 was consistent with 2023 performance.

An analysis of the dispersion of loans was conducted and revealed conspicuous lending gaps that included LMI tracts. However, the gaps were due to the bank's limited branch presence in the larger metropolitan area, and thus did not impact the overall conclusion.

Table 21

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Kansas City Metropolitan												
	Bank And Aggregate Loans By Year											Owner Occupied Units %
Geographic Income Level	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans												
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	5.9	24.5	155	4.2	17.5	3	14.3	24.6	585	17.7	18.4	23.0
Middle	12	70.6	45.1	1,895	51.6	43.3	18	85.7	46.7	2,723	82.3	44.5	51.7
Upper	4	23.5	30.4	1,623	44.2	39.1	0	0.0	28.6	0	0.0	37.2	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	17	100.0	100.0	3,673	100.0	100.0	21	100.0	100.0	3,308	100.0	100.0	100.0
Refinance Loans												
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	9.1	22.8	365	8.4	17.1	1	10.0	22.3	175	10.5	18.0	23.0
Middle	17	77.3	49.6	3,091	71.4	46.8	8	80.0	50.4	931	55.9	50.3	51.7
Upper	3	13.6	27.6	875	20.2	36.0	1	10.0	27.3	560	33.6	31.8	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	22	100.0	100.0	4,331	100.0	100.0	10	100.0	100.0	1,666	100.0	100.0	100.0
Home Improvement Loans												
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	18.6	25	23.8	15.4	0	0.0	17.2	0	0.0	15.0	23.0
Middle	1	50.0	44.9	80	76.2	44.4	4	100.0	49.9	286	100.0	46.8	51.7
Upper	0	0.0	36.3	0	0.0	39.8	0	0.0	32.8	0	0.0	38.2	25.2
Unknown	0	0.0	0.1	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	105	100.0	100.0	4	100.0	100.0	286	100.0	100.0	100.0
Multifamily Loans												Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	38.6	0	0.0	18.5	1	100.0	65.2	129	100.0	59.8	46.2
Middle	4	100.0	50.0	2,177	100.0	27.5	0	0.0	21.7	0	0.0	12.0	37.3
Upper	0	0.0	11.4	0	0.0	54.1	0	0.0	13.0	0	0.0	28.2	16.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	2,177	100.0	100.0	1	100.0	100.0	129	100.0	100.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	7.8	23.3	545	4.8	17.4	6	15.0	23.3	1,184	19.7	21.8	23.0
Middle	40	78.4	46.5	8,353	73.3	43.0	33	82.5	47.5	4,259	70.9	42.4	51.7
Upper	7	13.7	30.2	2,498	21.9	39.6	1	2.5	29.3	560	9.3	35.8	25.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	100.0	11,396	100.0	100.0	40	100.0	100.0	6,003	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
    2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Lending to Borrowers of Different Income Levels

The bank's lending has a reasonable distribution among individuals of different income levels.

<u>Home Mortgage Lending</u>

The borrower distribution of home mortgage lending is reasonable. The distribution of 2023 home mortgage loans to low-income borrowers was comparable to the aggregate lending data by number, above by dollar volume, and below the demographic figure of the percentage of families by income level. Lending to moderate-income borrowers was comparable to the aggregate lending data by number and dollar volume, and the demographic figure.

The borrower distribution of home mortgage lending in 2022 was consistent with 2023 levels.

Table 22

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level												
Assessment Area: Kansas City Metropolitan												
	Bank And Aggregate Loans By Year											Families by Family Income %
Borrower Income Level	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	4	23.5	8.2	333	9.1	4.4	0	0.0	7.9	0	0.0	4.2	19.2
Moderate	2	11.8	22.2	513	14.0	17.0	7	33.3	23.9	980	29.6	17.9	18.2
Middle	1	5.9	22.4	70	1.9	22.5	3	14.3	22.3	671	20.3	21.9	24.4
Upper	5	29.4	27.9	1,131	30.8	37.7	3	14.3	27.1	436	13.2	37.0	38.2
Unknown	5	29.4	19.3	1,626	44.3	18.4	8	38.1	18.8	1,221	36.9	19.0	0.0
Total	17	100.0	100.0	3,673	100.0	100.0	21	100.0	100.0	3,308	100.0	100.0	100.0
Refinance Loans													
Low	2	9.1	12.2	141	3.3	7.4	2	20.0	11.8	111	6.7	7.6	19.2
Moderate	5	22.7	26.6	619	14.3	21.9	1	10.0	23.1	112	6.7	20.6	18.2
Middle	6	27.3	23.3	1,171	27.0	23.4	2	20.0	22.8	391	23.5	21.7	24.4
Upper	6	27.3	23.8	2,040	47.1	32.6	3	30.0	26.6	797	47.8	32.5	38.2
Unknown	3	13.6	14.0	360	8.3	14.7	2	20.0	15.7	255	15.3	17.6	0.0
Total	22	100.0	100.0	4,331	100.0	100.0	10	100.0	100.0	1,666	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.3	0	0.0	4.3	0	0.0	8.3	0	0.0	4.9	19.2
Moderate	0	0.0	17.9	0	0.0	14.4	2	50.0	18.1	174	60.8	14.8	18.2
Middle	0	0.0	27.3	0	0.0	23.5	1	25.0	27.9	62	21.7	22.2	24.4
Upper	1	50.0	42.6	25	23.8	52.0	0	0.0	41.3	0	0.0	53.5	38.2
Unknown	1	50.0	5.8	80	76.2	5.9	1	25.0	4.4	50	17.5	4.7	0.0
Total	2	100.0	100.0	105	100.0	100.0	4	100.0	100.0	286	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	6	12.8	9.2	474	5.1	5.2	4	10.3	8.5	446	7.6	4.7	19.2
Moderate	8	17.0	23.0	1,304	14.1	18.1	10	25.6	22.8	1,266	21.6	18.1	18.2
Middle	9	19.1	23.0	1,548	16.8	22.7	8	20.5	23.4	1,403	23.9	22.0	24.4
Upper	15	31.9	28.3	3,827	41.5	36.8	6	15.4	29.1	1,233	21.0	37.0	38.2
Unknown	9	19.1	16.5	2,066	22.4	17.2	11	28.2	16.2	1,526	26.0	18.2	0.0
Total	47	100.0	100.0	9,219	100.0	100.0	39	100.0	100.0	5,874	100.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

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

Multifamily loans are not included in the borrower distribution analysis.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

COMMUNITY DEVELOPMENT TEST

The bank's CD performance demonstrates adequate responsiveness. The bank made one qualifying investment for the purchase of a school bond in a district where greater than 50.0 percent of students are on the free and reduced lunch program.

Table 23

Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	$(000)	#	$(000)	#	$(000)	#	$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	0	0	1	308	0	0	1	308	3
Economic Development	0	0	0	0	0	0	0	0	6
Revitalization and Stabilization	0	0	0	0	0	0	0	0	0
Totals	**0**	**0**	**1**	**308**	**0**	**0**	**1**	**308**	**9**

APPENDIX A – SCOPE OF EXAMINATION TABLE

Table A-1

SCOPE OF EXAMINATION			
FINANCIAL INSTITUTION	**PRODUCTS/SERVICES REVIEWED**		
The Union State Bank of Everest Everest, Kansas	• Home Mortgage Loans • Small Business Loans • Small Farm Loans • Community Development Loans • Qualified Investments and Donations • Community Development Services		
TIME PERIODS REVIEWED HMDA:	January 1, 2022 – December 31, 2023		
Small Business:	January 1, 2023 – December 31, 2023		
Small Farm:	January 1, 2023 – December 31, 2023		
Community Development Activities:	December 6, 2021 – June 30, 2024		
LIST OF AFFILIATES CONSIDERED IN THIS EVALUATION			
AFFILIATES	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
None	None		None
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAM	BRANCHES VISITED	OTHER INFORMATION
Kansas Northeast Kansas Jefferson County Metropolitan	Full Review Limited Review	None	
Missouri Kansas City Metropolitan	Full Review	None	

APPENDIX B – MAPS OF THE ASSESSMENT AREAS

Map B-1
Northeast Kansas AA
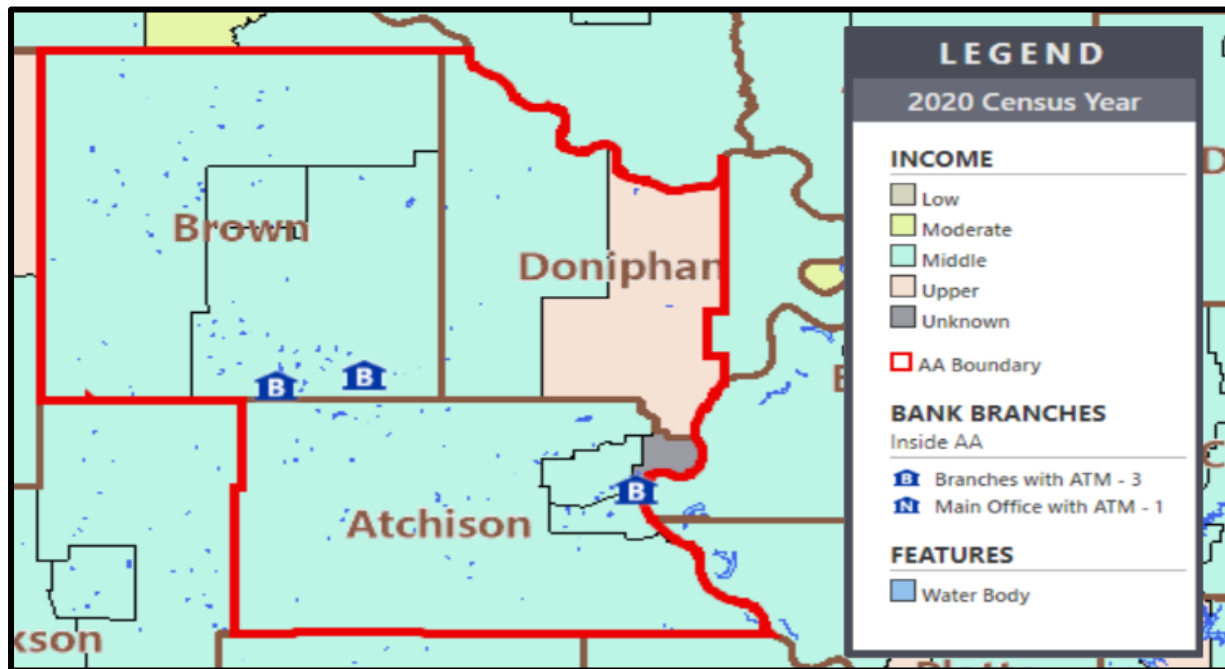
Map B-2
Jefferson County Metropolitan AA
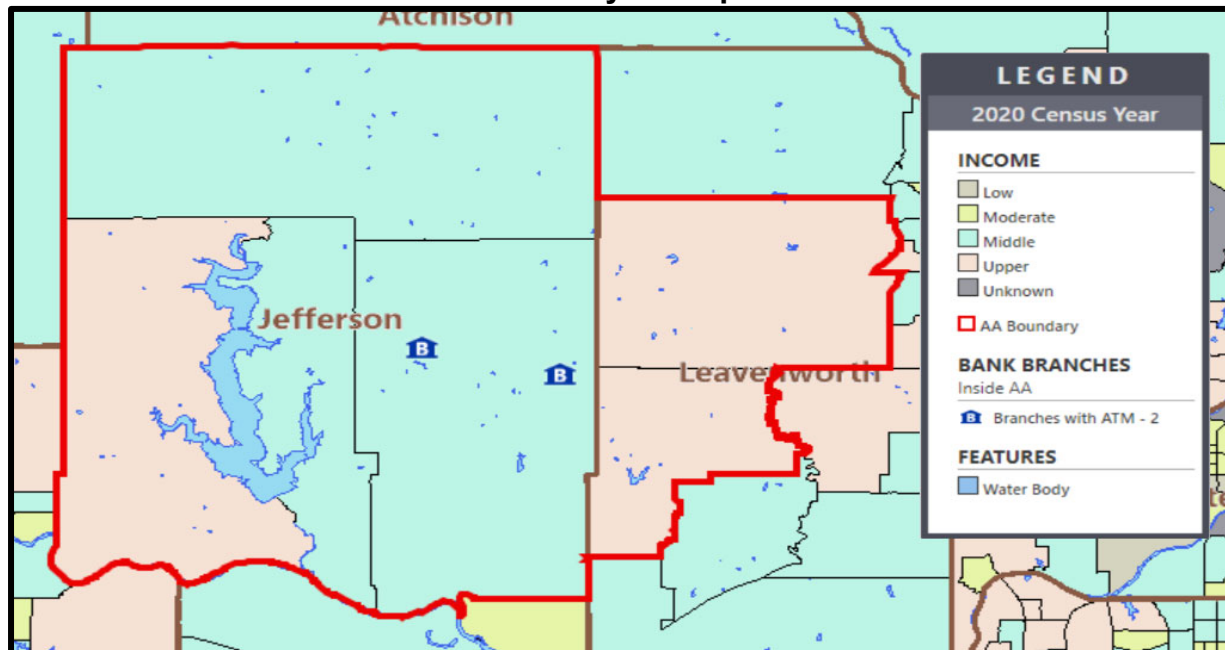
Map B-3
Kansas City Metropolitan AA
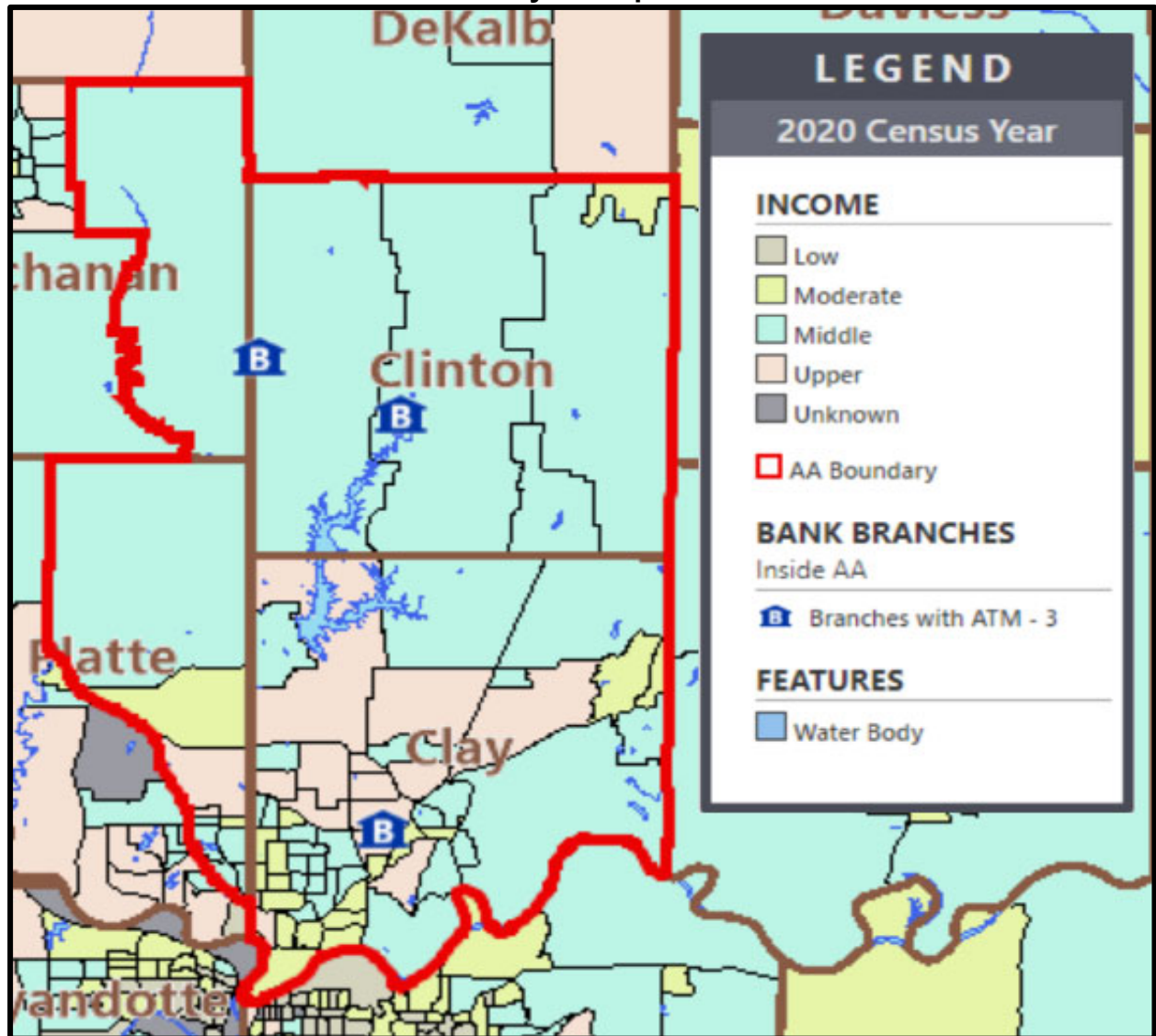
APPENDIX C – DEMOGRAPHIC INFORMATION

Table C-1

2023 Northeast Kansas AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	1,362	18.3
Moderate	1	10.0	766	10.3	96	12.5	1,412	18.9
Middle	7	70.0	5,852	78.4	466	8.0	1,737	23.3
Upper	1	10.0	525	7.0	33	6.3	2,952	39.6
Unknown	1	10.0	320	4.3	149	46.6	0	0.0
Total AA	**10**	**100.0**	**7,463**	**100.0**	**744**	**10.0**	**7,463**	**100.0**
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	1,624	727	8.8	44.8	673	41.4	224	13.8
Middle	10,579	6,655	81.0	62.9	2,099	19.8	1,825	17.3
Upper	942	640	7.8	67.9	176	18.7	126	13.4
Unknown	512	196	2.4	38.3	191	37.3	125	24.4
Total AA	**13,657**	**8,218**	**100.0**	**60.2**	**3,139**	**23.0**	**2,300**	**16.8**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	204	17.2	182	17.3	18	18.6	4	11.4
Middle	870	73.3	773	73.3	68	70.1	29	82.9
Upper	81	6.8	70	6.6	9	9.3	2	5.7
Unknown	32	2.7	30	2.8	2	2.1	0	0.0
Total AA	**1,187**	**100.0**	**1,055**	**100.0**	**97**	**100.0**	**35**	**100.0**
Percentage of Total Businesses:			**88.9**		**8.2**		**2.9**	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	0.4	1	0.4	0	0.0	0	0.0
Middle	229	86.4	226	86.3	2	100.0	1	100.0
Upper	33	12.5	33	12.6	0	0.0	0	0.0
Unknown	2	0.8	2	0.8	0	0.0	0	0.0
Total AA	**265**	**100.0**	**262**	**100.0**	**2**	**100.0**	**1**	**100.0**
Percentage of Total Farms:			**98.9**		**0.8**		**0.4**	

Source: 2023 FFIEC Census Data
    2023 Dun & Bradstreet Data
    2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-2

2022 Northeast Kansas AA Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	1,362	18.3	
Moderate	1	10.0	766	10.3	96	12.5	1,412	18.9	
Middle	7	70.0	5,852	78.4	466	8.0	1,737	23.3	
Upper	1	10.0	525	7.0	33	6.3	2,952	39.6	
Unknown	1	10.0	320	4.3	149	46.6	0	0.0	
Total AA	10	100.0	7,463	100.0	744	10.0	7,463	100.0	

	Housing Units by Tract	Housing Type by Tract							
		Owner-occupied			Rental			Vacant	
		#	% by tract	% by unit	#	% by unit		#	% by unit
Low	0	0	0.0	0.0	0	0.0		0	0.0
Moderate	1,624	727	8.8	44.8	673	41.4		224	13.8
Middle	10,579	6,655	81.0	62.9	2,099	19.8		1,825	17.3
Upper	942	640	7.8	67.9	176	18.7		126	13.4
Unknown	512	196	2.4	38.3	191	37.3		125	24.4
Total AA	13,657	8,218	100.0	60.2	3,139	23.0		2,300	16.8

	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	203	16.9	182	17.1	17	17.0	4	10.8	
Middle	885	73.5	783	73.4	71	71.0	31	83.8	
Upper	80	6.6	69	6.5	9	9.0	2	5.4	
Unknown	36	3.0	33	3.1	3	3.0	0	0.0	
Total AA	1,204	100.0	1,067	100.0	100	100.0	37	100.0	
Percentage of Total Businesses:			88.6		8.3		3.1		

	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	1	0.4	1	0.4	0	0.0	0	0.0	
Middle	230	87.1	227	87.0	2	100.0	1	100.0	
Upper	31	11.7	31	11.9	0	0.0	0	0.0	
Unknown	2	0.8	2	0.8	0	0.0	0	0.0	
Total AA	264	100.0	261	100.0	2	100.0	1	100.0	
Percentage of Total Farms:			98.9		0.8		0.4		

Source: 2022 FFIEC Census Data
    2022 Dun & Bradstreet Data
    2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-3

2023 Kansas City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	15,173	19.2
Moderate	20	28.2	20,292	25.7	2,080	10.3	14,367	18.2
Middle	36	50.7	39,743	50.3	2,144	5.4	19,272	24.4
Upper	15	21.1	18,988	24.0	197	1.0	30,211	38.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	71	100.0	79,023	100.0	4,421	5.6	79,023	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	38,934	18,348	23.0	47.1	16,592	42.6	3,994	10.3
Middle	60,402	41,215	51.7	68.2	16,003	26.5	3,184	5.3
Upper	26,268	20,110	25.2	76.6	4,881	18.6	1,277	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	125,604	79,673	100.0	63.4	37,476	29.8	8,455	6.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3,986	33.8	3,562	32.8	399	47.0	25	26.6
Middle	5,056	42.8	4,737	43.6	268	31.6	51	54.3
Upper	2,761	23.4	2,561	23.6	182	21.4	18	19.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	11,803	100.0	10,860	100.0	849	100.0	94	100.0
Percentage of Total Businesses:				92.0		7.2		0.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	35	13.9	35	14.1	0	0.0	0	0.0
Middle	178	70.9	177	71.4	1	33.3	0	0.0
Upper	38	15.1	36	14.5	2	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	251	100.0	248	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.8		1.2		0.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-4

2022 Kansas City Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	15,026	19.3
Moderate	20	28.6	20,292	26.0	2,080	10.3	14,236	18.3
Middle	35	50.0	38,714	49.6	2,033	5.3	19,013	24.4
Upper	15	21.4	18,988	24.3	197	1.0	29,719	38.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	70	100.0	77,994	100.0	4,310	5.5	77,994	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	38,934	18,348	23.3	47.1	16,592	42.6	3,994	10.3
Middle	58,887	40,399	51.2	68.6	15,462	26.3	3,026	5.1
Upper	26,268	20,110	25.5	76.6	4,881	18.6	1,277	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	124,089	78,857	100.0	63.5	36,935	29.8	8,297	6.7
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3,987	34.2	3,558	33.2	404	48.6	25	25.8
Middle	4,928	42.3	4,622	43.1	253	30.4	53	54.6
Upper	2,728	23.4	2,534	23.7	175	21.0	19	19.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	11,643	100.0	10,714	100.0	832	100.0	97	100.0
Percentage of Total Businesses:				92.0		7.1		0.8
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	36	16.5	36	16.7	0	0.0	0	0.0
Middle	143	65.6	142	66.0	1	33.3	0	0.0
Upper	39	17.9	37	17.2	2	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	218	100.0	215	100.0	3	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0

Source: *2022 FFIEC Census Data*
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: *Percentages may not total 100.0 percent due to rounding.*

APPENDIX D – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

Jefferson County Metropolitan AA

Table D-1

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Jefferson County Metropolitan													
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	5	83.3	46.9	753	88.3	40.3	7	87.5	49.1	1,383	86.4	38.7	52.1
Upper	1	16.7	53.1	100	11.7	59.7	1	12.5	50.9	218	13.6	61.3	47.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	853	100.0	100.0	8	100.0	100.0	1,601	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	16	88.9	37.2	2,090	81.5	31.7	8	80.0	40.3	919	69.6	17.9	52.1
Upper	2	11.1	62.8	473	18.5	68.3	2	20.0	59.7	401	30.4	82.1	47.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	18	100.0	100.0	2,563	100.0	100.0	10	100.0	100.0	1,320	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	50.0	46.3	60	30.0	54.9	1	50.0	42.2	60	60.6	37.9	52.1
Upper	1	50.0	53.7	140	70.0	45.1	1	50.0	57.8	39	39.4	62.1	47.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	200	100.0	100.0	2	100.0	100.0	99	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	1	100.0	66.7	202	100.0	60.3	87.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	33.3	0	0.0	39.7	12.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	202	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	26	86.7	43.5	3,438	82.8	38.3	17	77.3	46.5	2,564	78.1	30.8	52.1
Upper	4	13.3	56.5	713	17.2	61.7	5	22.7	53.5	718	21.9	69.2	47.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	30	100.0	100.0	4,151	100.0	100.0	22	100.0	100.0	3,282	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table D-2

Geographic Income Level	Bank Loans				Total Businesses %
Distribution of 2023 Small Business Lending By Income Level of Geography					
Assessment Area: Jefferson County Metropolitan					
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	22	55.0	567	44.9	53.0
Upper	18	45.0	697	55.1	47.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	40	100.0	1,264	100.0	100.0

Source: 2023 FFIEC Census Data
    2023 Dun & Bradstreet Data
    2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-3

Geographic Income Level	Bank Loans				Total Farms %
Distribution of 2023 Small Farm Lending By Income Level of Geography					
Assessment Area: Jefferson County Metropolitan					
	#	#%	$(000)	$%	
Low	0	0.0	0	0.0	0.0
Moderate	0	0.0	0	0.0	0.0
Middle	55	84.6	3,098	81.9	57.0
Upper	10	15.4	687	18.2	43.0
Unknown	0	0.0	0	0.0	0.0
Tract-Unk	0	0.0	0	0.0	
Total	65	100.0	3,784	100.0	100.0

Source: 2023 FFIEC Census Data
    2023 Dun & Bradstreet Data
    2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-4

	Bank And Aggregate Loans By Year												Families by Family Income %
Borrower Income Level	**2022**						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	2	33.3	3.7	268	31.4	1.9	0	0.0	4.8	0	0.0	2.0	12.5
Moderate	1	16.7	22.2	105	12.3	15.8	1	12.5	18.2	87	5.4	11.6	16.3
Middle	2	33.3	24.2	274	32.1	22.1	0	0.0	27.6	0	0.0	24.5	23.8
Upper	1	16.7	34.8	206	24.2	46.1	7	87.5	35.8	1,514	94.6	46.9	47.4
Unknown	0	0.0	15.0	0	0.0	14.1	0	0.0	13.6	0	0.0	15.0	0.0
Total	6	100.0	100.0	853	100.0	100.0	8	100.0	100.0	1,601	100.0	100.0	100.0
Refinance Loans													
Low	3	16.7	8.1	148	5.8	4.5	1	10.0	7.2	39	3.0	1.8	12.5
Moderate	0	0.0	19.1	0	0.0	13.6	2	20.0	17.3	144	10.9	5.8	16.3
Middle	5	27.8	28.2	627	24.5	25.2	2	20.0	29.5	292	22.1	13.5	23.8
Upper	9	50.0	34.9	1,685	65.7	44.7	5	50.0	36.7	845	64.0	21.6	47.4
Unknown	1	5.6	9.7	103	4.0	12.0	0	0.0	9.4	0	0.0	57.3	0.0
Total	18	100.0	100.0	2,563	100.0	100.0	10	100.0	100.0	1,320	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	10.4	0	0.0	9.8	0	0.0	4.4	0	0.0	3.6	12.5
Moderate	0	0.0	9.0	0	0.0	7.2	1	50.0	17.8	60	60.6	19.6	16.3
Middle	0	0.0	22.4	0	0.0	14.0	0	0.0	31.1	0	0.0	23.8	23.8
Upper	2	100.0	52.2	200	100.0	62.1	1	50.0	44.4	39	39.4	48.8	47.4
Unknown	0	0.0	6.0	0	0.0	6.8	0	0.0	2.2	0	0.0	4.2	0.0
Total	2	100.0	100.0	200	100.0	100.0	2	100.0	100.0	99	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	16.7	5.7	416	10.0	2.9	1	4.8	5.5	39	1.3	2.0	12.5
Moderate	1	3.3	20.4	105	2.5	15.0	4	19.0	18.1	291	9.4	9.6	16.3
Middle	8	26.7	25.0	961	23.2	22.6	3	14.3	28.5	352	11.4	20.2	23.8
Upper	15	50.0	36.2	2,566	61.8	46.1	13	61.9	36.6	2,398	77.9	37.2	47.4
Unknown	1	3.3	12.6	103	2.5	13.4	0	0.0	11.3	0	0.0	31.1	0.0
Total	30	100.0	100.0	4,151	100.0	100.0	21	100.0	100.0	3,080	100.0	100.0	100.0

Source: 2023 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

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

Multifamily loans are not included in the borrower distribution analysis.

Due to limited volume in the Other Purpose LOC, Other Purpose Closed/Exempt, and Purpose Not Applicable product categories, these categories are not displayed individually but are included in the total HMDA section of the table.

Table D-5

Distribution of 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Jefferson County Metropolitan					
	Bank Loans				Total
	#	#%	$(000)	$%	Businesses %
By Revenue					
$1 Million or Less	3	7.5	173	13.7	91.2
Over $1 Million	18	45.0	799	63.2	6.0
Revenue Unknown	19	47.5	292	23.1	2.7
Total	40	100.0	1,264	100.0	100.0
By Loan Size					
$100,000 or Less	38	95.0	984	77.8	
$100,001 - $250,000	2	5.0	280	22.2	
$250,001 - $1 Million	0	0.0	0	0.0	
Total	40	100.0	1,264	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	2	66.7	16	9.2	
$100,001 - $250,000	1	33.3	157	90.8	
$250,001 - $1 Million	0	0.0	0	0.0	
Total	3	100.0	173	100.0	
Source: 2023 FFIEC Census Data *2023 Dun & Bradstreet Data* *2016-2020 U.S. Census Bureau: American Community Survey* *Note: Percentages may not total 100.0 percent due to rounding.*					

Table D-6

Distribution of 2023 Small Farm Lending By Revenue Size of Farms					
Assessment Area: Jefferson County Metropolitan					
	Bank Loans				Total Farms
	#	#%	$(000)	$%	%
By Revenue					
$1 Million or Less	25	38.5	2,013	53.2	98.9
Over $1 Million	10	15.4	1,289	34.1	1.1
Revenue Unknown	30	46.2	481	12.7	0.0
Total	65	100.0	3,784	100.0	100.0
By Loan Size					
$100,000 or Less	55	84.6	1,548	40.9	
$100,001 - $250,000	6	9.2	920	24.3	
$250,001 - $500,000	4	6.2	1,317	34.8	
Total	65	100.0	3,784	100.0	
By Loan Size and Revenues $1 Million or Less					
$100,000 or Less	19	76.0	817	40.6	
$100,001 - $250,000	4	16.0	596	29.6	
$250,001 - $500,000	2	8.0	600	29.8	
Total	25	100.0	2,013	100.0	
Source: 2023 FFIEC Census Data					
2023 Dun & Bradstreet Data					
2016-2020 U.S. Census Bureau: American Community Survey					
Note: Percentages may not total 100.0 percent due to rounding.					

Table D-7

2023 Jefferson County Metropolitan AA Demographics							
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	956	12.5
Moderate	0	0.0	0	0.0	0	0.0	1,247	16.3
Middle	3	50.0	3,769	49.3	167	4.4	1,819	23.8
Upper	3	50.0	3,877	50.7	123	3.2	3,624	47.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6**	**100.0**	**7,646**	**100.0**	**290**	**3.8**	**7,646**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**					
		Owner-occupied			**Rental**		**Vacant**
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	6,148	4,513	52.1	73.4	910	14.8	725	11.8
Upper	4,969	4,141	47.9	83.3	556	11.2	272	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**11,117**	**8,654**	**100.0**	**77.8**	**1,466**	**13.2**	**997**	**9.0**

	Total Businesses by Tract	**Businesses by Tract & Revenue Size**					
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	386	53.0	351	52.9	22	50.0	13	65.0
Upper	342	47.0	313	47.1	22	50.0	7	35.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**728**	**100.0**	**664**	**100.0**	**44**	**100.0**	**20**	**100.0**
Percentage of Total Businesses:			**91.2**		**6.0**		**2.7**

	Total Farms by Tract	**Farms by Tract & Revenue Size**					
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	53	57.0	53	57.6	0	0.0	0	0.0
Upper	40	43.0	39	42.4	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**93**	**100.0**	**92**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:			**98.9**		**1.1**		**0.0**

Source: 2023 FFIEC Census Data
    2023 Dun & Bradstreet Data
    2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-8

2022 Jefferson County Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	956	12.5
Moderate	0	0.0	0	0.0	0	0.0	1,247	16.3
Middle	3	50.0	3,769	49.3	167	4.4	1,819	23.8
Upper	3	50.0	3,877	50.7	123	3.2	3,624	47.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**6**	**100.0**	**7,646**	**100.0**	**290**	**3.8**	**7,646**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	6,148	4,513	52.1	73.4	910	14.8	725	11.8
Upper	4,969	4,141	47.9	83.3	556	11.2	272	5.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**11,117**	**8,654**	**100.0**	**77.8**	**1,466**	**13.2**	**997**	**9.0**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	393	53.2	359	53.3	21	45.7	13	65.0
Upper	346	46.8	314	46.7	25	54.3	7	35.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**739**	**100.0**	**673**	**100.0**	**46**	**100.0**	**20**	**100.0**
Percentage of Total Businesses:				**91.1**		**6.2**		**2.7**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	51	56.0	51	56.7	0	0.0	0	0.0
Upper	40	44.0	39	43.3	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**91**	**100.0**	**90**	**100.0**	**1**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**98.9**		**1.1**		**0.0**

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX E – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. These loans have original amounts of $500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.