

# **PUBLIC DISCLOSURE**

**June 23, 2025**

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

**The Central Trust Bank  
RSSD #853952**

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

**Federal Reserve Bank of St. Louis**

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

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

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## INSTITUTION'S CRA RATING

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

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

The Central Trust Bank			
Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors supporting the institution's rating include the following:

- The bank's lending levels reflect good responsiveness to credit needs of its assessment areas.
- A high percentage of loans are made in the bank's assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes an adequate level of qualified community development investments and grants and is rarely in the leadership position.
- Service delivery systems are accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.
- The bank provides a relatively high level of community development services.

## DESCRIPTION OF INSTITUTION

The Central Trust Bank is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is headquartered in Jefferson City, Missouri, and is wholly owned by Central Bancompany, Inc., also headquartered in Jefferson City, Missouri. The bank operates a branch network consisting of 156 branches, including the main office, across six states. The bank's most significant presence is in its home state of Missouri, specifically in its Jefferson City metropolitan statistical area (MSA) assessment area, where the largest number of its branches, deposits, and loans are held. Though not as extensive as in Missouri, the bank also maintains significant operations in Kansas, Oklahoma, Illinois, Colorado, and Florida. During the review period, The Central Trust Bank opened six new branch offices, including a new branch in the Naples-Marco Island, Florida MSA in May 2022, resulting in a new assessment area for the bank (the only assessment area in Florida). Also, during this review period, the bank closed three branch offices. In addition, not included in the branch office total are 15 loan production offices (LPOs) located throughout Arkansas (one), Colorado (four), Florida (one), Iowa (one), Missouri (seven), and North Carolina (one). Furthermore, the bank operates 9 stand-alone interactive teller machines (ITMs) and 38 stand-alone automated teller machines (ATMs). In total, the bank has designated 15 separate assessment areas. However, and for the purposes of this evaluation, three of the noncontiguous Missouri assessment areas with similar economic and demographic characteristics were combined for analysis. Furthermore, due to the recent addition of the Florida branch, this new assessment area was excluded from the evaluation. These adjustments ultimately equate to the bank having 12 analyzed assessment areas, each of which is detailed in the corresponding *General Demographics* section.

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 assessment areas, and the bank is capable of meeting assessment area credit needs based on its available resources and financial products. As of March 31, 2025, the bank reported total assets of \$19.6 billion, which represents a 1.6 percent decrease since the previous examination. As of the same date, loans and leases outstanding were \$11.5 billion, while deposits totaled \$15.5 billion.

The bank's loan portfolio composition by credit category is displayed in the following table.

<b>Distribution of Total Loans as of March 31, 2025</b>		
<b>Credit Category</b>	<b>Amount \$ (000s)</b>	<b>Percentage of Total Loans</b>
Commercial Real Estate	3,701,023	32.1
1–4 Family Residential	3,178,986	27.6
Commercial and Industrial	1,240,937	10.8
Multifamily Residential	888,203	7.7
Construction and Development	792,386	6.9
Loans to Individuals	773,653	6.7
Total Other Loans	579,942	5.0
Farmland	311,265	2.7
Farm Loans	55,185	0.5
<b>TOTAL</b>	<b>11,521,580</b>	<b>100</b>

As indicated by the table above, a significant portion of the bank’s lending resources is directed to loans secured by commercial real estate and 1–4 family residential loans. While farmland and farm loans do not represent a significant portion of the bank’s loan portfolio by dollar volume, these products are nevertheless an important product line in several of the bank’s assessment areas and are thus included for review where applicable. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity is not captured in the table. The bank originated and sold 4,446 loans totaling \$1.3 billion and 3,535 loans totaling \$1.0 billion in 2022 and 2023, respectively.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on May 16, 2022.

## SCOPE OF EXAMINATION

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) Large Institution CRA Examination Procedures, which include a Lending Test, Investment Test, and Service Test. Bank performance under these tests is rated at the institution, multistate MSA, and state levels and is a reflection of the conclusions drawn in each of the bank’s 12 areas reviewed. The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2024.

Rated Areas	Offices		Deposits as of June 30, 2024		Assessment Area Reviews		
	#	%	\$ (000s)	%	Full Scope	Limited Scope	TOTAL
Kansas City	46	29.5	2,759,333	18.5	1	0	1
St. Louis	16	10.3	1,733,560	11.6	1	0	1
Missouri	74	47.4	9,690,972	64.8	2	2	4
Oklahoma	9	5.8	380,467	2.5	1	1	2
Kansas	6	3.9	267,318	1.8	1	0	1
Colorado	4	2.6	80,457	0.5	1	2	3
Florida	1	0.6	34,399	0.2	Not Reviewed		
<b>OVERALL</b>	<b>156</b>	<b>100</b>	<b>14,946,506</b>	<b>100</b>	<b>7</b>	<b>5</b>	<b>12</b>

The bank's overall institution rating is a composite of the six rated areas reviewed, which are weighted based on the significance of the bank's operations in each area. Based on branch structure and loan and deposit activity, primary emphasis (in order of significance) was placed on performance in the state of Missouri, Kansas City, and St. Louis.

To augment this evaluation, interviews with seven community contacts were utilized throughout the bank's assessment areas. These interviews helped to ascertain certain economic and demographic conditions, as well as credit needs and opportunities, in the bank's assessment areas, and provided context with which to evaluate the bank's responsiveness to these credit needs. Key details from these community contact interviews are included in the *Description of Assessment Area* section applicable to the area for which they were conducted.

### **Lending Test**

Under the Lending Test, the bank's performance is evaluated using the following criteria and time periods:

Lending Test Performance Criterion	Products Selected for Review	Time Period
Level of Lending Activity	<ul style="list-style-type: none"> <li>Home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA)</li> <li>Small business and small farm loans reported under the CRA</li> </ul>	January 1, 2022 – December 31, 2023
Assessment Areas Concentration		
Distribution of Loans by Borrower's Profile		
Geographic Distribution of Loans		
Community Development Lending Activities		January 1, 2022 – March 31, 2025
Product Innovation		

As shown in the preceding table, HMDA, small business, and small farm loans were used to evaluate the bank's lending performance, as these loans are considered the bank's core business lines based on lending volume and the bank's business strategy. Given the bank's strategic focus



on residential real estate and commercial lending, along with needs noted by community contacts, HMDA and small business loans are generally given more weight than small farm loans. Lastly, equal emphasis is generally placed on performance in 2022 and 2023.

The bank's Lending Test performance is evaluated using the following criteria, as applicable:

- Level of lending activity
- Assessment areas concentration<sup>1</sup>
- Distribution of loans by borrower's income/revenue profile
- Geographic distribution of loans
- Community development lending activities
- Product innovation<sup>2</sup>

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

- Assessment area demographics are based on 2020 American Community Survey (ACS) data, and business demographics are based on 2022 and 2023 Dun & Bradstreet data.
- Median family incomes are based on the FFIEC's 2022 and 2023 annual estimates. The 2023 estimates were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.
- Industry demographics are sourced from the U.S. Department of Labor, Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages data, according to the North American Industry Classification System.
- Unemployment data is sourced from the BLS and is not seasonally adjusted.
- Housing cost burden refers to the percentage of households with housing costs that exceed 30.0 percent of total household income. These figures are sourced from the U.S. Department of Housing and Urban Development 2017–2021 Comprehensive Housing Affordability Strategy data.
- In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses and farms of different revenue sizes, the demographic figure refers to either the percentage of families in that assessment area that are classified as low- and moderate-income (LMI) or the percentage of businesses/farms with annual revenues of \$1 million or less.

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<sup>1</sup> This criterion is applicable at the institution level only.

<sup>2</sup> Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

- In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to either the percentage of owner-occupied housing units in that assessment area that are in LMI census tracts or the percentage of businesses located in LMI census tracts.

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

### **Investment Test**

All community development investments, including grants and donations, made from January 1, 2022 through March 31, 2025, were reviewed and evaluated. In addition, investments made prior to the date of the previous review period, but still outstanding as of this review date, were also considered. Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to assessment area credit and community development needs.

### **Service Test**

The review period for retail services includes activity from the date of the bank's previous CRA evaluation to the date of the current evaluation. The review period for community development services includes activity from January 1, 2022 through March 31, 2025. The Service Test considers the following criteria:

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

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

The bank's performance under the Lending Test is rated high satisfactory. This rating reflects the performance in each rated area shown in the table below, with Missouri, Kansas City, MO-KS MSA (Kansas City MSA) and St. Louis, MO-IL MSA (St. Louis MSA) carrying the most weight toward the overall rating. The bank's performance under each of the criteria of the Lending Test are shown in the tables that follow.

Rated Area	Lending Test Rating
Kansas City MSA	High Satisfactory
St. Louis MSA	High Satisfactory
Missouri	High Satisfactory
Oklahoma	High Satisfactory
Kansas	High Satisfactory
Colorado	Low Satisfactory
<b>OVERALL</b>	<b>HIGH SATISFACTORY</b>

### Lending Activity

Overall, lending levels reflect good responsiveness to the credit needs of the bank's assessment areas, based on loan activity reviewed under the Lending Test. (See the *Lending Inside and Outside of Assessment Areas* table in the next section for a breakdown of lending activity by product type.) Additional lending activity details are discussed later for each assessment area reviewed under full-scope procedures.

### Assessment Area Concentration

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

Lending Inside and Outside the Assessment Areas January 1, 2022 through December 31, 2023								
Loan Type	Inside				Outside			
	#	# %	\$ (000s)	\$ %	#	# %	\$ (000s)	\$ %
HMDA	11,973	70.5	2,554,061	59.4	4,999	29.5	1,746,497	40.6
Small Business	10,222	91.9	1,333,715	90.1	895	8.1	146,197	9.9
Small Farm	2,423	85.2	220,383	85.0	422	14.8	38,835	15.0
<b>TOTAL LOANS</b>	<b>24,618</b>	<b>79.6</b>	<b>4,108,159</b>	<b>68.0</b>	<b>6,316</b>	<b>20.4</b>	<b>1,931,529</b>	<b>32.0</b>

A high percentage of loans were made inside the bank's assessment areas. As shown above, 79.6 percent of the bank's total HMDA, small business, and small farm loans were made inside the bank's assessment areas, representing 68.0 percent of loans by dollar volume.

### **Borrower and Geographic Distribution**

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

<b>Rated Area</b>	<b>Loan Distribution by Borrower's Profile</b>
Kansas City MSA	Good
St. Louis MSA	Good
Missouri	Adequate
Oklahoma	Good
Kansas	Adequate
Colorado	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

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

<b>Rated Area</b>	<b>Geographic Distribution of Loans</b>
Kansas City MSA	Good
St. Louis MSA	Adequate
Missouri	Adequate
Oklahoma	Good
Kansas	Excellent
Colorado	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

### **Community Development Lending Activity**

Overall, the bank makes a relatively high level of community development loans, as noted in the following tables.

<b>Rated Area</b>	<b>Community Development Lending</b>
Kansas City MSA	Leader in Making
St. Louis MSA	Relatively High Level
Missouri	Relatively High Level
Oklahoma	Relatively High Level
Kansas	Adequate Level
Colorado	Adequate Level
<b>OVERALL</b>	<b>RELATIVELY HIGH LEVEL</b>

During the review period, the bank originated or renewed 151 qualifying community development loans inside its assessment areas, totaling \$391.8 million.

### **Product Innovation**

Overall, the bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas, as shown in the table below.

<b>Rated Area</b>	<b>Use of Product Innovation</b>
Kansas City MSA	Makes Extensive Use
St. Louis MSA	Makes Extensive Use
Missouri	Makes Extensive Use
Oklahoma	Makes Extensive Use
Kansas	Limited Use
Colorado	Makes Extensive Use
<b>OVERALL</b>	<b>MAKES EXTENSIVE USE</b>

Following are descriptions of each of the innovative and/or flexible lending options offered by the bank during the review period, listed in order of uniqueness.

- Home Turf Program: The bank created this program specifically for the purpose of meeting the mortgage lending needs of LMI borrowers within the bank's assessment areas. Through this program, eligible borrowers are allowed to make a reduced minimum down payment of 3.0 percent, using the borrowers' personal funds, government assistance programs, or a gift from a relative. From January 1, 2022 through March 31, 2025, the bank originated 687 mortgage loans under this program totaling \$118.7 million, including 21 mortgage loans totaling \$4.4 million made outside of assessment areas.
- Missouri Housing Development Commission Loan Program: This program helps with closing costs and down payment assistance for LMI families. During the review period, the bank originated 249 loans totaling \$43.8 million, primarily in its Missouri, Kansas City, and St. Louis assessment areas.
- Oklahoma Housing Finance Agency Loan Program: This program helps with closing costs and down payment assistance for LMI families. During the review period, the bank originated 30 loans totaling \$5.5 million, primarily in its Oklahoma assessment areas.
- Colorado Housing and Finance Authority Loan Program: This program helps with down payment assistance for LMI families. During the review period, the bank originated 38 loans totaling \$13.0 million, primarily in its Colorado assessment areas.
- MOBUCK\$ Programs: The Missouri State Treasurer's Office offers several loan programs that are designed to provide low-cost funds to help create and retain Missouri jobs for small businesses. During the review period, the bank originated a total of 10 loans totaling \$4.6 million, made inside of Missouri assessment areas.

- Small Business Administration (SBA) Loan Programs: As an approved financial institution, the bank participates in two SBA loan programs, the SBA-Certified Development Company/504 Loan Program and the SBA 7(a) Loan Program. Through these programs, the bank offers loans that support small business operations and/or expansion. During the review period, the bank originated a total of 169 loans totaling \$56.8 million, including 13 loans totaling \$4.1 million made outside of assessment areas.
- Fannie Mae HomeReady Loan Program: This program is targeted to LMI individuals and has lower down payment requirements than traditional conventional loans. Borrowers are also provided financial education as an incident of the provision of credit. During the review period, the bank originated a total of 437 loans totaling \$75.5 million, including 183 loans totaling \$32.2 million made outside of assessment areas.
- Freddie Mac Home Possible Loan Program: This program is targeted to LMI individuals and has lower down payment requirements than traditional conventional loans. Borrowers are also provided financial education as an incident of the provision of credit. During the review period, the bank originated a total of 332 loans totaling \$56.3 million, including 93 loans totaling \$17.4 million made outside of assessment areas.
- U.S. Department of Agriculture (USDA), Farm Service Agency (FSA) Programs: The USDA offers several loan programs that are designed to assist farmers and ranchers obtain the financing needed to start, expand, or maintain farms. During the review period, the bank originated a total of 57 loans totaling \$24.3 million, including 1 loan totaling \$318,600 made outside of assessment areas.
- Veterans Affairs (VA) Loan Program: This program, which is offered to veterans, provides flexible, long-term home financing to eligible borrowers with low or no down payments. During the review period, the bank originated a total of 1,134 loans totaling \$485.0 million, including 821 loans totaling \$351.8 million made outside of assessment areas.
- Federal Housing Administration (FHA) Loan Program: This program offers flexible, long-term financing to eligible borrowers and has lower down payment and credit score requirements. During the review period, the bank originated a total of 1,088 loans totaling \$277.9 million, including 542 loans totaling \$147.3 million made outside of assessment areas.
- USDA, Rural Development (RD) Home Loan Program: This loan program is designed to assist LMI individuals in purchasing affordable housing in rural areas. There are no down payment requirements. During the review period, the bank originated a total of 213 loans totaling \$38.9 million, including 94 loans totaling \$19.5 million made outside of assessment areas.

## INVESTMENT TEST

The bank's performance under the Investment Test is rated low satisfactory. Overall, the bank made an adequate level of qualified community development investments and grants. The investments and grants exhibit adequate responsiveness to credit and community development needs, and the bank is rarely in a leadership position. The bank makes significant use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Rated Area	Community Development Investments	Community Development Donations/Grants	Investment Test Rating
Kansas City MSA	\$6.1 Million	\$449,450	Low Satisfactory
St. Louis MSA	\$9.0 Million	\$219,768	High Satisfactory
Missouri	\$20.0 Million	\$1.5 Million	Low Satisfactory
Oklahoma	\$2.7 Million	\$55,840	Low Satisfactory
Kansas		\$19,100	Low Satisfactory
Colorado	\$1.9 Million	\$35,750	Low Satisfactory
<b>TOTAL</b>	<b>\$39.6 Million</b>	<b>\$2.3 Million</b>	<b>LOW SATISFACTORY</b>

During the review period, the bank made 31 new investments totaling \$25.0 million and had 81 investments totaling \$14.6 million made in a prior period that were still outstanding. In addition, the bank made 442 donations totaling \$2.3 million. The bank's investment activity included municipal bonds benefiting schools or projects in LMI areas in the bank's assessment areas, as well as mortgage-backed securities (MBSs), which are investments in pools of loans made up of affordable housing loans to LMI borrowers. Other investment activity included projects eligible for low-income housing tax credits and New Markets Tax Credits.

While not included in the totals above, the bank also made three investments totaling \$1.5 million outside of reviewed assessment areas.

## SERVICE TEST

The bank's performance under the Service Test is rated high satisfactory based on the criteria shown in the table below.

Rated Area	Service Test Rating
Kansas City MSA	High Satisfactory
St. Louis MSA	High Satisfactory
Missouri	High Satisfactory
Oklahoma	Low Satisfactory
Kansas	High Satisfactory
Colorado	High Satisfactory
<b>OVERALL</b>	<b>HIGH SATISFACTORY</b>

### **Accessibility of Delivery Systems**

The bank's delivery systems are accessible to geographies and individuals of different income levels, as shown in the following tables.

<b>Rated Area</b>	<b>Accessibility of Delivery Systems</b>
Kansas City MSA	Reasonably Accessible
St. Louis MSA	Reasonably Accessible
Missouri	Readily Accessible
Oklahoma	Reasonably Accessible
Kansas	Accessible
Colorado	Accessible
<b>OVERALL</b>	<b>ACCESSIBLE</b>

The bank currently operates 40 of its 156 branches (25.6 percent) in LMI geographies. In addition to branch locations, consideration was also given to the bank's network of ATMs, ITMs, and LPOs, as well as online and mobile banking services.

### **Changes in Branch Locations**

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

<b>Rated Area</b>	<b>Changes in Branch Locations</b>
Kansas City MSA	Improved Access
St. Louis MSA	Not Adversely Affected
Missouri	Not Adversely Affected
Oklahoma	Not Adversely Affected
Kansas	Not Adversely Affected
Colorado	Not Adversely Affected
<b>OVERALL</b>	<b>NOT ADVERSELY AFFECTED</b>

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

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



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

### **Community Development Services**

The bank provides a relatively high level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Kansas City MSA	Leader in Providing
St. Louis MSA	Relatively High Level
Missouri	Relatively High Level
Oklahoma	Adequate Level
Kansas	Leader in Providing
Colorado	Adequate Level
<b>OVERALL</b>	<b>RELATIVELY HIGH LEVEL</b>

In total, 426 employees provided 16,830 hours of community development services to 171 different organizations, including 87 hours of community development services to 1 organization outside of the bank's assessment areas. Bank employees lent their expertise in various capacities, such as a board member, financial service provider, and financial literacy instructor, to local community service and economic development organizations. The bank also continued delivering its financial literacy and coaching services through its proprietary ProsperU program, which is based out of its Columbia, Kansas City, and Springfield, Missouri, classrooms as well as online.

### **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under 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.

## KANSAS CITY, MISSOURI-KANSAS MULTISTATE MSA<sup>3</sup>

### CRA RATING FOR KANSAS CITY:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

### SATISFACTORY

High Satisfactory

Low Satisfactory

High Satisfactory

Factors supporting the institution's Kansas City rating include the following:

- The bank's lending levels reflect adequate responsiveness to the credit needs of the Kansas City assessment area.
- The distribution of loans by borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good penetration throughout the Kansas City assessment area.
- The bank is a leader in making community development loans throughout the Kansas City assessment area.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the Kansas City assessment area.
- The bank makes an adequate level of qualified community development investments and grants and is rarely in a leadership position in the Kansas City assessment area.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Kansas City assessment area, and the bank's record of opening and closing branches has improved the accessibility of the bank's delivery systems.
- The bank is a leader in providing community development services.

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Kansas City assessment area are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section.

The Kansas City assessment area was reviewed under full-scope examination procedures and included information obtained from one community contact. The interview was used to ascertain

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<sup>3</sup> This rating reflects performance within the multistate MSA. The statewide evaluation of Missouri is adjusted and does not reflect performance in the portion of Missouri contained in the St. Louis assessment area.

specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from the community contact interview are included in the next section.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KANSAS CITY ASSESSMENT AREA

### Bank Structure

As shown in the table below, the bank operates 46 (29.5 percent) of its total branches in the Kansas City assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
2	10	27	7	0

The bank opened two of these branches during the review period: one in January 2024 and one in April 2025 (no branches were closed during the review period). In addition to the branches, the bank operates three LPOs and two stand-alone ATMs. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of its assessment area.

### General Demographics

The bank's Kansas City assessment area consists of seven Missouri counties (Cass, Clay, Clinton, Jackson, Lafayette, Platte, and Ray) and two Kansas counties (Johnson and Wyandotte), which total 9 of the 14 counties that make up the entire Kansas City MSA. The following table displays the populations of each of the counties in the bank's assessment area and the population of the assessment area as a whole.

State	County	Population
Missouri	Cass	107,824
	Clay	253,335
	Clinton	21,184
	Jackson	717,204
	Lafayette	32,984
	Platte	106,718
	Ray	23,158
Kansas	Johnson	609,863
	Wyandotte	169,245
ASSESSMENT AREA		2,041,515

Concentrations of residents are found in Jackson County, Missouri, and Johnson County, Kansas. The assessment area is largely urban, though several of the outlying counties are more rural in nature.

The bank's Kansas City assessment area is a highly competitive banking market with 108 FDIC-insured financial institutions in the area. According to the FDIC's Deposit Market Share Report as of June 30, 2024, The Central Trust Bank is ranked 8<sup>th</sup> among these financial institutions, holding 3.2 percent of the assessment area's deposit market share.

Competition for HMDA and CRA loans is similarly high. An analysis of 2023 HMDA-reportable loans shows that 638 institutions had loan activity in the assessment area, of which the bank ranked 20<sup>th</sup> with 1.5 percent of total HMDA loans. The bank ranked 8<sup>th</sup> out of 170 institutions with CRA loan activity in the assessment area, accounting for 2.0 percent of total CRA loan activity. As the assessment area covers a wide metropolitan area, and the demographics reflect an economically diverse population, credit needs in the area are varied. The community contact noted particular needs for affordable housing programs for consumers and venture capital funding for small businesses.

### **Income and Wealth Demographics**

The following table reflects the number of census tracts by income level and the family population within those tracts.

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
Low	56	9.8%	30,856	6.1%
Moderate	142	24.9%	112,199	22.3%
Middle	201	35.3%	199,438	39.6%
Upper	147	25.8%	158,707	31.5%
Unknown	24	4.2%	2,246	0.4%
<b>TOTAL</b>	<b>570</b>	<b>100%</b>	<b>503,446</b>	<b>100%</b>

As shown above, 34.7 percent of the census tracts in the assessment area are LMI geographies, but only 28.4 percent of the family population resides in these tracts. A significant portion of the LMI census tracts are concentrated in downtown Kansas City.

According to 2020 ACS data, the median family income for the assessment area was \$85,982. At the same time, the median family incomes for the state of Missouri and state of Kansas were \$72,834 and \$77,620, respectively. More recently, the FFIEC estimated the median family income for the Kansas City MSA to be \$97,300 in 2022 and \$104,400 in 2023. The following table displays population percentages of assessment area families by income level compared to the states of Kansas and Missouri.

Family Population by Income Level						
	Assessment Area		Kansas		Missouri	
Low	102,608	20.4%	135,113	18.3%	317,471	20.5%
Moderate	88,170	17.5%	130,126	17.6%	285,869	18.4%
Middle	109,461	21.7%	162,489	22.0%	333,130	21.5%
Upper	203,207	40.4%	309,883	42.0%	614,586	39.6%
<b>TOTAL</b>	<b>503,446</b>	<b>100%</b>	<b>737,611</b>	<b>100%</b>	<b>1,551,056</b>	<b>100%</b>

The table above shows that a significantly higher percentage of families in the assessment area are LMI (37.9 percent) than reside in LMI geographies (28.4 percent). Overall, the percentage of families in the assessment area that are considered LMI is marginally lower than in Missouri (38.9 percent) and slightly higher than in Kansas (35.9 percent). Furthermore, the percentage of families living below the poverty level in the assessment area (7.0 percent) is lower than that of Kansas (7.6) and Missouri (8.9 percent). This data indicates the assessment area is similar in affluence to Kansas and marginally more affluent than Missouri. However, affluence differs among the counties comprising the assessment area, with Wyandotte and Jackson Counties reporting the highest level of families that are living below poverty and Johnson and Platte Counties reporting the lowest levels.

### Housing Demographics

The following table displays key housing demographics for the assessment area compared to the states of Kansas and Missouri.

Housing Cost Burden Levels (%)						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
<b>Assessment Area</b>	<b>76.6</b>	<b>33.4</b>	<b>39.9</b>	<b>60.3</b>	<b>27.1</b>	<b>16.0</b>
Johnson County, KS	83.3	44.1	36.2	68.3	38.7	14.4
Wyandotte County, KS	71.9	20.1	42.8	55.4	19.0	20.2
Cass County, MO	70.2	25.4	35.9	57.5	26.1	15.1
Clay County, MO	81.4	35.5	41.3	64.9	25.9	15.0
Clinton County, MO	58.1	20.2	28.4	57.1	19.3	18.7
Jackson County, MO	75.6	30.8	43.0	57.7	24.6	17.6
Lafayette County, MO	61.8	7.6	30.9	38.4	10.1	10.0
Platte County, MO	79.5	33.4	31.2	77.2	33.8	16.4
Ray County, MO	56.6	11.8	34.9	42.7	9.1	10.7
<b>Kansas</b>	<b>75.7</b>	<b>29.8</b>	<b>38.2</b>	<b>58.1</b>	<b>26.8</b>	<b>15.3</b>
<b>Missouri</b>	<b>74.0</b>	<b>30.3</b>	<b>39.6</b>	<b>58.6</b>	<b>26.5</b>	<b>16.1</b>

Based on the data in the previous table, both LMI renters and owners in the assessment area are more cost burdened when compared to the states of Kansas and Missouri. Furthermore, a significant portion of LMI renters and owners in both the assessment area and the states of Kansas and Missouri are burdened with high housing costs. This aligns with the information provided by the community contact, who stated the assessment area lacks affordable housing.

### **Industry and Employment Demographics**

The assessment area supports a large and diverse business community, including a strong small business sector. The assessment area has 89,355 businesses (90.9 percent small businesses) and 1,321 farms (97.5 percent small farms). BLS industry demographics indicate that there are 1,054,147 paid employees in the assessment area (including 138,810 governmental employees). By percentage of nongovernmental employees, the three largest job categories are healthcare and social assistance (15.8 percent), retail trade (11.5 percent), and accommodation and food services (10.3 percent). The following table details BLS unemployment data (not seasonally adjusted) for the assessment area and the states of Kansas and Missouri.

Unemployment Levels (%)			
Dataset	Time Period (Annual Average)		
	2022	2023	2024 (Jan.–Nov.)
Assessment Area	2.7	2.9	3.5
Kansas	2.6	2.7	3.3
Missouri	2.6	3.1	3.7

As shown in the table above, unemployment levels in the assessment area were similar to those of Kansas and Missouri throughout the review period. Furthermore, unemployment levels across all datasets have experienced an upward trend.

### **Community Contact Information**

For this assessment area, one community contact interview was utilized with a representative from an economic development office in the Missouri portion of the MSA. The interviewee categorized the local economy as stable with a diversified industry mix and stated that local unemployment figures were consistent with the national average. The contact highlighted a lack of affordable housing throughout the area and emphasized a need for more venture capital loans for small businesses. Lastly, the contact mentioned that the area generally has a healthy level of banking options as well as ample community development opportunities.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KANSAS CITY ASSESSMENT AREA

### LENDING TEST

The bank's Lending Test performance in the Kansas City assessment area is rated high satisfactory. The following table displays the bank's performance under the Lending Test in the Kansas City assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Loans	Leader in Making
Product Innovation	Makes Extensive Use
<b>LENDING TEST RATING</b>	<b>HIGH SATISFACTORY</b>

### Lending Activity

The following table displays the bank's combined 2022 and 2023 lending volume in the Kansas City assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2022 through December 31, 2023				
Loan Type	#	%	\$ (000s)	%
Home Improvement	337	9.1	22,786	3.3
Home Purchase	789	21.3	208,459	30.5
Multifamily Housing	19	0.5	61,153	9.0
Refinancing	304	8.2	53,294	7.8
Other Purpose Line of Credit (LOC)	154	4.2	12,893	1.9
Other Purpose Closed/Exempt	37	1.0	3,844	0.6
Purpose Not Applicable	0	0.0	0	0.0
<b>Total HMDA</b>	<b>1,640</b>	<b>44.2</b>	<b>362,429</b>	<b>53.1</b>
Small Business	1,804	48.6	299,092	43.8
Small Farm	266	7.2	20,929	3.1
<b>TOTAL LOANS</b>	<b>3,710</b>	<b>100</b>	<b>682,450</b>	<b>100</b>

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. Loans made in the Kansas City assessment area represent 15.1 percent by number and 16.6 percent by dollar of total 2022 and 2023 HMDA and CRA loans made within the bank's assessment areas. While below the current percentage of total bank branches (29.5 percent), this level of lending is similar to the percentage of total bank deposits held in the assessment area (18.5 percent).

### **Loan Distribution by Borrower's Profile**

The bank's overall loan distribution by borrower's profile is good. As previously discussed, small farm lending received less weight toward the overall conclusion than did HMDA and small business lending.

#### *HMDA Lending*

When considering performance from both years, the bank's performance in making home mortgage loans to individuals of different income levels is good.

In 2022, the bank originated 12.9 percent of its HMDA loans to low-income borrowers. While well below the percentage of assessment area families who are low income (20.4 percent), the bank's performance was above the aggregate performance of institutions in the assessment area (9.8 percent). Therefore, the bank's performance is considered good. Furthermore, the bank originated 20.8 percent of its HMDA loans to moderate-income borrowers, which was closely aligned with the aggregate lending level (19.8 percent) and above the demographic figure (17.5 percent) and is considered good.

In 2023, the bank originated 12.4 percent of its HMDA loans to low-income borrowers, which again compared favorably to aggregate lending levels (9.3 percent) but was below the demographic figure (20.4 percent) and is considered good. The bank made 26.0 percent of its HMDA loans to moderate-income borrowers as compared to 20.1 percent for other lenders in the assessment area and the demographic figure (17.5 percent), reflecting excellent performance.

#### *Small Business Lending*

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

In 2022, the bank originated 59.5 percent of its small business loans to businesses with annual revenues of \$1 million or less; this performance is considered adequate when compared with aggregate lending levels (51.9 percent) and the demographic figure (90.8 percent).

Similarly, in 2023, lending to businesses with annual revenues of \$1 million or less was 55.4 percent and considered adequate when compared with aggregate lending levels (53.8 percent) and the demographic figure (90.9 percent).

#### *Small Farm Lending*

When considering performance from both years, the bank's borrower distribution of small farm loans is good.

In 2022, the bank originated 82.6 percent of its small farm loans to farms with annual revenues of \$1 million or less. This exceeded the performance of other lenders in the assessment area (58.1 percent) by a wide margin but was below the demographic figure of 97.3 percent, reflecting good performance.



Similarly, in 2023, the bank originated 82.9 percent of its small farm loans to farms with annual revenues of \$1 million or less. This greatly exceeded aggregate lending performance (56.6 percent) but was below the demographic figure (97.5 percent), reflecting good performance.

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans is good overall based on all three loan products reviewed, with primary emphasis placed on HMDA and small business lending. Additionally, an analysis of the dispersion of all three loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2022, the bank had loan activity in 80.5 percent of all assessment area census tracts and 76.8 percent of all LMI geographies. In 2023, the bank had lending activity in 80.2 percent of census tracts in the assessment area and 77.8 percent of LMI geographies in the assessment area. This dispersion was consistent with the bank's branch structure in the assessment area and supports the conclusion that the geographic distribution of loans is good overall.

#### *HMDA Lending*

The bank's distribution of HMDA loans reflects good penetration among geographies of different income levels, particularly LMI geographies.

In 2022, the bank originated 4.5 percent of its HMDA loans in low-income census tracts compared to aggregate lending levels of 3.8 percent and the percentage of owner-occupied housing units in low-income geographies (4.4 percent), reflecting good performance. The bank's lending in moderate-income geographies (18.5 percent), though below, was similar to the aggregate lending level (20.5 percent) and the demographic figure (20.2 percent), reflecting adequate performance.

In 2023, the bank's geographic distribution of HMDA loans in low-income census tracts (4.7 percent) is considered good, as this level of lending slightly exceeds the aggregate performance in the assessment area (4.5 percent) and the demographic figure (4.4 percent). Lending in moderate-income census tracts (23.6 percent) also exceeded both the aggregate lending performance (21.9 percent) and the demographic figure (20.2 percent) and is considered good.

#### *Small Business Lending*

The bank's small business lending in LMI geographies is excellent overall.

In 2022, the bank made 8.5 percent of its small business loans in low-income geographies. This performance is considered excellent, as it greatly exceeds both aggregate lending levels (5.2 percent) and the percentage of assessment area businesses that are in low-income geographies (5.7 percent). Lending in moderate-income geographies (21.2 percent) was similar to aggregate lending levels (19.1 percent) and the demographic figure (21.1 percent), reflecting good performance.

In 2023, the bank's level of lending in low-income geographies (6.4 percent) was higher than both aggregate lending performance (5.2 percent) and the demographic figure (5.7 percent), reflecting excellent performance. This excellent performance continued in moderate-income census tracts in

2023, as the percentage of the bank's small business loans (22.8 percent) exceeded both the aggregate performance in the assessment area (18.3 percent) and the demographic figure (21.3 percent).

### *Small Farm Lending*

The bank's small farm lending is considered adequate overall.

In 2022, the bank's performance in low-income census tracts consisted of one small farm loan origination (0.7 percent), which is similar to aggregate performance (0.9 percent) and demographic data (1.1 percent). This is considered adequate performance. The bank's performance in moderate-income census tracts (13.4 percent) is below aggregate data (14.3 percent) but in line with demographic data (13.4 percent), also reflecting adequate performance.

Similarly, in 2023, the bank's performance in low-income census tracts consisted of one small farm loan origination (0.9 percent), which is similar to aggregate performance (1.3 percent) and demographic data (1.3 percent). This is considered adequate performance. The bank's performance in moderate-income census tracts (12.0 percent) is in line with aggregate data (11.7 percent) but below demographic data (13.5 percent), reflecting adequate performance.

### **Community Development Lending Activity**

The bank is a leader in making community development loans in the Kansas City assessment area. During the review period, the bank made 25 community development loans totaling \$128.5 million. These community development loans supported various community development purposes, including affordable housing (3), economic development (11), and revitalization and stabilization (11). The most impactful of these loans are discussed below.

- The bank originated three community development loans with a purpose of affordable housing, totaling \$12.5 million. These loans provided funding for affordable multifamily housing developments. As noted by the community contact, the assessment area has a strong need for affordable options for LMI borrowers.
- The bank financed a \$21.5 million commercial construction project of an industrial complex that qualified as revitalization/stabilization of a low-income geography by supporting permanent LMI job creation/retention.

### **Product Innovation**

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

<b>Flexible and/or Innovative Lending Products January 1, 2022 through March 31, 2025</b>		
<b>Program</b>	<b>Number of Loans</b>	<b>\$</b>
Home Turf	283	50,338,708
Missouri Housing Development Commission	25	5,029,509
SBA	20	15,364,447
Fannie Mae HomeReady	32	6,377,103
Freddie Mac Home Possible	32	5,973,118
VA	22	8,070,543
FHA	80	20,022,458
USDA, RD	13	2,184,269

## INVESTMENT TEST

The bank's Investment Test performance in the Kansas City assessment area is rated low satisfactory. The bank made an adequate level of qualified community development investments and grants in the assessment area and was rarely in a leadership position. The bank made new qualified community development investments of \$1.7 million in addition to \$4.3 million in investments made prior to this review period but still outstanding. Of the new investments made during this review period, \$1.6 million was in a municipal bond for a school with a majority of students who qualify for the free or reduced-price lunch (FRL) program, while the remaining \$144,305 was an investment in a community development entity with a primary mission of promoting permanent job creation/retention for LMI persons who are employed by small businesses. In addition to these investments, the bank made 67 qualifying community development donations totaling \$449,450. The most impactful of these donations are summarized below.

- The bank made 3 donations totaling \$270,000 to an affordable housing organization. The donation benefited a workforce development initiative for unemployed LMI individuals.
- The bank made 11 donations totaling \$44,500 to an organization focused on providing transitional housing for homeless individuals.

## SERVICE TEST

The bank's performance under the Service Test in the Kansas City assessment area is rated high satisfactory. The following table displays the bank's performance under the Service Test.

<b>Service Test Summary</b>	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Improved Accessibility
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader in Providing
<b>SERVICE TEST RATING</b>	<b>HIGH SATISFACTORY</b>

### **Accessibility of Delivery Systems**

The bank operates 46 branches in the Kansas City assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

<b>Branch Distribution by Geography Income Level</b>						
<b>Dataset</b>	<b>Geography Income Level</b>					<b>TOTAL</b>
	<b>Low-</b>	<b>Moderate-</b>	<b>Middle-</b>	<b>Upper-</b>	<b>Unknown</b>	
Branches	2	10	27	7	0	<b>46</b>
	4.3%	21.7%	58.7%	15.2%	0.0%	<b>100%</b>
Census Tracts	9.8%	24.9%	35.3%	25.8%	4.2%	<b>100%</b>
Household Population	7.2%	24.7%	39.4%	28.0%	0.7%	<b>100%</b>

Based on data in the preceding table, the bank operates 26.0 percent of its assessment area branches in LMI census tracts. This distribution is below the percentage of assessment area census tracts that are LMI (34.7 percent) and the household population in LMI census tracts (31.9 percent). In addition to branch locations, consideration was also given to the distribution of stand-alone ATMs and the availability of alternative delivery systems, such as online and mobile banking. Overall, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels.

### **Changes in Branch Locations**

During the review period, the bank opened two branches in the assessment area: one in a moderate-income census tract and one an upper-income census tract. No branches were closed. As a result, the bank's record of opening and closing branches in the assessment area has improved the accessibility of its service delivery systems, particularly to LMI individuals and geographies.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the Kansas City assessment area. All branches are typically open from 9:00 a.m. to 5:00 p.m., Monday through Friday, or similar, while most offer Saturday morning lobby access. In addition, all branches have drive-up accessibility. One area of slight variance is in the number of lenders present at LMI branches compared to middle- and upper-income branches. Lenders are located at 3 of the 12 LMI branches compared to 15 of the 34 middle- and upper-income branches. Lastly, 7 branches have ITM access with extended hours Monday through Saturday. Overall, business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals.

### **Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 30 bank employees provided 1,959 hours of community development services to 22 different organizations in the Kansas City assessment area. These community development services included the following noteworthy services:

- Bank employees provided 87 service hours to three organizations that provide housing and supportive services to individuals and families in unstable housing or homeless situations.
- One bank employee provided 219 service hours to one organization that provides habilitation services to individuals with intellectual and developmental disabilities.

## ST. LOUIS, MISSOURI-ILLINOIS MULTISTATE MSA<sup>1</sup>

### CRA RATING FOR ST. LOUIS:

The Lending Test is rated:

The Investment Test is rated:

The Service Test is rated:

### SATISFACTORY

High Satisfactory

High Satisfactory

High Satisfactory

Factors supporting the institution's St. Louis rating include the following:

- The bank's lending levels reflect adequate responsiveness to the credit needs of the St. Louis assessment area.
- The distribution of loans by borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the St. Louis assessment area.
- The bank makes a relatively high level of community development loans throughout the St. Louis assessment area.
- The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of the St. Louis assessment area.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position in the St. Louis assessment area.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the St. Louis assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.
- The bank provides a relatively high level of community development services.

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the St. Louis assessment area are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. However, as demand for small farm loans and the bank's small farm loan activity are minimal in the assessment area, small farm lending is not assessed and did not impact the evaluation of lending performance in the assessment area. Based on loan demand and the bank's lending activity, HMDA lending received primary consideration in the analysis of the bank's lending performance.

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<sup>1</sup> This rating reflects performance within the multistate MSA. The statewide evaluation of Missouri is adjusted and does not reflect performance in the portion of Missouri contained in the St. Louis assessment area.

The St. Louis assessment area was reviewed under full-scope examination procedures and included information obtained from one community contact. The interview was used to ascertain specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from the community contact interview are included in the next section.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. LOUIS ASSESSMENT AREA

### Bank Structure

As shown in the table below, the bank operates 16 (10.3 percent) of its total branches in the St. Louis assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
2	1	2	11	0

In addition to the branches, the bank operates two LPOs and two stand-alone ATMs. No branches were opened/closed during this review period. Based on its branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to its entire assessment area.

### General Demographics

The assessment area is composed of the independent city of St. Louis and 4 of the 15 counties that make up the St. Louis MSA, including the Missouri counties of St. Louis and St. Charles and the Illinois counties of Monroe and St. Clair. The following table displays the populations of each of the counties in the bank's assessment area and the population of the assessment area as a whole.

State	County	Population
Missouri	St. Louis City	301,578
	St. Louis	1,004,125
	St. Charles	405,262
Illinois	Monroe	34,962
	St. Clair	257,400
ASSESSMENT AREA		2,003,327

The majority of the assessment area's population is concentrated in Missouri, particularly in St. Louis County. The assessment area hosts strong manufacturing and commercial industries and is anchored by several large national corporations with headquarters in the area. The assessment area is also home to numerous universities and colleges, notably Washington University and Saint Louis University, in the city of St. Louis.

The bank's assessment area is a highly competitive banking market with 75 FDIC-insured financial institutions in the area. According to the FDIC's Deposit Market Share Report as of June 30, 2024, The Central Trust Bank is ranked 14<sup>th</sup> among these financial institutions, holding 1.5 percent of the assessment area's deposit market share.

Competition for HMDA and CRA loans is similarly high. An analysis of 2023 HMDA-reportable loans shows that 553 institutions had loan activity in the assessment area, of which the bank ranked 18<sup>th</sup> with 1.6 percent of total HMDA loans. The bank ranked 14<sup>th</sup> out of 165 institutions with CRA loan activity in the assessment area, accounting for less than 1.0 percent of total CRA loan activity.

The assessment area covers a wide metropolitan area with a diverse population and demographic composition. As such, credit needs in the area are numerous and varied. Particular credit needs noted by the community contact include first-time home buyer and financial literacy programs for consumers. In addition, the St. Louis assessment area has high community development needs mixed with a large network of community development organizations. As such, there are significant opportunities for financial institution involvement in community development activities.

### **Income and Wealth Demographics**

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	69	13.8%	42,672	8.4%
Moderate	97	19.4%	80,569	15.9%
Middle	157	31.4%	171,045	33.8%
Upper	171	34.2%	210,936	41.6%
Unknown	6	1.2%	1,461	0.3%
<b>TOTAL</b>	<b>500</b>	<b>100%</b>	<b>506,683</b>	<b>100%</b>

As shown in the preceding table, 33.2 percent of the assessment area geographies are LMI, but only 24.3 percent of the family population resides in these tracts. These LMI areas are primarily concentrated in and around the city of St. Louis in Missouri and the city of East St. Louis in Illinois, which is located in St. Clair County.

According to 2020 ACS data, the median family income for the assessment area was \$87,053. In comparison, the median family income for the state of Illinois (\$86,251) and the state of Missouri (\$72,834) were below the assessment area. More recently, the FFIEC estimated the median family income for the St. Louis MSA to be \$96,800 in 2022 and \$100,800 in 2023. The following table displays the distribution of assessment area families by income level compared to all Illinois and Missouri families.

Family Population by Income Level						
	Assessment Area		Illinois		Missouri	
Low	102,862	20.3%	696,043	22.3%	317,471	20.5%
Moderate	86,109	17.0%	532,206	17.1%	285,869	18.4%
Middle	101,909	20.1%	621,096	19.9%	333,130	21.5%
Upper	215,803	42.6%	1,267,070	40.7%	614,586	39.6%
<b>TOTAL</b>	<b>506,683</b>	<b>100%</b>	<b>3,116,415</b>	<b>100%</b>	<b>1,551,056</b>	<b>100%</b>



The data in the previous table shows that the percentage of families who are LMI in the assessment area (37.3 percent) is less than that of the families living in the states of Illinois and Missouri (39.4 percent and 38.9 percent, respectively). Furthermore, the percentage of families living below the poverty level in the assessment area (7.3 percent) is slightly below the percentages in Illinois and Missouri (8.5 percent and 8.9 percent, respectively). This data indicates that the assessment area is slightly more affluent than the states of Illinois and Missouri. However, the level of affluence varies significantly among the assessment area's four counties and independent city when considering percentages of LMI families and those living below the poverty line. For example, the city of St. Louis and St. Clair County have the highest levels of LMI families (54.2 percent and 43.7 percent, respectively) and families living below the poverty level (15.1 percent and 10.1 percent, respectively).

### **Housing Demographics**

The following table displays key housing demographics for the assessment area compared to the states of Illinois and Missouri.

<b>Housing Cost Burden Levels (%)</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
<b>Assessment Area</b>	<b>76.5</b>	<b>28.2</b>	<b>41.4</b>	<b>64.4</b>	<b>29.5</b>	<b>17.1</b>
Monroe County, IL	83.2	39.8	43.4	55.9	29.6	14.2
St. Clair County, IL	70.7	22.6	41.3	61.0	25.9	17.9
St. Charles County, MO	78.6	37.7	35.3	67.8	34.6	14.3
St. Louis County, MO	80.2	30.2	41.9	66.9	29.5	17.8
St. Louis City, MO	73.6	21.8	42.9	57.7	25.7	18.9
<b>Illinois</b>	<b>73.6</b>	<b>34.6</b>	<b>41.8</b>	<b>67.0</b>	<b>34.3</b>	<b>20.8</b>
<b>Missouri</b>	<b>74.0</b>	<b>30.3</b>	<b>39.6</b>	<b>58.6</b>	<b>26.5</b>	<b>16.1</b>

Based on the data in the table above, the level of cost-burdened renters in the assessment area (41.4 percent) is similar to the states of Illinois (41.8 percent) and Missouri (39.6 percent). However, the level of cost-burdened homeowners in the assessment area (17.1 percent) varies, as it is similar to the state of Missouri as a whole (16.1 percent) but lower than the figure for the state of Illinois (20.8 percent). Every county in the assessment area has a cost-burden percentage over 70 percent for low-income renters, suggesting low-income renters might struggle saving for a down payment or purchasing a home. Furthermore, over half of all low-income homeowners in each assessment county are cost burdened, which might suggest low-income homeowners may struggle for necessary home improvement loans.

### **Industry and Employment Demographics**

The assessment area supports a large and diverse business community, including a strong small business sector, as evidenced by Dun & Bradstreet data that estimates 90.4 percent of businesses in the area have gross annual revenues of less than \$1 million. BLS industry demographics indicate that there are 1,073,226 paid employees in the assessment area (including 102,799 governmental

employees). By percentage of nongovernmental employees, the three largest job categories are healthcare and social assistance (19.1 percent), accommodation and food services (10.3 percent), and retail trade (10.1 percent). The following table details BLS unemployment data (not seasonally adjusted) for the assessment area and the states of Illinois and Missouri.

Unemployment Levels (%)			
Dataset	Time Period (Annual Average)		
	2022	2023	2024 (Jan.–Nov.)
Assessment Area	2.8	3.2	3.8
Illinois	4.6	4.5	5.2
Missouri	2.6	3.1	3.7

As shown in the table above, unemployment levels in the assessment area were below those of Illinois but similar to those of Missouri throughout the review period. Furthermore, unemployment levels across all datasets have experienced an overall upward trend.

### **Community Contact Information**

For this assessment area, one community contact interview with an individual from a local business association in the Illinois portion of the MSA was utilized. The interviewee categorized the local economy as consistent with the larger regional/national economy struggling with high interest rates and affordable housing. The contact also indicated that while unemployment rates are steady, they are slightly below the national unemployment figures. Furthermore, the interviewee highlighted an ongoing need for first-time home buyer and financial literacy programs. Finally, regarding banking competition, the contact mentioned that while many financial institutions are available, small local banks tend to be more active in the community.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. LOUIS ASSESSMENT AREA

### LENDING TEST

The bank's Lending Test performance in the St. Louis assessment area is rated high satisfactory. The following table displays the bank's performance under the Lending Test in the St. Louis assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Loans	Relatively High Level
Product Innovation	Makes Extensive Use
<b>LENDING TEST RATING</b>	<b>HIGH SATISFACTORY</b>

### Lending Activity

The following table displays the bank's combined 2022 and 2023 lending volume in the St. Louis assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2022 through December 31, 2023				
Loan Type	#	%	\$ (000s)	%
Home Improvement	106	4.3	12,640	2.3
Home Purchase	986	40.4	267,937	47.9
Multifamily Housing	10	0.4	22,142	4.0
Refinancing	189	7.7	40,813	7.3
Other Purpose LOC	143	5.9	11,605	2.1
Other Purpose Closed/Exempt	39	1.6	5,365	1.0
Purpose Not Applicable	0	0.0	0	0.0
<b>Total HMDA</b>	<b>1,473</b>	<b>60.3</b>	<b>360,502</b>	<b>64.5</b>
Small Business	951	39.0	196,304	35.1
Small Farm	17	0.7	2,087	0.4
<b>TOTAL LOANS</b>	<b>2,441</b>	<b>100</b>	<b>558,893</b>	<b>100</b>

Loans made in the St. Louis assessment area represent 9.9 percent by number and 13.6 percent by dollar of total 2022 and 2023 HMDA and CRA loans made within the bank's assessment area. This level of lending is similar to the current percentages of total bank branches (10.3 percent) and deposits held in the assessment area (11.6 percent). Therefore, the bank's lending levels reflect adequate responsiveness to assessment area credit needs.

### **Loan Distribution by Borrower's Profile**

The bank's overall loan distribution by borrower's profile is good, with primary consideration based on performance from the HMDA lending category.

#### *HMDA Lending*

Given the volume of lending to moderate-income borrowers, lending performance in the moderate-income category received greater weight when making overall the performance conclusion; as a result, when considering performance from both years, the bank's performance in making home mortgage loans to individuals of different income levels is good.

In 2022, the bank originated 10.3 percent of its HMDA loans to low-income borrowers, which was in line with performance of aggregate institutions in the assessment area (10.3 percent) but well below the percentage of assessment area families who are low income (20.3 percent), reflecting adequate performance. The bank originated 20.9 percent of its HMDA loans to moderate-income borrowers, which slightly exceeded the aggregate lending level (18.7 percent) and the demographic figure (17.0 percent), reflecting good performance.

In 2023, the bank originated 8.8 percent of its HMDA loans to low-income borrowers, which was similar to aggregate lending levels (9.5 percent) but below the demographic figure (20.3 percent) and is considered adequate. The bank made 20.3 percent of its HMDA loans to moderate-income borrowers as compared to 19.1 percent for other lenders in the assessment area and the demographic figure (17.0 percent), reflecting good performance.

#### *Small Business Lending*

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

In 2022, the bank originated 53.8 percent of its small business loans to businesses with annual revenues of \$1 million or less; this performance is considered adequate when compared with aggregate lending levels (52.8 percent) and the demographic figure (90.2 percent).

Similarly, in 2023, lending to businesses with annual revenues of \$1 million or less was 51.1 percent and considered adequate when compared with aggregate lending levels (55.6 percent) and the demographic figure (90.4 percent).

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans is adequate overall. Additionally, an analysis of the dispersion of all loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2022, the bank had loan activity in 72.8 percent of all assessment area census tracts and 57.2 percent of all LMI geographies. In 2023, the bank had lending activity in 71.8 percent of census tracts in the assessment area and 54.2 percent of LMI geographies in the assessment area. While lending penetration rates were lower in LMI areas,

the dispersion of loans was consistent with the bank's branch structure and assessment area lending opportunities, which supports the conclusion that the geographic distribution of loans is adequate overall.

### *HMDA Lending*

The bank's distribution of HMDA loans reflects adequate penetration among geographies of different income levels, particularly LMI geographies.

In 2022, the bank originated 3.4 percent of its HMDA loans in low-income census tracts compared to aggregate lending levels of 3.6 percent and the percentage of owner-occupied housing units in low-income geographies (5.6 percent), reflecting adequate performance. The bank's lending in moderate-income geographies (12.3 percent), though below, was similar to the aggregate lending level (13.2 percent) and the demographic figure (14.4 percent), reflecting adequate performance.

In 2023, the bank's geographic distribution of HMDA loans in low-income census tracts (3.5 percent) is considered adequate, as this level of lending is similar to the performance of aggregate institutions in the assessment area (4.2 percent) and the demographic figure (5.6 percent). The bank originated 10.7 percent of its HMDA loans in moderate-income census tracts compared to aggregate lending levels of 14.3 percent and the percentage of owner-occupied housing units in moderate-income geographies of 14.4 percent, reflecting adequate performance.

### *Small Business Lending*

Given the volume of lending in moderate-income geographies, lending performance in the moderate-income category received greater weight when making the overall performance conclusion; as a result, when considering performance from both years, the bank's small business lending in LMI geographies is adequate overall.

In 2022, the bank made 7.9 percent of its small business loans in low-income geographies. This performance is considered good, as it compares favorably to both aggregate lending levels (6.9 percent) and the percentage of assessment area businesses that are in low-income geographies (7.8 percent). Lending in moderate-income geographies (12.8 percent) was in line with aggregate lending levels (12.7 percent) and below the demographic figure (14.3 percent), reflecting adequate performance.

In 2023, the bank's level of lending in low-income geographies (7.4 percent) exceeded aggregate lending performance (6.3 percent) and was in line with the demographic figure (7.9 percent), reflecting good performance. Furthermore, lending in moderate-income census tracts (11.3 percent) was adequate when compared to the performance of aggregate institutions in the assessment area (12.1 percent) and the demographic figure (14.4 percent).

### **Community Development Lending Activity**

The bank makes a relatively high level of community development loans in the St. Louis assessment area. During the review period, the bank made 25 community development loans totaling \$23.9 million. These community development loans supported various community development purposes, including affordable housing (18), economic development (1), and revitalization/stabilization (6). The most impactful of these loans are discussed below.

- The bank originated one community development loan with a purpose of affordable housing, totaling \$1.9 million. The loan provided funding for an affordable multifamily housing development for LMI senior citizens in a low-income census tract.
- The bank financed a \$3.7 million commercial project that financed the acquisition of multiple small businesses that qualified as revitalization/stabilization of a moderate-income geography by supporting permanent LMI job creation/retention.

### **Product Innovation**

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

<b>Flexible and/or Innovative Lending Products January 1, 2022 through March 31, 2025</b>		
<b>Program</b>	<b>Number of Loans</b>	<b>\$</b>
Home Turf	287	41,192,057
Missouri Housing Development Commission	62	12,386,532
SBA	7	829,000
Fannie Mae HomeReady	37	7,286,985
Freddie Mac Home Possible	36	6,665,834
VA	34	11,049,222
FHA	91	22,740,051
USDA, RD	1	155,000

### **INVESTMENT TEST**

The bank's Investment Test performance in the St. Louis assessment area is rated high satisfactory. The bank made a significant level of qualified community development investments and grants in the assessment area and was occasionally in a leadership position. The bank made new qualified community development investments of \$6.3 million in addition to \$2.7 million in investments made prior to this review period but still outstanding. Of the new investments made during this review period, \$5.0 million was in an MBS providing affordable housing loans to LMI borrowers in the

assessment area, while \$400,000 was in municipal bonds for schools with a majority of students who qualify for the FRL program. In addition to these investments, the bank made 45 qualifying community development donations totaling \$219,768. The most impactful of these donations are summarized below.

- The bank made one donation totaling \$30,000 to an organization that promotes financial literacy. As noted by the community contact, the assessment area has a strong need for financial literacy programs.
- The bank made two donations totaling \$30,000 to an organization focused on providing housing for developmentally disabled adults.

## SERVICE TEST

The bank's performance under the Service Test in the St. Louis assessment area is rated high satisfactory. The following table displays the bank's performance under the Service Test.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level
<b>SERVICE TEST RATING</b>	<b>HIGH SATISFACTORY</b>

## Accessibility of Delivery Systems

The bank operates 16 branches in the St. Louis assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	2	1	2	11	0	16
	12.5%	6.3%	12.5%	68.8%	0.0%	100%
Census Tracts	13.8%	19.4%	31.4%	34.2%	1.2%	100%
Household Population	9.8%	17.7%	34.8%	37.2%	0.5%	100%

Based on data in the preceding table, the bank operates 18.8 percent of its assessment area branches in LMI census tracts. This distribution is below the percentage of assessment area census tracts that are LMI (33.2 percent) and the household population in LMI census tracts (27.5 percent). However, one of the bank's upper-income branches is located on the border of a moderate-income geography. Consideration was also given to the bank's stand-alone ATMs in the assessment area

along with the availability of online and mobile banking services. Therefore, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels.

### **Changes in Branch Locations**

The bank did not open or close any branch locations in the assessment area during the review period. Therefore, changes in branch locations have not adversely affected the accessibility of the bank's service delivery systems.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the St. Louis assessment area, with the exception of a limited-service branch in a moderate-income census tract that only provides access to residents of a senior living community. Branches are typically open from 9:00 a.m. to 5:00 p.m., Monday through Friday; 14 branches have open lobby hours on Saturday mornings, and 15 branches have drive-up access. One other area of slight variance is in the number of lenders present at LMI branches compared to middle- and upper-income branches. Lenders are located at 1 of the 3 LMI branches compared to 7 of the 13 middle- and upper-income branches. In addition, one branch has ITM access with extended hours Monday through Saturday. Overall, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

### **Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. During the review period, 148 bank employees provided 2,986 hours of community development services to 22 different organizations in the St. Louis assessment area. These community development services included the following noteworthy services:

- A total of 136 employees lent their financial expertise to one organization by delivering 1,374 hours of financial education sessions to children in LMI school districts.
- Two bank employees provided 710 service hours to one organization that provides affordable housing for LMI individuals.



## MISSOURI

### CRA RATING FOR MISSOURI:

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**SATISFACTORY**

**High Satisfactory**

**Low Satisfactory**

**High Satisfactory**

The major factors supporting the rating for the state of Missouri include the following:

- The bank's lending levels reflect excellent responsiveness to credit needs of its assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes an adequate level of qualified community development investments and grants and is rarely in the leadership position.
- Service delivery systems are readily accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.
- The bank provides a relatively high level of community development services throughout the Missouri assessment areas.

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Missouri assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section.

The bank operates six assessment areas throughout Missouri, located in three MSAs and three noncontiguous nonMSA portions of the state. Performance in the nonMSA assessment areas was combined for analysis, resulting in one set of performance conclusions for all of nonMSA Missouri. Of the Missouri areas, the Jefferson City assessment area and nonMSA Missouri combined area were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in the Jefferson City assessment area carried the greatest weight when forming overall state conclusions.

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

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSOURI

The following table gives additional detail regarding the bank's operations within Missouri.

Reviewed Area	Offices		Deposits As of June 30, 2024		Review Procedures
	#	%	\$ (000s)	%	
Jefferson City	15	20.3	3,539,399	36.5	Full-Scope
NonMSA Missouri	24	32.4	2,493,283	25.7	Full-Scope
Columbia	15	20.3	2,161,060	22.3	Limited-Scope
Springfield	20	27.0	1,497,230	15.4	Limited-Scope
<b>TOTAL</b>	<b>74</b>	<b>100</b>	<b>9,690,972</b>	<b>100</b>	<b>2 Full-Scope</b>

The bank operates 74 branches (47.4 percent of total branches) throughout the four CRA areas reviewed in the state of Missouri. Deposits in the state total \$9.7 billion, which represents 64.8 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank also operates 2 LPO locations, 9 stand-alone ITMs, and 34 stand-alone ATMs. The bank's operations in the state are heavily concentrated in the Jefferson City MSA, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed three branches throughout Missouri.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

### LENDING TEST

The bank's performance under the Lending Test in Missouri is rated high satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Loans	Relatively High Level
Product Innovation	Makes Extensive Use
<b>LENDING TEST RATING</b>	<b>HIGH SATISFACTORY</b>

### Lending Activity

Full-Scope Review Areas	Lending Activity
Jefferson City	Excellent
NonMSA Missouri	Excellent
<b>OVERALL</b>	<b>EXCELLENT</b>

Limited-Scope Review Areas	Lending Activity
Columbia	Consistent
Springfield	Below

Overall, lending levels reflect excellent responsiveness to the credit needs of the bank's reviewed areas, based on loan activity reviewed under the Lending Test. Though performance in the Springfield assessment area was below the statewide conclusion, lending activity in the Springfield assessment area was satisfactory. A more detailed analysis of these factors is described in sections for each area that was reviewed using full-scope procedures.

### **Borrower and Geographic Distribution**

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

Full-Scope Review Areas	Loan Distribution by Borrower's Profile
Jefferson City	Adequate
NonMSA Missouri	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

Limited-Scope Review Areas	Loan Distribution by Borrower's Profile
Columbia	Consistent
Springfield	Consistent

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

Full-Scope Review Areas	Geographic Distribution of Loans
Jefferson City	Adequate
NonMSA Missouri	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

Limited-Scope Review Areas	Geographic Distribution of Loans
Columbia	Consistent
Springfield	Consistent

### **Community Development Lending Activity**

Overall, the bank makes a relatively high level of community development loans, as noted in the following tables.

Full-Scope Review Areas	Community Development Lending
Jefferson City	Relatively High Level
NonMSA Missouri	Adequate Level
<b>OVERALL</b>	<b>RELATIVELY HIGH LEVEL</b>

Limited-Scope Review Areas	Community Development Lending
Columbia	Consistent
Springfield	Exceeds

During the review period, the bank originated or renewed 74 qualifying community development loans inside its Missouri assessment areas, totaling \$157.7 million.

### **Product Innovation**

The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its review areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section. The bank's use of flexible and/or innovative lending products in the Missouri assessment areas is detailed in the table below.

<b>Flexible and/or Innovative Lending Products January 1, 2022 through March 31, 2025</b>		
<b>Program</b>	<b>Number of Loans</b>	<b>\$</b>
Home Turf	1	166,250
Missouri Housing Development Commission	162	26,362,531
MOBUCK\$	10	4,558,578
SBA	122	33,768,620
Fannie Mae HomeReady	140	20,383,240
Freddie Mac Home Possible	149	21,181,465
USDA, FSA	55	24,014,688
VA	98	30,918,251
FHA	260	53,263,568
USDA, RD	103	16,683,081

### **INVESTMENT TEST**

The bank's performance under the Investment Test is rated low satisfactory. The following tables display investment and grant activity performance for each review area.

<b>Full-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Jefferson City	Adequate
NonMSA Missouri	Significant
<b>OVERALL</b>	<b>ADEQUATE</b>

<b>Limited-Scope Review Areas</b>	<b>Investment and Grant Activity</b>
Columbia	Consistent
Springfield	Exceeds

During the review period, the bank made 16 new investments totaling \$13.6 million and had \$6.4 million in previous period investments that were still outstanding. In addition, the bank made 289 donations totaling \$1.5 million. The bank's investment activity included municipal bonds benefiting schools with a majority of students who qualify for the FRL program, as well as MBSs supporting affordable housing throughout Missouri assessment areas. Additional details regarding the composition of the bank's investments can be found in the *Investment Test* section for each of the respective review areas.

Review Area	Community Development Investments (\$)	Community Development Donations/Grants (\$)
Jefferson City	1.7 Million	385,969
NonMSA Missouri	9.6 Million	238,004
Columbia	3.3 Million	217,346
Springfield	5.4 Million	662,674
<b>TOTAL</b>	<b>20.0 Million</b>	<b>1,503,993</b>

## SERVICE TEST

The bank's performance under the Service Test is rated high satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level
<b>SERVICE TEST RATING</b>	<b>HIGH SATISFACTORY</b>

### Accessibility of Delivery Systems

The bank's delivery systems are readily accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Review Areas	Accessibility of Delivery Systems
Jefferson City	Readily Accessible
NonMSA Missouri	Readily Accessible
<b>OVERALL</b>	<b>READILY ACCESSIBLE</b>

Limited-Scope Review Areas	Accessibility of Delivery Systems
Columbia	Below
Springfield	Below

Though performance in the limited-scope assessment areas was below the statewide conclusion, service delivery systems in both assessment areas were accessible.

### **Changes in Branch Locations**

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

Full-Scope Review Areas	Changes in Branch Locations
Jefferson City	Not Adversely Affected
NonMSA Missouri	Not Adversely Affected
<b>OVERALL</b>	<b>NOT ADVERSELY AFFECTED</b>

Limited-Scope Review Areas	Changes in Branch Locations
Columbia	Consistent
Springfield	Consistent

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

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

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Jefferson City	Do Not Vary in a Way that Inconveniences
NonMSA Missouri	Do Not Vary in a Way that Inconveniences
<b>OVERALL</b>	<b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b>

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Columbia	Consistent
Springfield	Consistent

### **Community Development Services**

The bank provides a relatively high level of community development services, as shown below.

<b>Full-Scope Review Areas</b>	<b>Community Development Services</b>
Jefferson City	Relatively High Level
NonMSA Missouri	Relatively High Level
<b>OVERALL</b>	<b>RELATIVELY HIGH LEVEL</b>

<b>Limited-Scope Review Areas</b>	<b>Community Development Services</b>
Columbia	Exceeds
Springfield	Exceeds

In total, 209 employees logged 10,517 hours of community development services to 115 different organizations. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope review area.



## JEFFERSON CITY, MISSOURI MSA

(Full-Scope Review)

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

#### **Bank Structure**

As shown in the table below, the bank operates 15 (9.6 percent) of its total branches in the Jefferson City assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
0	4	10	1	0

During the review period, the bank closed one branch (June 2024). In addition to branches, the bank operates two stand-alone ITMs and ten stand-alone ATMs in the assessment area. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

#### **General Demographics**

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

County	Population
Callaway	44,283
Cole	77,279
Moniteau	15,473
Osage	13,274
<b>TOTAL ASSESSMENT AREA POPULATION</b>	<b>150,309</b>

The majority of the assessment area population of 150,309 is concentrated in Cole County (51.4 percent) where the state capital, Jefferson City, is located. As the capital city, Jefferson City's economy is largely based on the government; however, it also hosts manufacturing facilities, universities, and a state prison. The remaining counties are more rural in nature, with Moniteau County being the most remote.

There is a moderate level of competition in this assessment area, where 19 FDIC-insured depository institutions operate 60 offices. The Central Trust Bank dominates the assessment area with a deposit market share of 54.3 percent, while the institution that ranks second possesses only 9.9 percent. The bank is also the 2023 leading HMDA and CRA lender in the assessment area, further illustrating the bank's significant role in meeting the community's credit needs.

As a result of the factors described, the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses/farms of different income/revenue levels. Furthermore, the community contact indicated there are ample opportunities for financial institution involvement in community development efforts.

### **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.

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
Low	0	0.0%	0	0.0%
Moderate	5	13.5%	3,728	10.0%
Middle	26	70.3%	27,450	73.3%
Upper	6	16.2%	6,260	16.7%
Unknown	0	0.0%	0	0.0%
<b>TOTAL</b>	<b>37</b>	<b>100%</b>	<b>37,438</b>	<b>100%</b>

As shown above, the assessment area does not contain any low-income census tracts. The majority of census tracts are middle income (70.3 percent), while only 13.5 percent are moderate income. Comparatively, 73.3 percent of the total families in the assessment area live in middle-income areas, while 10.0 percent live in moderate-income census tracts. The moderate-income areas are primarily concentrated in Jefferson City in Cole County and Fulton in Callaway County, while the remaining moderate-income census tract is in a rural portion of Moniteau County.

Based on 2020 ACS data, the median family income for the assessment area was \$75,335. At the same time, the median family income for the state of Missouri was \$72,834. More recently, the FFIEC estimates the 2022 and 2023 median family income for the Jefferson City MSA to be \$83,500 and \$88,800, respectively. The following table displays population percentages of assessment area families by income level compared to the Missouri family populations.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>Missouri</b>	
Low	6,507	17.4%	317,471	20.5%
Moderate	7,315	19.5%	285,869	18.4%
Middle	9,033	24.1%	333,130	21.5%
Upper	14,583	39.0%	614,586	39.6%
<b>TOTAL</b>	<b>37,438</b>	<b>100%</b>	<b>1,551,056</b>	<b>100%</b>

As shown in the table above, 36.9 percent of families within the assessment area were considered LMI, which is less than the LMI family percentage of 38.9 percent in the state of Missouri. In addition, the percentage of families living below the poverty level in the assessment area (7.3 percent) is less than the level in the state of Missouri (8.9 percent). Considering these factors, the assessment area appears more affluent than the state of Missouri.

## **Housing Demographics**

The following table displays housing demographics for the assessment area and the state of Missouri.

<b>Housing Cost Burden Levels (%)</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
<b>Assessment Area</b>	<b>67.3</b>	<b>15.4</b>	<b>30.8</b>	<b>54.5</b>	<b>26.2</b>	<b>13.5</b>
Callaway County	72.8	31.4	33.4	58.2	35.8	16.6
Cole County	67.3	12.4	30.7	54.1	26.7	12.4
Moniteau County	56.8	10.0	27.3	59.5	14.5	14.1
Osage County	60.9	3.3	25.5	42.5	12.8	10.3
<b>Missouri</b>	<b>74.0</b>	<b>30.3</b>	<b>39.6</b>	<b>58.6</b>	<b>26.5</b>	<b>16.1</b>

Based on the data in the table above, homeownership is similarly affordable in the assessment area for LMI individuals as in the state of Missouri as a whole, while LMI renters are less likely to be cost burdened in the assessment area. Of all the assessment area counties, Osage is the county with the lowest level of LMI homeowners who are cost burdened.

## **Industry and Employment Demographics**

According to the community contact, the assessment area economy is diversified, with state government among the top industries. The assessment area has 6,110 businesses (89.4 percent small businesses) and 368 farms (98.6 percent small farms). Furthermore, BLS industry demographics indicate that there are 78,266 employees in the assessment area (including 26,759 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are retail trade (15.9 percent), manufacturing (14.5 percent), and healthcare and social assistance (10.6 percent). The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and the state of Missouri.

<b>Unemployment Levels (%)</b>			
<b>Dataset</b>	<b>Time Period (Annual Average)</b>		
	<b>2022</b>	<b>2023</b>	<b>2024 (Jan.–Nov.)</b>
Assessment Area	2.2	2.6	3.2
Missouri	2.6	3.1	3.7

As shown in the table above, unemployment rates in the assessment area were slightly lower than statewide figures over the review period. Additionally, both the assessment area and the state of Missouri saw their unemployment rates experience a slight upward trend.

### **Community Contact Information**

For this assessment area, one community contact interview was completed with a representative from a local housing agency. The interviewee mentioned that state government is the largest industry in the area driving the local economy and that unemployment levels were on par with the national average. The contact indicated there is an insufficient housing supply in the area, largely due to destruction from a tornado within recent years. Lastly, the contact mentioned that the area generally has a healthy level of banking options as well as many community development opportunities, highlighting The Central Trust Bank as being particularly involved in the community.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JEFFERSON CITY ASSESSMENT AREA

### LENDING TEST

The following table displays the bank's performance under the Lending Test in the Jefferson City assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Loans	Relatively High Level

### Lending Activity

The following table displays the combined 2022 and 2023 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2022 through December 31, 2023				
Loan Type	#	%	\$ (000s)	%
Home Improvement	96	2.7	6,331	1.4
Home Purchase	761	21.1	145,484	31.5
Multifamily Housing	26	0.7	20,369	4.4
Refinancing	442	12.3	57,993	12.6
Other Purpose LOC	415	11.5	25,688	5.6
Other Purpose Closed/Exempt	87	2.4	6,369	1.4
<b>Total HMDA</b>	<b>1,827</b>	<b>50.7</b>	<b>262,234</b>	<b>56.8</b>
Small Business	1,491	41.3	174,305	37.8
Small Farm	289	8.0	24,762	5.4
<b>TOTAL LOANS</b>	<b>3,607</b>	<b>100</b>	<b>461,301</b>	<b>100</b>

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The bank's lending activity in the assessment area represents 14.7 percent by number and 11.2 percent by dollar volume of total 2022 and 2023 HMDA and CRA loans. By comparison, the bank operates 9.0 percent of its total branches and holds 23.7 percent of total bank deposits in the assessment area. In addition, the bank's lending levels were compared to those of the other lenders in the assessment area. In 2022 and 2023, the bank ranked first in number of originations across all HMDA and CRA products, demonstrating the key role the bank plays in meeting the area's credit needs.

### **Loan Distribution by Borrower's Profile**

The bank's overall loan distribution by borrower's profile is adequate. As previously mentioned, small farm lending received less weight toward the overall conclusion than did HMDA and small business lending.

#### *HMDA Lending*

When considering performance from both years, the bank's performance in making home mortgage loans to individuals of different income levels is adequate.

In 2022, the bank originated 9.6 percent of its HMDA loans to low-income borrowers. While well below the percentage of assessment area families who are low income (17.4 percent), the bank's performance was similar to the performance of aggregate institutions in the assessment area (10.4 percent). Therefore, the bank's performance is considered adequate. Furthermore, the bank originated 19.2 percent of its HMDA loans to moderate-income borrowers, which was comparable to both the aggregate lending level (21.4 percent) and the demographic figure (19.5 percent) and is considered adequate.

In 2023, the bank originated 10.2 percent of its HMDA loans to low-income borrowers, which aligned with aggregate lending levels (10.2 percent) but was below the demographic figure (17.4 percent) and is considered adequate. The bank made 18.7 percent of its HMDA loans to moderate-income borrowers as compared to 20.5 percent for other lenders in the assessment area and the demographic figure (19.5 percent), reflecting adequate performance.

#### *Small Business*

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

In 2022, the bank originated 66.2 percent of its small business loans to businesses with annual revenues of \$1 million or less; this performance is considered adequate when compared with aggregate lending levels (56.6 percent) and the demographic figure (88.9 percent).

In 2023, lending to businesses with annual revenues of \$1 million or less was 56.0 percent and considered adequate when compared with aggregate lending levels (57.2 percent) and the demographic figure (89.4 percent).

#### *Small Farm Lending*

When considering performance from both years, the bank's borrower distribution of small farm loans is adequate.

In 2022, the bank originated 84.1 percent of its small farm loans to farms with annual revenues of \$1 million or less; this performance is considered good when compared with aggregate lending levels (77.6 percent) and the demographic figure (98.6 percent).

In 2023, the bank originated 64.0 percent of its small farm loans to farms with annual revenues of \$1 million or less and is considered adequate when compared with aggregate lending levels (68.3 percent) and the demographic figure (98.6 percent).

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans is adequate overall based on all three loan products reviewed. Given the volume of lending in 2022 exceeds the volume of lending in 2023, lending in 2022 received greater weight. As there are no low-income census tracts in the assessment area, the bank's performance is primarily based on its lending in moderate-income census tracts. Additionally, an analysis of the dispersion of all three loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2022 and 2023, the bank had loan activity in all assessment area census tracts. This dispersion was consistent with the bank's branch structure in the assessment area and supports the conclusion that the geographic distribution of loans is adequate overall.

#### *HMDA Lending*

The bank's geographic distribution of HMDA loans is adequate overall.

In 2022, the bank originated 8.9 percent of its HMDA loans in moderate-income census tracts compared to aggregate lending levels of 9.7 percent and the percentage of owner-occupied housing units in low-income geographies of 7.2 percent, reflecting adequate performance.

In 2023, the bank's geographic distribution of HMDA loans in moderate-income census tracts (6.2 percent) is considered adequate, as this level of lending approaches the aggregate performance in the assessment area (9.9 percent) and the demographic figure (7.2 percent).

#### *Small Business Lending*

The bank's small business lending in LMI geographies is adequate overall.

In 2022, the bank made 13.8 percent of its small business loans in moderate-income geographies. This performance is considered adequate when compared to aggregate lending levels (16.2 percent) and the percentage of assessment area businesses that are in moderate-income geographies (19.8 percent).

In 2023, the bank's level of lending in moderate-income geographies (16.6 percent) is considered adequate when compared to aggregate lending performance (15.5 percent) and the demographic figure (19.8 percent).

### *Small Farm Lending*

The bank's small farm lending is considered adequate overall.

In 2022, the bank made 7.3 percent of its small farm loans in moderate-income census tracts. This performance is considered adequate when compared to aggregate lending levels (10.5 percent) and the percentage of businesses that are in moderate-income geographies (7.6 percent).

In 2023, the bank made 12.0 percent of its small farm loans in moderate-income census tracts, which exceeded aggregate performance (11.8 percent) and demographic data (8.2 percent) and is considered good.

### **Community Development Lending Activity**

The bank makes a relatively high level of community development loans in the Jefferson City assessment area. During the review period, the bank made 16 community development loans totaling \$22.9 million. These community development loans supported various community development purposes, including affordable housing (one), community service (seven), economic development (two), and revitalization/stabilization (six). The most impactful of these loans are discussed below.

- The bank originated one community development loan with a purpose of affordable housing, totaling \$1.8 million. The loan financed improvements for a Section 8 multifamily housing complex.
- The bank financed a \$5.0 million commercial project that qualified as revitalization/stabilization of a moderate-income geography by supporting permanent LMI job creation/retention.

### **INVESTMENT TEST**

The bank makes an adequate level of qualified community development investments and grants within the Jefferson City assessment area. The bank made new qualified community development investments of \$1.1 million in addition to \$589,735 in investments made prior to this review period but still outstanding. Both of the new investments made during this review period were in municipal bonds for schools with a majority of students that qualify for the FRL program. In addition to these investments, the bank made 54 qualifying community development donations totaling \$342,969. The most impactful of these donations are summarized below.

- The bank made one donation in the amount of \$67,500 to an organization located in a moderate-income census tract that provides programs targeted to children from LMI families.
- The bank made one donation in the amount of \$34,008 to an organization focused on providing services for those facing food insecurity.



## SERVICE TEST

The following table displays the bank's performance under the Service Test in the Jefferson City assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

### Accessibility of Delivery Systems

The bank operates 15 branches in the Jefferson City assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	4	10	1	0	15
	0.0%	26.7%	66.7%	6.7%	0.0%	100%
Census Tracts	0.0%	13.5%	70.3%	16.2%	0.0%	100%
Household Population	0.0%	11.4%	73.4%	15.3%	0.0%	100%

As shown in the previous table, the bank operates four branches (26.7 percent) in moderate-income geographies, which is well above demographic data used for comparison. In addition to branch locations, consideration was also given to the distribution of stand-alone ATMs and ITMs and the availability of alternative delivery systems, such as online and mobile banking. Therefore, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels.

### Changes in Branch Locations

During the review period, the bank closed one branch, which was in a middle-income census tract. The bank did not open any new branches in the assessment area. Thus, with the closure occurring in an area outside of LMI geographies, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies or individuals.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the Jefferson City assessment area. Branches are typically open from 8:30 a.m. to 4:30 p.m., Monday through Friday, and 11 branches, including 2 branches in an LMI census tract, have open lobby hours on Saturday mornings. Thirteen branches have drive-up access; seven branches have ITM access with extended hours Monday through Saturday, including three branches in LMI areas; and three branches have loan officers on site, including one branch in an LMI area. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

### **Community Development Services**

The bank provides a relatively high level of community development services in the assessment area. During the review period, 52 bank employees provided 3,010 hours of community development services to 22 different organizations in the Jefferson City assessment area. These community development services included the following noteworthy services:

- One bank employee provided 192 service hours to an organization that provides affordable housing for LMI individuals.
- One bank employee provided 29 hours of service providing income tax preparation and support services to LMI individuals.

# NONMETROPOLITAN MISSOURI STATEWIDE AREA

(Full-Scope Review)

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMSA MISSOURI

### Bank Structure

As shown in the table below, the bank operates 24 (15.4 percent) of its total branches in nonMSA Missouri.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
0	5	12	7	0

During the review period, the bank closed one branch (April 2025) in nonMSA Missouri. In addition to branches, the bank operates 3 stand-alone ITMs and 12 stand-alone ATMs in the assessment areas. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services throughout the assessment areas.

### General Demographics

The nonMSA Missouri combined area is composed of three noncontiguous assessment areas: the first includes the counties of Audrain and Randolph in central Missouri; the second includes the counties of Camden, Johnson, Miller, Morgan, and Pettis also in central Missouri; and the third includes the counties of Stone and Taney in south central Missouri. Given their similar demographic characteristics, economic conditions, and credit needs, these three assessment areas are combined for analysis as a single nonMSA Missouri review area. The combined area's population displayed by county is shown in the following table.

County	Population
Audrain	24,962
Camden	42,745
Johnson	54,013
Miller	24,722
Morgan	21,006
Pettis	42,980
Randolph	24,716
Stone	31,076
Taney	56,066
<b>TOTAL COMBINED AREA POPULATION</b>	<b>1,505,909</b>

The combined area has a total population of 1,505,909, with Taney and Johnson counties being the most populous counties. Within Taney County, the city of Branson serves as a regional hub, being a popular tourist destination, commercial hub, and banking center. The combined area banking market includes 42 FDIC-insured depository institutions operating 124 branches. The Central Trust Bank is the market leader among these institutions in terms of deposit market share (28.3 percent).

An analysis of 2023 HMDA-reportable loans shows that there were 488 entities with lending activity in the combined area, of which The Central Trust Bank ranked first with 12.6 percent of all HMDA lending activity. Furthermore, the bank ranked second out of 102 institutions with CRA lending activity in the combined area with 19.8 percent of all CRA lending activity.

Credit needs in the combined area are varied and include a blend of loan products designed to meet the needs of consumers, small businesses, and small farms. Furthermore, the community contact noted that a sufficient level of community development opportunities are available for financial institutions.

### **Income and Wealth Demographics**

The following table displays the number of census tracts by income level and the percentage of review area families within those census tracts.

<b>Combined Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
Low	0	0.0%	0	0.0%
Moderate	10	9.6%	5,760	6.9%
Middle	65	62.5%	54,581	65.5%
Upper	29	27.9%	23,024	27.6%
Unknown	0	0.0%	0	0.0%
<b>TOTAL</b>	<b>104</b>	<b>100%</b>	<b>83,365</b>	<b>100%</b>

As shown above, there are no low-income census tracts in the combined area and ten moderate-income census tracts, representing 9.6 percent of all census tracts. A clear majority of census tracts in the combined area are middle income, with an almost identical percentage of assessment area families residing within those tracts. Of these middle-income census tracts, three are designated as underserved tracts, all in Morgan County.

Based on 2020 ACS data, the median family income for the combined area was \$60,587. At the same time, the median family income for nonMSA Missouri as a whole was \$56,957. More recently, the FFIEC estimates the 2022 and 2023 median family income for nonMSA Missouri to be \$63,500 and \$71,000, respectively. The following table reflects the distribution of combined area families by income level compared to nonMSA Missouri as a whole.

<b>Family Population by Income Level</b>				
	<b>Combined Area</b>		<b>NonMSA Missouri</b>	
Low	14,083	16.9%	79,356	20.2%
Moderate	14,534	17.4%	71,657	18.2%
Middle	18,378	22.1%	82,407	21.0%
Upper	36,370	43.6%	159,994	40.7%
<b>TOTAL</b>	<b>83,365</b>	<b>100%</b>	<b>393,414</b>	<b>100%</b>

The table above shows that a significantly higher percentage of families in the combined area are LMI (34.3 percent) than reside in LMI geographies (6.9 percent). Overall, the percentage of families in the combined area that are considered LMI is lower than in nonMSA Missouri as a whole (38.4 percent). Furthermore, the percentage of families living below the poverty level in the combined area (10.1 percent) is lower than that of nonMSA Missouri as a whole (12.1 percent). Therefore, compared to the overall nonMSA portion of the state, the combined area appears to be more affluent.

### **Housing Demographics**

The following table displays housing demographics for the counties in the combined area, the combined area as a whole, and all of nonMSA Missouri.

<b>Housing Cost Burden Levels (%)</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
<b>Combined Area</b>	<b>70.9</b>	<b>35.4</b>	<b>36.5</b>	<b>58.6</b>	<b>27.6</b>	<b>17.4</b>
Audrain County	67.2	29.9	32.4	54.1	13.9	12.5
Camden County	55.5	31.8	31.4	61.2	34.5	22.6
Johnson County	82.4	35.6	40.5	59.2	28.9	13.8
Miller County	49.4	22.3	24.8	58.7	25.5	18.9
Morgan County	53.5	27.4	33.1	58.9	37.6	23.3
Pettis County	73.1	47.3	40.8	53.6	25.6	12.9
Randolph County	77.5	10.1	37.6	54.2	27.1	14.2
Stone County	68.2	46.0	32.0	58.1	31.8	18.7
Taney County	75.7	44.5	38.4	62.2	24.0	18.8
<b>NonMSA Missouri</b>	<b>65.6</b>	<b>30.7</b>	<b>35.2</b>	<b>54.7</b>	<b>25.5</b>	<b>16.3</b>

Based on the data in the preceding table, homeownership is less affordable in the assessment areas than in the entirety of nonMSA Missouri, although there are divergences in the housing burden among LMI individuals across this broad geographic area. Generally, it is likelier for not only an LMI individual in the combined area to be more housing cost burdened, but for all renters (36.5 percent) and all homeowners (17.4 percent) in the combined area when compared to the broader statewide nonMSA region (35.2 percent and 16.3 percent, respectively).

### **Industry and Employment Demographics**

According to the community contact, the combined area economy is diversified, with a focus on manufacturing and healthcare. The assessment area has 13,791 businesses (92.9 percent small businesses) and 722 farms (99.2 percent small farms). BLS industry demographics indicate that there are 122,532 employees in the combined area (including 21,843 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the combined area are accommodation and food services (19.9 percent), retail trade (17.6 percent), and manufacturing (12.1 percent). The following table details BLS unemployment data (not seasonally adjusted) for the combined area and all of nonMSA Missouri.

Unemployment Levels (%)			
Dataset	Time Period (Annual Average)		
	2022	2023	2024 (Jan.–Nov.)
Combined Area	3.2	3.8	4.6
NonMSA Missouri	2.9	3.5	4.3

As shown in the table above, unemployment rates in the combined area were slightly higher than nonMSA Missouri over the review period. Additionally, both the combined area and nonMSA Missouri unemployment rates experienced an upward trend. Among the counties in the combined area, Taney County consistently experienced slightly higher levels of unemployment.

### **Community Contact Information**

For this combined area, one community contact interview was completed with a representative from a local organization specializing in tourism. The interviewee categorized the local economy as stable with a diversified industry mix focused on manufacturing as well as healthcare and stated that local unemployment figures were slightly below national levels. While the contact emphasized a large need for additional housing in the area, the contact indicated there were no unmet credit needs. Finally, the contact mentioned that the area generally has a sufficient level of banking options and community development opportunities for banks to participate in, highlighting The Central Trust Bank as being particularly active in the community.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMSA MISSOURI

### LENDING TEST

The following table displays the bank's performance under the Lending Test in the nonMSA Missouri combined area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Loans	Adequate Level

### Lending Activity

The following table displays the combined 2022 and 2023 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2022 through December 31, 2023				
Loan Type	#	%	\$ (000s)	%
Home Improvement	429	6.4	27,832	3.3
Home Purchase	1,197	17.9	292,422	34.4
Multifamily Housing	33	0.5	22,995	2.7
Refinancing	635	9.5	103,536	12.2
Other Purpose LOC	332	5.0	26,156	3.1
Other Purpose Closed/Exempt	112	1.7	11,130	1.3
<b>Total HMDA</b>	<b>2,738</b>	<b>40.8</b>	<b>484,071</b>	<b>56.9</b>
Small Business	2,643	39.4	251,931	29.6
Small Farm	1,323	19.7	115,052	13.5
<b>TOTAL LOANS</b>	<b>6,704</b>	<b>100</b>	<b>851,054</b>	<b>100</b>

The bank's lending activity in the combined area represents 27.2 percent by number and 20.7 percent by dollar volume of total 2022 and 2023 HMDA and CRA loans. By comparison, the bank operates 15.4 percent of its total branches and holds 16.7 percent of total bank deposits in the combined area. Furthermore, in 2023, the bank ranked first out of 488 lenders in HMDA originations and a close second out of 102 lenders in CRA originations in the combined area. Therefore, the bank's lending activity levels reflect excellent responsiveness to the credit needs of the combined area.

### **Loan Distribution by Borrower's Profile**

The bank's overall loan distribution by borrower's profile is adequate. As previously mentioned, small farm lending received less weight toward the overall conclusion than did HMDA and small business lending.

#### *HMDA Lending*

When considering performance from both years, the bank's performance in making home mortgage loans to individuals of different income levels is good.

In 2022, the bank originated 6.6 percent of its HMDA loans to low-income borrowers. While well below the percentage of assessment area families who are low income (16.9 percent), the bank's performance exceeds the aggregate performance in the assessment area (4.3 percent). Therefore, the bank's performance is considered good. Furthermore, the bank originated 13.7 percent of its HMDA loans to moderate-income borrowers, which was closely aligned with the aggregate lending level (13.5 percent) but below the demographic figure (17.4 percent) and is considered adequate.

In 2023, the bank originated 7.1 percent of its HMDA loans to low-income borrowers, which exceeded aggregate lending levels (4.7 percent) but was below the demographic figure (16.9 percent) and is considered good. The bank made 16.3 percent of its HMDA loans to moderate-income borrowers as compared to 13.5 percent for other lenders in the assessment area and the demographic figure (17.4 percent), reflecting good performance.

#### *Small Business*

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

In 2022, the bank originated 64.1 percent of its small business loans to businesses with annual revenues of \$1 million or less; this performance is considered adequate when compared with aggregate lending levels (55.7 percent) and the demographic figure (92.7 percent).

Similarly, in 2023, lending to businesses with annual revenues of \$1 million or less was 60.8 percent and considered adequate when compared with aggregate lending levels (55.0 percent) and the demographic figure (92.9 percent).

#### *Small Farm Lending*

When considering performance from both years, the bank's borrower distribution of small farm loans is adequate.

In 2022, the bank originated 77.3 percent of its small farm loans to farms with annual revenues of \$1 million or less; this performance is considered adequate when compared with aggregate lending levels (71.2 percent) and the demographic figure (99.0 percent).



Similarly, in 2023, the bank originated 70.8 percent of its small farm loans to farms with annual revenues of \$1 million or less; this performance is considered adequate when compared with aggregate lending levels (66.2 percent) and the demographic figure (99.2 percent).

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans is adequate overall based on all three loan products reviewed. As there are no low-income census tracts in the combined area, the bank's performance is primarily based on its lending in moderate-income census tracts. Additionally, an analysis of the dispersion of all three loan products throughout the combined area did not reveal evidence of conspicuous lending gaps. In 2022, the bank had loan activity in 99.0 percent of all assessment area census tracts and 100 percent of all moderate-income geographies. In 2023, the bank had lending activity in 98.1 percent of census tracts in the assessment area and 100 percent of moderate-income geographies in the assessment area. This dispersion was consistent with the bank's branch structure in the assessment areas and supports the conclusion that the geographic distribution of loans is adequate overall.

#### *HMDA Lending*

The bank's distribution of HMDA loans reflects good penetration among geographies of different income levels, particularly LMI geographies.

In 2022, the bank originated 7.4 percent of its HMDA loans in moderate-income census tracts compared to aggregate lending levels of 7.2 percent and the percentage of owner-occupied housing units in moderate-income geographies of 6.3 percent, reflecting good performance.

Similarly, in 2023, the bank's geographic distribution of HMDA loans in moderate-income census tracts (8.3 percent) is considered good, as this level of lending exceeds the performance of aggregate institutions in the assessment area (7.6 percent) and the demographic figure (6.3 percent).

#### *Small Business Lending*

The bank's small business lending in LMI geographies is adequate overall.

In 2022, the bank made 6.4 percent of its small business loans in moderate-income geographies. This performance is considered adequate when compared to aggregate lending levels (7.9 percent) and the percentage of assessment area businesses that are in moderate-income geographies (9.0 percent).

Similarly, in 2023, the bank's level of lending in moderate-income geographies (6.8 percent) is considered adequate when compared to aggregate lending performance (7.8 percent) and the demographic figure (9.0 percent).

### *Small Farm Lending*

The bank's small farm lending is considered adequate overall.

In 2022, the bank made 0.3 percent of its small farm loans in moderate-income census tracts. This performance is considered adequate when compared to aggregate lending levels (0.7 percent) and the percentage of assessment area businesses that are in moderate-income geographies (1.4 percent).

Similarly, in 2023, the bank made 0.5 percent of its small farm loans in moderate-income census tracts, which approaches aggregate performance (0.8 percent) and demographic data (1.5 percent) and is considered adequate.

### **Community Development Lending Activity**

The bank makes an adequate level of community development loans in the combined area. During the review period, the bank made eight community development loans totaling \$9.5 million. These community development loans supported two community development purposes: affordable housing (four) and economic development (four). The most impactful of these loans are discussed below.

- The bank originated one community development loan with a purpose of affordable housing, totaling \$3.6 million. The loan provided funding for the purchase and renovation of two affordable multifamily housing developments.
- The bank financed one community development loan, totaling \$1.6 million, for a commercial project that qualified as economic development by supporting permanent LMI job creation for a small business.

### **INVESTMENT TEST**

The bank makes a significant level of qualified community development investments and grants within the combined area. The bank made new qualified community development investments of \$8.8 million in addition to \$846,245 in investments made prior to this review period but still outstanding. Of the new investments made during this review period, \$3.5 million was in a New Markets Tax Credit-eligible community development entity for the expansion of a manufacturing facility, adding an estimated 150 jobs. In addition to these investments, the bank made 78 qualifying community development donations totaling \$238,004. The most impactful of these donations are summarized below.

- The bank made one donation in an amount of \$30,000 to an organization that provides social assistance to underserved children in need.
- The bank made one donation in an amount of \$30,000 to an organization focused on providing services to help victims of abuse, a majority of whom are LMI individuals.

## SERVICE TEST

The following table displays the bank's performance under the Service Test in the combined area.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

### Accessibility of Delivery Systems

The bank operates 24 branches in the combined area. The following table displays the location of the bank's branches by geography income level compared to the distribution of review area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	5	12	7	0	24
	0.0%	20.8%	50.0%	29.2%	0.0%	100%
Census Tracts	0.0%	9.6%	62.5%	27.9%	0.0%	100%
Household Population	0.0%	8.4%	64.9%	26.7%	0.0%	100%

As shown in the previous table, the bank operates five branches (20.8 percent) in moderate-income geographies, which is well above demographic data used for comparison. In addition to branch locations, consideration was also given to the distribution of stand-alone ATMs and ITMs and the availability of alternative delivery systems, such as online and mobile banking. Therefore, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels.

### Changes in Branch Locations

During the review period, the bank closed one branch, which was in a middle-income census tract. Thus, with the closure occurring in an area outside of LMI geographies, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies or individuals.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the combined area. Branches are typically open from 8:30 a.m. to 5:00 p.m., Monday through Friday, and 17 branches, including 3 branches in LMI census tracts, have open lobby hours on Saturday mornings. All branches have drive-up access; 17 branches have ITM access with extended hours Monday through Saturday, including 4 branches in LMI areas; and 14 branches have loan officers on site, including 2 branches in LMI areas. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

### **Community Development Services**

The bank provides a relatively high level of community development services in the combined area. During the review period, 69 bank employees provided 2,756 hours of community development services to 45 different organizations in the combined area. These community development services included the following noteworthy services:

- Bank employees lent their financial expertise to teach financial education in schools where a majority of students qualify for the FRL program.
- Eight bank employees provided 352 service hours to five organizations that provide affordable housing for LMI individuals.

## COLUMBIA, MISSOURI MSA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBIA ASSESSMENT AREA

The assessment area is composed of the entire Columbia, Missouri MSA, which includes Boone, Cooper, and Howard counties. The bank's branch network consists of 15 offices. In addition to branches, the bank operates one stand-alone ITM and four stand-alone ATMs. During the review period, the bank closed one branch (April 2025). Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	4	14	20	9	1	48
	8.3%	29.2%	41.7%	18.8%	2.1%	100%
Family Population	962	10,742	22,743	13,085	364	47,896
	2.0%	22.4%	47.5%	27.3%	0.8%	100%
Household Population	5,042	22,276	33,709	18,745	1,949	81,721
	6.2%	27.3%	41.3%	22.9%	2.4%	100%
Business Institutions	878	2,142	3,247	1,795	192	8,254
	10.6%	26.0%	39.3%	21.7%	2.3%	100%
Agricultural Institutions	3	55	252	61	4	375
	0.8%	14.7%	67.2%	16.3%	1.1%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	9,367	9,065	10,155	19,309	47,896
	19.6%	18.9%	21.2%	40.3%	100%
Household Population	20,084	13,175	14,226	34,236	81,721
	24.6%	16.1%	17.4%	41.9%	100%

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBIA ASSESSMENT AREA

### LENDING TEST

The Central Trust Bank's overall lending performance in this assessment area is consistent with the Lending Test performance in the Missouri full-scope review areas, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Summary	
Lending Activity	Consistent
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, the bank made 20 community development loans totaling \$14.6 million. These loans qualified for a community development purpose of affordable housing (14), community service (1), economic development (4), and revitalization/stabilization (1).

### INVESTMENT TEST

The bank's Investment Test performance in this assessment area is consistent with the bank's overall performance in the Missouri full-scope review areas. During the review period, the bank had seven community development investments totaling \$3.3 million, of which two investments totaling \$827,172 were made in the current period. Furthermore, 63 donations were made totaling \$217,346.

### SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Missouri full-scope review areas, as shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Exceeds
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, 61 employees provided 3,055 hours of community development services to 24 organizations, including 792 hours teaching financial literacy through the bank's ProsperU program. This level of performance exceeds the bank's performance in the Missouri full-scope review areas.

## SPRINGFIELD, MISSOURI MSA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD ASSESSMENT AREA

The assessment area includes the Springfield, Missouri MSA in its entirety, which includes Christian, Dallas, Greene, Polk, and Webster counties. The bank's branch network consists of 20 offices. During the review period, the bank closed one branch (June 2022). In addition to branches, the bank operates three stand-alone ITMs and eight stand-alone ATMs. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	6	26	54	29	2	117
	5.1%	22.2%	46.2%	24.8%	1.7%	100%
Family Population	4,174	20,774	60,967	34,381	136	120,432
	3.5%	17.3%	50.6%	28.5%	0.1%	100%
Household Population	9,551	38,250	95,480	47,380	1,300	191,961
	5.0%	19.9%	49.7%	24.7%	0.7%	100%
Business Institutions	542	4,362	9,856	4,735	383	19,878
	2.7%	21.9%	49.6%	23.8%	1.9%	100%
Agricultural Institutions	23	69	337	103	3	535
	4.3%	12.9%	63.0%	19.3%	0.6%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	23,277	22,602	25,920	48,633	120,432
	19.3%	18.8%	21.5%	40.4%	100%
Household Population	45,819	31,799	35,427	78,916	191,961
	23.9%	16.6%	18.5%	41.1%	100%

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPRINGFIELD ASSESSMENT AREA

### LENDING TEST

The Central Trust Bank's overall lending performance in this assessment area is consistent with the Lending Test performance in the Missouri full-scope review areas, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Summary	
Lending Activity	Below
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Exceeds
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, the bank made 30 community development loans totaling \$110.7 million. These loans qualified for a community development purpose of affordable housing (2), community service (4), economic development (1), and revitalization/stabilization (23). One noteworthy loan totaling \$17.5 million financed the renovation of a new hotel in a moderate-income census tract, which will create numerous permanent LMI jobs.

### INVESTMENT TEST

The bank's Investment Test performance in this assessment area exceeds the bank's overall performance in the Missouri full-scope review areas. During the review period, the bank had 16 community development investments totaling \$5.4 million, of which 6 investments totaling \$2.9 million were made in the current period. Furthermore, 94 donations were made totaling \$705,674.

### SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Missouri full-scope review areas, as shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Exceeds
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, 32 employees provided 1,697 hours of community development services to 26 organizations. This level of performance exceeds the bank's performance in the Missouri full-scope review areas.



## OKLAHOMA

### CRA RATING FOR OKLAHOMA:

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**SATISFACTORY**

**High Satisfactory**

**Low Satisfactory**

**Low Satisfactory**

The major factors supporting the rating for the state of Oklahoma include the following:

- The bank's lending levels reflect good responsiveness to credit needs of its assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects good penetration throughout the assessment areas.
- The bank makes a relatively high level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes an adequate level of qualified community development investments and grants and is rarely in the leadership position.
- Service delivery systems are reasonably accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.
- The bank provides an adequate level of community development services throughout the Oklahoma assessment areas.

### SCOPE OF EXAMINATION

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

The bank operates two assessment areas in Oklahoma, which are both located in MSAs. One of the bank's Oklahoma assessment areas was reviewed using full-scope procedures.

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

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN OKLAHOMA

The following table provides additional detail regarding the bank's operations within Oklahoma.

Assessment Area	Offices		Deposits As of June 30, 2024		Review Procedures
	#	%	\$ (000s)	%	
Tulsa	6	66.7	333,239	87.6	Full-Scope
Oklahoma City	3	33.3	47,228	12.4	Limited-Scope
<b>TOTAL</b>	<b>9</b>	<b>100</b>	<b>380,467</b>	<b>100</b>	<b>1 Full-Scope</b>

The bank operates nine branches (5.8 percent of total branches) throughout the two CRA assessment areas in the state of Oklahoma. Deposits in the state total \$380.5 million, which represents 2.5 percent of total bank deposits. The bank's operations in the state are heavily concentrated in the Tulsa MSA, which drove the statewide rating as the lone full-scope review. During the review period, the bank opened one branch in Oklahoma; no branches were closed.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

### LENDING TEST

The bank's performance under the Lending Test in Oklahoma is rated high satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Loans	Relatively High Level
Product Innovation	Makes Extensive Use
<b>LENDING TEST RATING</b>	<b>HIGH SATISFACTORY</b>

### Lending Activity

Overall, lending levels reflect good responsiveness to the credit needs of the bank's assessment areas, based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Tulsa	Good
<b>OVERALL</b>	<b>GOOD</b>

Limited-Scope Assessment Areas	Lending Activity
Oklahoma City	Consistent

### Borrower and Geographic Distribution

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

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Tulsa	Good
<b>OVERALL</b>	<b>GOOD</b>

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Oklahoma City	Below

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

Full-Scope Assessment Areas	Geographic Distribution of Loans
Tulsa	Good
<b>OVERALL</b>	<b>GOOD</b>

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

### **Community Development Lending Activity**

Overall, the bank makes a relatively high level of community development loans, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
Tulsa	Relatively High Level
<b>OVERALL</b>	<b>RELATIVELY HIGH LEVEL</b>

Limited-Scope Assessment Areas	Community Development Lending
Oklahoma City	Consistent

During the review period, the bank originated or renewed 13 qualifying community development loans inside its assessment areas, totaling \$39.9 million.

### **Product Innovation**

The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section. The bank's use of flexible and/or innovative lending products in the Oklahoma assessment areas is detailed in the following table.

Flexible and/or Innovative Lending Products January 1, 2022 through March 31, 2025		
Program	Number of Loans	\$
Home Turf	50	7,760,144
Oklahoma Housing Finance Agency	30	5,507,644
Fannie Mae HomeReady	17	2,789,720
Freddie Mac Home Possible	3	369,350
USDA, FSA	1	10,100
VA	24	7,599,915
FHA	66	16,832,517
USDA, RD	2	347,000

## INVESTMENT TEST

The bank's performance under the Investment Test is rated low satisfactory. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Tulsa	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

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

During the review period, the bank made four new investments totaling \$1.5 million and had \$1.1 million in previous period investments that were still outstanding. In addition, the bank made 23 donations totaling \$55,840. The bank's investment activity included municipal bonds benefiting schools with a majority of students who qualify for the FRL program, as well as MBSs supporting affordable housing throughout the Oklahoma assessment areas.

Oklahoma Assessment Area	Community Development Investments (\$)	Community Development Donations/Grants (\$)
Tulsa	1.8 Million	54,740
Oklahoma City	868,460	1,100
<b>TOTAL</b>	<b>2.7 Million</b>	<b>55,840</b>

## SERVICE TEST

The bank's performance under the Service Test is rated low satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level
<b>SERVICE TEST RATING</b>	<b>LOW SATISFACTORY</b>

### Accessibility of Delivery Systems

The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Tulsa	Reasonably Accessible
<b>OVERALL</b>	<b>REASONABLY ACCESSIBLE</b>

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

### Changes in Branch Locations

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

Full-Scope Assessment Areas	Changes in Branch Locations
Tulsa	Not Adversely Affected
<b>OVERALL</b>	<b>NOT ADVERSELY AFFECTED</b>

Limited-Scope Assessment Areas	Changes in Branch Locations
Oklahoma City	Consistent

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Tulsa	Do Not Vary in a Way that Inconveniences
<b>OVERALL</b>	<b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b>

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Oklahoma City	Consistent

### **Community Development Services**

The bank provides an adequate level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Tulsa	Adequate Level
<b>OVERALL</b>	<b>ADEQUATE LEVEL</b>

Limited-Scope Assessment Areas	Community Development Services
Oklahoma City	Consistent

In total, 24 employees logged 282 hours of community development services to four different organizations. Details of the most impactful of these activities are included in the *Community Development Services* section for the full-scope assessment area.

## **TULSA, OKLAHOMA MSA**

*(Full-Scope Review)*

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TULSA ASSESSMENT AREA**

#### **Bank Structure**

As shown in the table below, the bank operates six (3.4 percent) of its total branches in the Tulsa assessment area.

<b>Branch Locations by Census Tract Income Level</b>				
<b>Low-Income</b>	<b>Moderate-Income</b>	<b>Middle-Income</b>	<b>Upper-Income</b>	<b>Unknown-Income</b>
0	2	2	2	0

The bank did not open or close any bank offices in this assessment area during the review period, and based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of its assessment area. However, it may experience challenges serving the outermost portions of its assessment area, namely northwest Osage County, given the geographical distance from the bank's nearest branch.

#### **General Demographics**

This assessment area includes the counties of Creek, Osage, Rogers, and Tulsa, four of the seven counties that comprise the Tulsa, Oklahoma MSA. The assessment area's population is shown in the following table.

<b>County</b>	<b>Population</b>
Creek	71,754
Osage	45,818
Rogers	95,240
Tulsa	629,279
<b>TOTAL ASSESSMENT AREA POPULATION</b>	<b>882,091</b>

The majority of the assessment area population of 882,091 is concentrated in Tulsa County (71.3 percent), where the city of Tulsa is located. Tulsa serves as the economic hub of the Tulsa MSA and is home to prominent energy, aerospace, telecommunications, and manufacturing companies. It also hosts several community colleges and universities, including the University of Tulsa. In contrast, Osage County is the smallest county by population in the assessment area. It is coextensive with the Osage Nation Reservation and consists of mostly natural, undeveloped land. Creek and Rogers are similar in population and are largely residential in nature.



Of the 56 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 23<sup>rd</sup> in deposit market share, encompassing 1.0 percent of total deposit dollars. An analysis of 2023 HMDA-reportable loans shows that 438 institutions had loan activity in the assessment area, of which the bank ranked 29<sup>th</sup> with 0.8 percent of total HMDA loans. The bank ranked 19<sup>th</sup> out of 130 institutions with CRA loan activity in the assessment area, accounting for 0.7 percent of total CRA loan activity.

The assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels. The community contact noted a strong demand for affordable housing and down payment assistance loan programs.

### **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.

<b>Assessment Area Demographics by Geography Income Level</b>				
	<b>Census Tracts</b>		<b>Family Population</b>	
Low	14	5.2%	10,082	4.7%
Moderate	83	30.5%	58,144	26.9%
Middle	86	31.6%	72,154	33.3%
Upper	88	32.4%	75,962	35.1%
Unknown	1	0.4%	135	0.1%
<b>TOTAL</b>	<b>272</b>	<b>100%</b>	<b>216,477</b>	<b>100%</b>

As shown above, 35.7 percent of census tracts in the assessment area are designated as LMI, and 31.6 percent of assessment area families reside within those tracts. The low-income census tracts are concentrated in Tulsa County. Moderate-income census tracts are found in each county in the assessment area, most of which are also in Tulsa County.

According to 2020 ACS data, the median family income for the Tulsa assessment area was \$72,695, while the same figure for the state of Oklahoma as a whole was \$67,511. More recently, the FFIEC estimates the 2022 and 2023 median family income for the Tulsa MSA to be \$81,300 and \$84,100, respectively. The following table displays the distribution of assessment area families by income level compared to all Oklahoma families.

<b>Family Population by Income Level</b>				
	<b>Assessment Area</b>		<b>Oklahoma</b>	
Low	46,303	21.4%	208,781	21.4%
Moderate	38,052	17.6%	172,430	17.7%
Middle	42,039	19.4%	196,188	20.1%
Upper	90,083	41.6%	397,808	40.8%
<b>TOTAL</b>	<b>216,477</b>	<b>100%</b>	<b>975,207</b>	<b>100%</b>

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (39.0 percent) than reside in LMI geographies (31.6 percent). As displayed in the second table, the percentage of assessment area families that are LMI is just below the figure for the state of Oklahoma as a whole (39.1 percent). Poverty levels in the assessment area (10.5 percent) are slightly lower than statewide levels (11.3 percent). Therefore, considering these statistics, the assessment area is slightly more affluent than the state of Oklahoma as a whole.

### **Housing Demographics**

The following table displays housing demographics for the assessment area and the state of Oklahoma.

<b>Housing Cost Burden Levels (%)</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
<b>Assessment Area</b>	<b>73.1</b>	<b>37.5</b>	<b>38.2</b>	<b>55.2</b>	<b>28.9</b>	<b>16.4</b>
Creek County	53.6	19.0	28.3	45.6	17.4	15.3
Osage County	62.7	27.6	37.3	44.5	20.1	14.6
Rogers County	67.6	36.5	34.1	54.6	31.1	15.1
Tulsa County	75.5	38.8	39.1	58.4	31.5	16.9
<b>Oklahoma</b>	<b>72.5</b>	<b>35.3</b>	<b>37.9</b>	<b>52.2</b>	<b>26.2</b>	<b>15.4</b>

Based on the data in the table above, the level of cost-burdened renters in the assessment area (38.2 percent) is similar to the level of cost-burdened renters in the state as a whole (37.9 percent). Furthermore, while the percentages of LMI cost-burdened homeowners in the assessment area (55.2 percent and 28.9 percent) are comparable to the figures for the state as a whole (52.2 percent and 26.2 percent), it is noteworthy that there are higher percentages of LMI cost-burdened homeowners in Tulsa County (58.4 percent and 31.5 percent), which is where a majority of the bank's branches are located.

### **Industry and Employment Demographics**

According to the community contact, the assessment area economy is diversified, with a focus on manufacturing and aerospace. BLS industry demographics indicate that there are 427,824 employees in the assessment area (including 49,945 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are healthcare and social assistance (16.7 percent), manufacturing (13.3 percent), and retail trade (11.8 percent). Furthermore, the assessment area has 43,061 businesses (90.7 percent small businesses). The following table details BLS unemployment data (not seasonally adjusted) for the assessment area and the state of Oklahoma.

Unemployment Levels (%)			
Dataset	Time Period (Annual Average)		
	2022	2023	2024 (Jan.–Nov.)
Assessment Area	3.1	3.2	3.4
Oklahoma	3.1	3.2	3.4

As shown in the table above, unemployment rates in the assessment area mirrored Oklahoma over the review period. Additionally, unemployment rates experienced an upward trend. Among the counties in the assessment area, Osage County consistently experienced slightly higher levels of unemployment.

### **Community Contact Information**

For this assessment area, one community contact interview was completed with an individual from a local business association. The interviewee categorized the local economy as being on an upward trajectory fueled by strong growth in the area’s major industries, including manufacturing and aerospace. However, the contact indicated that recent discussions surrounding tariffs have caused some uncertainty, specifically in trade-sensitive industries. The contact also mentioned that unemployment rates are similar to regional and national rates. Furthermore, the interviewee highlighted affordable housing development, financial literacy training, down payment assistance programs for home buyers, and venture capital funding for small businesses as the top credit-related needs. Finally, regarding banking competition, the contact mentioned that the area generally has a healthy level of banking options as well as ample community development opportunities.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA ASSESSMENT AREA

### LENDING TEST

The following table displays the bank's performance under the Lending Test in the Tulsa assessment area.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Loans	Relatively High Level

### Lending Activity

The following table displays the combined 2022 and 2023 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2022 through December 31, 2023				
Loan Type	#	%	\$ (000s)	%
Home Improvement	23	4.0	1,848	1.4
Home Purchase	180	31.1	41,540	31.0
Multifamily Housing	3	0.5	25,220	18.8
Refinancing	37	6.4	5,195	3.9
Other Purpose LOC	7	1.2	393	0.3
Other Purpose Closed/Exempt	6	1.0	615	0.5
<b>Total HMDA</b>	<b>256</b>	<b>44.3</b>	<b>74,811</b>	<b>55.8</b>
Small Business	322	55.7	59,273	44.2
Small Farm	0	0.0	0	0.0
<b>TOTAL LOANS</b>	<b>578</b>	<b>100</b>	<b>134,084</b>	<b>100</b>

Of the bank's total 2022 and 2023 HMDA and CRA loans, 2.3 percent by number and 3.3 percent by dollar were made in the Tulsa assessment area, which is closely aligned with the percentage of total bank deposits held (2.2 percent by dollar) and branches located (3.9 percent) in the assessment area. In addition, the bank's lending levels were compared to those of the other lenders in the assessment area. In 2023, the bank ranked 29<sup>th</sup> out of 438 HMDA aggregate lenders and 19<sup>th</sup> out of 130 CRA aggregate lenders. The bank's HMDA lending in the assessment area is considered especially responsive, as the community contact cites various HMDA-related loans as a key need in the area. Given the bank's relatively small share of deposits held and branches located in the Tulsa assessment area, its level of lending is considered good.

### **Loan Distribution by Borrower's Profile**

The bank's overall loan distribution by borrower's profile is good, with primary consideration based on performance from the HMDA lending category.

#### *HMDA Lending*

Given the volume of lending in 2023 exceeds the volume of lending in 2022, lending in 2023 received greater weight; as a result, when considering performance from both years, the bank's performance in making home mortgage loans to individuals of different income levels is good.

In 2022, the bank originated 9.7 percent of its HMDA loans to low-income borrowers. While below the percentage of assessment area families who are low income (21.4 percent), the bank's performance exceeded the aggregate performance of institutions in the assessment area (6.8 percent). Therefore, the bank's performance is considered good. However, the bank originated 12.9 percent of its HMDA loans to moderate-income borrowers, which was below both the aggregate lending level (17.6 percent) and the demographic figure (17.6 percent) and is considered poor.

In 2023, the bank originated 6.1 percent of its HMDA loans to low-income borrowers, which aligned with aggregate lending levels (5.9 percent) but was below the demographic figure (21.4 percent) and is considered adequate. However, the bank made 21.5 percent of its HMDA loans to moderate-income borrowers, exceeding both the performance of other lenders in the assessment area (16.2 percent) and the demographic figure (17.6 percent), reflecting excellent performance.

#### *Small Business*

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

In 2022, the bank originated 55.5 percent of its small business loans to businesses with annual revenues of \$1 million or less; this performance is considered adequate when compared with aggregate lending levels (52.6 percent) and the demographic figure (90.9 percent).

In 2023, lending to businesses with annual revenues of \$1 million or less was 43.0 percent and considered adequate when compared with aggregate lending levels (54.5 percent) and the demographic figure (90.7 percent).

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans is good overall. Additionally, an analysis of the dispersion of all loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2022, the bank had loan activity in 47.1 percent of all assessment area census tracts and 37.1 percent of all LMI geographies. In 2023, the bank had lending activity in 55.9 percent of census tracts in the assessment area and 46.4 percent of LMI geographies in the assessment area. This dispersion was consistent with the bank's branch

structure in the assessment area and supports the conclusion that the geographic distribution of loans is good overall.

### *HMDA Lending*

The bank's distribution of HMDA loans reflects adequate penetration among geographies of different income levels, particularly LMI geographies.

In 2022, the bank's lending in low-income geographies (1.1 percent) approaches aggregate lending levels of 1.5 percent and the percentage of owner-occupied housing units in low-income geographies of 2.9 percent, reflecting adequate performance. Furthermore, the bank originated 18.3 percent of its HMDA loans in moderate-income census tracts compared to aggregate lending levels of 18.9 percent and the percentage of owner-occupied housing units in moderate-income geographies of 22.7 percent, reflecting adequate performance.

In 2023, the bank's geographic distribution of HMDA loans in low-income census tracts (1.2 percent) is considered adequate when compared to the aggregate performance in the assessment area (1.8 percent) and the demographic figure (2.9 percent). In addition, the bank originated 20.9 percent of its HMDA loans in moderate-income census tracts compared to aggregate lending levels of 21.6 percent and the percentage of owner-occupied housing units in moderate-income geographies of 22.7 percent, reflecting adequate performance.

### *Small Business Lending*

The bank's small business lending in LMI geographies is excellent overall.

In 2022, the bank made 4.4 percent of its small business loans in low-income geographies. This performance is considered excellent when compared to both aggregate lending levels (3.3 percent) and the percentage of assessment area businesses that are in low-income geographies (3.8 percent). Lending in moderate-income geographies (28.3 percent) also exceeded aggregate lending levels (22.8 percent) and the demographic figure (26.1 percent), reflecting excellent performance.

Similarly, in 2023, the bank's level of lending in low-income geographies (4.2 percent) was higher than both aggregate lending performance (3.3 percent) and the demographic figure (3.8 percent), reflecting excellent performance. This excellent performance continued in moderate-income census tracts in 2023, as the percentage of the bank's small business loans (29.6 percent) exceeded both the performance of aggregate institutions in the assessment area (23.3 percent) and the demographic figure (26.3 percent).

### **Community Development Lending Activity**

The bank makes a relatively high level of community development loans in the Tulsa assessment area. During the review period, the bank made ten community development loans totaling \$18.5 million. These community development loans supported two community development purposes: affordable housing (five) and revitalization/stabilization (five). The most impactful of these loans are discussed below.

- The bank originated one community development loan with a purpose of affordable housing totaling \$2.7 million. The loan provided funding for an affordable multifamily housing development. As noted by the community contact, the assessment area has a strong need for affordable options for LMI borrowers.
- The bank financed a \$5.0 million commercial project that qualified as revitalization/stabilization of a moderate-income geography by supporting permanent LMI job creation/retention.

### **INVESTMENT TEST**

The bank makes an adequate level of qualified community development investments and grants within the Tulsa assessment area. The bank made new qualified community development investments of \$1.3 million in addition to \$526,479 in investments made prior to this review period but still outstanding. Of the new investments made during this review period, \$750,367 was in a municipal bond for a school with a majority of students who qualify for the FRL program. In addition to these investments, the bank made 20 qualifying community development donations totaling \$54,740, including 3 donations totaling \$34,000 to a community service organization that primarily supports the LMI population in Tulsa.

### **SERVICE TEST**

The following table displays the bank's performance under the Service Test in the Tulsa assessment area.

<b>Service Test Summary</b>	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level

### **Accessibility of Delivery Systems**

The bank operates six branches in the Tulsa assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	2	2	2	0	6
	0.0%	33.3%	33.3%	33.3%	0.0%	100%
Census Tracts	5.1%	30.5%	31.6%	32.4%	0.4%	100%
Household Population	5.3%	29.4%	33.3%	31.8%	0.3%	100%

Based on data in the preceding table, the bank operates 33.3 percent of its assessment area branches in LMI census tracts. This distribution approaches the percentage of assessment area census tracts that are LMI (35.6 percent) and the household population in LMI census tracts (34.7 percent). In addition to branch locations, consideration was also given to the availability of alternative delivery systems, such as online and mobile banking. Therefore, the bank's service delivery systems are reasonably accessible to individuals and geographies of different income levels.

### **Changes in Branch Locations**

The bank did not open or close any branch locations in the assessment area during the review period. Therefore, changes in branch locations have not adversely affected the accessibility of the bank's service delivery systems.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

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

### **Community Development Services**

The bank provides an adequate level of community development services in the assessment area. During the review period, 15 bank employees provided 103 hours of community development services to two different organizations in the Tulsa assessment area. These community development services included providing financial education to schools where a majority of students qualify for the FRL program.



## OKLAHOMA CITY, OKLAHOMA MSA

*(Limited-Scope Review)*

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

The assessment area includes the entirety of Oklahoma County, one of the seven counties that make up the Oklahoma City, Oklahoma MSA. Its branch network consists of three offices, one of which opened during the review period (September 2022); no branches were closed in this assessment area. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to its entire assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	26	85	73	67	15	266
	9.8%	32.0%	27.4%	25.2%	5.6%	100%
Family Population	15,253	55,307	55,451	58,427	2,848	187,286
	8.1%	29.5%	29.6%	31.2%	1.5%	100%
Household Population	26,052	100,301	92,293	82,021	5,113	305,780
	8.5%	32.8%	30.2%	26.8%	1.7%	100%
Business Institutions	2,506	10,534	10,871	13,021	1,170	38,102
	6.6%	27.6%	28.5%	34.2%	3.1%	100%
Agricultural Institutions	18	68	100	173	1	360
	5.0%	18.9%	27.8%	48.1%	0.3%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	45,154	34,969	35,206	71,957	187,286
	24.1%	18.7%	18.8%	38.4%	100%
Household Population	80,473	52,937	55,495	116,875	305,780
	26.3%	17.3%	18.2%	38.2%	100%

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE OKLAHOMA CITY ASSESSMENT AREA

### LENDING TEST

The Central Trust Bank's overall lending performance in this assessment area is consistent with the Lending Test performance in the Oklahoma full-scope assessment area, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower's Profile	Below
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, the bank made three community development loans totaling \$21.4 million. These loans all qualified for a community development purpose of revitalization/stabilization.

### INVESTMENT TEST

The bank's Investment Test performance in this assessment area is consistent with the bank's performance in the Oklahoma full-scope assessment area. During the review period, the bank had five community development investments totaling \$868,460, of which one investment in the amount of \$286,388 was made in the current period. Furthermore, three donations were made totaling \$1,100.

### SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Oklahoma full-scope assessment area, as shown in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, ten employees provided 179 hours of community development services to three organizations. This level of performance is consistent with the bank's performance in the Oklahoma full-scope assessment area.

## KANSAS

### CRA RATING FOR KANSAS:

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**SATISFACTORY**

**High Satisfactory**

**Low Satisfactory**

**High Satisfactory**

The major factors supporting the rating for the state of Kansas include the following:

- The bank's lending levels reflect adequate responsiveness to credit needs of its assessment area.
- The distribution of loans by borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects excellent penetration throughout the assessment area.
- The bank makes an adequate level of community development loans.
- The bank makes limited use of innovative and/or flexible lending products in meeting the credit needs of its assessment area.
- The bank makes an adequate level of qualified community development investments and grants and is rarely in the leadership position.
- Delivery systems are accessible to geographies and individuals of different income levels in the Kansas assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.
- The bank is a leader in providing community development services.

### SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Kansas assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. However, as demand for small farm loans and the bank's small farm loan activity are minimal in the assessment area, small farm lending is not assessed and did not impact the evaluation of lending performance in the assessment area. Based on loan demand and the bank's lending activity, small business lending received primary consideration in the analysis of the bank's lending performance.

The bank operates one assessment area in Kansas located in the Lawrence MSA. This assessment area was reviewed under full-scope examination procedures and included information obtained from one community contact. The interview was used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from the community contact interview are included in the next section.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAWRENCE ASSESSMENT AREA

### **Bank Structure**

As shown in the table below, the bank operates six (3.8 percent) of its total branches in the Lawrence assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
0	2	2	1	1

The banked opened one of these branches during the review period in August 2022. Based on its branch network and other service delivery systems, the bank is well positioned to deliver financial services to substantially all of its assessment area.

### **General Demographics**

This assessment area is composed of the entirety of the Lawrence, Kansas MSA, which includes Douglas County. According to 2020 ACS data, the assessment area population was 118,785, which is most heavily concentrated in the city of Lawrence, the county seat and home of the main campus of the University of Kansas. Of the 22 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 6<sup>th</sup> in deposit market share, encompassing 7.8 percent of total deposit dollars.

While only 22 depository institutions operate a branch in the assessment area, a much higher number of institutions reported loan activity in the assessment area. An analysis of 2023 HMDA-reportable loans shows that 213 institutions had loan activity in the assessment area, of which the bank ranked 12<sup>th</sup> with 1.9 percent of total HMDA loans. The bank ranked 6<sup>th</sup> out of 67 institutions with CRA loan activity in the assessment area, accounting for 5.1 percent of total CRA loan activity.

This assessment area covers a metropolitan area with diverse credit needs, including a blend of credit products for individuals and businesses of various income/revenue levels, and offers ample opportunity for community development involvement. The community contact noted down payment assistance programs as a specific credit-related need in the assessment area.

### **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				
	Census Tracts		Family Population	
Low	0	0.0%	0	0.0%
Moderate	7	25.9%	5,403	20.6%
Middle	13	48.2%	13,651	51.9%
Upper	5	18.5%	7,085	27.0%
Unknown	2	7.4%	142	0.5%
<b>TOTAL</b>	<b>27</b>	<b>100%</b>	<b>26,281</b>	<b>100%</b>

As shown above, the assessment area does not contain any low-income census tracts. The bulk of the census tracts are middle income (48.2 percent), while 25.9 percent are moderate income. Comparatively, 51.9 percent of the total families in the assessment area live in middle-income areas, while only 20.6 percent live in moderate-income census tracts. These moderate-income areas are primarily concentrated in the downtown area of the city of Lawrence.

Based on 2020 ACS data, the median family income for the assessment area was \$87,537. At the same time, the median family income for the state of Kansas was \$77,620. More recently, the FFIEC estimates the 2022 and 2023 median family income for the Lawrence MSA to be \$99,100 and \$94,600 respectively. The following table displays population percentages of assessment area families by income level compared to the Kansas family populations.

Family Population by Income Level				
	Assessment Area		Kansas	
Low	5,162	19.6%	135,113	18.3%
Moderate	4,953	18.9%	130,126	17.6%
Middle	5,939	22.6%	162,489	22.0%
Upper	10,227	38.9%	309,883	42.0%
<b>TOTAL</b>	<b>26,281</b>	<b>100%</b>	<b>737,611</b>	<b>100%</b>

As shown in the table above, 38.5 percent of families within the assessment area were considered LMI, which is just above the LMI family percentage of 35.9 percent in the state of Kansas. However, the percentage of families living below the poverty level in the assessment area (6.8 percent) falls slightly below the level in the state of Kansas (7.6 percent). Considering these factors, the assessment area is of similar affluence when compared to the state of Kansas.

## **Housing Demographics**

The following table displays housing demographics for the assessment area and the state of Kansas.

<b>Housing Cost Burden Levels (%)</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	86.5	27.3	46.2	71.9	34.6	15.6
Kansas	75.7	29.8	38.2	58.1	26.8	15.3

Based on the data in the table above, the level of cost-burdened renters in the assessment area (46.2 percent) is above the level of cost-burdened renters in the state as a whole (38.2 percent). In addition, more low-income renters (86.5 percent) are cost burdened than low-income renters in the state overall (75.7 percent). This is likely due to the fact that the median rental rate in the assessment area (\$952/month) is notably higher than the comparable figure for the state as a whole (\$863/month). In turn, this may suggest low-income households may struggle to save for a down payment and ultimately afford a home.

While the percentage of all cost-burdened homeowners in the assessment area (15.6 percent) is comparable to the figure for the state as a whole (15.3 percent), both low- and moderate-income homeowners in the assessment area are significantly more cost burdened. In fact, the community contact indicated that a significant portion of households are cost burdened and attributed this to rising costs associated with homeownership.

## **Industry and Employment Demographics**

The assessment area supports a large and diverse business community, including a strong small business sector, as evidenced by Dun & Bradstreet data indicating that 91.6 percent of assessment area businesses have gross annual revenues of \$1 million or less. Furthermore, BLS industry demographics indicate that there are 51,021 employees in the assessment area (including 12,701 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are accommodation and food services (18.7 percent), retail trade (14.7 percent), and manufacturing (13.4 percent). The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and the state of Kansas.

<b>Unemployment Levels (%)</b>			
<b>Dataset</b>	<b>Time Period (Annual Average)</b>		
	<b>2022</b>	<b>2023</b>	<b>2024 (Jan.–Nov.)</b>
Lawrence	2.6	2.6	3.3
Kansas	2.6	2.7	3.3

As shown in the table above, unemployment rates in the assessment area were very similar to Kansas over the review period. Additionally, unemployment rates experienced an upward trend.

### **Community Contact Information**

For this assessment area, one community contact interview was completed with a representative from a local housing agency. While the interviewee characterized the local economy as struggling due to rising housing and food costs, the contact indicated that unemployment levels were generally in line with the larger regional rates and slightly below the national average. The contact emphasized significant concerns regarding rising housing costs and indicated a significant portion of households are cost burdened in part due to rising costs associated with homeownership. Regarding credit needs, the contact indicated down payment assistance programs are lacking in the area. Lastly, the contact mentioned that the area has a robust level of banking options.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAWRENCE ASSESSMENT AREA

### LENDING TEST

The bank's Lending Test performance in Kansas is rated high satisfactory. The following table displays the bank's performance under the Lending Test in the Lawrence assessment area.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Adequate
Geographic Distribution	Excellent
Community Development Loans	Adequate Level
Product Innovation	Makes Limited Use
<b>LENDING TEST RATING</b>	<b>HIGH SATISFACTORY</b>

### Lending Activity

The following table displays the bank's combined 2022 and 2023 lending volume in the assessment area by number and dollar volume.

Summary of Lending Activity January 1, 2022 through December 31, 2023				
Loan Type	#	%	\$ (000s)	%
Home Improvement	35	11.4	2,367	5.5
Home Purchase	37	12.0	10,109	23.3
Multifamily Housing	1	0.3	3,000	6.9
Refinancing	12	3.9	1,212	2.8
Other Purpose LOC	9	2.9	459	1.1
Other Purpose Closed/Exempt	1	0.3	50	0.1
Purpose Not Applicable	0	0.0	0	0.0
<b>Total HMDA</b>	<b>95</b>	<b>30.8</b>	<b>17,197</b>	<b>39.7</b>
Small Business	195	63.3	24,467	56.5
Small Farm	18	5.8	1,654	3.8
<b>TOTAL LOANS</b>	<b>308</b>	<b>100</b>	<b>43,318</b>	<b>100</b>

Loans made in the Lawrence assessment area represent 1.3 percent by number and 1.1 percent by dollar of total 2022 and 2023 HMDA and CRA loans made within the bank's combined assessment areas. This level of lending is similar to the current percentages of total bank branches (3.9 percent) and deposits held in the assessment area (1.8 percent). Therefore, the bank's lending levels reflect adequate responsiveness to assessment area credit needs.



### **Loan Distribution by Borrower's Profile**

The bank's overall loan distribution by borrower's profile is adequate, with primary consideration based on performance from the small business lending category.

#### *HMDA Lending*

When considering performance from both years, the bank's performance in making home mortgage loans to individuals of different income levels is good.

In 2022, the bank originated 10.7 percent of its HMDA loans to low-income borrowers. While well below the percentage of assessment area families who are low income (19.6 percent), the bank's performance exceeded the performance of aggregate institutions in the assessment area (9.6 percent). Therefore, the bank's performance is considered good. Furthermore, the bank originated 19.6 percent of its HMDA loans to moderate-income borrowers, which was closely aligned with the aggregate lending level (21.3 percent) and above the demographic figure (18.8 percent) and is considered good.

In 2023, the bank originated 12.8 percent of its HMDA loans to low-income borrowers, which again compared favorably to aggregate lending levels (6.2 percent) but was well below the demographic figure (19.6 percent) and is considered good. In addition, the bank made 20.5 percent of its HMDA loans to moderate-income borrowers as compared to 17.5 percent for other lenders in the assessment area and the demographic figure (18.8 percent), reflecting excellent performance.

#### *Small Business Lending*

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

In 2022, the bank originated 45.8 percent of its small business loans to businesses with annual revenues of \$1 million or less; this performance is considered adequate when compared with aggregate lending levels (53.9 percent) and the demographic figure (91.6 percent).

In 2023, lending to businesses with annual revenues of \$1 million or less declined to 42.0 percent and considered poor when compared with aggregate lending levels (57.1 percent) and the demographic figure (91.6 percent).

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans is excellent overall. As there are no low-income census tracts in the assessment area, the bank's performance is primarily based on its lending in moderate-income census tracts. Additionally, an analysis of the dispersion of all loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps. In 2022, the bank had loan activity in 92.6 percent of all assessment area census tracts and 85.7 percent of all moderate-income geographies. In 2023, the bank had lending activity in 92.6 percent of census tracts in the assessment area and 71.4 percent of moderate-income geographies in the assessment area.

Between both years of data, 100 percent of assessment area census tracts had loan activity; this dispersion was consistent with the bank's branch structure in the assessment area and supports the conclusion that the geographic distribution of loans is excellent overall.

#### *HMDA Lending*

The bank's geographic distribution of HMDA loans is good overall.

In 2022, the bank originated 17.9 percent of its HMDA loans in moderate-income census tracts compared to aggregate lending levels of 20.2 percent and the percentage of owner-occupied housing units in moderate-income geographies of 17.9 percent, reflecting adequate performance.

In 2023, the bank's geographic distribution of HMDA loans rose in moderate-income census tracts (28.2 percent) and is considered excellent, as this level of lending exceeds the aggregate performance of institutions in the assessment area (21.8 percent) and the demographic figure (17.9 percent).

#### *Small Business Lending*

The bank's small business lending in LMI geographies is excellent overall.

In 2022, the bank made 32.7 percent of its small business loans in moderate-income geographies. This performance is considered excellent when compared to aggregate lending levels (24.7 percent) and the percentage of assessment area businesses that are in moderate-income geographies (27.3 percent).

Similarly, in 2023, the bank's level of lending in moderate-income geographies (30.7 percent) is considered excellent when compared to aggregate lending performance (24.3 percent) and the demographic figure (26.6 percent).

#### **Community Development Lending Activity**

The bank makes an adequate level of community development loans in the Lawrence assessment area. During the review period, the bank made seven community development loans totaling \$11.8 million. These community development loans supported various community development purposes, including community service (four), economic development (two), and revitalization/stabilization (one). Of note, the four loans with a purpose of community service totaled \$7.2 million and supported operations of a hospital serving a majority of Medicaid patients; two of these loans facilitated the expansion of this hospital.

## **Product Innovation**

The bank makes limited use of innovative and flexible lending practices in serving the credit needs of the Lawrence assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section. The bank's use of flexible and/or innovative lending products in the Lawrence assessment area is detailed in the table below.

<b>Flexible and/or Innovative Lending Products January 1, 2022 through March 31, 2025</b>		
<b>Program</b>	<b>Number of Loans</b>	<b>\$</b>
SBA	5	2,392,913
Fannie Mae HomeReady	2	327,000
Freddie Mac Home Possible	3	537,260
VA	1	215,000
FHA	2	459,340

## **INVESTMENT TEST**

The bank's Investment Test rating in Kansas is low satisfactory. The bank made an adequate level of qualified community development investments and grants in the assessment area and was rarely in a leadership position. During the review period, the bank made eight qualifying community development donations totaling \$19,100, including two donations totaling \$10,000 made to an economic development organization located in a moderate-income census tract.

## **SERVICE TEST**

The bank's performance under the Service Test in Kansas is rated high satisfactory based on the criteria shown in the table below.

<b>Service Test Summary</b>	
Accessibility of Delivery Systems	Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader in Providing
<b>SERVICE TEST RATING</b>	<b>HIGH SATISFACTORY</b>

## **Accessibility of Delivery Systems**

The bank operates six branches in the Lawrence assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	2	2	1	1	6
	0.0%	33.3%	33.3%	16.7%	16.7%	100%
Census Tracts	0.0%	25.9%	48.2%	18.5%	7.4%	100%
Household Population	0.0%	24.5%	48.3%	23.7%	3.5%	100%

Based on data in the preceding table, the bank operates 33.3 percent of its assessment area branches in LMI census tracts. This distribution is above the percentage of assessment area census tracts that are LMI (25.9 percent) and the household population in LMI census tracts (24.5 percent). In addition to branch locations, consideration was also given to the availability of alternative delivery systems, such as online and mobile banking. Therefore, the bank's service delivery systems are accessible to individuals and geographies of different income levels.

### **Changes in Branch Locations**

During the review period, the bank opened one branch on the campus of the University of Kansas, which was in an unknown-income census tract. Therefore, the bank's overall record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

Business hours, products, and services are generally consistent across all branches in the Lawrence assessment area. All branches are typically open from 9:00 a.m. to 5:00 p.m., Monday through Friday, with four of the five branches offering Saturday morning lobby access. In addition, all branches have drive-up accessibility. One area of slight variance is in the number of lenders present at branches; only one branch has a loan officer on site, which is in a middle-income census tract. However, the branch is in close proximity to LMI census tracts. Lastly, two branches have ITM access with extended hours Monday through Saturday. Overall, business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals.

### **Community Development Services**

The bank is a leader in providing community development services in the assessment area. During the review period, 15 bank employees provided 388 hours of community development services to 4 different organizations in the Lawrence assessment area. These community development services included the following noteworthy services:

- Ten bank employees provided 70 service hours teaching financial literacy to schools where a majority of students qualify for the FRL program.
- One bank employee provided 251 service hours to an organization that focuses on homelessness prevention.

## COLORADO

### CRA RATING FOR COLORADO:

**The Lending Test is rated:**

**The Investment Test is rated:**

**The Service Test is rated:**

**SATISFACTORY**

**Low Satisfactory**

**Low Satisfactory**

**High Satisfactory**

The major factors supporting the rating for the state of Colorado include the following:

- The bank's lending levels reflect excellent responsiveness to credit needs of its assessment areas.
- The distribution of loans by borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The bank makes an adequate level of community development loans.
- The bank makes extensive use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes an adequate level of qualified community development investments and grants and is rarely in the leadership position.
- Service delivery systems are accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.
- The bank provides an adequate level of community development services throughout the Colorado assessment areas.

### SCOPE OF EXAMINATION

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

The bank operates three assessment areas in Colorado, located in two MSAs and one nonMSA portion of the state. One of the bank's Colorado assessment areas was reviewed using full-scope procedures.

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

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN COLORADO

The following table provides additional detail regarding the bank's operations within Colorado.

Assessment Area	Offices		Deposits As of June 30, 2024		Review Procedures
	#	%	\$ (000s)	%	
Colorado Springs	1	25.0	29,896	37.2	Full-Scope
Denver	2	50.0	32,072	39.9	Limited-Scope
Durango	1	25.0	18,489	23.0	Limited-Scope
<b>TOTAL</b>	<b>4</b>	<b>100</b>	<b>80,457</b>	<b>100</b>	<b>1 Full-Scope</b>

The bank operates four branches (2.6 percent of total branches) throughout the three CRA assessment areas in the state of Colorado. Deposits in the state total \$80.5 million, which represents 0.5 percent of total bank deposits. Given this low relative level, performance in Colorado carried minimal weight when determining institutional level ratings. In addition to the branch locations shown in the table above, the bank also operates four LPO locations. Based on loan and deposit activity as well as other factors, the Colorado Springs assessment area was reviewed under full-scope examination procedures, driving the statewide rating. During the review period, the bank opened one branch in Colorado; no branches were closed.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

### LENDING TEST

The bank's performance under the Lending Test in Colorado is rated low satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Loans	Adequate Level
Product Innovation	Makes Extensive Use
<b>LENDING TEST RATING</b>	<b>LOW SATISFACTORY</b>

### Lending Activity

The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Colorado Springs	Excellent
<b>OVERALL</b>	<b>EXCELLENT</b>

Limited-Scope Assessment Areas	Lending Activity
Denver	Below
Durango	Below

Overall, lending levels reflect excellent responsiveness to the credit needs of the bank's assessment areas, based on loan activity reviewed under the Lending Test. Though performance in the limited-scope assessment areas was below the statewide conclusion, lending activity in limited-scope assessment areas was considered satisfactory.

### **Borrower and Geographic Distribution**

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

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Colorado Springs	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

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

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

Full-Scope Assessment Areas	Geographic Distribution of Loans
Colorado Springs	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Denver	Consistent
Durango	Consistent

### **Community Development Lending Activity**

Overall, the bank makes an adequate level of community development loans, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
Colorado Springs	Adequate Level
<b>OVERALL</b>	<b>ADEQUATE LEVEL</b>

Limited-Scope Assessment Areas	Community Development Lending
Denver	Consistent
Durango	Below

During the review period, the bank originated or renewed seven qualifying community development loans inside its assessment areas, totaling \$30.1 million.



## **Product Innovation**

The bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section. The bank's use of flexible and/or innovative lending products in the Colorado assessment areas is detailed in the table below.

<b>Flexible and/or Innovative Lending Products January 1, 2022 through March 31, 2025</b>		
<b>Program</b>	<b>Number of Loans</b>	<b>\$</b>
Home Turf	44	14,525,274
Colorado Housing and Finance Authority	38	13,009,728
SBA	2	428,900
Fannie Mae HomeReady	26	6,176,755
Freddie Mac Home Possible	15	3,750,540
VA	131	73,567,936
FHA	46	17,031,826

## **INVESTMENT TEST**

The bank's performance under the Investment Test is rated low satisfactory. The following tables display investment and grant activity performance for each assessment area.

<b>Full-Scope Assessment Areas</b>	<b>Investment and Grant Activity</b>
Colorado Springs	Adequate
<b>OVERALL</b>	<b>ADEQUATE</b>

<b>Limited-Scope Assessment Areas</b>	<b>Investment and Grant Activity</b>
Denver	Consistent
Durango	Below

During the review period, the bank made four new investments totaling \$1.9 million. In addition, the bank made ten donations totaling \$35,750. The bank's investment activity included low-income housing tax credits supporting affordable housing.

<b>Colorado Assessment Area</b>	<b>Community Development Investments (\$)</b>	<b>Community Development Donations/Grants (\$)</b>
Colorado Springs	869,946	8,500
Denver	1.0 Million	5,000
Durango		22,250
<b>TOTAL</b>	<b>1.9 Million</b>	<b>35,750</b>

## SERVICE TEST

The bank's performance under the Service Test is rated high satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level
<b>OVERALL</b>	<b>HIGH SATISFACTORY</b>

### Accessibility of Delivery Systems

The bank's delivery systems are accessible to the geographies and individuals of different income levels, as shown in the following tables.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Colorado Springs	Accessible
<b>OVERALL</b>	<b>ACCESSIBLE</b>

Limited-Scope Assessment Areas	Accessibility of Delivery Systems
Denver	Consistent
Durango	Consistent

### Changes in Branch Locations

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

Full-Scope Assessment Areas	Changes in Branch Locations
Colorado Springs	Not Adversely Affected
<b>OVERALL</b>	<b>NOT ADVERSELY AFFECTED</b>

Limited-Scope Assessment Areas	Changes in Branch Locations
Denver	Exceeds
Durango	Consistent

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Colorado Springs	Do Not Vary in a Way that Inconveniences
<b>OVERALL</b>	<b>DO NOT VARY IN A WAY THAT INCONVENIENCES</b>

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Denver	Exceeds
Durango	Consistent

### **Community Development Services**

The bank provides an adequate level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Colorado Springs	Adequate Level
<b>OVERALL</b>	<b>ADEQUATE LEVEL</b>

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

In total, ten employees logged 612 hours of community development services to ten different organizations. In addition, one employee provided 87 hours of community development services to one organization outside of the bank's Colorado assessment areas. Details of the most impactful of these activities are included in the *Community Development Services* section for each full-scope assessment area.

## COLORADO SPRINGS, COLORADO MSA

*(Full-Scope Review)*

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

#### **Bank Structure**

As shown in the table below, the bank operates one (0.6 percent) of its total branches in the Colorado Springs assessment area.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
0	1	0	0	0

The bank did not open/close any branches in this assessment area during the review period.

#### **General Demographics**

This assessment area includes El Paso County, the largest of the two counties comprising the Colorado Springs, Colorado MSA. The assessment area population of 730,395 is concentrated in the city of Colorado Springs, which serves as the county seat, and the assessment area has a mix of credit needs, including consumer and business loan products for residents and businesses of different income/revenue levels. According to the community contact, down payment assistance loan programs are a prevalent need in the assessment area.

Of the 40 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked 35<sup>th</sup> in deposit market share, encompassing 0.3 percent of total deposit dollars. An analysis of 2023 HMDA-reportable loans shows that 504 institutions had loan activity in the assessment area, of which the bank ranked 18<sup>th</sup> with 1.0 percent of total HMDA loans. The bank ranked 47<sup>th</sup> out of 129 institutions with CRA loan activity in the assessment area, accounting for less than 0.1 percent of total CRA loan activity.

#### **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				
	Census Tracts		Family Population	
Low	4	2.4%	3,334	1.9%
Moderate	46	27.5%	42,172	23.6%
Middle	66	39.5%	72,461	40.5%
Upper	49	29.3%	60,481	33.8%
Unknown	2	1.2%	309	0.2%
<b>TOTAL</b>	<b>167</b>	<b>100%</b>	<b>178,757</b>	<b>100%</b>

As shown in the preceding table, a significant portion of the assessment area census tracts are LMI (29.9 percent), primarily moderate-income census tracts (27.5 percent). These areas are concentrated in the city of Colorado Springs.

According to 2020 ACS data, the median family income for the assessment area was \$83,575. In comparison, the median family income for the state of Colorado as a whole was above the assessment area at \$92,752. More recently, the FFIEC estimates the 2022 and 2023 median family income for the Colorado Springs MSA to be \$96,200 and \$105,000, respectively. The following table displays the distribution of assessment area families by income level compared to all Colorado families.

Family Population by Income Level				
	Assessment Area		Colorado	
Low	33,715	18.9%	271,679	20.0%
Moderate	33,300	18.6%	246,520	18.1%
Middle	39,095	21.9%	297,621	21.9%
Upper	72,647	40.6%	543,083	40.0%
<b>TOTAL</b>	<b>178,757</b>	<b>100%</b>	<b>1,358,903</b>	<b>100%</b>

The table above reveals that 37.5 percent of the families in the assessment area are considered LMI, which is similar to the state of Colorado (38.1 percent). Furthermore, the percentage of families living below the poverty level in the assessment area (6.6 percent) is similar to the percentage of Colorado families (6.1 percent). Therefore, considering these statistics, the assessment area is similar in affluence when compared to the state of Colorado as a whole.

### **Housing Demographics**

The following table displays housing demographics for the assessment area and the state of Colorado.

Housing Cost Burden Levels (%)						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Colorado Springs	85.3	64.7	49.7	68.3	47.8	21.9
Colorado	80.2	54.4	46.8	64.2	40.6	21.5

Based on the data in the table above, the assessment area appears less affordable, as the levels of cost-burdened renters (49.7 percent) and homeowners (21.9 percent) exceed the levels of cost-burdened renters (46.8 percent) and homeowners (21.5 percent) in the state of Colorado as a whole. Similarly, the levels of LMI cost-burdened renters and homeowners in the assessment area exceed statewide levels.

## **Industry and Employment Demographics**

The assessment area supports a large and diverse business community, including a strong small business sector. According to Dun & Bradstreet, 35,027, or 94.7 percent, of businesses in the assessment area have annual revenues under \$1 million. BLS industry demographics indicate that there are 305,196 employees in the assessment area (including 56,194 governmental employees). By percentage of nongovernmental employees, the three largest job categories in the assessment area are healthcare and social assistance (16.2 percent), professional and technical services (13.7 percent), and accommodation and food services (13.1 percent). The table below details BLS unemployment data (not seasonally adjusted) for the assessment area and the state of Colorado.

<b>Unemployment Levels (%)</b>			
<b>Dataset</b>	<b>Time Period (Annual Average)</b>		
	<b>2022</b>	<b>2023</b>	<b>2024 (Jan.–Nov.)</b>
Colorado Springs	3.3	3.3	4.2
Colorado	3.1	3.2	4.1

As shown in the table above, unemployment rates in the assessment area were slightly higher than the state of Colorado over the review period. Additionally, unemployment rates experienced an upward trend.

## **Community Contact Information**

For this assessment area, one community contact interview was completed with a representative from a local housing agency. The interviewee categorized the local economy as declining due to a lack of affordable housing. The contact indicated the lack of affordable housing has forced many people to rent as opposed to purchasing homes. This has also resulted in a strong need for first-time home buyer programs. Lastly, the contact mentioned that the area generally has a healthy level of banking options.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLORADO SPRINGS ASSESSMENT AREA

### LENDING TEST

The following table displays the bank's performance under the Lending Test in the Colorado Springs assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Adequate
Geographic Distribution	Adequate
Community Development Loans	Adequate Level

### Lending Activity

The following table displays the combined 2022 and 2023 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2022 through December 31, 2023				
Loan Type	#	%	\$ (000s)	%
Home Improvement	4	0.9	605	0.4
Home Purchase	332	78.3	141,926	87.8
Multifamily Housing	0	0.0	0	0.0
Refinancing	32	7.5	10,834	6.7
Other Purpose LOC	40	9.4	4,634	2.9
Other Purpose Closed/Exempt	1	0.2	310	0.2
<b>Total HMDA</b>	<b>409</b>	<b>96.5</b>	<b>158,309</b>	<b>97.9</b>
Small Business	15	3.5	3,328	2.1
Small Farm	0	0.0	0	0.0
<b>TOTAL LOANS</b>	<b>424</b>	<b>100</b>	<b>161,637</b>	<b>100</b>

The bank's lending activity in the assessment area represents 1.7 percent by number and 3.9 percent by dollar volume of total 2022 and 2023 HMDA and CRA loans. By comparison, the bank operates 0.6 percent of its total branches and holds 0.2 percent of total bank deposits in the assessment area. Overall, the bank's lending activity levels reflect excellent responsiveness to the credit needs of the assessment area.

### **Loan Distribution by Borrower's Profile**

The bank's overall loan distribution by borrower's profile is adequate, with primary consideration based on performance from the HMDA lending category.

#### *HMDA Lending*

When considering performance from both years, the bank's performance in making home mortgage loans to individuals of different income levels is adequate.

In 2022, the bank originated 1.5 percent of its HMDA loans to low-income borrowers, which was well below both the performance of aggregate institutions in the assessment area (5.3 percent) and the percentage of assessment area families who are low income (18.9 percent), reflecting poor performance. However, the bank originated 14.9 percent of its HMDA loans to moderate-income borrowers as compared to 17.9 percent for other lenders in the assessment area and the demographic figure (18.6 percent), reflecting adequate performance.

In 2023, the bank originated 5.1 percent of its HMDA loans to low-income borrowers, which exceeded aggregate lending levels (4.3 percent) but was below the demographic figure (18.9 percent) and is considered good. Furthermore, the bank made 20.0 percent of its HMDA loans to moderate-income borrowers as compared to 17.0 percent for other lenders in the assessment area and the demographic figure (18.6 percent), reflecting good performance.

#### *Small Business*

Within the assessment area, the bank's level of small business lending was not high enough to perform a detailed analysis. However, a review of available small business lending activity supports a conclusion of adequate borrower distribution.

### **Geographic Distribution of Loans**

The bank's geographic distribution of loans is adequate overall; additionally, an analysis of the dispersion of all loan products throughout the assessment area affirms the overall adequate conclusion. In 2022, the bank had loan activity in 53.3 percent of all assessment area census tracts and 32.0 percent of all LMI geographies. In 2023, the bank had lending activity in 67.1 percent of census tracts in the assessment area and 62.0 percent of LMI geographies in the assessment area. While LMI geography penetration was lower in both years, performance improved significantly in 2023. Moreover, the bank's lending dispersion was consistent with the limited branch footprint in the assessment area.



### *HMDA Lending*

The bank's distribution of HMDA loans overall reflects adequate penetration among geographies of different income levels, particularly LMI geographies.

In 2022, the bank originated 1.0 percent of its HMDA loans in low-income census tracts compared to aggregate lending levels of 1.6 percent and the percentage of owner-occupied housing units in low-income geographies of 1.3 percent, reflecting adequate performance. Furthermore, the bank's lending in moderate-income geographies (9.8 percent) was far below the aggregate lending level (17.8 percent) and the demographic figure (19.7 percent), reflecting poor performance.

However, in 2023, the bank's geographic distribution of HMDA loans in low-income census tracts (2.8 percent) is considered good, as this level of lending exceeds the aggregate performance of institutions in the assessment area (1.7 percent) and the demographic figure (1.3 percent). Lending in moderate-income census tracts (19.5 percent) exceeds the aggregate lending performance (18.6 percent) and approaches the demographic figure (19.7 percent) and is also considered good.

### *Small Business Lending*

Within the assessment area, the bank's level of small business lending was not high enough to perform a detailed analysis. However, a review of available small business lending activity supports a conclusion of adequate geographic distribution.

### **Community Development Lending Activity**

The bank makes an adequate level of community development loans in the Colorado Springs assessment area. During the review period, the bank made one community development loan with a community development purpose of revitalization/stabilization, totaling \$3.0 million.

### **INVESTMENT TEST**

The bank makes an adequate level of qualified community development investments and grants within the Colorado Springs assessment area. The bank made new qualified community development investments of \$869,946 during the review period. In addition to these investments, the bank made one community development donation in an amount of \$8,500 to an affordable housing organization.

## SERVICE TEST

The following table displays the bank's performance under the Service Test in the Colorado Springs assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Adequate Level

### Accessibility of Delivery Systems

The bank operates one branch in the Colorado Springs assessment area. The following table displays the location of the bank's branch by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	1	0	0	0	1
	0.0%	100%	0.0%	0.0%	0.0%	100%
Census Tracts	2.4%	27.5%	39.5%	29.3%	1.2%	100%
Household Population	2.1%	27.3%	40.5%	29.7%	0.4%	100%

Based on data in the preceding table, the bank operates its only assessment area branch in a moderate-income census tract. This is above the percentage of assessment area census tracts that are LMI geographies (29.9 percent) and the household population in LMI census tracts (29.4 percent). In addition to the branch's location, consideration was also given to the availability of alternative delivery systems, such as online and mobile banking. Therefore, the bank's service delivery systems are accessible to individuals and geographies of different income levels.

### Changes in Branch Locations

The bank did not open or close any branch locations in the assessment area during the review period. Therefore, changes in branch locations have not adversely affected the accessibility of the bank's service delivery systems.

### **Reasonableness of Business Hours and Services in Meeting Assessment Area Needs**

The only branch in this assessment has a loan officer on site and standard lobby business hours, which are Monday through Friday from 8:30 a.m. to 4:30 p.m.; there is also ITM access. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

### **Community Development Services**

The bank provides an adequate level of community development services in the assessment area. During the review period, two bank employees provided 166 hours of community development services to two different organizations in the Colorado Springs assessment area. These community development services included providing financial expertise by serving as a board member for an organization that provides affordable housing for LMI individuals.

## DENVER, COLORADO MSA

*(Limited-Scope Review)*

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DENVER ASSESSMENT AREA

The assessment area is composed of Adams, Arapahoe, Denver, and Jefferson counties, four of the ten counties that make up the Denver–Aurora–Centennial, Colorado MSA. The bank's branch network consists of two offices, one of which opened during the review period in August 2023; no branches were closed. Based on its branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to most of its assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	37	170	217	152	16	<b>592</b>
	6.3%	28.7%	36.7%	25.7%	2.7%	<b>100%</b>
Family Population	30,100	163,729	207,417	154,855	4,152	<b>560,253</b>
	5.4%	29.2%	37.0%	27.6%	0.7%	<b>100%</b>
Household Population	54,975	282,363	341,000	235,359	12,245	<b>925,942</b>
	5.9%	30.5%	36.8%	25.4%	1.3%	<b>100%</b>
Business Institutions	7,430	36,399	51,509	49,916	4,905	<b>150,159</b>
	4.9%	24.2%	34.3%	33.2%	3.3%	<b>100%</b>
Agricultural Institutions	43	244	495	427	37	<b>1,246</b>
	3.5%	19.6%	39.7%	34.3%	3.0%	<b>100%</b>

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	124,740	108,404	123,444	203,665	<b>560,253</b>
	22.3%	19.3%	22.0%	36.4%	<b>100%</b>
Household Population	223,860	166,472	178,370	357,240	<b>925,942</b>
	24.2%	18.0%	19.3%	38.6%	<b>100%</b>

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DENVER ASSESSMENT AREA

### LENDING TEST

The Central Trust Bank's overall lending performance in this assessment area is consistent with the Lending Test performance in the Colorado full-scope assessment area, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Summary	
Lending Activity	Below
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, the bank made six community development loans totaling \$27.1 million. These loans qualified for a community development purpose of affordable housing (two) and revitalization/stabilization (four).

### INVESTMENT TEST

The bank's Investment Test performance in this assessment area is consistent with the bank's performance in the Colorado full-scope assessment area. During the review period, the bank had two community development investments totaling \$1.0 million, both of which were made in the current period. Furthermore, two donations were made totaling \$5,000.

### SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Colorado full-scope assessment area, as shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Exceeds
Reasonableness of Business Hours and Services	Exceeds
Community Development Services	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, three employees provided 126 hours of community development services to three organizations. This level of performance is consistent with the bank's performance in the Colorado full-scope assessment area.

# NONMETROPOLITAN COLORADO STATEWIDE AREA

*(Limited-Scope Review)*

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DURANGO ASSESSMENT AREA

The assessment area is composed of La Plata County and consists of one office; no branches were opened or closed during the review period. Based on its branch network and other service delivery systems, the bank is adequately positioned to deliver financial services to its assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	0	0	5	7	0	12
	0.0%	0.0%	41.7%	58.3%	0.0%	100%
Family Population	0	0	5,892	7,391	0	13,283
	0.0%	0.0%	44.4%	55.6%	0.0%	100%
Household Population	0	0	8,689	12,681	0	21,370
	0.0%	0.0%	40.7%	59.3%	0.0%	100%
Business Institutions	0	0	1,324	3,119	0	4,443
	0.0%	0.0%	29.8%	70.2%	0.0%	100%
Agricultural Institutions	0	0	86	51	0	137
	0.0%	0.0%	62.8%	37.2%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	2,245	1,649	2,425	6,964	13,283
	16.9%	12.4%	18.3%	52.4%	100%
Household Population	4,354	3,163	3,382	10,471	21,370
	20.4%	14.8%	15.8%	49.0%	100%

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DURANGO ASSESSMENT AREA

### LENDING TEST

The Central Trust Bank's overall lending performance in this assessment area is consistent with the Lending Test performance in the Colorado full-scope assessment area, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

Lending Test Summary	
Lending Activity	Below
Distribution of Loans by Borrower's Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activity	Below
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, the bank originated zero community development loans.

### INVESTMENT TEST

The bank's Investment Test performance in this assessment area is below the bank's performance in the Colorado full-scope assessment area. During the review period, the bank made seven community development donations totaling \$22,250.

### SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Colorado full-scope assessment areas, as shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
<b>OVERALL</b>	<b>CONSISTENT</b>

During the review period, five employees provided 321 hours of community development services to five organizations. This level of performance is consistent with the bank's performance in the Colorado full-scope assessment area.

## APPENDIX A – SCOPE OF EXAMINATION TABLES

Scope of Examination			
TIME PERIOD REVIEWED	January 1, 2022 – December 31, 2023 for HMDA, small business, and small farm lending.		
	January 1, 2022 – March 31, 2025 for community development loans, investment, and service activities.		
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
The Central Trust Bank Jefferson City, Missouri			HMDA Small Business Small Farm
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
N/A	N/A		N/A

Assessment Area – Examination Scope Details					
Assessment Area	Rated Area	# of Offices	Deposits \$ (000s) (as of June 30, 2024)	Branches Visited	CRA Review Procedures
Kansas City	Kansas City	46	\$2,759,333	0	Full-Scope
St. Louis	St. Louis	16	\$1,733,560	0	Full-Scope
Jefferson City	Missouri	15	\$3,539,399	0	Full-Scope
NonMSA Missouri	Missouri	24	\$2,493,283	0	Full-Scope
Columbia	Missouri	15	\$2,161,060	0	Limited-Scope
Springfield	Missouri	20	\$1,497,230	1	Limited-Scope
Tulsa	Oklahoma	6	\$333,239	0	Full-Scope
Oklahoma City	Oklahoma	3	\$47,228	0	Limited-Scope
Lawrence	Kansas	6	\$267,318	0	Full-Scope
Colorado Springs	Colorado	1	\$29,896	0	Full-Scope
Denver	Colorado	2	\$32,072	0	Limited-Scope
Durango	Colorado	1	\$18,489	0	Limited-Scope
Naples-Marco Island	Florida	1	\$34,399	0	Not Reviewed
<b>OVERALL</b>		<b>156</b>	<b>\$14,946,506</b>	<b>1</b>	<b>7 Full-Scope</b>



## APPENDIX B – SUMMARY OF STATE AND MULTISTATE METROPOLITAN STATISTICAL AREA RATINGS

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Kansas City MSA	High Satisfactory	Low Satisfactory	High Satisfactory	<b>Satisfactory</b>
St. Louis MSA	High Satisfactory	High Satisfactory	High Satisfactory	<b>Satisfactory</b>
Missouri	High Satisfactory	Low Satisfactory	High Satisfactory	<b>Satisfactory</b>
Oklahoma	High Satisfactory	Low Satisfactory	Low Satisfactory	<b>Satisfactory</b>
Kansas	High Satisfactory	Low Satisfactory	High Satisfactory	<b>Satisfactory</b>
Colorado	Low Satisfactory	Low Satisfactory	High Satisfactory	<b>Satisfactory</b>

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

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Total Points	Overall Rating
Kansas City MSA	9	3	4	16	<b>Satisfactory</b>
St. Louis MSA	9	4	4	17	<b>Satisfactory</b>
Missouri	9	3	4	16	<b>Satisfactory</b>
Oklahoma	9	3	3	15	<b>Satisfactory</b>
Kansas	9	3	4	16	<b>Satisfactory</b>
Colorado	6	3	4	13	<b>Satisfactory</b>

## APPENDIX C – LENDING PERFORMANCE TABLES BY ASSESSMENT AREA

### Kansas City Assessment Area

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	46	11.3%	9.1%	\$6,114	5.6%	4.5%	20.4%
Moderate	90	22.2%	19.9%	\$18,072	16.6%	14.3%	17.5%
Middle	90	22.2%	20.3%	\$24,621	22.6%	19.2%	21.7%
Upper	119	29.3%	31.2%	\$49,118	45.0%	44.5%	40.4%
Unknown	61	15.0%	19.5%	\$11,161	10.2%	17.6%	0.0%
TOTAL	406	100.0%	100.0%	\$109,086	100.0%	100.0%	100.0%
Refinance							
Low	29	14.2%	12.8%	\$2,475	6.9%	7.3%	20.4%
Moderate	45	22.1%	22.4%	\$6,952	19.3%	17.3%	17.5%
Middle	46	22.5%	21.6%	\$7,772	21.6%	21.0%	21.7%
Upper	59	28.9%	27.7%	\$14,522	40.4%	38.4%	40.4%
Unknown	25	12.3%	15.5%	\$4,214	11.7%	16.0%	0.0%
TOTAL	204	100.0%	100.0%	\$35,934	100.0%	100.0%	100.0%
Home Improvement							
Low	29	15.3%	6.7%	\$1,277	10.6%	4.2%	20.4%
Moderate	36	18.9%	14.5%	\$2,101	17.4%	10.0%	17.5%
Middle	43	22.6%	23.0%	\$2,406	19.9%	18.1%	21.7%
Upper	72	37.9%	50.3%	\$5,692	47.1%	60.7%	40.4%
Unknown	10	5.3%	5.5%	\$611	5.1%	7.1%	0.0%
TOTAL	190	100.0%	100.0%	\$12,087	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	9	13.4%	6.1%	\$360	5.5%	3.2%	20.4%
Moderate	9	13.4%	15.9%	\$416	6.3%	9.3%	17.5%
Middle	19	28.4%	21.8%	\$1,797	27.4%	15.6%	21.7%
Upper	27	40.3%	50.0%	\$3,788	57.7%	64.7%	40.4%
Unknown	3	4.5%	6.3%	\$200	3.0%	7.2%	0.0%
TOTAL	67	100.0%	100.0%	\$6,561	100.0%	100.0%	100.0%

Other Purpose Closed/Exempt							
Low	2	16.7%	13.4%	\$73	7.3%	6.2%	20.4%
Moderate	5	41.7%	19.6%	\$377	37.6%	12.8%	17.5%
Middle	3	25.0%	19.9%	\$426	42.5%	12.4%	21.7%
Upper	1	8.3%	38.5%	\$26	2.5%	54.5%	40.4%
Unknown	1	8.3%	8.6%	\$100	10.0%	14.0%	0.0%
<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,002</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Purpose Not Applicable							
Low	0	0.0%	4.0%	\$0	0.0%	3.0%	20.4%
Moderate	0	0.0%	1.3%	\$0	0.0%	1.7%	17.5%
Middle	0	0.0%	0.5%	\$0	0.0%	0.2%	21.7%
Upper	0	0.0%	0.3%	\$0	0.0%	0.3%	40.4%
Unknown	0	0.0%	93.9%	\$0	0.0%	94.8%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.5%	\$0	0.0%	0.1%	N/A
Moderate	0	0.0%	0.3%	\$0	0.0%	0.0%	N/A
Middle	1	8.3%	2.1%	\$808	1.5%	0.1%	N/A
Upper	0	0.0%	3.2%	\$0	0.0%	0.2%	N/A
Unknown	11	91.7%	93.8%	\$53,696	98.5%	99.6%	N/A
<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$54,503</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	115	12.9%	9.8%	\$10,298	4.7%	4.6%	20.4%
Moderate	185	20.8%	19.8%	\$27,917	12.7%	13.2%	17.5%
Middle	202	22.7%	20.7%	\$37,830	17.3%	17.4%	21.7%
Upper	278	31.2%	32.2%	\$73,146	33.4%	39.3%	40.4%
Unknown	111	12.5%	17.5%	\$69,981	31.9%	25.4%	0.0%
<b>TOTAL</b>	<b>891</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$219,173</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
<b>Home Purchase Loans</b>							
Low	46	11.8%	8.9%	\$6,201	6.1%	4.4%	20.4%
Moderate	117	30.0%	20.8%	\$24,253	24.0%	14.6%	17.5%
Middle	84	21.5%	19.7%	\$22,016	21.8%	18.4%	21.7%
Upper	121	31.0%	30.1%	\$42,701	42.3%	43.5%	40.4%
Unknown	22	5.6%	20.4%	\$5,852	5.8%	19.2%	0.0%
<b>TOTAL</b>	<b>390</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$101,023</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>							
Low	13	13.5%	12.4%	\$1,089	6.9%	7.1%	20.4%
Moderate	29	30.2%	20.6%	\$3,767	24.0%	16.6%	17.5%
Middle	17	17.7%	20.1%	\$2,879	18.4%	18.8%	21.7%
Upper	31	32.3%	29.6%	\$6,635	42.3%	38.3%	40.4%
Unknown	6	6.3%	17.2%	\$1,301	8.3%	19.2%	0.0%
<b>TOTAL</b>	<b>96</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,671</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>							
Low	24	15.5%	8.2%	\$975	8.6%	5.0%	20.4%
Moderate	29	18.7%	17.1%	\$1,516	13.4%	11.9%	17.5%
Middle	48	31.0%	23.1%	\$2,945	26.1%	18.1%	21.7%
Upper	43	27.7%	46.0%	\$4,920	43.6%	58.9%	40.4%
Unknown	11	7.1%	5.5%	\$925	8.2%	6.0%	0.0%
<b>TOTAL</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,281</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Other Purpose LOC</b>							
Low	4	5.3%	6.2%	\$127	2.2%	3.4%	20.4%
Moderate	18	23.7%	17.0%	\$899	15.6%	11.0%	17.5%
Middle	13	17.1%	25.8%	\$1,195	20.7%	19.9%	21.7%
Upper	39	51.3%	45.0%	\$3,409	59.0%	60.3%	40.4%
Unknown	2	2.6%	6.0%	\$145	2.5%	5.4%	0.0%
<b>TOTAL</b>	<b>76</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,775</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Other Purpose Closed/Exempt</b>							
Low	6	24.0%	11.5%	\$579	20.4%	7.2%	20.4%
Moderate	2	8.0%	20.3%	\$283	10.0%	14.5%	17.5%
Middle	10	40.0%	24.9%	\$1,157	40.7%	21.2%	21.7%
Upper	6	24.0%	36.6%	\$790	27.8%	47.8%	40.4%
Unknown	1	4.0%	6.7%	\$33	1.2%	9.4%	0.0%
<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,842</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Purpose Not Applicable							
Low	0	0.0%	2.6%	\$0	0.0%	1.9%	20.4%
Moderate	0	0.0%	0.5%	\$0	0.0%	0.6%	17.5%
Middle	0	0.0%	1.0%	\$0	0.0%	2.1%	21.7%
Upper	0	0.0%	0.5%	\$0	0.0%	2.2%	40.4%
Unknown	0	0.0%	95.4%	\$0	0.0%	93.2%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	1.1%	\$0	0.0%	0.1%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.4%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.3%	\$0	0.0%	0.2%	N/A
Unknown	7	100.0%	96.2%	\$6,650	100.0%	99.8%	N/A
<b>TOTAL</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	93	12.4%	9.3%	\$8,971	6.3%	4.2%	20.4%
Moderate	195	26.0%	20.1%	\$30,718	21.4%	12.8%	17.5%
Middle	172	23.0%	20.4%	\$30,192	21.1%	16.1%	21.7%
Upper	240	32.0%	32.1%	\$58,455	40.8%	37.9%	40.4%
Unknown	49	6.5%	18.1%	\$14,906	10.4%	29.1%	0.0%
<b>TOTAL</b>	<b>749</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$143,242</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	24	5.9%	4.3%	\$3,853	3.5%	2.2%	4.4%
Moderate	87	21.4%	21.7%	\$14,866	13.6%	13.6%	20.2%
Middle	168	41.4%	39.4%	\$42,423	38.9%	35.6%	41.2%
Upper	126	31.0%	34.1%	\$47,813	43.8%	48.2%	33.8%
Unknown	1	0.2%	0.5%	\$131	0.1%	0.3%	0.4%
TOTAL	406	100.0%	100.0%	\$109,086	100.0%	100.0%	100.0%
Refinance							
Low	7	3.4%	3.2%	\$999	2.8%	1.9%	4.4%
Moderate	27	13.2%	20.4%	\$3,211	8.9%	13.6%	20.2%
Middle	100	49.0%	43.3%	\$16,464	45.8%	39.1%	41.2%
Upper	70	34.3%	32.7%	\$15,260	42.5%	45.2%	33.8%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.2%	0.4%
TOTAL	204	100.0%	100.0%	\$35,934	100.0%	100.0%	100.0%
Home Improvement							
Low	5	2.6%	2.2%	\$140	1.2%	1.8%	4.4%
Moderate	37	19.5%	13.5%	\$1,732	14.3%	9.7%	20.2%
Middle	84	44.2%	37.1%	\$5,199	43.0%	30.8%	41.2%
Upper	64	33.7%	46.9%	\$5,016	41.5%	57.4%	33.8%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.2%	0.4%
TOTAL	190	100.0%	100.0%	\$12,087	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	2	3.0%	1.0%	\$67	1.0%	1.0%	4.4%
Moderate	6	9.0%	12.6%	\$390	5.9%	7.7%	20.2%
Middle	32	47.8%	37.9%	\$1,958	29.8%	29.2%	41.2%
Upper	27	40.3%	48.4%	\$4,146	63.2%	62.1%	33.8%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.1%	0.4%
TOTAL	67	100.0%	100.0%	\$6,561	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	5.1%	\$0	0.0%	2.9%	4.4%
Moderate	3	25.0%	19.6%	\$223	22.3%	10.8%	20.2%
Middle	6	50.0%	38.4%	\$613	61.2%	27.9%	41.2%
Upper	3	25.0%	36.8%	\$166	16.5%	58.3%	33.8%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.2%	0.4%
TOTAL	12	100.0%	100.0%	\$1,002	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	2.5%	\$0	0.0%	1.6%	4.4%
Moderate	0	0.0%	34.3%	\$0	0.0%	26.9%	20.2%
Middle	0	0.0%	47.7%	\$0	0.0%	49.9%	41.2%
Upper	0	0.0%	15.2%	\$0	0.0%	21.3%	33.8%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.2%	0.4%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	2	16.7%	13.1%	\$1,064	2.0%	5.8%	11.0%
Moderate	5	41.7%	35.1%	\$2,720	5.0%	19.9%	28.4%
Middle	3	25.0%	32.7%	\$47,291	86.8%	21.6%	33.8%
Upper	2	16.7%	17.2%	\$3,429	6.3%	51.8%	23.8%
Unknown	0	0.0%	1.9%	\$0	0.0%	0.8%	3.0%
<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$54,503</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	40	4.5%	3.8%	\$6,122	2.8%	2.5%	4.4%
Moderate	165	18.5%	20.5%	\$23,142	10.6%	14.1%	20.2%
Middle	393	44.1%	40.2%	\$113,948	52.0%	34.7%	41.2%
Upper	292	32.8%	35.1%	\$75,830	34.6%	48.4%	33.8%
Unknown	1	0.1%	0.4%	\$131	0.1%	0.3%	0.4%
<b>TOTAL</b>	<b>891</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$219,173</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	24	6.2%	5.0%	\$3,910	3.9%	2.8%	4.4%
Moderate	110	28.2%	23.1%	\$21,649	21.4%	15.3%	20.2%
Middle	148	37.9%	39.6%	\$37,536	37.2%	36.4%	41.2%
Upper	104	26.7%	31.9%	\$37,455	37.1%	45.3%	33.8%
Unknown	4	1.0%	0.5%	\$473	0.5%	0.3%	0.4%
TOTAL	390	100.0%	100.0%	\$101,023	100.0%	100.0%	100.0%
Refinance							
Low	3	3.1%	4.5%	\$507	3.2%	3.0%	4.4%
Moderate	21	21.9%	22.8%	\$2,843	18.1%	16.8%	20.2%
Middle	41	42.7%	40.6%	\$5,682	36.3%	39.4%	41.2%
Upper	31	32.3%	31.6%	\$6,639	42.4%	40.6%	33.8%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.2%	0.4%
TOTAL	96	100.0%	100.0%	\$15,671	100.0%	100.0%	100.0%
Home Improvement							
Low	2	1.3%	2.8%	\$102	0.9%	1.8%	4.4%
Moderate	31	20.0%	14.5%	\$1,940	17.2%	10.4%	20.2%
Middle	72	46.5%	38.5%	\$4,574	40.5%	33.8%	41.2%
Upper	50	32.3%	44.1%	\$4,665	41.4%	53.9%	33.8%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.1%	0.4%
TOTAL	155	100.0%	100.0%	\$11,281	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	5	6.6%	1.4%	\$208	3.6%	1.0%	4.4%
Moderate	6	7.9%	14.9%	\$390	6.8%	10.1%	20.2%
Middle	31	40.8%	39.6%	\$2,054	35.6%	31.0%	41.2%
Upper	34	44.7%	43.9%	\$3,123	54.1%	57.9%	33.8%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.1%	0.4%
TOTAL	76	100.0%	100.0%	\$5,775	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	4.0%	2.7%	\$50	1.8%	1.3%	4.4%
Moderate	5	20.0%	20.4%	\$665	23.4%	15.6%	20.2%
Middle	12	48.0%	39.3%	\$1,007	35.4%	31.3%	41.2%
Upper	7	28.0%	37.6%	\$1,120	39.4%	51.7%	33.8%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.1%	0.4%
TOTAL	25	100.0%	100.0%	\$2,842	100.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	6.6%	\$0	0.0%	3.8%	4.4%
Moderate	0	0.0%	31.1%	\$0	0.0%	21.5%	20.2%
Middle	0	0.0%	46.4%	\$0	0.0%	48.8%	41.2%
Upper	0	0.0%	15.3%	\$0	0.0%	25.7%	33.8%
Unknown	0	0.0%	0.5%	\$0	0.0%	0.2%	0.4%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	11.4%	\$0	0.0%	10.7%	11.0%
Moderate	4	57.1%	37.6%	\$4,085	61.4%	35.7%	28.4%
Middle	2	28.6%	33.1%	\$1,315	19.8%	26.7%	33.8%
Upper	1	14.3%	17.5%	\$1,250	18.8%	26.5%	23.8%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.5%	3.0%
<b>TOTAL</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	35	4.7%	4.5%	\$4,777	3.3%	3.7%	4.4%
Moderate	177	23.6%	21.9%	\$31,572	22.0%	17.9%	20.2%
Middle	306	40.9%	39.7%	\$52,168	36.4%	35.3%	41.2%
Upper	227	30.3%	33.6%	\$54,252	37.9%	42.8%	33.8%
Unknown	4	0.5%	0.4%	\$473	0.3%	0.3%	0.4%
<b>TOTAL</b>	<b>749</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$143,242</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2022							
		Count			Dollars			Total Businesses	
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	\$ (000s)	\$ %	\$ %		%
Business Revenue	\$1 Million or Less	584	59.5%	51.9%	\$59,814	36.4%	31.5%	90.8%	
	Over \$1 Million/ Unknown	397	40.5%	48.1%	\$104,536	63.6%	68.5%	9.2%	
	TOTAL	981	100.0%	100.0%	\$164,350	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	622	63.4%	92.3%	\$20,956	12.8%	30.6%		
	\$100,001–\$250,000	159	16.2%	3.6%	\$29,065	17.7%	14.6%		
	\$250,001–\$1 Million	200	20.4%	4.1%	\$114,329	69.6%	54.7%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	981	100.0%	100.0%	\$164,350	100.0%	100.0%		
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	437	74.8%		\$12,748	21.3%		
		\$100,001–\$250,000	84	14.4%		\$14,985	25.1%		
		\$250,001–\$1 Million	63	10.8%		\$32,081	53.6%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	584	100.0%		\$59,814	100.0%		

Distribution of 2023 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			2023						
			Count			Dollars			Total Businesses
			Bank		Aggregate	Bank		Aggregate	
			#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less		456	55.4%	53.8%	\$41,918	31.1%	29.8%	90.9%
	Over \$1 Million/ Unknown		367	44.6%	46.2%	\$92,824	68.9%	70.2%	9.1%
	TOTAL		823	100.0%	100.0%	\$134,742	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less		518	62.9%	92.8%	\$17,582	13.0%	32.3%	
	\$100,001–\$250,000		136	16.5%	3.4%	\$24,628	18.3%	14.1%	
	\$250,001–\$1 Million		169	20.5%	3.8%	\$92,532	68.7%	53.6%	
	Over \$1 Million		0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL		823	100.0%	100.0%	\$134,742	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	360	78.9%		\$9,788	23.4%		
		\$100,001–\$250,000	54	11.8%		\$9,934	23.7%		
		\$250,001–\$1 Million	42	9.2%		\$22,196	53.0%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	456	100.0%		\$41,918	100.0%		

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	83	8.5%	5.2%	\$17,568	10.7%	6.5%	5.7%
Moderate	208	21.2%	19.1%	\$34,014	20.7%	19.0%	21.1%
Middle	400	40.8%	33.9%	\$52,388	31.9%	28.5%	35.3%
Upper	267	27.2%	38.9%	\$51,156	31.1%	39.2%	35.1%
Unknown	23	2.3%	3.0%	\$9,224	5.6%	6.8%	2.8%
<b>TOTAL</b>	<b>981</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$164,350</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	53	6.4%	5.2%	\$13,756	10.2%	6.2%	5.7%
Moderate	188	22.8%	18.3%	\$27,907	20.7%	18.1%	21.3%
Middle	319	38.8%	33.6%	\$47,449	35.2%	28.5%	35.3%
Upper	243	29.5%	40.1%	\$41,739	31.0%	40.9%	35.0%
Unknown	20	2.4%	2.8%	\$3,891	2.9%	6.3%	2.7%
<b>TOTAL</b>	<b>823</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$134,742</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2022						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	123	82.6%	58.1%	\$9,047	73.8%	66.9%	97.3%
	Over \$1 Million/Unknown	26	17.4%	41.9%	\$3,204	26.2%	33.1%	2.7%
	<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,251</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	114	76.5%	83.9%	\$4,417	36.1%	32.4%	
	\$100,001–\$250,000	25	16.8%	9.0%	\$3,852	31.4%	24.5%	
	\$250,001–\$500,000	10	6.7%	7.1%	\$3,982	32.5%	43.1%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,251</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	\$100,000 or Less	99	80.5%		\$3,718	41.1%		
	\$100,001–\$250,000	18	14.6%		\$2,842	31.4%		
	\$250,001–\$1 Million	6	4.9%		\$2,487	27.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>123</b>	<b>100.0%</b>		<b>\$9,047</b>	<b>100.0%</b>		

Distribution of 2023 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2023						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	97	82.9%	56.6%	\$6,244	72.0%	60.5%	97.5%
	Over \$1 Million/Unknown	20	17.1%	43.4%	\$2,434	28.0%	39.5%	2.5%
	<b>TOTAL</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,678</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	91	77.8%	86.5%	\$3,440	39.6%	36.5%	
	\$100,001–\$250,000	20	17.1%	8.8%	\$2,924	33.7%	29.2%	
	\$250,001–\$500,000	6	5.1%	4.7%	\$2,314	26.7%	34.4%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,678</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	\$100,000 or Less	80	82.5%		\$2,986	47.8%		
	\$100,001–\$250,000	14	14.4%		\$2,119	33.9%		
	\$250,001–\$1 Million	3	3.1%		\$1,139	18.2%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>97</b>	<b>100.0%</b>		<b>\$6,244</b>	<b>100.0%</b>		

Distribution of 2022 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	1	0.7%	0.9%	\$365	3.0%	1.1%	1.1%
Moderate	20	13.4%	14.3%	\$2,269	18.5%	13.0%	13.4%
Middle	120	80.5%	64.9%	\$8,637	70.5%	64.5%	57.4%
Upper	8	5.4%	18.8%	\$980	8.0%	20.7%	27.8%
Unknown	0	0.0%	1.2%	\$0	0.0%	0.8%	0.2%
<b>TOTAL</b>	<b>149</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$12,251</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	1	0.9%	1.3%	\$365	4.2%	2.1%	1.3%
Moderate	14	12.0%	11.7%	\$1,518	17.5%	12.1%	13.5%
Middle	97	82.9%	68.0%	\$5,830	67.2%	64.0%	57.7%
Upper	5	4.3%	17.2%	\$965	11.1%	21.0%	27.3%
Unknown	0	0.0%	1.8%	\$0	0.0%	0.8%	0.2%
<b>TOTAL</b>	<b>117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,678</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**St. Louis Assessment Area**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	56	13.3%	10.2%	\$7,419	6.7%	5.0%	20.3%
Moderate	108	25.6%	19.1%	\$19,488	17.5%	13.6%	17.0%
Middle	81	19.2%	18.2%	\$21,021	18.9%	17.1%	20.1%
Upper	157	37.2%	29.3%	\$56,248	50.6%	42.9%	42.6%
Unknown	20	4.7%	23.2%	\$7,005	6.3%	21.4%	0.0%
TOTAL	422	100.0%	100.0%	\$111,180	100.0%	100.0%	100.0%
Refinance							
Low	11	9.1%	11.8%	\$1,303	4.6%	6.2%	20.3%
Moderate	20	16.5%	20.4%	\$3,383	12.0%	14.5%	17.0%
Middle	30	24.8%	20.5%	\$6,183	21.9%	18.3%	20.1%
Upper	53	43.8%	29.7%	\$14,844	52.5%	43.2%	42.6%
Unknown	7	5.8%	17.6%	\$2,555	9.0%	17.8%	0.0%
TOTAL	121	100.0%	100.0%	\$28,268	100.0%	100.0%	100.0%
Home Improvement							
Low	2	3.5%	8.4%	\$145	3.3%	5.2%	20.3%
Moderate	9	15.8%	15.4%	\$458	10.4%	10.7%	17.0%
Middle	13	22.8%	22.1%	\$727	16.4%	17.7%	20.1%
Upper	30	52.6%	50.8%	\$2,824	63.9%	62.0%	42.6%
Unknown	3	5.3%	3.3%	\$265	6.0%	4.4%	0.0%
TOTAL	57	100.0%	100.0%	\$4,419	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	3	3.7%	8.7%	\$168	2.6%	5.1%	20.3%
Moderate	8	9.8%	15.6%	\$316	4.8%	9.9%	17.0%
Middle	20	24.4%	22.2%	\$1,276	19.5%	16.1%	20.1%
Upper	47	57.3%	49.2%	\$4,562	69.7%	64.6%	42.6%
Unknown	4	4.9%	4.2%	\$223	3.4%	4.3%	0.0%
TOTAL	82	100.0%	100.0%	\$6,544	100.0%	100.0%	100.0%

Other Purpose Closed/Exempt							
Low	1	5.6%	11.4%	\$60	2.0%	5.7%	20.3%
Moderate	3	16.7%	17.6%	\$328	10.7%	8.8%	17.0%
Middle	1	5.6%	22.4%	\$25	0.8%	13.9%	20.1%
Upper	12	66.7%	43.6%	\$2,559	83.3%	64.2%	42.6%
Unknown	1	5.6%	5.0%	\$102	3.3%	7.4%	0.0%
<b>TOTAL</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,073</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Purpose Not Applicable							
Low	0	0.0%	3.8%	\$0	0.0%	3.2%	20.3%
Moderate	0	0.0%	1.0%	\$0	0.0%	2.1%	17.0%
Middle	0	0.0%	0.2%	\$0	0.0%	0.5%	20.1%
Upper	0	0.0%	0.2%	\$0	0.0%	0.1%	42.6%
Unknown	0	0.0%	94.8%	\$0	0.0%	94.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.2%	\$0	0.0%	0.2%	N/A
Unknown	9	100.0%	98.8%	\$21,566	100.0%	99.8%	N/A
<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,566</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	73	10.3%	10.3%	\$9,094	5.2%	4.8%	20.3%
Moderate	148	20.9%	18.7%	\$23,973	13.7%	12.2%	17.0%
Middle	145	20.5%	19.1%	\$29,231	16.7%	15.5%	20.1%
Upper	299	42.2%	31.7%	\$81,036	46.3%	39.5%	42.6%
Unknown	44	6.2%	20.1%	\$31,716	18.1%	28.0%	0.0%
<b>TOTAL</b>	<b>709</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$175,050</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
<b>Home Purchase Loans</b>							
Low	55	9.8%	9.6%	\$7,198	4.6%	4.3%	20.3%
Moderate	125	22.2%	19.8%	\$22,062	14.1%	13.4%	17.0%
Middle	124	22.0%	18.6%	\$32,016	20.4%	16.9%	20.1%
Upper	241	42.7%	31.0%	\$89,467	57.1%	45.2%	42.6%
Unknown	19	3.4%	21.0%	\$6,001	3.8%	20.2%	0.0%
<b>TOTAL</b>	<b>564</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$156,744</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>							
Low	5	7.6%	11.5%	\$1,349	10.0%	6.1%	20.3%
Moderate	12	18.2%	19.9%	\$1,528	11.3%	14.3%	17.0%
Middle	12	18.2%	19.9%	\$1,596	11.8%	17.1%	20.1%
Upper	37	56.1%	29.4%	\$9,021	66.9%	39.8%	42.6%
Unknown	0	0.0%	19.2%	\$0	0.0%	22.7%	0.0%
<b>TOTAL</b>	<b>66</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,494</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>							
Low	2	3.9%	7.2%	\$65	0.9%	3.6%	20.3%
Moderate	4	7.8%	16.2%	\$260	3.5%	10.3%	17.0%
Middle	14	27.5%	20.9%	\$817	10.9%	16.4%	20.1%
Upper	26	51.0%	50.8%	\$2,498	33.5%	61.5%	42.6%
Unknown	5	9.8%	4.9%	\$3,824	51.2%	8.2%	0.0%
<b>TOTAL</b>	<b>51</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$7,464</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Other Purpose LOC</b>							
Low	2	3.3%	6.5%	\$135	2.8%	3.7%	20.3%
Moderate	11	18.0%	15.7%	\$602	12.4%	10.4%	17.0%
Middle	11	18.0%	21.7%	\$815	16.7%	16.0%	20.1%
Upper	33	54.1%	51.5%	\$2,768	56.9%	66.2%	42.6%
Unknown	4	6.6%	4.6%	\$547	11.2%	3.6%	0.0%
<b>TOTAL</b>	<b>61</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,867</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Other Purpose Closed/Exempt</b>							
Low	3	14.3%	11.0%	\$237	10.3%	6.6%	20.3%
Moderate	3	14.3%	19.5%	\$206	9.0%	12.1%	17.0%
Middle	4	19.0%	23.3%	\$284	12.4%	17.6%	20.1%
Upper	10	47.6%	41.5%	\$1,489	65.0%	54.0%	42.6%
Unknown	1	4.8%	4.8%	\$74	3.2%	9.8%	0.0%
<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,290</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>



Purpose Not Applicable							
Low	0	0.0%	2.6%	\$0	0.0%	1.1%	20.3%
Moderate	0	0.0%	0.8%	\$0	0.0%	0.4%	17.0%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	20.1%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	42.6%
Unknown	0	0.0%	96.6%	\$0	0.0%	98.5%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.3%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.3%	\$0	0.0%	0.1%	N/A
Upper	0	0.0%	2.2%	\$0	0.0%	0.5%	N/A
Unknown	1	100.0%	97.2%	\$575	100.0%	99.4%	N/A
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$575</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	67	8.8%	9.5%	\$8,984	4.8%	4.2%	20.3%
Moderate	155	20.3%	19.1%	\$24,658	13.3%	12.2%	17.0%
Middle	165	21.6%	19.0%	\$35,528	19.2%	15.5%	20.1%
Upper	347	45.4%	33.5%	\$105,243	56.8%	41.8%	42.6%
Unknown	30	3.9%	18.9%	\$11,021	5.9%	26.3%	0.0%
<b>TOTAL</b>	<b>764</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$185,434</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	21	5.0%	4.1%	\$2,988	2.7%	2.1%	5.6%
Moderate	70	16.6%	14.8%	\$10,340	9.3%	8.1%	14.4%
Middle	148	35.1%	38.6%	\$35,525	32.0%	32.7%	35.0%
Upper	180	42.7%	42.3%	\$61,527	55.3%	56.9%	44.7%
Unknown	3	0.7%	0.2%	\$800	0.7%	0.2%	0.2%
TOTAL	422	100.0%	100.0%	\$111,180	100.0%	100.0%	100.0%
Refinance							
Low	1	0.8%	3.1%	\$52	0.2%	1.7%	5.6%
Moderate	6	5.0%	12.0%	\$1,032	3.6%	6.6%	14.4%
Middle	34	28.1%	36.7%	\$5,780	20.4%	29.2%	35.0%
Upper	78	64.5%	48.1%	\$21,177	74.9%	62.4%	44.7%
Unknown	2	1.7%	0.2%	\$227	0.8%	0.2%	0.2%
TOTAL	121	100.0%	100.0%	\$28,268	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	1.8%	\$0	0.0%	0.9%	5.6%
Moderate	3	5.3%	7.2%	\$260	5.9%	4.7%	14.4%
Middle	6	10.5%	30.7%	\$425	9.6%	24.3%	35.0%
Upper	47	82.5%	60.1%	\$3,583	81.1%	70.0%	44.7%
Unknown	1	1.8%	0.1%	\$150	3.4%	0.1%	0.2%
TOTAL	57	100.0%	100.0%	\$4,419	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	1.2%	1.2%	\$73	1.1%	0.8%	5.6%
Moderate	2	2.4%	5.6%	\$153	2.3%	3.0%	14.4%
Middle	18	22.0%	30.7%	\$1,187	18.1%	23.0%	35.0%
Upper	60	73.2%	62.3%	\$5,108	78.0%	73.2%	44.7%
Unknown	1	1.2%	0.1%	\$24	0.4%	0.0%	0.2%
TOTAL	82	100.0%	100.0%	\$6,544	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	3.4%	\$0	0.0%	1.7%	5.6%
Moderate	2	11.1%	8.7%	\$248	8.1%	4.2%	14.4%
Middle	5	27.8%	34.6%	\$698	22.7%	22.0%	35.0%
Upper	11	61.1%	53.1%	\$2,127	69.2%	72.1%	44.7%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.0%	0.2%
TOTAL	18	100.0%	100.0%	\$3,073	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	9.9%	\$0	0.0%	5.5%	5.6%
Moderate	0	0.0%	31.7%	\$0	0.0%	23.8%	14.4%
Middle	0	0.0%	38.8%	\$0	0.0%	42.3%	35.0%
Upper	0	0.0%	19.7%	\$0	0.0%	28.4%	44.7%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.2%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	1	11.1%	13.4%	\$250	1.2%	10.3%	12.4%
Moderate	4	44.4%	26.5%	\$2,200	10.2%	10.3%	17.3%
Middle	1	11.1%	36.4%	\$450	2.1%	46.8%	38.8%
Upper	3	33.3%	22.2%	\$18,667	86.6%	31.4%	29.6%
Unknown	0	0.0%	1.4%	\$0	0.0%	1.2%	1.9%
<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$21,566</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	24	3.4%	3.6%	\$3,362	1.9%	2.8%	5.6%
Moderate	87	12.3%	13.2%	\$14,233	8.1%	7.8%	14.4%
Middle	212	29.9%	37.1%	\$44,065	25.2%	32.9%	35.0%
Upper	379	53.5%	45.9%	\$112,189	64.1%	56.2%	44.7%
Unknown	7	1.0%	0.2%	\$1,201	0.7%	0.3%	0.2%
<b>TOTAL</b>	<b>709</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$175,050</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	25	4.4%	4.7%	\$3,732	2.4%	2.2%	5.6%
Moderate	78	13.8%	15.5%	\$11,256	7.2%	8.4%	14.4%
Middle	215	38.1%	38.3%	\$53,888	34.4%	32.8%	35.0%
Upper	245	43.4%	41.3%	\$87,643	55.9%	56.3%	44.7%
Unknown	1	0.2%	0.3%	\$225	0.1%	0.3%	0.2%
TOTAL	564	100.0%	100.0%	\$156,744	100.0%	100.0%	100.0%
Refinance							
Low	1	1.5%	3.9%	\$90	0.7%	2.2%	5.6%
Moderate	0	0.0%	15.0%	\$0	0.0%	9.1%	14.4%
Middle	19	28.8%	37.2%	\$2,922	21.7%	31.0%	35.0%
Upper	46	69.7%	43.6%	\$10,482	77.7%	57.4%	44.7%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.2%	0.2%
TOTAL	66	100.0%	100.0%	\$13,494	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	2.2%	\$0	0.0%	1.4%	5.6%
Moderate	2	3.9%	8.5%	\$35	0.5%	6.0%	14.4%
Middle	15	29.4%	33.1%	\$1,272	17.0%	27.5%	35.0%
Upper	34	66.7%	56.0%	\$6,157	82.5%	64.9%	44.7%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.2%	0.2%
TOTAL	51	100.0%	100.0%	\$7,464	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	1.6%	1.1%	\$85	1.7%	0.6%	5.6%
Moderate	1	1.6%	5.7%	\$53	1.1%	3.2%	14.4%
Middle	20	32.8%	32.9%	\$1,115	22.9%	26.2%	35.0%
Upper	39	63.9%	60.2%	\$3,614	74.3%	69.9%	44.7%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.2%
TOTAL	61	100.0%	100.0%	\$4,867	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	3.1%	\$0	0.0%	1.8%	5.6%
Moderate	1	4.8%	10.6%	\$131	5.7%	6.2%	14.4%
Middle	7	33.3%	35.4%	\$933	40.7%	24.6%	35.0%
Upper	13	61.9%	50.9%	\$1,226	53.5%	67.3%	44.7%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.0%	0.2%
TOTAL	21	100.0%	100.0%	\$2,290	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	7.2%	\$0	0.0%	3.0%	5.6%
Moderate	0	0.0%	27.5%	\$0	0.0%	13.4%	14.4%
Middle	0	0.0%	34.3%	\$0	0.0%	24.3%	35.0%
Upper	0	0.0%	30.6%	\$0	0.0%	59.3%	44.7%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.0%	0.2%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	14.4%	\$0	0.0%	7.1%	12.4%
Moderate	0	0.0%	29.1%	\$0	0.0%	17.5%	17.3%
Middle	1	100.0%	35.6%	\$575	100.0%	41.2%	38.8%
Upper	0	0.0%	20.6%	\$0	0.0%	34.1%	29.6%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.1%	1.9%
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$575</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	27	3.5%	4.2%	\$3,907	2.1%	2.6%	5.6%
Moderate	82	10.7%	14.3%	\$11,475	6.2%	9.0%	14.4%
Middle	277	36.3%	37.3%	\$60,705	32.7%	32.8%	35.0%
Upper	377	49.3%	44.0%	\$109,122	58.8%	55.3%	44.7%
Unknown	1	0.1%	0.3%	\$225	0.1%	0.3%	0.2%
<b>TOTAL</b>	<b>764</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$185,434</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total
		Bank		Aggregate	Bank		Aggregate	Businesses
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	273	53.8%	52.8%	\$43,641	41.9%	29.4%	90.2%
	Over \$1 Million/ Unknown	234	46.2%	47.2%	\$60,438	58.1%	70.6%	9.8%
	<b>TOTAL</b>	<b>507</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$104,079</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	273	53.8%	92.1%	\$7,986	7.7%	30.2%	
	\$100,001–\$250,000	88	17.4%	3.7%	\$15,235	14.6%	15.2%	
	\$250,001–\$1 Million	146	28.8%	4.2%	\$80,858	77.7%	54.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>507</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$104,079</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	168	61.5%		\$3,903	8.9%		
	\$100,001–\$250,000	43	15.8%		\$7,536	17.3%		
	\$250,001–\$1 Million	62	22.7%		\$32,202	73.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>273</b>	<b>100.0%</b>		<b>\$43,641</b>	<b>100.0%</b>		

Distribution of 2023 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total
		Bank		Aggregate	Bank		Aggregate	Businesses
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	227	51.1%	55.6%	\$31,788	34.5%	29.7%	90.4%
	Over \$1 Million/ Unknown	217	48.9%	44.4%	\$60,437	65.5%	70.3%	9.6%
	<b>TOTAL</b>	<b>444</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,225</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	239	53.8%	92.0%	\$7,555	8.2%	29.8%	
	\$100,001–\$250,000	85	19.1%	3.7%	\$14,656	15.9%	14.9%	
	\$250,001–\$1 Million	120	27.0%	4.3%	\$70,014	75.9%	55.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>444</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,225</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	156	68.7%		\$3,879	12.2%		
	\$100,001–\$250,000	30	13.2%		\$4,985	15.7%		
	\$250,001–\$1 Million	41	18.1%		\$22,924	72.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>227</b>	<b>100.0%</b>		<b>\$31,788</b>	<b>100.0%</b>		

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	40	7.9%	6.9%	\$9,544	9.2%	8.3%	7.8%
Moderate	65	12.8%	12.7%	\$9,413	9.0%	11.4%	14.3%
Middle	137	27.0%	33.2%	\$28,747	27.6%	31.6%	33.1%
Upper	252	49.7%	46.1%	\$51,938	49.9%	46.4%	43.7%
Unknown	13	2.6%	1.2%	\$4,437	4.3%	2.3%	1.0%
<b>TOTAL</b>	<b>507</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$104,079</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	33	7.4%	6.3%	\$8,438	9.1%	8.0%	7.9%
Moderate	50	11.3%	12.1%	\$8,278	9.0%	10.0%	14.4%
Middle	120	27.0%	32.3%	\$23,574	25.6%	31.8%	33.1%
Upper	230	51.8%	48.2%	\$48,771	52.9%	48.3%	43.6%
Unknown	11	2.5%	1.1%	\$3,164	3.4%	1.8%	1.0%
<b>TOTAL</b>	<b>444</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$92,225</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## MISSOURI

### Jefferson City Assessment Area

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	41	9.4%	10.9%	\$4,382	5.3%	6.4%	17.4%
Moderate	84	19.2%	22.2%	\$13,535	16.4%	18.8%	19.5%
Middle	82	18.7%	20.7%	\$16,013	19.4%	21.3%	24.1%
Upper	127	29.0%	22.9%	\$32,718	39.6%	32.2%	39.0%
Unknown	104	23.7%	23.2%	\$15,923	19.3%	21.3%	0.0%
TOTAL	438	100.0%	100.0%	\$82,570	100.0%	100.0%	100.0%
Refinance							
Low	32	11.9%	11.0%	\$2,598	6.8%	6.3%	17.4%
Moderate	44	16.3%	23.0%	\$5,296	13.9%	18.3%	19.5%
Middle	78	28.9%	25.5%	\$9,938	26.0%	23.2%	24.1%
Upper	92	34.1%	28.2%	\$17,487	45.8%	38.0%	39.0%
Unknown	24	8.9%	12.3%	\$2,835	7.4%	14.1%	0.0%
TOTAL	270	100.0%	100.0%	\$38,155	100.0%	100.0%	100.0%
Home Improvement							
Low	4	7.3%	9.4%	\$195	6.5%	6.1%	17.4%
Moderate	10	18.2%	13.1%	\$441	14.8%	8.4%	19.5%
Middle	13	23.6%	25.7%	\$599	20.1%	29.7%	24.1%
Upper	9	16.4%	34.0%	\$471	15.8%	37.6%	39.0%
Unknown	19	34.5%	17.8%	\$1,276	42.8%	18.2%	0.0%
TOTAL	55	100.0%	100.0%	\$2,981	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	20	7.8%	8.3%	\$765	5.0%	4.8%	17.4%
Moderate	56	21.9%	20.6%	\$2,550	16.7%	15.2%	19.5%
Middle	59	23.0%	23.1%	\$3,356	21.9%	22.0%	24.1%
Upper	90	35.2%	37.6%	\$6,607	43.1%	47.4%	39.0%
Unknown	31	12.1%	10.4%	\$2,037	13.3%	10.6%	0.0%
TOTAL	256	100.0%	100.0%	\$15,316	100.0%	100.0%	100.0%



Other Purpose Closed/Exempt							
Low	6	17.1%	11.7%	\$352	12.7%	8.4%	17.4%
Moderate	11	31.4%	23.4%	\$377	13.6%	15.6%	19.5%
Middle	10	28.6%	31.2%	\$492	17.8%	26.8%	24.1%
Upper	6	17.1%	27.3%	\$1,160	41.9%	37.6%	39.0%
Unknown	2	5.7%	6.5%	\$385	13.9%	11.6%	0.0%
<b>TOTAL</b>	<b>35</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,765</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	17.4%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	19.5%
Middle	0	0.0%	4.5%	\$0	0.0%	7.2%	24.1%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	39.0%
Unknown	0	0.0%	95.5%	\$0	0.0%	92.8%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	1.2%	\$0	0.0%	0.4%	N/A
Middle	0	0.0%	1.2%	\$0	0.0%	0.7%	N/A
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Unknown	15	100.0%	97.5%	\$6,650	100.0%	98.9%	N/A
<b>TOTAL</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	103	9.6%	10.4%	\$8,291	5.6%	5.7%	17.4%
Moderate	205	19.2%	21.4%	\$22,199	15.0%	16.6%	19.5%
Middle	242	22.6%	22.2%	\$30,399	20.5%	20.1%	24.1%
Upper	324	30.3%	25.9%	\$58,442	39.4%	31.3%	39.0%
Unknown	195	18.2%	20.2%	\$29,107	19.6%	26.4%	0.0%
<b>TOTAL</b>	<b>1,069</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$148,438</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
<b>Home Purchase Loans</b>							
Low	27	8.4%	9.5%	\$3,160	5.0%	5.3%	17.4%
Moderate	60	18.6%	20.4%	\$9,222	14.7%	16.1%	19.5%
Middle	64	19.8%	21.6%	\$12,335	19.6%	21.5%	24.1%
Upper	89	27.6%	23.5%	\$24,487	38.9%	33.6%	39.0%
Unknown	83	25.7%	25.0%	\$13,691	21.8%	23.6%	0.0%
<b>TOTAL</b>	<b>323</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$62,895</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Refinance</b>							
Low	23	14.8%	12.4%	\$1,789	9.4%	6.5%	17.4%
Moderate	31	20.0%	22.5%	\$2,778	14.5%	16.9%	19.5%
Middle	38	24.5%	23.8%	\$4,647	24.3%	24.6%	24.1%
Upper	47	30.3%	28.8%	\$8,172	42.8%	38.5%	39.0%
Unknown	16	10.3%	12.4%	\$1,709	8.9%	13.5%	0.0%
<b>TOTAL</b>	<b>155</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$19,095</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Home Improvement</b>							
Low	4	8.9%	11.0%	\$141	3.9%	7.6%	17.4%
Moderate	8	17.8%	22.5%	\$440	12.2%	18.6%	19.5%
Middle	9	20.0%	22.5%	\$548	15.2%	17.6%	24.1%
Upper	16	35.6%	32.0%	\$1,068	29.7%	36.0%	39.0%
Unknown	8	17.8%	12.0%	\$1,401	38.9%	20.3%	0.0%
<b>TOTAL</b>	<b>45</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,598</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Other Purpose LOC</b>							
Low	17	9.9%	11.5%	\$882	8.1%	9.0%	17.4%
Moderate	31	18.0%	18.4%	\$1,550	14.3%	13.5%	19.5%
Middle	57	33.1%	29.1%	\$3,228	29.8%	26.2%	24.1%
Upper	52	30.2%	31.4%	\$4,352	40.1%	42.6%	39.0%
Unknown	15	8.7%	9.6%	\$838	7.7%	8.6%	0.0%
<b>TOTAL</b>	<b>172</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,850</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
<b>Other Purpose Closed/Exempt</b>							
Low	6	11.5%	9.3%	\$416	11.6%	7.8%	17.4%
Moderate	12	23.1%	21.6%	\$621	17.2%	18.2%	19.5%
Middle	26	50.0%	37.7%	\$1,836	51.0%	34.1%	24.1%
Upper	8	15.4%	30.9%	\$728	20.2%	39.3%	39.0%
Unknown	0	0.0%	0.6%	\$0	0.0%	0.5%	0.0%
<b>TOTAL</b>	<b>52</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,601</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	17.4%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	19.5%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	24.1%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	39.0%
Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	2.3%	\$0	0.0%	0.7%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	2	18.2%	6.8%	\$1,095	8.0%	3.6%	N/A
Unknown	9	81.8%	90.9%	\$12,623	92.0%	95.6%	N/A
<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,718</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	77	10.2%	10.2%	\$6,388	5.6%	5.4%	17.4%
Moderate	142	18.7%	20.5%	\$14,611	12.8%	15.4%	19.5%
Middle	194	25.6%	23.1%	\$22,594	19.9%	21.1%	24.1%
Upper	214	28.2%	25.7%	\$39,902	35.1%	33.3%	39.0%
Unknown	131	17.3%	20.5%	\$30,262	26.6%	24.7%	0.0%
<b>TOTAL</b>	<b>758</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$113,757</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	43	9.8%	9.8%	\$5,863	7.1%	7.5%	7.2%
Middle	301	68.7%	73.4%	\$55,043	66.7%	72.2%	75.0%
Upper	94	21.5%	16.8%	\$21,664	26.2%	20.3%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	438	100.0%	100.0%	\$82,570	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	19	7.0%	9.5%	\$2,667	7.0%	8.8%	7.2%
Middle	189	70.0%	74.2%	\$25,400	66.6%	72.8%	75.0%
Upper	62	23.0%	16.3%	\$10,087	26.4%	18.4%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	270	100.0%	100.0%	\$38,155	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	6	10.9%	11.5%	\$365	12.2%	14.6%	7.2%
Middle	41	74.5%	68.6%	\$2,405	80.7%	69.3%	75.0%
Upper	8	14.5%	19.9%	\$212	7.1%	16.1%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	55	100.0%	100.0%	\$2,981	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	20	7.8%	5.8%	\$713	4.7%	4.7%	7.2%
Middle	167	65.2%	67.7%	\$10,168	66.4%	64.2%	75.0%
Upper	69	27.0%	26.6%	\$4,435	29.0%	31.1%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	256	100.0%	100.0%	\$15,316	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	1	2.9%	3.9%	\$75	2.7%	1.8%	7.2%
Middle	23	65.7%	66.2%	\$1,304	47.1%	57.1%	75.0%
Upper	11	31.4%	29.9%	\$1,387	50.1%	41.0%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	35	100.0%	100.0%	\$2,765	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	18.2%	\$0	0.0%	17.4%	7.2%
Middle	0	0.0%	72.7%	\$0	0.0%	70.7%	75.0%
Upper	0	0.0%	9.1%	\$0	0.0%	12.0%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	6	40.0%	28.4%	\$3,104	46.7%	15.4%	35.0%
Middle	9	60.0%	63.0%	\$3,546	53.3%	70.7%	54.1%
Upper	0	0.0%	8.6%	\$0	0.0%	13.9%	10.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$6,650</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	95	8.9%	9.7%	\$12,787	8.6%	8.6%	7.2%
Middle	730	68.3%	72.5%	\$97,865	65.9%	71.8%	75.0%
Upper	244	22.8%	17.8%	\$37,785	25.5%	19.7%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>1,069</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$148,438</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	22	6.8%	10.7%	\$3,577	5.7%	8.5%	7.2%
Middle	235	72.8%	73.7%	\$43,139	68.6%	72.0%	75.0%
Upper	66	20.4%	15.5%	\$16,179	25.7%	19.5%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	323	100.0%	100.0%	\$62,895	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	5	3.2%	6.8%	\$502	2.6%	5.1%	7.2%
Middle	111	71.6%	74.7%	\$13,028	68.2%	71.6%	75.0%
Upper	39	25.2%	18.5%	\$5,565	29.1%	23.3%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	155	100.0%	100.0%	\$19,095	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	3	6.7%	8.5%	\$280	7.8%	10.2%	7.2%
Middle	30	66.7%	71.0%	\$1,659	46.1%	59.1%	75.0%
Upper	12	26.7%	20.5%	\$1,659	46.1%	30.8%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	45	100.0%	100.0%	\$3,598	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	11	6.4%	7.3%	\$585	5.4%	6.5%	7.2%
Middle	118	68.6%	67.0%	\$6,591	60.7%	60.5%	75.0%
Upper	43	25.0%	25.7%	\$3,674	33.9%	33.0%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	172	100.0%	100.0%	\$10,850	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	4	7.7%	9.3%	\$209	5.8%	8.6%	7.2%
Middle	43	82.7%	71.6%	\$3,051	84.7%	69.3%	75.0%
Upper	5	9.6%	19.1%	\$341	9.5%	22.1%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	52	100.0%	100.0%	\$3,601	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	25.0%	\$0	0.0%	20.6%	7.2%
Middle	0	0.0%	75.0%	\$0	0.0%	79.4%	75.0%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	18.2%	36.4%	\$281	2.0%	12.9%	35.0%
Middle	7	63.6%	56.8%	\$12,281	89.5%	82.9%	54.1%
Upper	2	18.2%	6.8%	\$1,156	8.4%	4.2%	10.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>11</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,718</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	47	6.2%	9.9%	\$5,434	4.8%	8.2%	7.2%
Middle	544	71.8%	72.9%	\$79,749	70.1%	71.8%	75.0%
Upper	167	22.0%	17.2%	\$28,574	25.1%	20.0%	17.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>758</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$113,757</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			2022						
			Count			Dollars		Total Businesses	
			Bank		Aggregate	Bank			Aggregate
			#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less		532	66.2%	56.6%	\$45,450	51.3%	49.8%	88.9%
	Over \$1 Million/ Unknown		272	33.8%	43.4%	\$43,077	48.7%	50.2%	11.1%
	TOTAL		804	100.0%	100.0%	\$88,527	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less		607	75.5%	87.3%	\$18,932	21.4%	29.0%	
	\$100,001–\$250,000		101	12.6%	7.0%	\$17,393	19.6%	20.8%	
	\$250,001–\$1 Million		96	11.9%	5.7%	\$52,202	59.0%	50.2%	
	Over \$1 Million		0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL		804	100.0%	100.0%	\$88,527	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	427	80.3%		\$11,799	26.0%		
		\$100,001–\$250,000	60	11.3%		\$9,597	21.1%		
		\$250,001–\$1 Million	45	8.5%		\$24,054	52.9%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	532	100.0%		\$45,450	100.0%		

Distribution of 2023 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	385	56.0%	57.2%	\$34,997	40.8%	44.1%	89.4%
	Over \$1 Million/ Unknown	302	44.0%	42.8%	\$50,781	59.2%	55.9%	10.6%
	TOTAL	687	100.0%	100.0%	\$85,778	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	480	69.9%	86.2%	\$16,872	19.7%	28.2%	
	\$100,001–\$250,000	115	16.7%	7.7%	\$19,262	22.5%	20.7%	
	\$250,001–\$1 Million	92	13.4%	6.1%	\$49,644	57.9%	51.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	687	100.0%	100.0%	\$85,778	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	290	42.2%		\$8,411	9.8%	
		\$100,001–\$250,000	59	8.6%		\$9,518	11.1%	
		\$250,001–\$1 Million	36	5.2%		\$17,068	19.9%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	385	56.0%		\$31,788	100.0%	



Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	111	13.8%	16.2%	\$18,591	21.0%	20.1%	19.8%
Middle	496	61.7%	64.5%	\$47,446	53.6%	59.3%	64.7%
Upper	197	24.5%	18.3%	\$22,490	25.4%	20.4%	15.5%
Unknown	0	0.0%	1.0%	\$0	0.0%	0.2%	0.0%
<b>TOTAL</b>	<b>804</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$88,527</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	114	16.6%	15.5%	\$17,878	20.8%	19.6%	19.8%
Middle	424	61.7%	66.2%	\$50,994	59.4%	61.8%	64.9%
Upper	149	21.7%	17.6%	\$16,906	19.7%	18.4%	15.3%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.1%	0.0%
<b>TOTAL</b>	<b>687</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$85,778</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2022						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	138	84.1%	77.6%	\$13,225	86.7%	86.7%	98.6%
	Over \$1 Million/ Unknown	26	15.9%	22.4%	\$2,024	13.3%	13.3%	1.4%
	<b>TOTAL</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,249</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	114	69.5%	76.2%	\$4,280	28.1%	29.7%	
	\$100,001–\$250,000	36	22.0%	15.1%	\$5,945	39.0%	31.1%	
	\$250,001–\$500,000	14	8.5%	8.7%	\$5,024	32.9%	39.2%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,249</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	96	69.6%		\$3,677	27.8%		
	\$100,001–\$250,000	29	21.0%		\$4,804	36.3%		
	\$250,001–\$1 Million	13	9.4%		\$4,744	35.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>138</b>	<b>100.0%</b>		<b>\$13,225</b>	<b>100.0%</b>		

Distribution of 2023 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2023						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	80	64.0%	68.3%	\$6,532	68.7%	76.8%	98.6%
	Over \$1 Million/ Unknown	45	36.0%	31.7%	\$2,981	31.3%	23.2%	1.4%
	<b>TOTAL</b>	<b>125</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,513</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	100	80.0%	80.1%	\$3,785	39.8%	33.7%	
	\$100,001–\$250,000	18	14.4%	11.8%	\$3,177	33.4%	26.2%	
	\$250,001–\$500,000	7	5.6%	8.1%	\$2,551	26.8%	40.0%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>125</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,513</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	63	78.8%		\$2,414	37.0%		
	\$100,001–\$250,000	11	13.8%		\$1,909	29.2%		
	\$250,001–\$1 Million	6	7.5%		\$2,209	33.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>80</b>	<b>100.0%</b>		<b>\$6,532</b>	<b>100.0%</b>		

Distribution of 2022 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	12	7.3%	10.5%	\$1,035	6.8%	15.8%	7.6%
Middle	133	81.1%	81.5%	\$12,402	81.3%	77.6%	80.2%
Upper	19	11.6%	7.6%	\$1,812	11.9%	6.5%	12.2%
Unknown	0	0.0%	0.5%	\$0	0.0%	0.1%	0.0%
<b>TOTAL</b>	<b>164</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,249</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	15	12.0%	11.8%	\$1,254	13.2%	19.8%	8.2%
Middle	92	73.6%	78.4%	\$7,231	76.0%	75.0%	79.9%
Upper	18	14.4%	9.5%	\$1,028	10.8%	5.2%	12.0%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>125</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$9,513</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**NonMSA Missouri Assessment Area**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	35	5.0%	3.2%	\$3,095	1.8%	1.7%	16.9%
Moderate	87	12.4%	12.6%	\$11,564	6.9%	7.3%	17.4%
Middle	117	16.7%	17.4%	\$20,489	12.2%	13.5%	22.0%
Upper	386	55.1%	44.9%	\$114,029	67.8%	55.5%	43.6%
Unknown	76	10.8%	22.0%	\$18,883	11.2%	22.0%	0.0%
TOTAL	701	100.0%	100.0%	\$168,061	100.0%	100.0%	100.0%
Refinance							
Low	37	9.0%	5.9%	\$3,478	4.9%	2.9%	16.9%
Moderate	74	17.9%	16.7%	\$8,113	11.4%	10.1%	17.4%
Middle	89	21.5%	19.5%	\$11,693	16.5%	14.5%	22.0%
Upper	171	41.4%	42.8%	\$36,717	51.7%	52.3%	43.6%
Unknown	42	10.2%	15.0%	\$11,074	15.6%	20.2%	0.0%
TOTAL	413	100.0%	100.0%	\$71,076	100.0%	100.0%	100.0%
Home Improvement							
Low	18	7.0%	5.3%	\$653	3.9%	2.7%	16.9%
Moderate	37	14.3%	12.2%	\$1,649	9.9%	6.8%	17.4%
Middle	56	21.7%	20.3%	\$2,691	16.1%	14.7%	22.0%
Upper	123	47.7%	52.0%	\$9,805	58.8%	61.4%	43.6%
Unknown	24	9.3%	10.2%	\$1,878	11.3%	14.4%	0.0%
TOTAL	258	100.0%	100.0%	\$16,675	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	13	6.0%	5.7%	\$689	3.8%	3.1%	16.9%
Moderate	19	8.8%	11.0%	\$1,001	5.6%	6.3%	17.4%
Middle	38	17.5%	17.6%	\$2,105	11.7%	11.0%	22.0%
Upper	137	63.1%	61.4%	\$13,424	74.8%	76.4%	43.6%
Unknown	10	4.6%	4.3%	\$740	4.1%	3.3%	0.0%
TOTAL	217	100.0%	100.0%	\$17,958	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	5	12.5%	9.3%	\$282	5.7%	8.0%	16.9%
Moderate	8	20.0%	13.9%	\$551	11.2%	6.7%	17.4%
Middle	9	22.5%	17.8%	\$1,246	25.2%	14.3%	22.0%
Upper	18	45.0%	49.4%	\$2,860	57.9%	61.4%	43.6%
Unknown	0	0.0%	9.7%	\$0	0.0%	9.5%	0.0%
TOTAL	40	100.0%	100.0%	\$4,939	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	7.1%	\$0	0.0%	5.7%	16.9%
Moderate	0	0.0%	7.1%	\$0	0.0%	7.4%	17.4%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	22.0%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	43.6%
Unknown	0	0.0%	85.7%	\$0	0.0%	86.8%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	1	5.3%	0.7%	\$183	1.2%	0.1%	N/A
Moderate	1	5.3%	1.4%	\$353	2.4%	0.5%	N/A
Middle	0	0.0%	0.7%	\$0	0.0%	0.1%	N/A
Upper	3	15.8%	25.9%	\$1,582	10.7%	6.4%	N/A
Unknown	14	73.7%	71.3%	\$12,708	85.7%	92.9%	N/A
<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,826</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	109	6.6%	4.3%	\$8,380	2.9%	2.1%	16.9%
Moderate	226	13.7%	13.5%	\$23,231	7.9%	7.7%	17.4%
Middle	309	18.8%	17.9%	\$38,224	13.0%	13.2%	22.0%
Upper	838	50.8%	45.0%	\$178,417	60.8%	52.9%	43.6%
Unknown	166	10.1%	19.4%	\$45,284	15.4%	24.2%	0.0%
<b>TOTAL</b>	<b>1,648</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$293,535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	33	6.6%	3.7%	\$3,270	2.6%	1.5%	16.9%
Moderate	76	15.2%	12.8%	\$11,282	9.0%	7.6%	17.4%
Middle	96	19.2%	17.3%	\$18,273	14.6%	13.4%	22.0%
Upper	241	48.3%	42.4%	\$82,452	66.0%	54.8%	43.6%
Unknown	53	10.6%	23.8%	\$9,675	7.7%	22.7%	0.0%
TOTAL	499	100.0%	100.0%	\$124,952	100.0%	100.0%	100.0%
Refinance							
Low	19	9.0%	7.2%	\$1,252	4.0%	2.9%	16.9%
Moderate	36	17.1%	14.7%	\$3,728	12.0%	8.1%	17.4%
Middle	44	20.9%	21.0%	\$5,084	16.3%	15.0%	22.0%
Upper	91	43.1%	41.6%	\$17,436	55.9%	54.7%	43.6%
Unknown	21	10.0%	15.4%	\$3,664	11.8%	19.3%	0.0%
TOTAL	211	100.0%	100.0%	\$31,164	100.0%	100.0%	100.0%
Home Improvement							
Low	13	7.4%	6.8%	\$711	6.3%	4.1%	16.9%
Moderate	39	22.3%	16.6%	\$1,884	16.8%	10.5%	17.4%
Middle	30	17.1%	21.6%	\$1,900	16.9%	17.8%	22.0%
Upper	80	45.7%	46.7%	\$5,862	52.2%	57.6%	43.6%
Unknown	13	7.4%	8.2%	\$864	7.7%	10.1%	0.0%
TOTAL	175	100.0%	100.0%	\$11,221	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	5	4.2%	5.0%	\$115	1.3%	3.1%	16.9%
Moderate	15	12.6%	14.6%	\$1,000	11.4%	11.3%	17.4%
Middle	34	28.6%	24.2%	\$2,062	23.4%	18.4%	22.0%
Upper	61	51.3%	50.5%	\$5,382	61.1%	60.9%	43.6%
Unknown	4	3.4%	5.7%	\$250	2.8%	6.4%	0.0%
TOTAL	119	100.0%	100.0%	\$8,809	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	7	9.7%	9.4%	\$336	5.4%	4.6%	16.9%
Moderate	12	16.7%	16.4%	\$826	13.3%	11.9%	17.4%
Middle	18	25.0%	22.4%	\$1,387	22.4%	16.2%	22.0%
Upper	34	47.2%	46.8%	\$3,557	57.5%	58.7%	43.6%
Unknown	1	1.4%	5.0%	\$85	1.4%	8.5%	0.0%
TOTAL	72	100.0%	100.0%	\$6,191	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	5.0%	\$0	0.0%	1.9%	16.9%
Moderate	0	0.0%	5.0%	\$0	0.0%	4.9%	17.4%
Middle	0	0.0%	5.0%	\$0	0.0%	5.6%	22.0%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	43.6%
Unknown	0	0.0%	85.0%	\$0	0.0%	87.5%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	1.1%	\$0	0.0%	0.4%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	1	7.1%	2.3%	\$215	2.6%	0.4%	N/A
Upper	2	14.3%	12.6%	\$400	4.9%	5.1%	N/A
Unknown	11	78.6%	83.9%	\$7,554	92.5%	94.1%	N/A
<b>TOTAL</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,169</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	77	7.1%	4.7%	\$5,684	3.0%	1.8%	16.9%
Moderate	178	16.3%	13.5%	\$18,720	9.8%	7.5%	17.4%
Middle	223	20.5%	18.5%	\$28,921	15.2%	13.3%	22.0%
Upper	509	46.7%	42.5%	\$115,089	60.4%	52.7%	43.6%
Unknown	103	9.4%	20.8%	\$22,092	11.6%	24.6%	0.0%
<b>TOTAL</b>	<b>1,090</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$190,506</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	54	7.7%	7.6%	\$8,834	5.3%	6.2%	6.3%
Middle	390	55.6%	56.1%	\$79,561	47.3%	50.0%	65.0%
Upper	257	36.7%	36.2%	\$79,665	47.4%	43.7%	28.6%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.0%	0.0%
TOTAL	701	100.0%	100.0%	\$168,061	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	31	7.5%	6.4%	\$4,182	5.9%	5.7%	6.3%
Middle	236	57.1%	59.0%	\$38,896	54.7%	55.2%	65.0%
Upper	146	35.4%	34.6%	\$27,998	39.4%	39.1%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	413	100.0%	100.0%	\$71,076	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	16	6.2%	5.0%	\$647	3.9%	3.9%	6.3%
Middle	142	55.0%	59.0%	\$7,678	46.0%	53.5%	65.0%
Upper	100	38.8%	36.0%	\$8,350	50.1%	42.6%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	258	100.0%	100.0%	\$16,675	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	18	8.3%	7.4%	\$1,632	9.1%	5.8%	6.3%
Middle	86	39.6%	47.6%	\$5,510	30.7%	38.4%	65.0%
Upper	113	52.1%	45.0%	\$10,816	60.2%	55.8%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	217	100.0%	100.0%	\$17,958	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	5.0%	5.0%	\$248	5.0%	3.9%	6.3%
Middle	18	45.0%	58.7%	\$1,794	36.3%	51.9%	65.0%
Upper	20	50.0%	36.3%	\$2,897	58.7%	44.3%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	40	100.0%	100.0%	\$4,939	100.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	7.1%	\$0	0.0%	7.2%	6.3%
Middle	0	0.0%	69.0%	\$0	0.0%	62.9%	65.0%
Upper	0	0.0%	23.8%	\$0	0.0%	29.9%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	1	5.3%	16.1%	\$780	5.3%	19.6%	8.7%
Middle	14	73.7%	55.2%	\$7,611	51.3%	50.5%	43.5%
Upper	4	21.1%	28.7%	\$6,435	43.4%	29.9%	47.7%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>19</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,826</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	122	7.4%	7.2%	\$16,323	5.6%	6.6%	6.3%
Middle	886	53.8%	56.8%	\$141,050	48.1%	51.3%	65.0%
Upper	640	38.8%	36.0%	\$136,162	46.4%	42.1%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>1,648</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$293,535</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	50	10.0%	8.1%	\$9,653	7.7%	6.3%	6.3%
Middle	276	55.3%	56.5%	\$59,320	47.5%	50.9%	65.0%
Upper	173	34.7%	35.4%	\$55,979	44.8%	42.8%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.1%	0.0%
TOTAL	499	100.0%	100.0%	\$124,952	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	17	8.1%	7.2%	\$1,986	6.4%	5.4%	6.3%
Middle	99	46.9%	58.4%	\$11,829	38.0%	57.7%	65.0%
Upper	95	45.0%	34.4%	\$17,349	55.7%	36.8%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	211	100.0%	100.0%	\$31,164	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	15	8.6%	6.1%	\$735	6.6%	4.4%	6.3%
Middle	106	60.6%	58.9%	\$6,936	61.8%	56.8%	65.0%
Upper	54	30.9%	35.1%	\$3,550	31.6%	38.8%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	175	100.0%	100.0%	\$11,221	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	8	6.7%	5.0%	\$451	5.1%	4.6%	6.3%
Middle	54	45.4%	53.0%	\$3,639	41.3%	47.9%	65.0%
Upper	57	47.9%	42.0%	\$4,719	53.6%	47.4%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	119	100.0%	100.0%	\$8,809	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	1	1.4%	4.0%	\$25	0.4%	3.7%	6.3%
Middle	31	43.1%	62.2%	\$1,987	32.1%	53.2%	65.0%
Upper	40	55.6%	33.8%	\$4,179	67.5%	43.1%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	72	100.0%	100.0%	\$6,191	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	20.0%	\$0	0.0%	16.9%	6.3%
Middle	0	0.0%	55.0%	\$0	0.0%	53.7%	65.0%
Upper	0	0.0%	25.0%	\$0	0.0%	29.4%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	10.3%	\$0	0.0%	11.8%	8.7%
Middle	9	64.3%	63.2%	\$3,357	41.1%	55.8%	43.5%
Upper	5	35.7%	26.4%	\$4,812	58.9%	32.4%	47.7%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>14</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,169</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	91	8.3%	7.6%	\$12,850	6.7%	6.3%	6.3%
Middle	575	52.8%	57.1%	\$87,068	45.7%	52.4%	65.0%
Upper	424	38.9%	35.3%	\$90,588	47.6%	41.3%	28.6%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>1,090</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$190,506</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	927	64.1%	55.7%	\$71,776	51.0%	47.9%	92.7%
	Over \$1 Million/ Unknown	520	35.9%	44.3%	\$69,038	49.0%	52.1%	7.3%
	TOTAL	1447	100.0%	100.0%	\$140,814	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1133	78.3%	91.3%	\$32,488	23.1%	33.2%	
	\$100,001–\$250,000	164	11.3%	4.8%	\$28,688	20.4%	18.6%	
	\$250,001–\$1 Million	150	10.4%	3.9%	\$79,638	56.6%	48.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1447	100.0%	100.0%	\$140,814	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	761	82.1%		\$19,657	27.4%	
		\$100,001–\$250,000	89	9.6%		\$15,093	21.0%	
		\$250,001–\$1 Million	77	8.3%		\$37,026	51.6%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	927	100.0%		\$71,776	100.0%	

Distribution of 2023 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	727	60.8%	55.0%	\$49,375	44.4%	44.9%	92.9%
	Over \$1 Million/ Unknown	469	39.2%	45.0%	\$61,742	55.6%	55.1%	7.1%
	TOTAL	1196	100.0%	100.0%	\$111,117	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	922	77.1%	91.4%	\$25,163	22.6%	33.9%	
	\$100,001–\$250,000	147	12.3%	4.6%	\$24,887	22.4%	18.5%	
	\$250,001–\$1 Million	127	10.6%	3.9%	\$61,067	55.0%	47.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1196	100.0%	100.0%	\$111,117	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	590	81.2%		\$14,122	28.6%	
		\$100,001–\$250,000	82	11.3%		\$13,020	26.4%	
		\$250,001–\$1 Million	55	7.6%		\$22,233	45.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	727	100.0%		\$49,375	100.0%	

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	92	6.4%	7.9%	\$9,651	6.9%	8.3%	9.0%
Middle	823	56.9%	59.9%	\$79,449	56.4%	58.7%	61.4%
Upper	532	36.8%	31.5%	\$51,714	36.7%	32.9%	29.6%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.2%	0.0%
<b>TOTAL</b>	<b>1,447</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$140,814</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	81	6.8%	7.8%	\$7,743	7.0%	9.2%	9.0%
Middle	681	56.9%	58.6%	\$58,997	53.1%	58.8%	61.6%
Upper	434	36.3%	32.9%	\$44,377	39.9%	31.9%	29.4%
Unknown	0	0.0%	0.8%	\$0	0.0%	0.2%	0.0%
<b>TOTAL</b>	<b>1,196</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$111,117</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2022						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	552	77.3%	71.2%	\$47,280	76.9%	76.5%	99.0%
	Over \$1 Million/ Unknown	162	22.7%	28.8%	\$14,227	23.1%	23.5%	1.0%
	<b>TOTAL</b>	<b>714</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$61,507</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	536	75.1%	77.3%	\$18,358	29.8%	31.1%	
	\$100,001–\$250,000	112	15.7%	14.8%	\$19,025	30.9%	32.0%	
	\$250,001–\$500,000	66	9.2%	8.0%	\$24,124	39.2%	36.8%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>714</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$61,507</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	411	74.5%		\$14,822	31.3%		
	\$100,001–\$250,000	94	17.0%		\$15,962	33.8%		
	\$250,001–\$1 Million	47	8.5%		\$16,496	34.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>552</b>	<b>100.0%</b>		<b>\$47,280</b>	<b>100.0%</b>		

Distribution of 2023 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2023						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	431	70.8%	66.2%	\$37,200	69.5%	71.7%	99.2%
	Over \$1 Million/ Unknown	178	29.2%	33.8%	\$16,345	30.5%	28.3%	0.8%
	<b>TOTAL</b>	<b>609</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$53,545</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	462	75.9%	78.7%	\$16,714	31.2%	32.9%	
	\$100,001–\$250,000	88	14.4%	14.0%	\$14,984	28.0%	31.7%	
	\$250,001–\$500,000	59	9.7%	7.3%	\$21,847	40.8%	35.4%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>609</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$53,545</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	327	75.9%		\$12,648	34.0%		
	\$100,001–\$250,000	69	16.0%		\$11,670	31.4%		
	\$250,001–\$1 Million	35	8.1%		\$12,882	34.6%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>431</b>	<b>100.0%</b>		<b>\$37,200</b>	<b>100.0%</b>		

Distribution of 2022 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	0.3%	0.7%	\$4	0.0%	0.4%	1.4%
Middle	540	75.6%	77.9%	\$49,265	80.1%	82.8%	71.8%
Upper	172	24.1%	21.2%	\$12,238	19.9%	16.8%	26.8%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>714</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$61,507</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	3	0.5%	0.8%	\$212	0.4%	0.5%	1.5%
Middle	467	76.7%	77.9%	\$41,661	77.8%	79.1%	72.2%
Upper	139	22.8%	21.1%	\$11,672	21.8%	20.3%	26.3%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>609</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$53,545</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Columbia Assessment Area**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	63	11.4%	7.6%	\$9,765	6.9%	4.2%	19.6%
Moderate	93	16.8%	17.3%	\$16,848	11.9%	13.1%	18.9%
Middle	85	15.3%	19.2%	\$18,533	13.0%	18.3%	21.2%
Upper	196	35.4%	29.7%	\$74,606	52.5%	41.2%	40.3%
Unknown	117	21.1%	26.2%	\$22,349	15.7%	23.1%	0.0%
TOTAL	554	100.0%	100.0%	\$142,101	100.0%	100.0%	100.0%
Refinance							
Low	23	13.1%	10.2%	\$2,206	6.3%	5.3%	19.6%
Moderate	32	18.3%	18.8%	\$4,074	11.6%	13.2%	18.9%
Middle	34	19.4%	21.1%	\$4,674	13.3%	18.2%	21.2%
Upper	70	40.0%	34.5%	\$21,754	62.1%	48.8%	40.3%
Unknown	16	9.1%	15.3%	\$2,342	6.7%	14.4%	0.0%
TOTAL	175	100.0%	100.0%	\$35,049	100.0%	100.0%	100.0%
Home Improvement							
Low	11	8.2%	9.4%	\$435	5.3%	5.3%	19.6%
Moderate	13	9.7%	12.3%	\$506	6.2%	9.4%	18.9%
Middle	31	23.1%	22.5%	\$1,421	17.4%	21.3%	21.2%
Upper	70	52.2%	48.7%	\$5,120	62.8%	58.0%	40.3%
Unknown	9	6.7%	7.2%	\$669	8.2%	5.9%	0.0%
TOTAL	134	100.0%	100.0%	\$8,151	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	7	9.1%	4.7%	\$242	4.9%	3.0%	19.6%
Moderate	19	24.7%	13.6%	\$1,224	24.7%	9.8%	18.9%
Middle	14	18.2%	20.6%	\$713	14.4%	14.5%	21.2%
Upper	30	39.0%	53.5%	\$2,438	49.2%	66.2%	40.3%
Unknown	7	9.1%	7.6%	\$344	6.9%	6.4%	0.0%
TOTAL	77	100.0%	100.0%	\$4,961	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	3	12.0%	9.1%	\$345	12.5%	4.7%	19.6%
Moderate	7	28.0%	18.2%	\$647	23.5%	10.3%	18.9%
Middle	7	28.0%	19.3%	\$474	17.2%	13.0%	21.2%
Upper	8	32.0%	50.0%	\$1,283	46.7%	68.4%	40.3%
Unknown	0	0.0%	3.4%	\$0	0.0%	3.5%	0.0%
TOTAL	25	100.0%	100.0%	\$2,749	100.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	19.6%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	18.9%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	21.2%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	40.3%
Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	1	4.8%	0.9%	\$107	0.7%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	1.8%	\$0	0.0%	0.3%	N/A
Upper	0	0.0%	4.5%	\$0	0.0%	0.7%	N/A
Unknown	20	95.2%	92.8%	\$15,904	99.3%	98.9%	N/A
<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,011</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	108	11.0%	8.0%	\$13,099	6.3%	3.5%	19.6%
Moderate	164	16.6%	16.8%	\$23,298	11.1%	10.3%	18.9%
Middle	171	17.3%	19.6%	\$25,814	12.4%	14.6%	21.2%
Upper	374	37.9%	32.9%	\$105,202	50.3%	35.2%	40.3%
Unknown	169	17.1%	22.8%	\$41,607	19.9%	36.4%	0.0%
<b>TOTAL</b>	<b>986</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$209,020</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	44	11.7%	8.6%	\$6,067	5.9%	4.5%	19.6%
Moderate	72	19.2%	19.2%	\$14,576	14.1%	14.9%	18.9%
Middle	65	17.3%	19.9%	\$15,720	15.2%	19.3%	21.2%
Upper	130	34.7%	26.6%	\$52,195	50.4%	38.5%	40.3%
Unknown	64	17.1%	25.7%	\$14,959	14.5%	22.8%	0.0%
TOTAL	375	100.0%	100.0%	\$103,517	100.0%	100.0%	100.0%
Refinance							
Low	11	11.8%	13.7%	\$855	6.3%	7.3%	19.6%
Moderate	15	16.1%	20.0%	\$1,493	10.9%	13.9%	18.9%
Middle	20	21.5%	23.2%	\$2,559	18.7%	21.9%	21.2%
Upper	36	38.7%	26.0%	\$7,549	55.3%	35.7%	40.3%
Unknown	11	11.8%	17.1%	\$1,201	8.8%	21.2%	0.0%
TOTAL	93	100.0%	100.0%	\$13,657	100.0%	100.0%	100.0%
Home Improvement							
Low	18	17.5%	9.8%	\$613	9.3%	3.6%	19.6%
Moderate	24	23.3%	18.0%	\$1,235	18.7%	12.4%	18.9%
Middle	28	27.2%	26.5%	\$1,722	26.0%	20.4%	21.2%
Upper	28	27.2%	39.6%	\$2,790	42.1%	58.0%	40.3%
Unknown	5	4.9%	6.1%	\$260	3.9%	5.6%	0.0%
TOTAL	103	100.0%	100.0%	\$6,620	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	9	11.1%	10.7%	\$469	8.4%	6.7%	19.6%
Moderate	17	21.0%	13.6%	\$736	13.1%	7.3%	18.9%
Middle	24	29.6%	26.7%	\$1,725	30.8%	21.1%	21.2%
Upper	28	34.6%	41.3%	\$2,573	45.9%	57.6%	40.3%
Unknown	3	3.7%	7.8%	\$104	1.9%	7.3%	0.0%
TOTAL	81	100.0%	100.0%	\$5,607	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	6	20.7%	9.1%	\$210	12.8%	6.2%	19.6%
Moderate	7	24.1%	20.8%	\$518	31.6%	17.0%	18.9%
Middle	9	31.0%	30.5%	\$343	21.0%	26.2%	21.2%
Upper	7	24.1%	37.7%	\$566	34.6%	48.4%	40.3%
Unknown	0	0.0%	1.9%	\$0	0.0%	2.2%	0.0%
TOTAL	29	100.0%	100.0%	\$1,637	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	19.6%
Moderate	0	0.0%	11.1%	\$0	0.0%	7.1%	18.9%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	21.2%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	40.3%
Unknown	0	0.0%	88.9%	\$0	0.0%	92.9%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	1	11.1%	2.4%	\$900	10.1%	1.3%	N/A
Moderate	0	0.0%	2.4%	\$0	0.0%	0.3%	N/A
Middle	0	0.0%	2.4%	\$0	0.0%	0.6%	N/A
Upper	0	0.0%	4.8%	\$0	0.0%	0.9%	N/A
Unknown	8	88.9%	88.1%	\$7,969	89.9%	96.9%	N/A
<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,869</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	89	12.9%	9.5%	\$9,114	6.5%	4.7%	19.6%
Moderate	135	19.6%	18.9%	\$18,558	13.3%	13.7%	18.9%
Middle	146	21.2%	21.3%	\$22,069	15.8%	18.5%	21.2%
Upper	229	33.2%	28.2%	\$65,673	46.9%	36.7%	40.3%
Unknown	91	13.2%	22.1%	\$24,493	17.5%	26.4%	0.0%
<b>TOTAL</b>	<b>690</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$139,907</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	7	1.3%	1.2%	\$1,193	0.8%	1.0%	0.9%
Moderate	145	26.2%	24.6%	\$24,602	17.3%	19.2%	20.8%
Middle	199	35.9%	43.2%	\$44,979	31.7%	39.2%	48.1%
Upper	201	36.3%	30.2%	\$70,858	49.9%	40.1%	29.8%
Unknown	2	0.4%	0.8%	\$469	0.3%	0.5%	0.4%
TOTAL	554	100.0%	100.0%	\$142,101	100.0%	100.0%	100.0%
Refinance							
Low	4	2.3%	1.2%	\$923	2.6%	0.9%	0.9%
Moderate	15	8.6%	19.4%	\$2,494	7.1%	16.0%	20.8%
Middle	76	43.4%	47.7%	\$11,267	32.1%	42.6%	48.1%
Upper	80	45.7%	31.6%	\$20,365	58.1%	40.5%	29.8%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.1%	0.4%
TOTAL	175	100.0%	100.0%	\$35,049	100.0%	100.0%	100.0%
Home Improvement							
Low	1	0.7%	0.8%	\$55	0.7%	0.9%	0.9%
Moderate	14	10.4%	13.6%	\$833	10.2%	12.4%	20.8%
Middle	51	38.1%	41.7%	\$2,266	27.8%	35.0%	48.1%
Upper	67	50.0%	43.6%	\$4,897	60.1%	51.3%	29.8%
Unknown	1	0.7%	0.3%	\$100	1.2%	0.4%	0.4%
TOTAL	134	100.0%	100.0%	\$8,151	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.7%	\$0	0.0%	0.6%	0.9%
Moderate	13	16.9%	21.9%	\$807	16.3%	19.0%	20.8%
Middle	26	33.8%	37.5%	\$1,354	27.3%	32.3%	48.1%
Upper	38	49.4%	39.5%	\$2,799	56.4%	48.0%	29.8%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.1%	0.4%
TOTAL	77	100.0%	100.0%	\$4,961	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.9%
Moderate	4	16.0%	15.9%	\$194	7.0%	9.8%	20.8%
Middle	12	48.0%	47.7%	\$672	24.4%	29.1%	48.1%
Upper	9	36.0%	36.4%	\$1,883	68.5%	61.1%	29.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
TOTAL	25	100.0%	100.0%	\$2,749	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.9%
Moderate	0	0.0%	10.0%	\$0	0.0%	10.8%	20.8%
Middle	0	0.0%	70.0%	\$0	0.0%	65.5%	48.1%
Upper	0	0.0%	20.0%	\$0	0.0%	23.6%	29.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	11.7%	\$0	0.0%	26.6%	21.6%
Moderate	11	52.4%	44.1%	\$4,952	30.9%	38.2%	37.8%
Middle	7	33.3%	24.3%	\$7,920	49.5%	12.7%	20.9%
Upper	3	14.3%	17.1%	\$3,138	19.6%	6.5%	11.1%
Unknown	0	0.0%	2.7%	\$0	0.0%	16.0%	8.7%
<b>TOTAL</b>	<b>21</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$16,011</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	12	1.2%	1.3%	\$2,171	1.0%	6.2%	0.9%
Moderate	202	20.5%	22.8%	\$33,882	16.2%	22.3%	20.8%
Middle	371	37.6%	43.7%	\$68,459	32.8%	34.2%	48.1%
Upper	398	40.4%	31.6%	\$103,940	49.7%	33.8%	29.8%
Unknown	3	0.3%	0.6%	\$569	0.3%	3.6%	0.4%
<b>TOTAL</b>	<b>986</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$209,020</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	5	1.3%	1.0%	\$1,747	1.7%	0.7%	0.9%
Moderate	88	23.5%	24.8%	\$18,707	18.1%	19.1%	20.8%
Middle	162	43.2%	46.5%	\$38,138	36.8%	42.4%	48.1%
Upper	120	32.0%	27.4%	\$44,925	43.4%	37.5%	29.8%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.3%	0.4%
TOTAL	375	100.0%	100.0%	\$103,517	100.0%	100.0%	100.0%
Refinance							
Low	1	1.1%	0.7%	\$35	0.3%	0.9%	0.9%
Moderate	14	15.1%	20.7%	\$982	7.2%	16.3%	20.8%
Middle	38	40.9%	50.4%	\$5,977	43.8%	47.4%	48.1%
Upper	40	43.0%	28.1%	\$6,663	48.8%	35.4%	29.8%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.1%	0.4%
TOTAL	93	100.0%	100.0%	\$13,657	100.0%	100.0%	100.0%
Home Improvement							
Low	2	1.9%	1.5%	\$56	0.8%	1.1%	0.9%
Moderate	15	14.6%	17.1%	\$1,168	17.6%	17.4%	20.8%
Middle	52	50.5%	48.8%	\$2,699	40.8%	42.1%	48.1%
Upper	34	33.0%	32.6%	\$2,697	40.7%	39.4%	29.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
TOTAL	103	100.0%	100.0%	\$6,620	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	1.2%	0.5%	\$17	0.3%	0.1%	0.9%
Moderate	8	9.9%	12.1%	\$296	5.3%	8.9%	20.8%
Middle	32	39.5%	42.2%	\$2,289	40.8%	46.8%	48.1%
Upper	40	49.4%	45.1%	\$3,005	53.6%	44.3%	29.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
TOTAL	81	100.0%	100.0%	\$5,607	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.6%	\$0	0.0%	1.8%	0.9%
Moderate	4	13.8%	17.5%	\$406	24.8%	21.0%	20.8%
Middle	19	65.5%	47.4%	\$813	49.7%	42.6%	48.1%
Upper	6	20.7%	34.4%	\$418	25.5%	34.6%	29.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
TOTAL	29	100.0%	100.0%	\$1,637	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.9%
Moderate	0	0.0%	22.2%	\$0	0.0%	29.6%	20.8%
Middle	0	0.0%	66.7%	\$0	0.0%	58.2%	48.1%
Upper	0	0.0%	11.1%	\$0	0.0%	12.2%	29.8%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	3	33.3%	9.5%	\$1,119	12.6%	2.2%	21.6%
Moderate	3	33.3%	35.7%	\$1,970	22.2%	37.9%	37.8%
Middle	2	22.2%	38.1%	\$2,280	25.7%	33.7%	20.9%
Upper	1	11.1%	14.3%	\$3,500	39.5%	25.2%	11.1%
Unknown	0	0.0%	2.4%	\$0	0.0%	0.9%	8.7%
<b>TOTAL</b>	<b>9</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,869</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	12	1.7%	1.0%	\$2,974	2.1%	0.9%	0.9%
Moderate	132	19.1%	22.9%	\$23,529	16.8%	19.8%	20.8%
Middle	305	44.2%	47.1%	\$52,196	37.3%	42.5%	48.1%
Upper	241	34.9%	28.7%	\$61,208	43.7%	36.6%	29.8%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.3%	0.4%
<b>TOTAL</b>	<b>690</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$139,907</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2022							
		Count			Dollars			Total Businesses	
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	\$ (000s)	\$ %	\$ %		%
Business Revenue	\$1 Million or Less	406	63.3%	50.8%	\$37,042	48.7%	43.7%	91.9%	
	Over \$1 Million/ Unknown	235	36.7%	49.2%	\$39,066	51.3%	56.3%	8.1%	
	TOTAL	641	100.0%	100.0%	\$76,108	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	473	73.8%	88.8%	\$14,965	19.7%	26.8%		
	\$100,001–\$250,000	74	11.5%	5.3%	\$13,148	17.3%	16.9%		
	\$250,001–\$1 Million	94	14.7%	5.9%	\$47,995	63.1%	56.4%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	641	100.0%	100.0%	\$76,108	100.0%	100.0%		
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	321	79.1%		\$8,851	23.9%		
		\$100,001–\$250,000	42	10.3%		\$7,346	19.8%		
		\$250,001–\$1 Million	43	10.6%		\$20,845	56.3%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	406	100.0%		\$37,042	100.0%		

Distribution of 2023 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			2023						
			Count			Dollars			Total Businesses
			Bank		Aggregate	Bank		Aggregate	
			#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less		383	64.5%	53.4%	\$25,438	44.6%	40.2%	91.9%
	Over \$1 Million/ Unknown		211	35.5%	46.6%	\$31,557	55.4%	59.8%	8.1%
	TOTAL		594	100.0%	100.0%	\$56,995	100.0%	100.0%	100.0%
Loan Size		\$100,000 or Less	459	77.3%	90.9%	\$13,330	23.4%	34.2%	
		\$100,001–\$250,000	73	12.3%	4.9%	\$12,519	22.0%	18.6%	
		\$250,001–\$1 Million	62	10.4%	4.2%	\$31,146	54.6%	47.2%	
		Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
		TOTAL	594	100.0%	100.0%	\$56,995	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	317	82.8%		\$7,608	29.9%		
		\$100,001–\$250,000	43	11.2%		\$7,641	30.0%		
		\$250,001–\$1 Million	23	6.0%		\$10,189	40.1%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	383	100.0%		\$25,438	100.0%		



Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	60	9.4%	7.3%	\$6,166	8.1%	11.9%	10.5%
Moderate	144	22.5%	25.1%	\$20,799	27.3%	26.3%	26.3%
Middle	263	41.0%	38.1%	\$32,562	42.8%	35.8%	39.2%
Upper	157	24.5%	26.7%	\$15,319	20.1%	23.7%	21.4%
Unknown	17	2.7%	2.8%	\$1,262	1.7%	2.2%	2.6%
<b>TOTAL</b>	<b>641</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$76,108</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	53	8.9%	5.9%	\$5,716	10.0%	8.8%	10.6%
Moderate	146	24.6%	25.9%	\$13,957	24.5%	28.3%	26.0%
Middle	237	39.9%	36.2%	\$22,294	39.1%	33.6%	39.3%
Upper	147	24.7%	29.2%	\$14,426	25.3%	27.5%	21.7%
Unknown	11	1.9%	2.8%	\$602	1.1%	1.8%	2.3%
<b>TOTAL</b>	<b>594</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$56,995</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2022						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	69	81.2%	57.7%	\$8,288	78.6%	76.8%	98.9%
	Over \$1 Million/ Unknown	16	18.8%	42.3%	\$2,262	21.4%	23.2%	1.1%
	<b>TOTAL</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	53	62.4%	73.9%	\$2,223	21.1%	22.5%	
	\$100,001–\$250,000	17	20.0%	14.8%	\$3,069	29.1%	31.0%	
	\$250,001–\$500,000	15	17.6%	11.3%	\$5,258	49.8%	46.4%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,550</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	43	62.3%		\$1,833	22.1%		
	\$100,001–\$250,000	14	20.3%		\$2,395	28.9%		
	\$250,001–\$1 Million	12	17.4%		\$4,060	49.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>69</b>	<b>100.0%</b>		<b>\$8,288</b>	<b>100.0%</b>		

Distribution of 2023 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2023						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	52	76.5%	60.6%	\$6,570	77.4%	78.6%	99.2%
	Over \$1 Million/ Unknown	16	23.5%	39.4%	\$1,914	22.6%	21.4%	0.8%
	<b>TOTAL</b>	<b>68</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,484</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	40	58.8%	77.3%	\$1,520	17.9%	23.3%	
	\$100,001–\$250,000	17	25.0%	14.7%	\$3,163	37.3%	37.3%	
	\$250,001–\$500,000	11	16.2%	8.0%	\$3,801	44.8%	39.4%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>68</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,484</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	Revenue \$1 Million or Less	32	61.5%		\$1,252	19.1%		
	\$100,001–\$250,000	10	19.2%		\$1,867	28.4%		
	\$250,001–\$1 Million	10	19.2%		\$3,451	52.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>52</b>	<b>100.0%</b>		<b>\$6,570</b>	<b>100.0%</b>		

Distribution of 2022 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	1	1.2%	0.3%	\$20	0.2%	0.1%	0.8%
Moderate	7	8.2%	11.3%	\$793	7.5%	8.8%	14.9%
Middle	67	78.8%	76.3%	\$8,409	79.7%	75.9%	67.0%
Upper	10	11.8%	11.0%	\$1,328	12.6%	14.9%	16.5%
Unknown	0	0.0%	1.0%	\$0	0.0%	0.4%	0.8%
<b>TOTAL</b>	<b>85</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,550</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	1	1.5%	0.8%	\$20	0.2%	0.2%	0.8%
Moderate	8	11.8%	12.4%	\$1,077	12.7%	12.1%	14.7%
Middle	52	76.5%	74.1%	\$6,171	72.7%	73.4%	67.2%
Upper	6	8.8%	12.0%	\$866	10.2%	12.3%	16.3%
Unknown	1	1.5%	0.8%	\$350	4.1%	2.0%	1.1%
<b>TOTAL</b>	<b>68</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$8,484</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Springfield Assessment Area**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	18	4.7%	4.6%	\$1,853	2.0%	2.2%	19.3%
Moderate	67	17.5%	16.9%	\$10,392	11.5%	11.9%	18.8%
Middle	74	19.3%	20.2%	\$14,805	16.3%	18.4%	21.5%
Upper	159	41.5%	33.1%	\$50,819	56.0%	43.1%	40.4%
Unknown	65	17.0%	25.3%	\$12,846	14.2%	24.3%	0.0%
TOTAL	383	100.0%	100.0%	\$90,715	100.0%	100.0%	100.0%
Refinance							
Low	10	6.1%	7.8%	\$923	2.8%	4.1%	19.3%
Moderate	25	15.2%	17.8%	\$2,876	8.7%	12.3%	18.8%
Middle	33	20.0%	21.0%	\$4,761	14.4%	18.1%	21.5%
Upper	68	41.2%	34.5%	\$18,511	56.1%	43.3%	40.4%
Unknown	29	17.6%	18.9%	\$5,929	18.0%	22.2%	0.0%
TOTAL	165	100.0%	100.0%	\$33,001	100.0%	100.0%	100.0%
Home Improvement							
Low	6	4.2%	7.3%	\$267	2.8%	4.4%	19.3%
Moderate	19	13.3%	13.7%	\$759	7.8%	10.0%	18.8%
Middle	31	21.7%	19.7%	\$1,765	18.2%	16.1%	21.5%
Upper	82	57.3%	50.6%	\$6,145	63.5%	58.0%	40.4%
Unknown	5	3.5%	8.7%	\$745	7.7%	11.5%	0.0%
TOTAL	143	100.0%	100.0%	\$9,681	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	2	4.3%	3.4%	\$100	2.6%	1.3%	19.3%
Moderate	4	8.7%	12.2%	\$345	8.9%	6.0%	18.8%
Middle	8	17.4%	16.9%	\$510	13.2%	10.7%	21.5%
Upper	31	67.4%	58.1%	\$2,893	74.8%	74.4%	40.4%
Unknown	1	2.2%	9.5%	\$18	0.5%	7.6%	0.0%
TOTAL	46	100.0%	100.0%	\$3,866	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	2	15.4%	8.3%	\$209	10.2%	6.7%	19.3%
Moderate	3	23.1%	20.3%	\$411	20.1%	14.3%	18.8%
Middle	3	23.1%	18.8%	\$501	24.5%	14.2%	21.5%
Upper	5	38.5%	40.3%	\$925	45.2%	45.7%	40.4%
Unknown	0	0.0%	12.3%	\$0	0.0%	19.2%	0.0%
TOTAL	13	100.0%	100.0%	\$2,045	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	19.3%
Moderate	0	0.0%	5.7%	\$0	0.0%	4.9%	18.8%
Middle	0	0.0%	1.4%	\$0	0.0%	2.1%	21.5%
Upper	0	0.0%	1.4%	\$0	0.0%	2.7%	40.4%
Unknown	0	0.0%	91.4%	\$0	0.0%	90.3%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	2.0%	\$0	0.0%	0.3%	N/A
Upper	0	0.0%	4.1%	\$0	0.0%	1.1%	N/A
Unknown	15	100.0%	93.9%	\$36,056	100.0%	98.6%	N/A
<b>TOTAL</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$36,056</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	38	5.0%	5.6%	\$3,353	1.9%	2.5%	19.3%
Moderate	118	15.4%	16.7%	\$14,782	8.4%	10.5%	18.8%
Middle	149	19.5%	20.0%	\$22,342	12.7%	16.0%	21.5%
Upper	345	45.1%	34.9%	\$79,294	45.2%	38.9%	40.4%
Unknown	115	15.0%	22.8%	\$55,594	31.7%	32.1%	0.0%
<b>TOTAL</b>	<b>765</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$175,365</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	27	9.8%	8.1%	\$3,449	5.0%	4.3%	19.3%
Moderate	61	22.2%	19.2%	\$10,444	15.0%	14.2%	18.8%
Middle	64	23.3%	20.4%	\$14,875	21.4%	19.4%	21.5%
Upper	86	31.3%	26.1%	\$32,080	46.1%	36.5%	40.4%
Unknown	37	13.5%	26.2%	\$8,732	12.5%	25.5%	0.0%
TOTAL	275	100.0%	100.0%	\$69,580	100.0%	100.0%	100.0%
Refinance							
Low	8	11.3%	11.5%	\$706	6.3%	5.9%	19.3%
Moderate	9	12.7%	20.2%	\$1,511	13.5%	15.6%	18.8%
Middle	11	15.5%	21.7%	\$1,719	15.3%	19.4%	21.5%
Upper	26	36.6%	26.9%	\$4,843	43.2%	35.7%	40.4%
Unknown	17	23.9%	19.7%	\$2,430	21.7%	23.4%	0.0%
TOTAL	71	100.0%	100.0%	\$11,209	100.0%	100.0%	100.0%
Home Improvement							
Low	12	11.0%	8.4%	\$474	5.4%	4.3%	19.3%
Moderate	28	25.7%	19.3%	\$1,160	13.2%	12.7%	18.8%
Middle	25	22.9%	24.9%	\$1,833	20.9%	21.1%	21.5%
Upper	37	33.9%	38.3%	\$4,861	55.5%	52.1%	40.4%
Unknown	7	6.4%	9.0%	\$438	5.0%	9.9%	0.0%
TOTAL	109	100.0%	100.0%	\$8,766	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	5	10.4%	7.4%	\$147	4.8%	3.7%	19.3%
Moderate	14	29.2%	17.8%	\$675	22.1%	11.1%	18.8%
Middle	7	14.6%	17.8%	\$364	11.9%	13.5%	21.5%
Upper	22	45.8%	47.4%	\$1,862	61.1%	63.2%	40.4%
Unknown	0	0.0%	9.6%	\$0	0.0%	8.6%	0.0%
TOTAL	48	100.0%	100.0%	\$3,048	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	8	27.6%	14.1%	\$582	17.5%	10.6%	19.3%
Moderate	10	34.5%	23.5%	\$1,027	30.9%	20.1%	18.8%
Middle	3	10.3%	23.8%	\$277	8.3%	19.4%	21.5%
Upper	8	27.6%	32.1%	\$1,435	43.2%	40.5%	40.4%
Unknown	0	0.0%	6.5%	\$0	0.0%	9.3%	0.0%
TOTAL	29	100.0%	100.0%	\$3,321	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	6.1%	\$0	0.0%	2.0%	19.3%
Moderate	0	0.0%	2.0%	\$0	0.0%	1.3%	18.8%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	21.5%
Upper	0	0.0%	6.1%	\$0	0.0%	6.6%	40.4%
Unknown	0	0.0%	85.7%	\$0	0.0%	90.2%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	2.2%	\$0	0.0%	0.1%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	4.3%	\$0	0.0%	1.0%	N/A
Unknown	4	100.0%	93.5%	\$2,036	100.0%	98.9%	N/A
<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,036</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	60	11.2%	8.9%	\$5,358	5.5%	4.4%	19.3%
Moderate	122	22.8%	19.3%	\$14,817	15.1%	13.5%	18.8%
Middle	110	20.5%	20.7%	\$19,068	19.5%	18.1%	21.5%
Upper	179	33.4%	27.8%	\$45,081	46.0%	34.8%	40.4%
Unknown	65	12.1%	23.4%	\$13,636	13.9%	29.3%	0.0%
<b>TOTAL</b>	<b>536</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$97,960</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	7	1.8%	3.1%	\$872	1.0%	1.9%	2.2%
Moderate	62	16.2%	18.6%	\$8,840	9.7%	13.0%	14.7%
Middle	187	48.8%	50.1%	\$42,330	46.7%	50.2%	51.7%
Upper	126	32.9%	28.2%	\$38,324	42.2%	34.8%	31.4%
Unknown	1	0.3%	0.0%	\$350	0.4%	0.1%	0.0%
TOTAL	383	100.0%	100.0%	\$90,715	100.0%	100.0%	100.0%
Refinance							
Low	1	0.6%	1.9%	\$82	0.2%	1.4%	2.2%
Moderate	19	11.5%	14.7%	\$2,317	7.0%	10.4%	14.7%
Middle	85	51.5%	51.6%	\$16,340	49.5%	48.9%	51.7%
Upper	59	35.8%	31.7%	\$13,986	42.4%	39.2%	31.4%
Unknown	1	0.6%	0.1%	\$275	0.8%	0.1%	0.0%
TOTAL	165	100.0%	100.0%	\$33,001	100.0%	100.0%	100.0%
Home Improvement							
Low	1	0.7%	1.6%	\$25	0.3%	1.3%	2.2%
Moderate	16	11.2%	12.7%	\$1,112	11.5%	9.5%	14.7%
Middle	70	49.0%	48.1%	\$4,606	47.6%	46.4%	51.7%
Upper	56	39.2%	37.4%	\$3,937	40.7%	42.4%	31.4%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.3%	0.0%
TOTAL	143	100.0%	100.0%	\$9,681	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	1.7%	\$0	0.0%	1.0%	2.2%
Moderate	1	2.2%	9.8%	\$30	0.8%	6.9%	14.7%
Middle	23	50.0%	48.3%	\$1,944	50.3%	44.6%	51.7%
Upper	22	47.8%	40.2%	\$1,892	48.9%	47.5%	31.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	46	100.0%	100.0%	\$3,866	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	3.1%	\$0	0.0%	2.0%	2.2%
Moderate	0	0.0%	11.4%	\$0	0.0%	8.0%	14.7%
Middle	12	92.3%	52.9%	\$1,975	96.6%	47.9%	51.7%
Upper	1	7.7%	32.6%	\$70	3.4%	42.0%	31.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	13	100.0%	100.0%	\$2,045	100.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	2.9%	\$0	0.0%	2.2%	2.2%
Moderate	0	0.0%	17.1%	\$0	0.0%	11.3%	14.7%
Middle	0	0.0%	58.6%	\$0	0.0%	61.4%	51.7%
Upper	0	0.0%	21.4%	\$0	0.0%	25.2%	31.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	3	20.0%	15.7%	\$4,520	12.5%	6.7%	14.7%
Moderate	4	26.7%	29.9%	\$12,536	34.8%	28.0%	27.3%
Middle	5	33.3%	40.6%	\$3,855	10.7%	44.1%	44.9%
Upper	3	20.0%	11.7%	\$15,145	42.0%	17.2%	9.2%
Unknown	0	0.0%	2.0%	\$0	0.0%	4.0%	4.0%
<b>TOTAL</b>	<b>15</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$36,056</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	12	1.6%	2.8%	\$5,499	3.1%	2.3%	2.2%
Moderate	102	13.3%	16.8%	\$24,835	14.2%	13.9%	14.7%
Middle	382	49.9%	50.4%	\$71,052	40.5%	49.0%	51.7%
Upper	267	34.9%	30.0%	\$73,354	41.8%	34.2%	31.4%
Unknown	2	0.3%	0.1%	\$625	0.4%	0.5%	0.0%
<b>TOTAL</b>	<b>765</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$175,365</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	2	0.7%	3.0%	\$260	0.4%	1.9%	2.2%
Moderate	48	17.5%	19.9%	\$7,169	10.3%	14.3%	14.7%
Middle	138	50.2%	49.1%	\$35,090	50.4%	48.4%	51.7%
Upper	87	31.6%	27.9%	\$27,061	38.9%	35.4%	31.4%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.1%	0.0%
TOTAL	275	100.0%	100.0%	\$69,580	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	2.4%	\$0	0.0%	1.8%	2.2%
Moderate	8	11.3%	15.7%	\$1,239	11.1%	11.2%	14.7%
Middle	41	57.7%	51.0%	\$6,371	56.8%	49.1%	51.7%
Upper	22	31.0%	30.9%	\$3,599	32.1%	37.8%	31.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	71	100.0%	100.0%	\$11,209	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	1.4%	\$0	0.0%	0.8%	2.2%
Moderate	12	11.0%	12.8%	\$559	6.4%	9.6%	14.7%
Middle	57	52.3%	52.5%	\$4,702	53.6%	51.0%	51.7%
Upper	40	36.7%	33.2%	\$3,505	40.0%	37.7%	31.4%
Unknown	0	0.0%	0.1%	\$0	0.0%	1.0%	0.0%
TOTAL	109	100.0%	100.0%	\$8,766	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	2.1%	1.0%	\$30	1.0%	0.3%	2.2%
Moderate	4	8.3%	8.8%	\$175	5.7%	6.6%	14.7%
Middle	22	45.8%	53.2%	\$1,082	35.5%	48.8%	51.7%
Upper	21	43.8%	37.0%	\$1,761	57.8%	44.3%	31.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	48	100.0%	100.0%	\$3,048	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	1.6%	\$0	0.0%	1.3%	2.2%
Moderate	3	10.3%	15.1%	\$115	3.5%	12.0%	14.7%
Middle	15	51.7%	50.7%	\$1,930	58.1%	47.7%	51.7%
Upper	11	37.9%	32.6%	\$1,276	38.4%	38.9%	31.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	29	100.0%	100.0%	\$3,321	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	2.2%
Moderate	0	0.0%	18.4%	\$0	0.0%	7.6%	14.7%
Middle	0	0.0%	42.9%	\$0	0.0%	44.0%	51.7%
Upper	0	0.0%	38.8%	\$0	0.0%	48.4%	31.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	1	25.0%	21.5%	\$915	44.9%	20.8%	14.7%
Moderate	2	50.0%	31.2%	\$639	31.4%	21.7%	27.3%
Middle	1	25.0%	39.8%	\$482	23.7%	24.9%	44.9%
Upper	0	0.0%	5.4%	\$0	0.0%	29.8%	9.2%
Unknown	0	0.0%	2.2%	\$0	0.0%	2.7%	4.0%
<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,036</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	4	0.7%	2.8%	\$1,205	1.2%	3.0%	2.2%
Moderate	77	14.4%	18.1%	\$9,896	10.1%	14.0%	14.7%
Middle	274	51.1%	49.8%	\$49,657	50.7%	47.0%	51.7%
Upper	181	33.8%	29.2%	\$37,202	38.0%	35.7%	31.4%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.3%	0.0%
<b>TOTAL</b>	<b>536</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$97,960</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	534	69.8%	55.6%	\$43,619	50.7%	41.0%	91.5%
	Over \$1 Million/ Unknown	231	30.2%	44.4%	\$42,355	49.3%	59.0%	8.5%
	<b>TOTAL</b>	<b>765</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$85,974</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	575	75.2%	89.7%	\$15,951	18.6%	29.5%	
	\$100,001–\$250,000	83	10.8%	5.4%	\$14,018	16.3%	18.3%	
	\$250,001–\$1 Million	107	14.0%	4.9%	\$56,005	65.1%	52.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>765</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$85,974</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	\$100,000 or Less	439	82.2%		\$10,902	25.0%		
	\$100,001–\$250,000	43	8.1%		\$7,045	16.2%		
	\$250,001–\$1 Million	52	9.7%		\$25,672	58.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>534</b>	<b>100.0%</b>		<b>\$43,619</b>	<b>100.0%</b>		

Distribution of 2023 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	381	59.3%	56.5%	\$30,357	42.6%	38.5%	91.6%
	Over \$1 Million/ Unknown	261	40.7%	43.5%	\$40,877	57.4%	61.5%	8.4%
	<b>TOTAL</b>	<b>642</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$71,234</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	495	77.1%	90.8%	\$15,115	21.2%	32.1%	
	\$100,001–\$250,000	70	10.9%	4.9%	\$12,724	17.9%	18.2%	
	\$250,001–\$1 Million	77	12.0%	4.3%	\$43,395	60.9%	49.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>642</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$71,234</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	\$100,000 or Less	319	83.7%		\$7,829	25.8%		
	\$100,001–\$250,000	31	8.1%		\$5,138	16.9%		
	\$250,001–\$1 Million	31	8.1%		\$17,390	57.3%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>381</b>	<b>100.0%</b>		<b>\$30,357</b>	<b>100.0%</b>		

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	15	2.0%	2.0%	\$3,147	3.7%	2.5%	2.7%
Moderate	160	20.9%	20.2%	\$25,941	30.2%	26.7%	22.0%
Middle	381	49.8%	49.5%	\$35,965	41.8%	46.1%	49.6%
Upper	197	25.8%	26.3%	\$18,534	21.6%	22.9%	23.6%
Unknown	12	1.6%	2.0%	\$2,387	2.8%	1.8%	2.0%
<b>TOTAL</b>	<b>765</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$85,974</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	16	2.5%	2.3%	\$4,361	6.1%	3.0%	2.7%
Moderate	129	20.1%	19.1%	\$23,519	33.0%	27.3%	21.9%
Middle	326	50.8%	49.4%	\$25,677	36.0%	45.4%	49.6%
Upper	159	24.8%	27.4%	\$15,956	22.4%	22.5%	23.8%
Unknown	12	1.9%	1.8%	\$1,721	2.4%	1.7%	1.9%
<b>TOTAL</b>	<b>642</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$71,234</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2022						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	158	86.3%	84.1%	\$17,857	87.5%	87.7%	98.9%
	Over \$1 Million/ Unknown	25	13.7%	15.9%	\$2,556	12.5%	12.3%	1.1%
	TOTAL	183	100.0%	100.0%	\$20,413	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	115	62.8%	79.4%	\$4,492	22.0%	34.7%	
	\$100,001–\$250,000	48	26.2%	14.7%	\$8,203	40.2%	35.3%	
	\$250,001–\$500,000	20	10.9%	5.9%	\$7,718	37.8%	30.0%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	183	100.0%	100.0%	\$20,413	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	99	62.7%		\$3,960	22.2%	
		\$100,001–\$250,000	42	26.6%		\$7,289	40.8%	
		\$250,001–\$1 Million	17	10.8%		\$6,608	37.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	158	100.0%		\$17,857	100.0%	

Distribution of 2023 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2023						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	137	81.1%	82.5%	\$13,974	89.1%	85.6%	99.1%
	Over \$1 Million/ Unknown	32	18.9%	17.5%	\$1,713	10.9%	14.4%	0.9%
	TOTAL	169	100.0%	100.0%	\$15,687	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	118	69.8%	82.4%	\$4,698	29.9%	40.5%	
	\$100,001–\$250,000	36	21.3%	12.9%	\$5,700	36.3%	32.9%	
	\$250,001–\$500,000	15	8.9%	4.7%	\$5,289	33.7%	26.6%	
	Over \$500,000	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	169	100.0%	100.0%	\$15,687	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	92	67.2%		\$3,874	27.7%	
		\$100,001–\$250,000	30	21.9%		\$4,811	34.4%	
		\$250,001–\$1 Million	15	10.9%		\$5,289	37.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	137	100.0%		\$13,974	100.0%	

Distribution of 2022 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	4	2.2%	3.4%	\$953	4.7%	4.3%	4.2%
Moderate	16	8.7%	15.0%	\$883	4.3%	13.1%	12.7%
Middle	140	76.5%	73.2%	\$16,126	79.0%	71.8%	63.5%
Upper	23	12.6%	8.3%	\$2,451	12.0%	10.5%	19.2%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.3%	0.4%
<b>TOTAL</b>	<b>183</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$20,413</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans		Aggregate of Peer Data	Bank Small Farm Loans		Aggregate of Peer Data	% of Farms
	#	# %	# %	\$ (000s)	\$ %	\$ %	
Low	3	1.8%	3.6%	\$340	2.2%	3.7%	4.3%
Moderate	18	10.7%	14.3%	\$526	3.4%	14.0%	12.9%
Middle	123	72.8%	73.2%	\$12,664	80.7%	72.4%	63.0%
Upper	25	14.8%	8.7%	\$2,157	13.8%	9.9%	19.3%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.0%	0.6%
<b>TOTAL</b>	<b>169</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$15,687</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## OKLAHOMA

### Tulsa Assessment Area

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	5	8.6%	6.0%	\$679	5.4%	3.1%	21.4%
Moderate	9	15.5%	17.2%	\$1,611	12.8%	12.3%	17.6%
Middle	11	19.0%	18.7%	\$2,559	20.4%	17.1%	19.4%
Upper	15	25.9%	31.5%	\$4,770	38.0%	41.9%	41.6%
Unknown	18	31.0%	26.6%	\$2,924	23.3%	25.5%	0.0%
TOTAL	58	100.0%	100.0%	\$12,544	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	9.1%	\$0	0.0%	4.6%	21.4%
Moderate	1	6.7%	20.1%	\$77	3.3%	14.0%	17.6%
Middle	5	33.3%	20.0%	\$714	31.0%	17.1%	19.4%
Upper	6	40.0%	33.7%	\$1,206	52.4%	45.7%	41.6%
Unknown	3	20.0%	17.1%	\$305	13.3%	18.6%	0.0%
TOTAL	15	100.0%	100.0%	\$2,302	100.0%	100.0%	100.0%
Home Improvement							
Low	3	27.3%	7.0%	\$326	35.2%	5.1%	21.4%
Moderate	1	9.1%	16.4%	\$100	10.8%	12.9%	17.6%
Middle	2	18.2%	20.5%	\$175	18.9%	17.4%	19.4%
Upper	4	36.4%	49.7%	\$251	27.1%	55.6%	41.6%
Unknown	1	9.1%	6.4%	\$75	8.1%	9.0%	0.0%
TOTAL	11	100.0%	100.0%	\$927	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	5.0%	\$0	0.0%	3.5%	21.4%
Moderate	0	0.0%	13.1%	\$0	0.0%	9.1%	17.6%
Middle	1	33.3%	20.2%	\$28	21.9%	15.5%	19.4%
Upper	2	66.7%	52.3%	\$100	78.1%	61.0%	41.6%
Unknown	0	0.0%	9.4%	\$0	0.0%	11.0%	0.0%
TOTAL	3	100.0%	100.0%	\$128	100.0%	100.0%	100.0%



Other Purpose Closed/Exempt							
Low	1	25.0%	10.6%	\$105	30.7%	5.6%	21.4%
Moderate	1	25.0%	19.0%	\$155	45.4%	12.7%	17.6%
Middle	1	25.0%	19.5%	\$42	12.2%	13.3%	19.4%
Upper	1	25.0%	43.1%	\$40	11.7%	61.7%	41.6%
Unknown	0	0.0%	7.8%	\$0	0.0%	6.7%	0.0%
<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$342</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Purpose Not Applicable							
Low	0	0.0%	2.0%	\$0	0.0%	1.1%	21.4%
Moderate	0	0.0%	0.5%	\$0	0.0%	0.9%	17.6%
Middle	0	0.0%	0.5%	\$0	0.0%	0.4%	19.4%
Upper	0	0.0%	0.5%	\$0	0.0%	0.4%	41.6%
Unknown	0	0.0%	96.5%	\$0	0.0%	97.1%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	2.7%	\$0	0.0%	0.2%	N/A
Unknown	2	100.0%	97.3%	\$23,270	100.0%	99.8%	N/A
<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,270</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	9	9.7%	6.8%	\$1,110	2.8%	3.1%	21.4%
Moderate	12	12.9%	17.6%	\$1,943	4.9%	11.1%	17.6%
Middle	20	21.5%	18.9%	\$3,518	8.9%	15.0%	19.4%
Upper	28	30.1%	33.5%	\$6,368	16.1%	38.2%	41.6%
Unknown	24	25.8%	23.2%	\$26,574	67.3%	32.6%	0.0%
<b>TOTAL</b>	<b>93</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$39,513</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	9	7.4%	5.5%	\$967	3.3%	2.7%	21.4%
Moderate	26	21.3%	16.2%	\$4,297	14.8%	11.0%	17.6%
Middle	33	27.0%	19.8%	\$7,585	26.2%	17.7%	19.4%
Upper	41	33.6%	32.2%	\$14,314	49.4%	43.3%	41.6%
Unknown	13	10.7%	26.2%	\$1,829	6.3%	25.3%	0.0%
TOTAL	122	100.0%	100.0%	\$28,992	100.0%	100.0%	100.0%
Refinance							
Low	1	4.5%	7.8%	\$66	2.3%	3.9%	21.4%
Moderate	3	13.6%	17.3%	\$260	9.0%	11.9%	17.6%
Middle	2	9.1%	19.0%	\$598	20.7%	16.2%	19.4%
Upper	6	27.3%	33.7%	\$804	27.8%	42.7%	41.6%
Unknown	10	45.5%	22.2%	\$1,165	40.3%	25.4%	0.0%
TOTAL	22	100.0%	100.0%	\$2,893	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	5.0%	\$0	0.0%	2.8%	21.4%
Moderate	1	8.3%	15.6%	\$49	5.3%	11.2%	17.6%
Middle	1	8.3%	23.0%	\$20	2.2%	18.2%	19.4%
Upper	6	50.0%	48.8%	\$419	45.5%	56.7%	41.6%
Unknown	4	33.3%	7.6%	\$433	47.0%	11.1%	0.0%
TOTAL	12	100.0%	100.0%	\$921	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	6.7%	\$0	0.0%	5.5%	21.4%
Moderate	3	75.0%	15.4%	\$165	62.3%	10.9%	17.6%
Middle	0	0.0%	21.3%	\$0	0.0%	15.6%	19.4%
Upper	0	0.0%	49.1%	\$0	0.0%	59.4%	41.6%
Unknown	1	25.0%	7.5%	\$100	37.7%	8.6%	0.0%
TOTAL	4	100.0%	100.0%	\$265	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	10.0%	\$0	0.0%	6.2%	21.4%
Moderate	2	100.0%	18.4%	\$273	100.0%	12.5%	17.6%
Middle	0	0.0%	19.9%	\$0	0.0%	14.2%	19.4%
Upper	0	0.0%	45.8%	\$0	0.0%	61.2%	41.6%
Unknown	0	0.0%	5.9%	\$0	0.0%	5.9%	0.0%
TOTAL	2	100.0%	100.0%	\$273	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	21.4%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	17.6%
Middle	0	0.0%	1.2%	\$0	0.0%	2.3%	19.4%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	41.6%
Unknown	0	0.0%	98.8%	\$0	0.0%	97.7%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	9.5%	\$0	0.0%	1.2%	N/A
Unknown	1	100.0%	90.5%	\$1,950	100.0%	98.8%	N/A
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,950</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	10	6.1%	5.9%	\$1,033	2.9%	2.7%	21.4%
Moderate	35	21.5%	16.2%	\$5,044	14.3%	10.1%	17.6%
Middle	36	22.1%	19.9%	\$8,203	23.2%	15.8%	19.4%
Upper	53	32.5%	34.6%	\$15,537	44.0%	40.0%	41.6%
Unknown	29	17.8%	23.5%	\$5,477	15.5%	31.6%	0.0%
<b>TOTAL</b>	<b>163</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35,294</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	1	1.7%	1.7%	\$48	0.4%	0.9%	2.9%
Moderate	12	20.7%	19.2%	\$1,622	12.9%	12.8%	22.7%
Middle	20	34.5%	34.5%	\$4,793	38.2%	30.1%	35.4%
Upper	25	43.1%	44.6%	\$6,081	48.5%	56.1%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	58	100.0%	100.0%	\$12,544	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	1.1%	\$0	0.0%	0.6%	2.9%
Moderate	3	20.0%	19.1%	\$362	15.7%	12.1%	22.7%
Middle	5	33.3%	35.7%	\$666	28.9%	32.1%	35.4%
Upper	7	46.7%	44.1%	\$1,274	55.3%	55.1%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	15	100.0%	100.0%	\$2,302	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	1.4%	\$0	0.0%	1.2%	2.9%
Moderate	1	9.1%	15.8%	\$75	8.1%	12.7%	22.7%
Middle	3	27.3%	31.0%	\$321	34.7%	27.7%	35.4%
Upper	7	63.6%	51.8%	\$531	57.3%	58.4%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	11	100.0%	100.0%	\$927	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.5%	\$0	0.0%	0.2%	2.9%
Moderate	0	0.0%	9.2%	\$0	0.0%	5.8%	22.7%
Middle	2	66.7%	28.2%	\$78	60.9%	23.5%	35.4%
Upper	1	33.3%	62.2%	\$50	39.1%	70.5%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	3	100.0%	100.0%	\$128	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.9%	\$0	0.0%	0.5%	2.9%
Moderate	0	0.0%	18.1%	\$0	0.0%	10.7%	22.7%
Middle	1	25.0%	32.6%	\$42	12.2%	24.0%	35.4%
Upper	3	75.0%	48.4%	\$300	87.8%	64.9%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	4	100.0%	100.0%	\$342	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	1.5%	\$0	0.0%	0.9%	2.9%
Moderate	0	0.0%	28.8%	\$0	0.0%	22.6%	22.7%
Middle	0	0.0%	43.4%	\$0	0.0%	42.3%	35.4%
Upper	0	0.0%	26.3%	\$0	0.0%	34.1%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	10.1%	\$0	0.0%	8.4%	11.7%
Moderate	1	50.0%	44.3%	\$21,000	90.2%	30.4%	38.3%
Middle	0	0.0%	28.2%	\$0	0.0%	34.1%	27.3%
Upper	1	50.0%	15.4%	\$2,270	9.8%	26.6%	21.4%
Unknown	0	0.0%	2.0%	\$0	0.0%	0.6%	1.3%
<b>TOTAL</b>	<b>2</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,270</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	1	1.1%	1.5%	\$48	0.1%	1.7%	2.9%
Moderate	17	18.3%	18.9%	\$23,059	58.4%	14.7%	22.7%
Middle	31	33.3%	34.4%	\$5,900	14.9%	30.8%	35.4%
Upper	44	47.3%	45.1%	\$10,506	26.6%	52.6%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.1%	0.0%
<b>TOTAL</b>	<b>93</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$39,513</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	1	0.8%	1.9%	\$71	0.2%	1.0%	2.9%
Moderate	27	22.1%	22.5%	\$4,734	16.3%	15.5%	22.7%
Middle	47	38.5%	33.1%	\$10,162	35.1%	29.3%	35.4%
Upper	47	38.5%	42.5%	\$14,025	48.4%	54.2%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	122	100.0%	100.0%	\$28,992	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	1.6%	\$0	0.0%	1.1%	2.9%
Moderate	6	27.3%	21.4%	\$645	22.3%	15.4%	22.7%
Middle	8	36.4%	38.2%	\$819	28.3%	35.2%	35.4%
Upper	8	36.4%	38.7%	\$1,429	49.4%	48.3%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	22	100.0%	100.0%	\$2,893	100.0%	100.0%	100.0%
Home Improvement							
Low	1	8.3%	1.5%	\$60	6.5%	1.2%	2.9%
Moderate	0	0.0%	17.2%	\$0	0.0%	14.5%	22.7%
Middle	5	41.7%	33.1%	\$492	53.4%	29.4%	35.4%
Upper	6	50.0%	48.3%	\$369	40.1%	54.8%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	12	100.0%	100.0%	\$921	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.6%	\$0	0.0%	0.2%	2.9%
Moderate	1	25.0%	14.0%	\$15	5.7%	8.5%	22.7%
Middle	2	50.0%	31.2%	\$130	49.1%	28.4%	35.4%
Upper	1	25.0%	53.8%	\$120	45.3%	62.6%	38.9%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.3%	0.0%
TOTAL	4	100.0%	100.0%	\$265	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	1.4%	\$0	0.0%	0.7%	2.9%
Moderate	0	0.0%	16.7%	\$0	0.0%	11.6%	22.7%
Middle	1	50.0%	37.7%	\$168	61.5%	28.5%	35.4%
Upper	1	50.0%	44.3%	\$105	38.5%	59.2%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	2	100.0%	100.0%	\$273	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	4.7%	\$0	0.0%	3.0%	2.9%
Moderate	0	0.0%	36.5%	\$0	0.0%	21.8%	22.7%
Middle	0	0.0%	37.6%	\$0	0.0%	40.7%	35.4%
Upper	0	0.0%	21.2%	\$0	0.0%	34.6%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	9.5%	\$0	0.0%	13.0%	11.7%
Moderate	0	0.0%	35.2%	\$0	0.0%	21.1%	38.3%
Middle	0	0.0%	30.5%	\$0	0.0%	22.9%	27.3%
Upper	1	100.0%	24.8%	\$1,950	100.0%	43.1%	21.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	1.3%
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,950</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	2	1.2%	1.8%	\$131	0.4%	2.2%	2.9%
Moderate	34	20.9%	21.6%	\$5,394	15.3%	15.9%	22.7%
Middle	63	38.7%	33.9%	\$11,771	33.4%	29.4%	35.4%
Upper	64	39.3%	42.7%	\$17,998	51.0%	52.6%	38.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>163</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35,294</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2022							
		Count			Dollars			Total Businesses	
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	\$ (000s)	\$ %	\$ %		%
Business Revenue	\$1 Million or Less	99	55.0%	52.6%	\$20,720	57.9%	35.3%	90.9%	
	Over \$1 Million/ Unknown	81	45.0%	47.4%	\$15,083	42.1%	64.7%	9.1%	
	TOTAL	180	100.0%	100.0%	\$35,803	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	102	56.7%	92.0%	\$4,230	11.8%	32.7%		
	\$100,001–\$250,000	36	20.0%	4.1%	\$6,548	18.3%	16.6%		
	\$250,001–\$1 Million	42	23.3%	4.0%	\$25,025	69.9%	50.7%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	180	100.0%	100.0%	\$35,803	100.0%	100.0%		
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	59	59.6%		\$2,490	12.0%		
		\$100,001–\$250,000	14	14.1%		\$2,661	12.8%		
		\$250,001–\$1 Million	26	26.3%		\$15,569	75.1%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	99	100.0%		\$20,720	100.0%		

Distribution of 2023 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2023							
		Count			Dollars			Total Businesses	
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	\$ (000s)	\$ %	\$ %		%
Business Revenue	\$1 Million or Less	61	43.0%	54.5%	\$9,014	38.4%	36.0%	90.7%	
	Over \$1 Million/ Unknown	81	57.0%	45.5%	\$14,456	61.6%	64.0%	9.3%	
	TOTAL	142	100.0%	100.0%	\$23,470	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	83	58.5%	92.1%	\$3,551	15.1%	32.9%		
	\$100,001–\$250,000	29	20.4%	3.9%	\$5,354	22.8%	15.9%		
	\$250,001–\$1 Million	30	21.1%	3.9%	\$14,565	62.1%	51.2%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	142	100.0%	100.0%	\$23,470	100.0%	100.0%		
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	42	68.9%		\$1,854	20.6%		
		\$100,001–\$250,000	9	14.8%		\$1,721	19.1%		
		\$250,001–\$1 Million	10	16.4%		\$5,439	60.3%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	61	100.0%		\$9,014	100.0%		



Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	8	4.4%	3.3%	\$996	2.8%	5.2%	3.8%
Moderate	51	28.3%	22.8%	\$9,805	27.4%	26.5%	26.1%
Middle	63	35.0%	33.1%	\$12,696	35.5%	31.9%	33.3%
Upper	58	32.2%	39.8%	\$12,306	34.4%	36.1%	36.6%
Unknown	0	0.0%	0.9%	\$0	0.0%	0.3%	0.1%
<b>TOTAL</b>	<b>180</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$35,803</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	6	4.2%	3.3%	\$524	2.2%	4.7%	3.8%
Moderate	42	29.6%	23.3%	\$6,660	28.4%	27.9%	26.3%
Middle	54	38.0%	31.5%	\$8,775	37.4%	30.9%	33.3%
Upper	40	28.2%	41.0%	\$7,511	32.0%	36.3%	36.5%
Unknown	0	0.0%	0.9%	\$0	0.0%	0.3%	0.1%
<b>TOTAL</b>	<b>142</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,470</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Oklahoma City Assessment Area**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	1	2.9%	6.8%	\$100	1.0%	3.6%	24.1%
Moderate	1	2.9%	16.0%	\$60	0.6%	11.8%	18.7%
Middle	2	5.9%	16.3%	\$568	5.8%	15.2%	18.8%
Upper	15	44.1%	29.5%	\$6,478	66.2%	41.9%	38.4%
Unknown	15	44.1%	31.4%	\$2,581	26.4%	27.5%	0.0%
TOTAL	34	100.0%	100.0%	\$9,787	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	9.0%	\$0	0.0%	4.5%	24.1%
Moderate	1	5.0%	17.6%	\$177	2.6%	11.7%	18.7%
Middle	0	0.0%	18.4%	\$0	0.0%	16.0%	18.8%
Upper	8	40.0%	28.9%	\$3,590	51.8%	41.6%	38.4%
Unknown	11	55.0%	26.1%	\$3,167	45.7%	26.2%	0.0%
TOTAL	20	100.0%	100.0%	\$6,935	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	8.4%	\$0	0.0%	4.3%	24.1%
Moderate	1	50.0%	15.1%	\$35	53.8%	8.9%	18.7%
Middle	1	50.0%	18.0%	\$30	46.2%	13.9%	18.8%
Upper	0	0.0%	48.1%	\$0	0.0%	54.5%	38.4%
Unknown	0	0.0%	10.3%	\$0	0.0%	18.4%	0.0%
TOTAL	2	100.0%	100.0%	\$65	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	33.3%	6.9%	\$34	16.7%	5.6%	24.1%
Moderate	0	0.0%	11.1%	\$0	0.0%	6.0%	18.7%
Middle	1	33.3%	20.6%	\$20	9.8%	10.4%	18.8%
Upper	1	33.3%	51.9%	\$150	73.5%	67.6%	38.4%
Unknown	0	0.0%	9.4%	\$0	0.0%	10.3%	0.0%
TOTAL	3	100.0%	100.0%	\$204	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	12.9%	\$0	0.0%	7.1%	24.1%
Moderate	0	0.0%	17.5%	\$0	0.0%	11.3%	18.7%
Middle	0	0.0%	18.5%	\$0	0.0%	12.5%	18.8%
Upper	1	100.0%	44.2%	\$500	100.0%	60.7%	38.4%
Unknown	0	0.0%	7.0%	\$0	0.0%	8.4%	0.0%
TOTAL	1	100.0%	100.0%	\$500	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.4%	\$0	0.0%	0.1%	24.1%
Moderate	0	0.0%	1.7%	\$0	0.0%	2.4%	18.7%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	18.8%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	38.4%
Unknown	0	0.0%	97.9%	\$0	0.0%	97.5%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.9%	\$0	0.0%	0.1%	N/A
Upper	0	0.0%	1.4%	\$0	0.0%	0.4%	N/A
Unknown	6	100.0%	97.7%	\$5,815	100.0%	99.5%	N/A
<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,815</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	2	3.0%	7.4%	\$134	0.6%	3.5%	24.1%
Moderate	3	4.5%	16.0%	\$272	1.2%	10.5%	18.7%
Middle	4	6.1%	16.7%	\$618	2.7%	13.9%	18.8%
Upper	25	37.9%	30.4%	\$10,718	46.0%	38.4%	38.4%
Unknown	32	48.5%	29.6%	\$11,563	49.6%	33.8%	0.0%
<b>TOTAL</b>	<b>66</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,306</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	4	2.7%	5.8%	\$463	1.1%	2.9%	24.1%
Moderate	13	8.7%	16.3%	\$2,205	5.1%	11.1%	18.7%
Middle	26	17.3%	16.9%	\$6,258	14.4%	14.9%	18.8%
Upper	82	54.7%	30.5%	\$28,598	65.9%	43.0%	38.4%
Unknown	25	16.7%	30.5%	\$5,843	13.5%	28.1%	0.0%
TOTAL	150	100.0%	100.0%	\$43,367	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	8.0%	\$0	0.0%	4.2%	24.1%
Moderate	0	0.0%	15.0%	\$0	0.0%	9.6%	18.7%
Middle	0	0.0%	16.8%	\$0	0.0%	13.2%	18.8%
Upper	4	33.3%	29.6%	\$1,025	21.5%	40.4%	38.4%
Unknown	8	66.7%	30.6%	\$3,740	78.5%	32.7%	0.0%
TOTAL	12	100.0%	100.0%	\$4,765	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	8.0%	\$0	0.0%	4.2%	24.1%
Moderate	0	0.0%	17.2%	\$0	0.0%	10.7%	18.7%
Middle	1	20.0%	20.7%	\$75	4.2%	15.2%	18.8%
Upper	2	40.0%	45.7%	\$935	52.7%	57.1%	38.4%
Unknown	2	40.0%	8.3%	\$765	43.1%	12.9%	0.0%
TOTAL	5	100.0%	100.0%	\$1,775	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	6.0%	\$0	0.0%	3.9%	24.1%
Moderate	1	9.1%	17.3%	\$46	3.5%	14.4%	18.7%
Middle	2	18.2%	18.4%	\$135	10.4%	11.0%	18.8%
Upper	8	72.7%	49.0%	\$1,122	86.1%	63.2%	38.4%
Unknown	0	0.0%	9.3%	\$0	0.0%	7.5%	0.0%
TOTAL	11	100.0%	100.0%	\$1,303	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	7.9%	\$0	0.0%	4.5%	24.1%
Moderate	0	0.0%	18.6%	\$0	0.0%	13.7%	18.7%
Middle	0	0.0%	23.3%	\$0	0.0%	14.7%	18.8%
Upper	0	0.0%	42.7%	\$0	0.0%	56.6%	38.4%
Unknown	1	100.0%	7.5%	\$240	100.0%	10.4%	0.0%
TOTAL	1	100.0%	100.0%	\$240	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	24.1%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	18.7%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	18.8%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	38.4%
Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.8%	\$0	0.0%	0.1%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	3.2%	\$0	0.0%	0.6%	N/A
Unknown	5	100.0%	96.0%	\$2,893	100.0%	99.3%	N/A
<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,893</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	4	2.2%	6.3%	\$463	0.9%	2.9%	24.1%
Moderate	14	7.6%	16.1%	\$2,251	4.1%	10.0%	18.7%
Middle	29	15.8%	17.2%	\$6,468	11.9%	13.3%	18.8%
Upper	96	52.2%	31.9%	\$31,680	58.3%	39.6%	38.4%
Unknown	41	22.3%	28.5%	\$13,481	24.8%	34.2%	0.0%
<b>TOTAL</b>	<b>184</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$54,343</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	1	2.9%	4.4%	\$556	5.7%	2.8%	5.9%
Moderate	7	20.6%	22.5%	\$904	9.2%	15.3%	26.4%
Middle	9	26.5%	31.3%	\$1,929	19.7%	25.8%	31.8%
Upper	16	47.1%	41.0%	\$6,238	63.7%	55.4%	34.7%
Unknown	1	2.9%	0.9%	\$160	1.6%	0.7%	1.3%
TOTAL	34	100.0%	100.0%	\$9,787	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	4.4%	\$0	0.0%	2.4%	5.9%
Moderate	8	40.0%	24.1%	\$1,810	26.1%	17.0%	26.4%
Middle	2	10.0%	31.8%	\$172	2.5%	26.3%	31.8%
Upper	10	50.0%	38.4%	\$4,953	71.4%	53.3%	34.7%
Unknown	0	0.0%	1.3%	\$0	0.0%	1.0%	1.3%
TOTAL	20	100.0%	100.0%	\$6,935	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	4.2%	\$0	0.0%	2.9%	5.9%
Moderate	0	0.0%	18.3%	\$0	0.0%	14.8%	26.4%
Middle	1	50.0%	29.2%	\$35	53.8%	23.9%	31.8%
Upper	1	50.0%	47.5%	\$30	46.2%	57.7%	34.7%
Unknown	0	0.0%	0.8%	\$0	0.0%	0.7%	1.3%
TOTAL	2	100.0%	100.0%	\$65	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	1.7%	\$0	0.0%	1.2%	5.9%
Moderate	1	33.3%	16.4%	\$34	16.7%	7.9%	26.4%
Middle	0	0.0%	24.2%	\$0	0.0%	17.5%	31.8%
Upper	2	66.7%	57.2%	\$170	83.3%	72.9%	34.7%
Unknown	0	0.0%	0.6%	\$0	0.0%	0.4%	1.3%
TOTAL	3	100.0%	100.0%	\$204	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	4.4%	\$0	0.0%	2.5%	5.9%
Moderate	0	0.0%	18.2%	\$0	0.0%	12.6%	26.4%
Middle	0	0.0%	32.2%	\$0	0.0%	23.1%	31.8%
Upper	1	100.0%	44.4%	\$500	100.0%	61.1%	34.7%
Unknown	0	0.0%	0.7%	\$0	0.0%	0.7%	1.3%
TOTAL	1	100.0%	100.0%	\$500	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	6.4%	\$0	0.0%	2.9%	5.9%
Moderate	0	0.0%	32.6%	\$0	0.0%	27.3%	26.4%
Middle	0	0.0%	36.4%	\$0	0.0%	37.4%	31.8%
Upper	0	0.0%	24.2%	\$0	0.0%	31.9%	34.7%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.5%	1.3%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	1	16.7%	21.8%	\$902	15.5%	13.7%	8.1%
Moderate	2	33.3%	44.1%	\$1,595	27.4%	50.4%	41.3%
Middle	1	16.7%	20.9%	\$1,200	20.6%	17.5%	27.9%
Upper	2	33.3%	11.4%	\$2,118	36.4%	16.8%	18.6%
Unknown	0	0.0%	1.8%	\$0	0.0%	1.5%	4.1%
<b>TOTAL</b>	<b>6</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,815</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	2	3.0%	4.5%	\$1,458	6.3%	3.7%	5.9%
Moderate	18	27.3%	22.8%	\$4,343	18.6%	18.9%	26.4%
Middle	13	19.7%	31.2%	\$3,336	14.3%	25.0%	31.8%
Upper	32	48.5%	40.6%	\$14,009	60.1%	51.5%	34.7%
Unknown	1	1.5%	1.0%	\$160	0.7%	0.8%	1.3%
<b>TOTAL</b>	<b>66</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$23,306</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	6	4.0%	6.5%	\$1,316	3.0%	4.2%	5.9%
Moderate	25	16.7%	24.2%	\$4,254	9.8%	16.5%	26.4%
Middle	38	25.3%	30.1%	\$8,484	19.6%	25.6%	31.8%
Upper	79	52.7%	38.2%	\$28,916	66.7%	52.9%	34.7%
Unknown	2	1.3%	1.0%	\$397	0.9%	0.7%	1.3%
TOTAL	150	100.0%	100.0%	\$43,367	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	5.5%	\$0	0.0%	3.0%	5.9%
Moderate	6	50.0%	26.7%	\$1,062	22.3%	18.2%	26.4%
Middle	3	25.0%	32.8%	\$368	7.7%	28.1%	31.8%
Upper	3	25.0%	34.4%	\$3,335	70.0%	50.2%	34.7%
Unknown	0	0.0%	0.6%	\$0	0.0%	0.5%	1.3%
TOTAL	12	100.0%	100.0%	\$4,765	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	5.2%	\$0	0.0%	5.1%	5.9%
Moderate	1	20.0%	20.7%	\$30	1.7%	14.6%	26.4%
Middle	0	0.0%	31.9%	\$0	0.0%	26.1%	31.8%
Upper	4	80.0%	41.3%	\$1,745	98.3%	53.7%	34.7%
Unknown	0	0.0%	0.9%	\$0	0.0%	0.6%	1.3%
TOTAL	5	100.0%	100.0%	\$1,775	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	3.0%	\$0	0.0%	1.7%	5.9%
Moderate	0	0.0%	16.2%	\$0	0.0%	9.1%	26.4%
Middle	3	27.3%	27.4%	\$256	19.6%	19.1%	31.8%
Upper	8	72.7%	53.1%	\$1,047	80.4%	70.0%	34.7%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.1%	1.3%
TOTAL	11	100.0%	100.0%	\$1,303	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	3.5%	\$0	0.0%	4.3%	5.9%
Moderate	0	0.0%	17.5%	\$0	0.0%	12.8%	26.4%
Middle	0	0.0%	36.8%	\$0	0.0%	27.5%	31.8%
Upper	1	100.0%	41.7%	\$240	100.0%	55.1%	34.7%
Unknown	0	0.0%	0.5%	\$0	0.0%	0.4%	1.3%
TOTAL	1	100.0%	100.0%	\$240	100.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	11.4%	\$0	0.0%	6.5%	5.9%
Moderate	0	0.0%	42.9%	\$0	0.0%	32.5%	26.4%
Middle	0	0.0%	31.4%	\$0	0.0%	38.9%	31.8%
Upper	0	0.0%	14.3%	\$0	0.0%	22.2%	34.7%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	1.3%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	10.3%	\$0	0.0%	7.7%	8.1%
Moderate	5	100.0%	46.8%	\$2,893	100.0%	43.9%	41.3%
Middle	0	0.0%	20.6%	\$0	0.0%	20.1%	27.9%
Upper	0	0.0%	21.4%	\$0	0.0%	25.8%	18.6%
Unknown	0	0.0%	0.8%	\$0	0.0%	2.4%	4.1%
<b>TOTAL</b>	<b>5</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,893</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	6	3.3%	6.1%	\$1,316	2.4%	4.4%	5.9%
Moderate	37	20.1%	24.1%	\$8,239	15.2%	19.0%	26.4%
Middle	44	23.9%	30.7%	\$9,108	16.8%	25.5%	31.8%
Upper	95	51.6%	38.1%	\$35,283	64.9%	50.4%	34.7%
Unknown	2	1.1%	0.9%	\$397	0.7%	0.8%	1.3%
<b>TOTAL</b>	<b>184</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$54,343</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level										
Business Revenue and Loan Size			2022							
			Count			Dollars			Total Businesses	
			Bank		Aggregate	Bank		Aggregate		
			#	%	%	\$ (000s)	\$ %	\$ %		%
Business Revenue	\$1 Million or Less		35	70.0%	51.0%	\$8,016	78.5%	36.3%	90.3%	
	Over \$1 Million/ Unknown		15	30.0%	49.0%	\$2,196	21.5%	63.7%	9.7%	
	TOTAL		50	100.0%	100.0%	\$10,212	100.0%	100.0%	100.0%	
Loan Size			\$100,000 or Less	19	38.0%	92.4%	\$664	6.5%	35.5%	
			\$100,001–\$250,000	17	34.0%	3.8%	\$2,510	24.6%	14.9%	
			\$250,001–\$1 Million	14	28.0%	3.9%	\$7,038	68.9%	49.6%	
			Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
			TOTAL		50	100.0%	100.0%	\$10,212	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	14	40.0%		\$550	6.9%			
		\$100,001–\$250,000	9	25.7%		\$1,465	18.3%			
		\$250,001–\$1 Million	12	34.3%		\$6,001	74.9%			
		Over \$1 Million	0	0.0%		\$0	0.0%			
		TOTAL		35		100.0%	\$8,016		100.0%	

Distribution of 2023 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			2023						
			Count			Dollars			Total Businesses
			Bank		Aggregate	Bank		Aggregate	
			#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less		36	67.9%	53.5%	\$9,168	76.6%	35.0%	90.1%
	Over \$1 Million/ Unknown		17	32.1%	46.5%	\$2,803	23.4%	65.0%	9.9%
	TOTAL		53	100.0%	100.0%	\$11,971	100.0%	100.0%	100.0%
Loan Size		\$100,000 or Less	27	50.9%	92.3%	\$1,466	12.2%	34.7%	
		\$100,001–\$250,000	10	18.9%	4.0%	\$1,729	14.4%	16.0%	
		\$250,001–\$1 Million	16	30.2%	3.6%	\$8,776	73.3%	49.3%	
		Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
		TOTAL	53	100.0%	100.0%	\$11,971	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	16	44.4%		\$822	9.0%		
		\$100,001–\$250,000	8	22.2%		\$1,446	15.8%		
		\$250,001–\$1 Million	12	33.3%		\$6,900	75.3%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	36	100.0%		\$9,168	100.0%		

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	2	4.0%	5.8%	\$41	0.4%	6.0%	6.5%
Moderate	10	20.0%	26.2%	\$1,847	18.1%	27.0%	27.3%
Middle	12	24.0%	26.5%	\$3,235	31.7%	24.7%	28.6%
Upper	25	50.0%	38.9%	\$4,489	44.0%	39.6%	34.4%
Unknown	1	2.0%	2.6%	\$600	5.9%	2.7%	3.2%
<b>TOTAL</b>	<b>50</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,212</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	3	5.7%	6.0%	\$802	6.7%	6.6%	6.6%
Moderate	8	15.1%	25.8%	\$1,842	15.4%	28.4%	27.6%
Middle	16	30.2%	25.8%	\$5,059	42.3%	23.8%	28.5%
Upper	26	49.1%	39.9%	\$4,268	35.7%	38.9%	34.2%
Unknown	0	0.0%	2.4%	\$0	0.0%	2.4%	3.1%
<b>TOTAL</b>	<b>53</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,971</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## KANSAS

### Lawrence Assessment Area

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	2	10.5%	8.7%	\$493	8.4%	4.5%	19.6%
Moderate	3	15.8%	21.5%	\$573	9.8%	15.9%	18.8%
Middle	3	15.8%	20.8%	\$1,248	21.2%	20.6%	22.6%
Upper	6	31.6%	35.3%	\$2,494	42.5%	44.6%	38.9%
Unknown	5	26.3%	13.8%	\$1,066	18.2%	14.4%	0.0%
TOTAL	19	100.0%	100.0%	\$5,875	100.0%	100.0%	100.0%
Refinance							
Low	2	22.2%	12.2%	\$120	12.3%	7.3%	19.6%
Moderate	2	22.2%	22.5%	\$235	24.1%	17.9%	18.8%
Middle	2	22.2%	21.8%	\$259	26.5%	20.7%	22.6%
Upper	3	33.3%	30.9%	\$362	37.1%	41.7%	38.9%
Unknown	0	0.0%	12.7%	\$0	0.0%	12.3%	0.0%
TOTAL	9	100.0%	100.0%	\$975	100.0%	100.0%	100.0%
Home Improvement							
Low	2	9.5%	7.3%	\$230	13.4%	5.3%	19.6%
Moderate	4	19.0%	15.0%	\$154	9.0%	10.6%	18.8%
Middle	7	33.3%	21.4%	\$695	40.5%	20.0%	22.6%
Upper	7	33.3%	48.1%	\$588	34.3%	53.1%	38.9%
Unknown	1	4.8%	8.3%	\$50	2.9%	11.1%	0.0%
TOTAL	21	100.0%	100.0%	\$1,717	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	16.9%	\$0	0.0%	11.8%	19.6%
Moderate	2	40.0%	27.1%	\$55	21.6%	18.7%	18.8%
Middle	2	40.0%	15.3%	\$140	54.9%	15.9%	22.6%
Upper	1	20.0%	35.6%	\$60	23.5%	50.3%	38.9%
Unknown	0	0.0%	5.1%	\$0	0.0%	3.4%	0.0%
TOTAL	5	100.0%	100.0%	\$255	100.0%	100.0%	100.0%

Other Purpose Closed/Exempt							
Low	0	0.0%	9.4%	\$0	0.0%	8.9%	19.6%
Moderate	0	0.0%	30.6%	\$0	0.0%	35.0%	18.8%
Middle	1	100.0%	22.4%	\$50	100.0%	17.3%	22.6%
Upper	0	0.0%	34.1%	\$0	0.0%	36.0%	38.9%
Unknown	0	0.0%	3.5%	\$0	0.0%	2.9%	0.0%
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$50</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	19.6%
Moderate	0	0.0%	9.1%	\$0	0.0%	9.2%	18.8%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	22.6%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	38.9%
Unknown	0	0.0%	90.9%	\$0	0.0%	90.8%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	5.0%	\$0	0.0%	1.4%	N/A
Unknown	1	100.0%	95.0%	\$3,000	100.0%	98.6%	N/A
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,000</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	6	10.7%	9.6%	\$843	7.1%	4.9%	19.6%
Moderate	11	19.6%	21.3%	\$1,017	8.6%	14.9%	18.8%
Middle	15	26.8%	20.7%	\$2,392	20.1%	18.5%	22.6%
Upper	17	30.4%	34.4%	\$3,504	29.5%	39.8%	38.9%
Unknown	7	12.5%	14.0%	\$4,116	34.7%	22.0%	0.0%
<b>TOTAL</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,872</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	1	5.6%	6.4%	\$116	2.7%	2.7%	19.6%
Moderate	4	22.2%	16.3%	\$822	19.4%	11.1%	18.8%
Middle	2	11.1%	21.2%	\$390	9.2%	19.2%	22.6%
Upper	9	50.0%	40.5%	\$2,662	62.9%	51.2%	38.9%
Unknown	2	11.1%	15.5%	\$245	5.8%	15.9%	0.0%
TOTAL	18	100.0%	100.0%	\$4,235	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	6.7%	\$0	0.0%	3.6%	19.6%
Moderate	1	33.3%	21.8%	\$15	6.3%	16.5%	18.8%
Middle	1	33.3%	22.6%	\$72	30.4%	19.2%	22.6%
Upper	1	33.3%	33.8%	\$150	63.3%	41.9%	38.9%
Unknown	0	0.0%	15.1%	\$0	0.0%	18.7%	0.0%
TOTAL	3	100.0%	100.0%	\$237	100.0%	100.0%	100.0%
Home Improvement							
Low	2	14.3%	4.3%	\$55	8.5%	3.4%	19.6%
Moderate	3	21.4%	18.9%	\$85	13.1%	12.2%	18.8%
Middle	3	21.4%	21.6%	\$180	27.7%	17.1%	22.6%
Upper	5	35.7%	48.6%	\$295	45.4%	52.9%	38.9%
Unknown	1	7.1%	6.5%	\$35	5.4%	14.4%	0.0%
TOTAL	14	100.0%	100.0%	\$650	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	2	50.0%	5.5%	\$154	75.5%	1.0%	19.6%
Moderate	0	0.0%	14.3%	\$0	0.0%	1.6%	18.8%
Middle	0	0.0%	23.1%	\$0	0.0%	4.4%	22.6%
Upper	2	50.0%	29.7%	\$50	24.5%	7.7%	38.9%
Unknown	0	0.0%	27.5%	\$0	0.0%	85.3%	0.0%
TOTAL	4	100.0%	100.0%	\$204	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	7.8%	\$0	0.0%	6.6%	19.6%
Moderate	0	0.0%	20.9%	\$0	0.0%	13.3%	18.8%
Middle	0	0.0%	20.0%	\$0	0.0%	14.3%	22.6%
Upper	0	0.0%	47.8%	\$0	0.0%	63.0%	38.9%
Unknown	0	0.0%	3.5%	\$0	0.0%	2.8%	0.0%
TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	19.6%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	18.8%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	22.6%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	38.9%
Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	4.3%	\$0	0.0%	0.2%	N/A
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Unknown	0	0.0%	95.7%	\$0	0.0%	99.8%	N/A
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	5	12.8%	6.2%	\$325	6.1%	2.6%	19.6%
Moderate	8	20.5%	17.5%	\$922	17.3%	10.6%	18.8%
Middle	6	15.4%	21.3%	\$642	12.1%	16.8%	22.6%
Upper	17	43.6%	39.5%	\$3,157	59.3%	43.9%	38.9%
Unknown	3	7.7%	15.5%	\$280	5.3%	26.1%	0.0%
<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,326</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	5	26.3%	21.8%	\$1,353	23.0%	16.1%	17.9%
Middle	9	47.4%	49.1%	\$2,777	47.3%	47.2%	54.0%
Upper	5	26.3%	28.2%	\$1,744	29.7%	35.5%	27.9%
Unknown	0	0.0%	0.9%	\$0	0.0%	1.2%	0.1%
TOTAL	19	100.0%	100.0%	\$5,875	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	22.2%	19.4%	\$249	25.5%	15.1%	17.9%
Middle	3	33.3%	52.7%	\$282	28.9%	50.4%	54.0%
Upper	4	44.4%	24.7%	\$444	45.6%	30.1%	27.9%
Unknown	0	0.0%	3.3%	\$0	0.0%	4.4%	0.1%
TOTAL	9	100.0%	100.0%	\$975	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	9.5%	11.2%	\$75	4.4%	7.9%	17.9%
Middle	9	42.9%	56.3%	\$608	35.4%	55.6%	54.0%
Upper	10	47.6%	31.1%	\$1,034	60.2%	32.7%	27.9%
Unknown	0	0.0%	1.5%	\$0	0.0%	3.8%	0.1%
TOTAL	21	100.0%	100.0%	\$1,717	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	6.8%	\$0	0.0%	4.8%	17.9%
Middle	2	40.0%	50.8%	\$70	27.5%	39.5%	54.0%
Upper	3	60.0%	42.4%	\$185	72.5%	55.7%	27.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.1%
TOTAL	5	100.0%	100.0%	\$255	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	20.0%	\$0	0.0%	16.8%	17.9%
Middle	1	100.0%	54.1%	\$50	100.0%	46.5%	54.0%
Upper	0	0.0%	25.9%	\$0	0.0%	36.6%	27.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.1%
TOTAL	1	100.0%	100.0%	\$50	100.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	27.3%	\$0	0.0%	22.2%	17.9%
Middle	0	0.0%	72.7%	\$0	0.0%	77.8%	54.0%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	27.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.1%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	1	100.0%	37.5%	\$3,000	100.0%	50.9%	28.2%
Middle	0	0.0%	27.5%	\$0	0.0%	8.8%	40.9%
Upper	0	0.0%	5.0%	\$0	0.0%	27.8%	24.1%
Unknown	0	0.0%	30.0%	\$0	0.0%	12.5%	6.8%
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$3,000</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	10	17.9%	20.2%	\$4,677	39.4%	19.0%	17.9%
Middle	24	42.9%	50.6%	\$3,788	31.9%	44.4%	54.0%
Upper	22	39.3%	27.2%	\$3,408	28.7%	33.5%	27.9%
Unknown	0	0.0%	2.0%	\$0	0.0%	3.1%	0.1%
<b>TOTAL</b>	<b>56</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$11,872</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	5	27.8%	25.3%	\$844	19.9%	17.6%	17.9%
Middle	8	44.4%	47.6%	\$1,891	44.7%	48.2%	54.0%
Upper	5	27.8%	26.8%	\$1,500	35.4%	34.0%	27.9%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.2%	0.1%
TOTAL	18	100.0%	100.0%	\$4,235	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	2	66.7%	15.4%	\$87	36.7%	13.7%	17.9%
Middle	1	33.3%	60.9%	\$150	63.3%	56.0%	54.0%
Upper	0	0.0%	22.9%	\$0	0.0%	28.0%	27.9%
Unknown	0	0.0%	0.8%	\$0	0.0%	2.3%	0.1%
TOTAL	3	100.0%	100.0%	\$237	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	4	28.6%	17.3%	\$110	16.9%	15.3%	17.9%
Middle	9	64.3%	57.8%	\$490	75.4%	57.0%	54.0%
Upper	1	7.1%	23.8%	\$50	7.7%	25.0%	27.9%
Unknown	0	0.0%	1.1%	\$0	0.0%	2.7%	0.1%
TOTAL	14	100.0%	100.0%	\$650	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	12.1%	\$0	0.0%	3.3%	17.9%
Middle	1	25.0%	52.7%	\$20	9.8%	82.5%	54.0%
Upper	3	75.0%	29.7%	\$184	90.2%	7.9%	27.9%
Unknown	0	0.0%	5.5%	\$0	0.0%	6.3%	0.1%
TOTAL	4	100.0%	100.0%	\$204	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	18.3%	\$0	0.0%	16.1%	17.9%
Middle	0	0.0%	51.3%	\$0	0.0%	45.7%	54.0%
Upper	0	0.0%	30.4%	\$0	0.0%	38.2%	27.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.1%
TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	17.9%
Middle	0	0.0%	100.0%	\$0	0.0%	100.0%	54.0%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	27.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.1%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	21.7%	\$0	0.0%	25.4%	28.2%
Middle	0	0.0%	52.2%	\$0	0.0%	32.9%	40.9%
Upper	0	0.0%	21.7%	\$0	0.0%	39.6%	24.1%
Unknown	0	0.0%	4.3%	\$0	0.0%	2.1%	6.8%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	11	28.2%	21.8%	\$1,041	19.5%	16.7%	17.9%
Middle	19	48.7%	51.5%	\$2,551	47.9%	50.5%	54.0%
Upper	9	23.1%	26.1%	\$1,734	32.6%	31.8%	27.9%
Unknown	0	0.0%	0.7%	\$0	0.0%	1.1%	0.1%
<b>TOTAL</b>	<b>39</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$5,326</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2022						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	49	45.8%	53.9%	\$4,723	34.6%	36.2%	91.6%
	Over \$1 Million/ Unknown	58	54.2%	46.1%	\$8,928	65.4%	63.8%	8.4%
	<b>TOTAL</b>	<b>107</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,651</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	74	69.2%	93.7%	\$2,795	20.5%	39.9%	
	\$100,001–\$250,000	18	16.8%	3.7%	\$3,326	24.4%	18.7%	
	\$250,001–\$1 Million	15	14.0%	2.7%	\$7,530	55.2%	41.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>107</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,651</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	\$100,000 or Less	37	75.5%		\$931	19.7%		
	\$100,001–\$250,000	6	12.2%		\$1,105	23.4%		
	\$250,001–\$1 Million	6	12.2%		\$2,687	56.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>49</b>	<b>100.0%</b>		<b>\$4,723</b>	<b>100.0%</b>		

Distribution of 2023 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	37	42.0%	57.1%	\$3,502	32.4%	41.3%	91.6%
	Over \$1 Million/ Unknown	51	58.0%	42.9%	\$7,314	67.6%	58.7%	8.4%
	<b>TOTAL</b>	<b>88</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,816</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Loan Size	\$100,000 or Less	62	70.5%	93.6%	\$2,550	23.6%	36.4%	
	\$100,001–\$250,000	17	19.3%	3.6%	\$2,927	27.1%	17.3%	
	\$250,001–\$1 Million	9	10.2%	2.8%	\$5,339	49.4%	46.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<b>TOTAL</b>	<b>88</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,816</b>	<b>100.0%</b>	<b>100.0%</b>	
Loan Size	\$100,000 or Less	28	75.7%		\$843	24.1%		
	\$100,001–\$250,000	6	16.2%		\$1,104	31.5%		
	\$250,001–\$1 Million	3	8.1%		\$1,555	44.4%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	<b>TOTAL</b>	<b>37</b>	<b>100.0%</b>		<b>\$3,502</b>	<b>100.0%</b>		

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	35	32.7%	24.7%	\$6,066	44.4%	31.6%	27.3%
Middle	43	40.2%	46.1%	\$4,659	34.1%	41.7%	45.1%
Upper	24	22.4%	26.0%	\$2,521	18.5%	24.3%	22.7%
Unknown	5	4.7%	3.2%	\$405	3.0%	2.4%	4.9%
<b>TOTAL</b>	<b>107</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$13,651</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	27	30.7%	24.3%	\$4,775	44.1%	34.2%	26.6%
Middle	34	38.6%	46.0%	\$3,044	28.1%	40.0%	46.0%
Upper	22	25.0%	25.9%	\$2,592	24.0%	22.1%	22.7%
Unknown	5	5.7%	3.8%	\$405	3.7%	3.7%	4.8%
<b>TOTAL</b>	<b>88</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$10,816</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## COLORADO

### Colorado Springs Assessment Area

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	2	1.4%	2.4%	\$420	0.7%	1.1%	18.9%
Moderate	19	13.3%	17.3%	\$6,180	9.7%	13.1%	18.6%
Middle	40	28.0%	26.2%	\$15,520	24.4%	24.0%	21.9%
Upper	82	57.3%	36.6%	\$41,570	65.3%	43.3%	40.6%
Unknown	0	0.0%	17.6%	\$0	0.0%	18.5%	0.0%
TOTAL	143	100.0%	100.0%	\$63,690	100.0%	100.0%	100.0%
Refinance							
Low	1	5.0%	11.4%	\$103	1.4%	6.9%	18.9%
Moderate	7	35.0%	20.9%	\$1,978	26.3%	17.1%	18.6%
Middle	7	35.0%	24.4%	\$2,152	28.7%	24.1%	21.9%
Upper	5	25.0%	27.2%	\$3,278	43.6%	34.0%	40.6%
Unknown	0	0.0%	16.0%	\$0	0.0%	17.9%	0.0%
TOTAL	20	100.0%	100.0%	\$7,511	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	5.1%	\$0	0.0%	3.3%	18.9%
Moderate	2	100.0%	14.7%	\$200	100.0%	10.1%	18.6%
Middle	0	0.0%	25.3%	\$0	0.0%	20.9%	21.9%
Upper	0	0.0%	53.9%	\$0	0.0%	64.4%	40.6%
Unknown	0	0.0%	1.0%	\$0	0.0%	1.3%	0.0%
TOTAL	2	100.0%	100.0%	\$200	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	5.5%	\$0	0.0%	3.3%	18.9%
Moderate	1	3.6%	17.0%	\$65	2.1%	11.7%	18.6%
Middle	8	28.6%	28.2%	\$796	25.6%	23.3%	21.9%
Upper	18	64.3%	47.4%	\$2,177	69.9%	59.7%	40.6%
Unknown	1	3.6%	1.9%	\$75	2.4%	2.1%	0.0%
TOTAL	28	100.0%	100.0%	\$3,113	100.0%	100.0%	100.0%

Other Purpose Closed/Exempt							
Low	0	0.0%	6.9%	\$0	0.0%	4.7%	18.9%
Moderate	0	0.0%	18.3%	\$0	0.0%	11.5%	18.6%
Middle	0	0.0%	22.3%	\$0	0.0%	15.1%	21.9%
Upper	1	100.0%	45.4%	\$310	100.0%	58.9%	40.6%
Unknown	0	0.0%	7.1%	\$0	0.0%	9.8%	0.0%
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$310</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Purpose Not Applicable							
Low	0	0.0%	1.2%	\$0	0.0%	0.3%	18.9%
Moderate	0	0.0%	2.4%	\$0	0.0%	1.8%	18.6%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	21.9%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	40.6%
Unknown	0	0.0%	96.4%	\$0	0.0%	97.9%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	7.8%	\$0	0.0%	0.6%	N/A
Unknown	0	0.0%	92.2%	\$0	0.0%	99.4%	N/A
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	3	1.5%	5.3%	\$523	0.7%	2.6%	18.9%
Moderate	29	14.9%	17.9%	\$8,423	11.3%	13.1%	18.6%
Middle	55	28.4%	25.6%	\$18,469	24.7%	22.3%	21.9%
Upper	106	54.6%	36.9%	\$47,335	63.3%	39.4%	40.6%
Unknown	1	0.5%	14.3%	\$75	0.1%	22.7%	0.0%
<b>TOTAL</b>	<b>194</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$74,824</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	9	4.8%	2.4%	\$1,696	2.2%	1.1%	18.9%
Moderate	40	21.2%	16.1%	\$12,958	16.6%	11.6%	18.6%
Middle	61	32.3%	27.5%	\$24,406	31.2%	24.5%	21.9%
Upper	79	41.8%	35.1%	\$39,174	50.1%	43.4%	40.6%
Unknown	0	0.0%	18.9%	\$0	0.0%	19.5%	0.0%
TOTAL	189	100.0%	100.0%	\$78,234	100.0%	100.0%	100.0%
Refinance							
Low	2	25.0%	9.4%	\$394	13.1%	4.9%	18.9%
Moderate	2	25.0%	19.3%	\$638	21.3%	13.5%	18.6%
Middle	0	0.0%	24.7%	\$0	0.0%	21.5%	21.9%
Upper	3	37.5%	29.2%	\$1,381	46.1%	32.8%	40.6%
Unknown	1	12.5%	17.3%	\$585	19.5%	27.4%	0.0%
TOTAL	8	100.0%	100.0%	\$2,998	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	6.7%	\$0	0.0%	4.1%	18.9%
Moderate	0	0.0%	17.2%	\$0	0.0%	12.0%	18.6%
Middle	1	50.0%	27.2%	\$25	6.2%	24.1%	21.9%
Upper	1	50.0%	45.9%	\$380	93.8%	55.1%	40.6%
Unknown	0	0.0%	2.9%	\$0	0.0%	4.6%	0.0%
TOTAL	2	100.0%	100.0%	\$405	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	7.5%	\$0	0.0%	5.3%	18.9%
Moderate	1	6.3%	20.3%	\$123	6.7%	14.6%	18.6%
Middle	2	12.5%	28.6%	\$150	8.1%	25.1%	21.9%
Upper	13	81.3%	41.2%	\$1,573	85.2%	52.3%	40.6%
Unknown	0	0.0%	2.4%	\$0	0.0%	2.8%	0.0%
TOTAL	16	100.0%	100.0%	\$1,846	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	6.0%	\$0	0.0%	3.8%	18.9%
Moderate	0	0.0%	19.3%	\$0	0.0%	14.1%	18.6%
Middle	0	0.0%	24.7%	\$0	0.0%	21.3%	21.9%
Upper	0	0.0%	45.3%	\$0	0.0%	56.4%	40.6%
Unknown	0	0.0%	4.7%	\$0	0.0%	4.5%	0.0%
TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	18.9%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	18.6%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	21.9%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	40.6%
Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.4%	\$0	0.0%	0.1%	N/A
Unknown	0	0.0%	98.6%	\$0	0.0%	99.9%	N/A
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	11	5.1%	4.3%	\$2,090	2.5%	1.7%	18.9%
Moderate	43	20.0%	17.0%	\$13,719	16.4%	11.5%	18.6%
Middle	64	29.8%	27.0%	\$24,581	29.4%	23.2%	21.9%
Upper	96	44.7%	36.1%	\$42,508	50.9%	41.1%	40.6%
Unknown	1	0.5%	15.6%	\$585	0.7%	22.5%	0.0%
<b>TOTAL</b>	<b>215</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$83,483</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	1.7%	\$0	0.0%	1.2%	1.3%
Moderate	15	10.5%	17.9%	\$5,376	8.4%	14.1%	19.7%
Middle	52	36.4%	37.4%	\$19,841	31.2%	34.3%	41.8%
Upper	76	53.1%	42.8%	\$38,472	60.4%	50.2%	37.0%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.2%	0.3%
TOTAL	143	100.0%	100.0%	\$63,690	100.0%	100.0%	100.0%
Refinance							
Low	2	10.0%	1.9%	\$623	8.3%	1.3%	1.3%
Moderate	3	15.0%	19.9%	\$754	10.0%	15.3%	19.7%
Middle	2	10.0%	42.8%	\$404	5.4%	39.4%	41.8%
Upper	13	65.0%	35.2%	\$5,730	76.3%	43.9%	37.0%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.1%	0.3%
TOTAL	20	100.0%	100.0%	\$7,511	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.9%	\$0	0.0%	0.6%	1.3%
Moderate	0	0.0%	15.1%	\$0	0.0%	12.0%	19.7%
Middle	1	50.0%	38.6%	\$100	50.0%	32.9%	41.8%
Upper	1	50.0%	45.1%	\$100	50.0%	54.2%	37.0%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.2%	0.3%
TOTAL	2	100.0%	100.0%	\$200	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	1.0%	\$0	0.0%	0.6%	1.3%
Moderate	1	3.6%	12.9%	\$150	4.8%	9.7%	19.7%
Middle	8	28.6%	39.4%	\$680	21.8%	33.3%	41.8%
Upper	19	67.9%	46.5%	\$2,283	73.3%	56.1%	37.0%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.2%	0.3%
TOTAL	28	100.0%	100.0%	\$3,113	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	1.0%	\$0	0.0%	1.0%	1.3%
Moderate	0	0.0%	16.5%	\$0	0.0%	10.9%	19.7%
Middle	1	100.0%	36.3%	\$310	100.0%	27.6%	41.8%
Upper	0	0.0%	46.2%	\$0	0.0%	60.5%	37.0%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.3%
TOTAL	1	100.0%	100.0%	\$310	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	1.2%	\$0	0.0%	0.5%	1.3%
Moderate	0	0.0%	28.6%	\$0	0.0%	19.0%	19.7%
Middle	0	0.0%	50.0%	\$0	0.0%	52.2%	41.8%
Upper	0	0.0%	20.2%	\$0	0.0%	28.4%	37.0%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.3%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	1.3%	\$0	0.0%	2.6%	4.3%
Moderate	0	0.0%	48.1%	\$0	0.0%	50.9%	45.1%
Middle	0	0.0%	40.3%	\$0	0.0%	34.6%	32.8%
Upper	0	0.0%	10.4%	\$0	0.0%	11.8%	17.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	2	1.0%	1.6%	\$623	0.8%	1.3%	1.3%
Moderate	19	9.8%	17.8%	\$6,281	8.4%	16.6%	19.7%
Middle	64	33.0%	39.1%	\$21,336	28.5%	35.5%	41.8%
Upper	109	56.2%	41.3%	\$46,585	62.3%	46.5%	37.0%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.1%	0.3%
<b>TOTAL</b>	<b>194</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$74,824</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner- Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	6	3.2%	1.8%	\$1,589	2.0%	1.1%	1.3%
Moderate	38	20.1%	18.6%	\$13,571	17.3%	14.3%	19.7%
Middle	77	40.7%	40.1%	\$28,752	36.8%	36.7%	41.8%
Upper	68	36.0%	39.4%	\$34,322	43.9%	47.8%	37.0%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.1%	0.3%
TOTAL	189	100.0%	100.0%	\$78,234	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	1.5%	\$0	0.0%	1.1%	1.3%
Moderate	2	25.0%	20.7%	\$824	27.5%	14.9%	19.7%
Middle	4	50.0%	41.3%	\$1,305	43.5%	35.3%	41.8%
Upper	2	25.0%	36.3%	\$869	29.0%	48.6%	37.0%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.2%	0.3%
TOTAL	8	100.0%	100.0%	\$2,998	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	1.4%	\$0	0.0%	0.9%	1.3%
Moderate	0	0.0%	16.1%	\$0	0.0%	13.0%	19.7%
Middle	1	50.0%	41.3%	\$25	6.2%	36.5%	41.8%
Upper	1	50.0%	40.8%	\$380	93.8%	49.3%	37.0%
Unknown	0	0.0%	0.3%	\$0	0.0%	0.3%	0.3%
TOTAL	2	100.0%	100.0%	\$405	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	1.6%	\$0	0.0%	1.0%	1.3%
Moderate	2	12.5%	17.6%	\$198	10.7%	14.0%	19.7%
Middle	5	31.3%	40.7%	\$405	21.9%	36.6%	41.8%
Upper	9	56.3%	40.0%	\$1,243	67.3%	48.3%	37.0%
Unknown	0	0.0%	0.2%	\$0	0.0%	0.1%	0.3%
TOTAL	16	100.0%	100.0%	\$1,846	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.2%	\$0	0.0%	0.1%	1.3%
Moderate	0	0.0%	13.3%	\$0	0.0%	10.2%	19.7%
Middle	0	0.0%	40.4%	\$0	0.0%	30.6%	41.8%
Upper	0	0.0%	45.6%	\$0	0.0%	57.5%	37.0%
Unknown	0	0.0%	0.4%	\$0	0.0%	1.6%	0.3%
TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	1.3%
Moderate	0	0.0%	38.3%	\$0	0.0%	30.4%	19.7%
Middle	0	0.0%	51.1%	\$0	0.0%	56.9%	41.8%
Upper	0	0.0%	10.6%	\$0	0.0%	12.7%	37.0%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.3%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	1.4%	\$0	0.0%	0.1%	4.3%
Moderate	0	0.0%	43.7%	\$0	0.0%	53.9%	45.1%
Middle	0	0.0%	35.2%	\$0	0.0%	9.3%	32.8%
Upper	0	0.0%	19.7%	\$0	0.0%	36.7%	17.4%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.4%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	6	2.8%	1.7%	\$1,589	1.9%	1.1%	1.3%
Moderate	42	19.5%	18.6%	\$14,593	17.5%	15.8%	19.7%
Middle	87	40.5%	40.4%	\$30,487	36.5%	35.5%	41.8%
Upper	80	37.2%	39.2%	\$36,814	44.1%	47.5%	37.0%
Unknown	0	0.0%	0.1%	\$0	0.0%	0.1%	0.3%
<b>TOTAL</b>	<b>215</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$83,483</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2022							
		Count			Dollars			Total Businesses	
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	\$ (000s)	\$ %	\$ %		%
Business Revenue	\$1 Million or Less	11	91.7%	60.0%	\$1,530	68.0%	37.1%	94.6%	
	Over \$1 Million/ Unknown	1	8.3%	40.0%	\$720	32.0%	62.9%	5.4%	
	TOTAL	12	100.0%	100.0%	\$2,250	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	8	66.7%	96.7%	\$179	8.0%	47.4%		
	\$100,001–\$250,000	1	8.3%	1.6%	\$180	8.0%	11.7%		
	\$250,001–\$1 Million	3	25.0%	1.7%	\$1,891	84.0%	40.9%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	12	100.0%	100.0%	\$2,250	100.0%	100.0%		
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	8	72.7%		\$179	11.7%		
		\$100,001–\$250,000	1	9.1%		\$180	11.8%		
		\$250,001–\$1 Million	2	18.2%		\$1,171	76.5%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	11	100.0%		\$1,530	100.0%		

Distribution of 2023 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	0	0.0%	61.2%	\$0	0.0%	38.6%	94.7%
	Over \$1 Million/ Unknown	3	100.0%	38.8%	\$1,078	100.0%	61.4%	5.3%
	TOTAL	3	100.0%	100.0%	\$1,078	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	0	0.0%	96.8%	\$0	0.0%	49.8%	
	\$100,001–\$250,000	0	0.0%	1.7%	\$0	0.0%	11.7%	
	\$250,001–\$1 Million	3	100.0%	1.6%	\$1,078	100.0%	38.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	3	100.0%	100.0%	\$1,078	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	0	0.0%		\$0	0.0%	
		\$100,001–\$250,000	0	0.0%		\$0	0.0%	
		\$250,001–\$1 Million	0	0.0%		\$0	0.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	0	0.0%		\$0	0.0%	

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	1.1%	\$0	0.0%	0.9%	1.3%
Moderate	2	16.7%	25.7%	\$930	41.3%	33.6%	27.4%
Middle	2	16.7%	34.3%	\$40	1.8%	27.8%	35.8%
Upper	8	66.7%	37.8%	\$1,280	56.9%	36.6%	34.7%
Unknown	0	0.0%	1.1%	\$0	0.0%	1.1%	0.8%
<b>TOTAL</b>	<b>12</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,250</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	1.2%	\$0	0.0%	0.9%	1.2%
Moderate	1	33.3%	24.3%	\$500	46.4%	32.2%	27.6%
Middle	0	0.0%	34.6%	\$0	0.0%	29.2%	36.1%
Upper	2	66.7%	39.0%	\$578	53.6%	36.9%	34.4%
Unknown	0	0.0%	1.0%	\$0	0.0%	0.8%	0.7%
<b>TOTAL</b>	<b>3</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,078</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Denver Assessment Area**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	1	3.1%	4.8%	\$233	1.3%	2.1%	22.3%
Moderate	6	18.8%	19.6%	\$2,339	13.2%	13.6%	19.3%
Middle	7	21.9%	24.5%	\$3,571	20.1%	22.2%	22.0%
Upper	16	50.0%	35.3%	\$10,982	61.9%	45.7%	36.4%
Unknown	2	6.3%	15.9%	\$606	3.4%	16.4%	0.0%
TOTAL	32	100.0%	100.0%	\$17,731	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	15.8%	\$0	0.0%	9.8%	22.3%
Moderate	1	12.5%	23.5%	\$433	6.2%	19.1%	19.3%
Middle	1	12.5%	20.6%	\$325	4.7%	19.9%	22.0%
Upper	6	75.0%	24.8%	\$6,185	89.1%	34.3%	36.4%
Unknown	0	0.0%	15.2%	\$0	0.0%	16.9%	0.0%
TOTAL	8	100.0%	100.0%	\$6,943	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	6.7%	\$0	0.0%	4.6%	22.3%
Moderate	0	0.0%	17.7%	\$0	0.0%	11.3%	19.3%
Middle	0	0.0%	25.8%	\$0	0.0%	20.5%	22.0%
Upper	2	100.0%	47.1%	\$979	100.0%	59.8%	36.4%
Unknown	0	0.0%	2.8%	\$0	0.0%	3.8%	0.0%
TOTAL	2	100.0%	100.0%	\$979	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	7.7%	\$0	0.0%	5.0%	22.3%
Moderate	2	33.3%	20.7%	\$149	11.4%	12.8%	19.3%
Middle	0	0.0%	25.9%	\$0	0.0%	20.7%	22.0%
Upper	4	66.7%	42.1%	\$1,163	88.6%	58.2%	36.4%
Unknown	0	0.0%	3.5%	\$0	0.0%	3.3%	0.0%
TOTAL	6	100.0%	100.0%	\$1,312	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	8.4%	\$0	0.0%	3.6%	22.3%
Moderate	1	50.0%	20.0%	\$75	16.7%	7.8%	19.3%
Middle	1	50.0%	21.2%	\$374	83.3%	9.8%	22.0%
Upper	0	0.0%	42.7%	\$0	0.0%	65.0%	36.4%
Unknown	0	0.0%	7.7%	\$0	0.0%	13.8%	0.0%
TOTAL	2	100.0%	100.0%	\$449	100.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	2.2%	\$0	0.0%	0.3%	22.3%
Moderate	0	0.0%	0.4%	\$0	0.0%	0.1%	19.3%
Middle	0	0.0%	0.4%	\$0	0.0%	0.4%	22.0%
Upper	0	0.0%	0.4%	\$0	0.0%	0.1%	36.4%
Unknown	0	0.0%	96.6%	\$0	0.0%	99.1%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.4%	\$0	0.0%	0.2%	N/A
Unknown	0	0.0%	98.6%	\$0	0.0%	99.8%	N/A
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	1	2.0%	8.6%	\$233	0.8%	4.1%	22.3%
Moderate	10	20.0%	20.5%	\$2,996	10.9%	13.6%	19.3%
Middle	9	18.0%	23.4%	\$4,270	15.6%	19.3%	22.0%
Upper	28	56.0%	33.8%	\$19,308	70.4%	39.7%	36.4%
Unknown	2	4.0%	13.7%	\$606	2.2%	23.3%	0.0%
<b>TOTAL</b>	<b>50</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,413</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	1	3.8%	4.2%	\$260	2.1%	1.8%	22.3%
Moderate	6	23.1%	19.1%	\$1,959	16.2%	13.0%	19.3%
Middle	6	23.1%	25.9%	\$2,741	22.6%	23.2%	22.0%
Upper	13	50.0%	33.0%	\$7,170	59.1%	43.7%	36.4%
Unknown	0	0.0%	17.9%	\$0	0.0%	18.3%	0.0%
TOTAL	26	100.0%	100.0%	\$12,130	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	12.8%	\$0	0.0%	5.6%	22.3%
Moderate	0	0.0%	22.6%	\$0	0.0%	12.0%	19.3%
Middle	1	25.0%	21.9%	\$200	10.7%	13.6%	22.0%
Upper	3	75.0%	27.9%	\$1,673	89.3%	26.1%	36.4%
Unknown	0	0.0%	14.7%	\$0	0.0%	42.7%	0.0%
TOTAL	4	100.0%	100.0%	\$1,873	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	7.5%	\$0	0.0%	3.9%	22.3%
Moderate	0	0.0%	19.9%	\$0	0.0%	12.3%	19.3%
Middle	0	0.0%	26.6%	\$0	0.0%	21.8%	22.0%
Upper	0	0.0%	42.5%	\$0	0.0%	57.6%	36.4%
Unknown	1	100.0%	3.5%	\$395	100.0%	4.3%	0.0%
TOTAL	1	100.0%	100.0%	\$395	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	9.3%	\$0	0.0%	5.3%	22.3%
Moderate	0	0.0%	22.6%	\$0	0.0%	13.9%	19.3%
Middle	0	0.0%	26.1%	\$0	0.0%	20.9%	22.0%
Upper	1	100.0%	36.6%	\$200	100.0%	53.5%	36.4%
Unknown	0	0.0%	5.3%	\$0	0.0%	6.4%	0.0%
TOTAL	1	100.0%	100.0%	\$200	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	10.8%	\$0	0.0%	4.1%	22.3%
Moderate	0	0.0%	23.4%	\$0	0.0%	11.1%	19.3%
Middle	1	100.0%	26.3%	\$100	100.0%	14.1%	22.0%
Upper	0	0.0%	32.3%	\$0	0.0%	54.6%	36.4%
Unknown	0	0.0%	7.1%	\$0	0.0%	16.0%	0.0%
TOTAL	1	100.0%	100.0%	\$100	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	2.1%	\$0	0.0%	1.7%	22.3%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	19.3%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	22.0%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	36.4%
Unknown	0	0.0%	97.9%	\$0	0.0%	98.3%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	1.5%	\$0	0.0%	0.1%	N/A
Unknown	0	0.0%	98.5%	\$0	0.0%	99.9%	N/A
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	1	3.0%	6.5%	\$260	1.8%	2.4%	22.3%
Moderate	6	18.2%	20.0%	\$1,959	13.3%	11.6%	19.3%
Middle	8	24.2%	25.2%	\$3,041	20.7%	19.4%	22.0%
Upper	17	51.5%	33.3%	\$9,043	61.5%	37.6%	36.4%
Unknown	1	3.0%	14.9%	\$395	2.7%	29.1%	0.0%
<b>TOTAL</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,698</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner–Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	1	3.1%	3.7%	\$404	2.3%	2.6%	3.5%
Moderate	13	40.6%	25.7%	\$6,114	34.5%	19.9%	24.9%
Middle	13	40.6%	39.5%	\$6,596	37.2%	37.7%	40.1%
Upper	5	15.6%	30.4%	\$4,618	26.0%	38.8%	30.9%
Unknown	0	0.0%	0.8%	\$0	0.0%	1.0%	0.6%
TOTAL	32	100.0%	100.0%	\$17,731	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	3.5%	\$0	0.0%	2.6%	3.5%
Moderate	0	0.0%	26.8%	\$0	0.0%	21.0%	24.9%
Middle	3	37.5%	40.2%	\$2,765	39.8%	37.3%	40.1%
Upper	5	62.5%	28.9%	\$4,177	60.2%	38.4%	30.9%
Unknown	0	0.0%	0.6%	\$0	0.0%	0.8%	0.6%
TOTAL	8	100.0%	100.0%	\$6,943	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	2.2%	\$0	0.0%	1.8%	3.5%
Moderate	0	0.0%	18.6%	\$0	0.0%	13.8%	24.9%
Middle	0	0.0%	40.0%	\$0	0.0%	34.9%	40.1%
Upper	2	100.0%	38.5%	\$979	100.0%	48.7%	30.9%
Unknown	0	0.0%	0.6%	\$0	0.0%	0.7%	0.6%
TOTAL	2	100.0%	100.0%	\$979	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	2.5%	\$0	0.0%	1.9%	3.5%
Moderate	1	16.7%	20.6%	\$70	5.3%	14.2%	24.9%
Middle	2	33.3%	39.7%	\$479	36.5%	34.8%	40.1%
Upper	3	50.0%	36.7%	\$763	58.1%	48.5%	30.9%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.6%	0.6%
TOTAL	6	100.0%	100.0%	\$1,312	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	1.9%	\$0	0.0%	1.0%	3.5%
Moderate	0	0.0%	19.9%	\$0	0.0%	9.3%	24.9%
Middle	0	0.0%	37.7%	\$0	0.0%	22.3%	40.1%
Upper	2	100.0%	39.2%	\$449	100.0%	65.0%	30.9%
Unknown	0	0.0%	1.3%	\$0	0.0%	2.4%	0.6%
TOTAL	2	100.0%	100.0%	\$449	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	7.8%	\$0	0.0%	2.5%	3.5%
Moderate	0	0.0%	38.8%	\$0	0.0%	35.6%	24.9%
Middle	0	0.0%	39.2%	\$0	0.0%	47.9%	40.1%
Upper	0	0.0%	13.4%	\$0	0.0%	12.4%	30.9%
Unknown	0	0.0%	0.9%	\$0	0.0%	1.6%	0.6%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	13.1%	\$0	0.0%	13.3%	8.9%
Moderate	0	0.0%	32.0%	\$0	0.0%	34.9%	38.2%
Middle	0	0.0%	34.1%	\$0	0.0%	36.6%	31.1%
Upper	0	0.0%	18.0%	\$0	0.0%	13.9%	18.7%
Unknown	0	0.0%	2.8%	\$0	0.0%	1.2%	3.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	1	2.0%	3.4%	\$404	1.5%	3.4%	3.5%
Moderate	14	28.0%	24.8%	\$6,184	22.6%	21.0%	24.9%
Middle	18	36.0%	39.7%	\$9,840	35.9%	37.2%	40.1%
Upper	17	34.0%	31.4%	\$10,986	40.1%	37.4%	30.9%
Unknown	0	0.0%	0.7%	\$0	0.0%	1.0%	0.6%
<b>TOTAL</b>	<b>50</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$27,413</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	3.6%	\$0	0.0%	2.5%	3.5%
Moderate	9	34.6%	28.4%	\$3,360	27.7%	22.4%	24.9%
Middle	10	38.5%	39.1%	\$4,902	40.4%	38.0%	40.1%
Upper	7	26.9%	28.3%	\$3,868	31.9%	36.3%	30.9%
Unknown	0	0.0%	0.6%	\$0	0.0%	0.8%	0.6%
TOTAL	26	100.0%	100.0%	\$12,130	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	3.4%	\$0	0.0%	1.8%	3.5%
Moderate	2	50.0%	26.8%	\$926	49.4%	17.6%	24.9%
Middle	1	25.0%	38.8%	\$275	14.7%	47.4%	40.1%
Upper	1	25.0%	30.4%	\$672	35.9%	32.7%	30.9%
Unknown	0	0.0%	0.5%	\$0	0.0%	0.4%	0.6%
TOTAL	4	100.0%	100.0%	\$1,873	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	2.4%	\$0	0.0%	1.6%	3.5%
Moderate	0	0.0%	20.4%	\$0	0.0%	14.3%	24.9%
Middle	0	0.0%	41.9%	\$0	0.0%	36.6%	40.1%
Upper	0	0.0%	34.8%	\$0	0.0%	46.7%	30.9%
Unknown	1	100.0%	0.6%	\$395	100.0%	0.8%	0.6%
TOTAL	1	100.0%	100.0%	\$395	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	2.6%	\$0	0.0%	1.8%	3.5%
Moderate	0	0.0%	22.3%	\$0	0.0%	16.0%	24.9%
Middle	0	0.0%	41.1%	\$0	0.0%	34.4%	40.1%
Upper	1	100.0%	33.6%	\$200	100.0%	46.8%	30.9%
Unknown	0	0.0%	0.4%	\$0	0.0%	0.9%	0.6%
TOTAL	1	100.0%	100.0%	\$200	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	2.3%	\$0	0.0%	1.5%	3.5%
Moderate	0	0.0%	24.4%	\$0	0.0%	11.8%	24.9%
Middle	1	100.0%	40.3%	\$100	100.0%	29.2%	40.1%
Upper	0	0.0%	32.3%	\$0	0.0%	55.4%	30.9%
Unknown	0	0.0%	0.6%	\$0	0.0%	2.1%	0.6%
TOTAL	1	100.0%	100.0%	\$100	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	8.2%	\$0	0.0%	3.5%	3.5%
Moderate	0	0.0%	38.4%	\$0	0.0%	30.9%	24.9%
Middle	0	0.0%	29.5%	\$0	0.0%	27.5%	40.1%
Upper	0	0.0%	24.0%	\$0	0.0%	38.1%	30.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.6%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	15.5%	\$0	0.0%	9.3%	8.9%
Moderate	0	0.0%	31.1%	\$0	0.0%	27.8%	38.2%
Middle	0	0.0%	35.9%	\$0	0.0%	45.6%	31.1%
Upper	0	0.0%	15.5%	\$0	0.0%	11.9%	18.7%
Unknown	0	0.0%	1.9%	\$0	0.0%	5.5%	3.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	0	0.0%	3.4%	\$0	0.0%	3.0%	3.5%
Moderate	11	33.3%	26.7%	\$4,286	29.2%	21.7%	24.9%
Middle	12	36.4%	39.5%	\$5,277	35.9%	39.9%	40.1%
Upper	9	27.3%	29.8%	\$4,740	32.2%	34.2%	30.9%
Unknown	1	3.0%	0.6%	\$395	2.7%	1.2%	0.6%
<b>TOTAL</b>	<b>33</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$14,698</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2022							
		Count			Dollars			Total Businesses	
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	\$ (000s)	\$ %	\$ %		
Business Revenue	\$1 Million or Less	18	72.0%	53.4%	\$2,708	66.1%	33.0%	92.5%	
	Over \$1 Million/ Unknown	7	28.0%	46.6%	\$1,389	33.9%	67.0%	7.5%	
	TOTAL	25	100.0%	100.0%	\$4,097	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	14	56.0%	95.0%	\$615	15.0%	40.8%		
	\$100,001–\$250,000	7	28.0%	2.5%	\$1,224	29.9%	13.0%		
	\$250,001–\$1 Million	4	16.0%	2.6%	\$2,258	55.1%	46.1%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	25	100.0%	100.0%	\$4,097	100.0%	100.0%		
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	9	50.0%		\$379	14.0%		
		\$100,001–\$250,000	7	38.9%		\$1,224	45.2%		
		\$250,001–\$1 Million	2	11.1%		\$1,105	40.8%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	18	100.0%		\$2,708	100.0%		

Distribution of 2023 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			2023						
			Count			Dollars			Total Businesses
			Bank		Aggregate	Bank		Aggregate	
			#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less		8	44.4%	55.8%	\$2,136	52.5%	31.5%	92.6%
	Over \$1 Million/ Unknown		10	55.6%	44.2%	\$1,930	47.5%	68.5%	7.4%
	TOTAL		18	100.0%	100.0%	\$4,066	100.0%	100.0%	100.0%
Loan Size		\$100,000 or Less	10	55.6%	94.8%	\$468	11.5%	42.2%	
		\$100,001–\$250,000	2	11.1%	2.7%	\$400	9.8%	14.6%	
		\$250,001–\$1 Million	6	33.3%	2.5%	\$3,198	78.7%	43.2%	
		Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
		TOTAL	18	100.0%	100.0%	\$4,066	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	5	62.5%		\$182	8.5%		
		\$100,001–\$250,000	0	0.0%		\$0	0.0%		
		\$250,001–\$1 Million	3	37.5%		\$1,954	91.5%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	8	100.0%		\$2,136	100.0%		



Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	5.5%	\$0	0.0%	7.1%	4.9%
Moderate	7	28.0%	25.6%	\$1,560	38.1%	27.5%	24.0%
Middle	8	32.0%	32.9%	\$494	12.1%	28.8%	34.1%
Upper	8	32.0%	32.5%	\$1,290	31.5%	31.1%	33.4%
Unknown	2	8.0%	3.5%	\$753	18.4%	5.5%	3.6%
<b>TOTAL</b>	<b>25</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,097</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	1	5.6%	5.4%	\$933	22.9%	6.4%	4.9%
Moderate	3	16.7%	24.8%	\$503	12.4%	27.1%	24.2%
Middle	2	11.1%	33.8%	\$391	9.6%	27.7%	34.3%
Upper	12	66.7%	32.8%	\$2,239	55.1%	33.6%	33.2%
Unknown	0	0.0%	3.2%	\$0	0.0%	5.2%	3.3%
<b>TOTAL</b>	<b>18</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$4,066</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

**Durango Assessment Area**

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	1.1%	\$0	0.0%	0.4%	16.9%
Moderate	6	8.2%	8.1%	\$1,500	4.4%	4.3%	12.4%
Middle	14	19.2%	17.0%	\$5,984	17.7%	12.1%	18.3%
Upper	52	71.2%	62.5%	\$26,077	77.1%	70.3%	52.4%
Unknown	1	1.4%	11.2%	\$259	0.8%	12.9%	0.0%
TOTAL	73	100.0%	100.0%	\$33,820	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	7.3%	\$0	0.0%	3.8%	16.9%
Moderate	0	0.0%	15.5%	\$0	0.0%	9.9%	12.4%
Middle	2	18.2%	19.1%	\$647	14.1%	14.1%	18.3%
Upper	9	81.8%	46.2%	\$3,938	85.9%	57.1%	52.4%
Unknown	0	0.0%	11.9%	\$0	0.0%	15.2%	0.0%
TOTAL	11	100.0%	100.0%	\$4,585	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	1.9%	\$0	0.0%	3.1%	16.9%
Moderate	0	0.0%	6.3%	\$0	0.0%	2.1%	12.4%
Middle	0	0.0%	13.8%	\$0	0.0%	8.5%	18.3%
Upper	0	0.0%	71.1%	\$0	0.0%	76.8%	52.4%
Unknown	0	0.0%	6.9%	\$0	0.0%	9.5%	0.0%
TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	2.0%	\$0	0.0%	1.1%	16.9%
Moderate	0	0.0%	17.0%	\$0	0.0%	13.7%	12.4%
Middle	0	0.0%	20.0%	\$0	0.0%	15.1%	18.3%
Upper	0	0.0%	59.0%	\$0	0.0%	69.4%	52.4%
Unknown	0	0.0%	2.0%	\$0	0.0%	0.7%	0.0%
TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	4.2%	\$0	0.0%	0.6%	16.9%
Moderate	0	0.0%	6.3%	\$0	0.0%	2.4%	12.4%
Middle	1	50.0%	14.6%	\$255	25.7%	11.7%	18.3%
Upper	1	50.0%	68.8%	\$736	74.3%	82.0%	52.4%
Unknown	0	0.0%	6.3%	\$0	0.0%	3.3%	0.0%
TOTAL	2	100.0%	100.0%	\$991	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	16.9%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	12.4%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	18.3%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	52.4%
Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	N/A
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families by Family Income %
Low	0	0.0%	3.2%	\$0	0.0%	1.5%	16.9%
Moderate	6	7.0%	10.6%	\$1,500	3.8%	5.8%	12.4%
Middle	17	19.8%	17.4%	\$6,886	17.5%	12.4%	18.3%
Upper	62	72.1%	57.7%	\$30,750	78.1%	65.8%	52.4%
Unknown	1	1.2%	11.0%	\$259	0.7%	14.5%	0.0%
<b>TOTAL</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$39,396</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Borrower Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Families by Family Income %
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	3	5.1%	1.7%	\$502	1.9%	0.7%	16.9%
Moderate	5	8.5%	8.3%	\$1,230	4.6%	3.8%	12.4%
Middle	16	27.1%	18.9%	\$4,746	17.7%	12.5%	18.3%
Upper	35	59.3%	58.3%	\$20,339	75.8%	70.3%	52.4%
Unknown	0	0.0%	12.8%	\$0	0.0%	12.7%	0.0%
TOTAL	59	100.0%	100.0%	\$26,817	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	4.2%	\$0	0.0%	0.6%	16.9%
Moderate	0	0.0%	16.8%	\$0	0.0%	1.5%	12.4%
Middle	0	0.0%	19.6%	\$0	0.0%	2.4%	18.3%
Upper	4	80.0%	47.2%	\$1,290	76.3%	8.7%	52.4%
Unknown	1	20.0%	12.1%	\$400	23.7%	86.8%	0.0%
TOTAL	5	100.0%	100.0%	\$1,690	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	1.7%	\$0	0.0%	1.2%	16.9%
Moderate	0	0.0%	11.0%	\$0	0.0%	6.0%	12.4%
Middle	1	16.7%	21.2%	\$75	11.1%	12.2%	18.3%
Upper	5	83.3%	56.8%	\$600	88.9%	71.9%	52.4%
Unknown	0	0.0%	9.3%	\$0	0.0%	8.8%	0.0%
TOTAL	6	100.0%	100.0%	\$675	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	3.4%	\$0	0.0%	2.6%	16.9%
Moderate	0	0.0%	12.1%	\$0	0.0%	7.5%	12.4%
Middle	2	33.3%	27.6%	\$235	23.2%	24.1%	18.3%
Upper	4	66.7%	46.6%	\$777	76.8%	56.6%	52.4%
Unknown	0	0.0%	10.3%	\$0	0.0%	9.2%	0.0%
TOTAL	6	100.0%	100.0%	\$1,012	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	33.3%	6.1%	\$50	5.3%	1.1%	16.9%
Moderate	1	33.3%	18.4%	\$363	38.3%	7.9%	12.4%
Middle	0	0.0%	18.4%	\$0	0.0%	5.2%	18.3%
Upper	1	33.3%	44.9%	\$535	56.4%	62.7%	52.4%
Unknown	0	0.0%	12.2%	\$0	0.0%	23.0%	0.0%
TOTAL	3	100.0%	100.0%	\$948	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	16.9%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	12.4%
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	18.3%
Upper	0	0.0%	0.0%	\$0	0.0%	0.0%	52.4%
Unknown	0	0.0%	100.0%	\$0	0.0%	100.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Middle	0	0.0%	0.0%	\$0	0.0%	0.0%	N/A
Upper	0	0.0%	25.0%	\$0	0.0%	29.8%	N/A
Unknown	1	100.0%	75.0%	\$700	100.0%	70.2%	N/A
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$700</b>	<b>100.0%</b>	<b>100.0%</b>	<b>N/A</b>
Total Home Mortgage Loans							Families By Family Income %
Low	4	5.0%	2.4%	\$552	1.7%	0.7%	16.9%
Moderate	6	7.5%	10.7%	\$1,593	5.0%	2.8%	12.4%
Middle	19	23.8%	19.9%	\$5,056	15.9%	7.3%	18.3%
Upper	49	61.3%	54.3%	\$23,541	73.9%	38.5%	52.4%
Unknown	2	2.5%	12.6%	\$1,100	3.5%	50.6%	0.0%
<b>TOTAL</b>	<b>80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$31,842</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner–Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	20	27.4%	30.7%	\$10,508	31.1%	30.9%	43.7%
Upper	53	72.6%	69.3%	\$23,313	68.9%	69.1%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	73	100.0%	100.0%	\$33,820	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	4	36.4%	39.1%	\$1,843	40.2%	38.1%	43.7%
Upper	7	63.6%	60.9%	\$2,742	59.8%	61.9%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	11	100.0%	100.0%	\$4,585	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	37.7%	\$0	0.0%	35.9%	43.7%
Upper	0	0.0%	62.3%	\$0	0.0%	64.1%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	32.0%	\$0	0.0%	34.1%	43.7%
Upper	0	0.0%	68.0%	\$0	0.0%	65.9%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	0	0.0%	100.0%	\$0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	33.3%	\$0	0.0%	24.0%	43.7%
Upper	2	100.0%	66.7%	\$991	100.0%	76.0%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	2	100.0%	100.0%	\$991	100.0%	100.0%	100.0%

Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	50.0%	\$0	0.0%	48.0%	43.7%
Upper	0	0.0%	50.0%	\$0	0.0%	52.0%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	16.7%	\$0	0.0%	11.1%	7.1%
Upper	0	0.0%	83.3%	\$0	0.0%	88.9%	92.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	24	27.9%	34.0%	\$12,351	31.4%	32.6%	43.7%
Upper	62	72.1%	66.0%	\$27,045	68.6%	67.4%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>86</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$39,396</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	% of Owner– Occupied Units
	#	# %	# %	\$	\$ %	\$ %	
Home Purchase Loans							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	19	32.2%	32.9%	\$12,045	44.9%	35.1%	43.7%
Upper	40	67.8%	67.1%	\$14,772	55.1%	64.9%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	59	100.0%	100.0%	\$26,817	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	1	20.0%	42.5%	\$100	5.9%	6.1%	43.7%
Upper	4	80.0%	57.5%	\$1,590	94.1%	93.9%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	5	100.0%	100.0%	\$1,690	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	43.2%	\$0	0.0%	31.6%	43.7%
Upper	6	100.0%	56.8%	\$675	100.0%	68.4%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	6	100.0%	100.0%	\$675	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	28.4%	\$0	0.0%	31.7%	43.7%
Upper	6	100.0%	71.6%	\$1,012	100.0%	68.3%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	6	100.0%	100.0%	\$1,012	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	44.9%	\$0	0.0%	44.3%	43.7%
Upper	3	100.0%	55.1%	\$948	100.0%	55.7%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
TOTAL	3	100.0%	100.0%	\$948	100.0%	100.0%	100.0%



Purpose Not Applicable							
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	0	0.0%	25.0%	\$0	0.0%	18.5%	43.7%
Upper	0	0.0%	75.0%	\$0	0.0%	81.5%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>\$0</b>	<b>0.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Multifamily Loans							% of Multifamily Units
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	1	100.0%	25.0%	\$700	100.0%	14.9%	7.1%
Upper	0	0.0%	75.0%	\$0	0.0%	85.1%	92.9%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>1</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$700</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>
Total Home Mortgage Loans							% of Owner-Occupied Units
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	21	26.3%	35.6%	\$12,845	40.3%	20.4%	43.7%
Upper	59	73.8%	64.4%	\$18,997	59.7%	79.6%	56.3%
Unknown	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
<b>TOTAL</b>	<b>80</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$31,842</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2022 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2022							
		Count			Dollars			Total Businesses	
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	\$ (000s)	\$ %	\$ %		%
Business Revenue	\$1 Million or Less	3	75.0%	52.2%	\$848	57.0%	38.3%	93.8%	
	Over \$1 Million/ Unknown	1	25.0%	47.8%	\$640	43.0%	61.7%	6.2%	
	TOTAL	4	100.0%	100.0%	\$1,488	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	1	25.0%	92.1%	\$1	0.1%	32.5%		
	\$100,001–\$250,000	0	0.0%	3.5%	\$0	0.0%	14.3%		
	\$250,001–\$1 Million	3	75.0%	4.4%	\$1,487	99.9%	53.1%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	4	100.0%	100.0%	\$1,488	100.0%	100.0%		
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	1	33.3%		\$1	0.1%		
		\$100,001–\$250,000	0	0.0%		\$0	0.0%		
		\$250,001–\$1 Million	2	66.7%		\$847	99.9%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	3	100.0%		\$848	100.0%		

Distribution of 2023 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2023						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	5	71.4%	55.3%	\$1,258	56.2%	31.2%	93.9%
	Over \$1 Million/ Unknown	2	28.6%	44.7%	\$980	43.8%	68.8%	6.1%
	TOTAL	7	100.0%	100.0%	\$2,238	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	3	42.9%	93.0%	\$180	8.0%	36.7%	
	\$100,001–\$250,000	1	14.3%	4.2%	\$118	5.3%	19.5%	
	\$250,001–\$1 Million	3	42.9%	2.8%	\$1,940	86.7%	43.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	7	100.0%	100.0%	\$2,238	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	2	40.0%		\$100	7.9%	
		\$100,001–\$250,000	1	20.0%		\$118	9.4%	
		\$250,001–\$1 Million	2	40.0%		\$1,040	82.7%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	5	100.0%		\$1,258	100.0%	

Distribution of 2022 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	1	25.0%	28.5%	\$640	43.0%	19.9%	29.4%
Upper	3	75.0%	69.4%	\$848	57.0%	79.6%	70.6%
Unknown	0	0.0%	2.1%	\$0	0.0%	0.5%	0.0%
<b>TOTAL</b>	<b>4</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$1,488</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

Distribution of 2023 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	# %	%	\$ (000s)	\$ %	\$ %	
Low	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	\$0	0.0%	0.0%	0.0%
Middle	2	28.6%	28.8%	\$950	42.4%	23.3%	29.8%
Upper	5	71.4%	69.5%	\$1,288	57.6%	76.4%	70.2%
Unknown	0	0.0%	1.7%	\$0	0.0%	0.3%	0.0%
<b>TOTAL</b>	<b>7</b>	<b>100.0%</b>	<b>100.0%</b>	<b>\$2,238</b>	<b>100.0%</b>	<b>100.0%</b>	<b>100.0%</b>

## APPENDIX D – GLOSSARY

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

**Assessment area:** One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

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

**Community contact:** Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

**Community development:** An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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

**Demographics:** The statistical characteristics of human populations (e.g., age, race, sex, and income) 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 income of applicants; the amount of loan requested; and the disposition of the application (e.g., approved, denied, and withdrawn).

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

**Household:** One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

**Housing affordability ratio:** Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

**Limited-scope review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**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 either by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

**Underserved middle-income geography:** A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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