



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Equity Bank, National Association
Charter Number 18478

225 W. Central
Andover, KS 67002

Office of the Comptroller of the Currency

Thomas J. Jorn, ADC
Wichita Field Office
3450 N. Rock Road, Suite 505
Wichita, KS. 67226-1355

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

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

- Equity Bank, National Association's (Equity) average loan-to-deposit ratio of 89% is more than reasonable compared to the average of 80% for similarly situated banks.
- A majority of the bank's primary loan products have been granted in the bank's assessment areas. The loan analysis indicated that 69% of the dollar amount and 87% of the number of loans were extended to borrowers within the bank's assessment area (AA).
- Equity demonstrated satisfactory penetration to business and farms of different sizes, and to borrowers of different incomes. In the Wichita AA and the Ellis/Trego AA, penetration was excellent. The business loan samples indicated the bank made 80% and 90%, respectively, of its loan to businesses with revenues of one million dollars or less.
- The bank's lending performance throughout the AAs reflects reasonable dispersion throughout low- and moderate-income census tracts (CT). Dispersion of business and HMDA loans to low- and moderate-income tracts in the Wichita AA was less than satisfactory; however, dispersion was excellent in the Kansas City AA. The percentage of loans granted by the bank to businesses in moderate-income tracts significantly exceeded the percentage of businesses located in those tracts.
- Equity demonstrated excellent responsiveness to community development needs overall. Community development loans and qualified investments extended in this evaluation period represent 29% of the bank's Tier One Capital.

Scope of Examination

The evaluation of lending products included a review of loans originated or purchased from January 1, 2009 through June 30, 2011. A sample of 20 business loans and all loans from the Home Mortgage Disclosure Act Loan Activity Report (HMDA) were used for the Wichita and Kansas City AAs. A sample of 20 business loans and 20 farm loans were used for the Ellis/Trego AA. These were the primary products granted in the AAs since the previous Community Reinvestment Act (CRA) examination.

The Community Development Test included a review of community development loans, qualified investments, and community development services. The evaluation period for community development was from January 1, 2009 to October 1, 2011.

To determine the accuracy of the bank's HMDA data used in our analyses, we performed a separate data integrity examination in April 2011, where we reviewed a sample of residential loans. This Performance Evaluation (PE) is based on statistically valid data.

Description of Institution

Equity is a \$483 million interstate institution headquartered in Andover, KS. The bank is a wholly owned subsidiary of Equity Bancshares, Inc., a two bank holding company located in Wichita, KS. Equity has a total of ten branches and eight automated teller machines (ATMs). The ATMs are located at branches.

Since the last CRA exam, the bank has grown from \$158 million in assets and has increased the number of branches from four to ten. The majority of growth has been from acquisitions. In November 2007, the bank acquired two branches in the Kansas City, KS area. In March 2008, the bank converted a loan production office in Lee's Summit, MO to a full-service branch. In August 2008, the bank purchased two branches in Ellis County, KS. During April 2009, a new branch was opened in Kansas City.

Equity is a full-service banking institution that offers a full range of commercial, real estate, and consumer credit products. As of June 30, 2011, net loans and leases represent 58% of total assets. The \$289 million loan portfolio consists of 75% real estate, 23% commercial, 2% agriculture operations, 1% consumer, and approximately 1% other loans.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The Office of the Comptroller of the Currency last evaluated Equity's CRA performance on September 18, 2006. The bank received an overall rating of "Satisfactory".

Selection of Areas for Full-Scope Review

Equity has three AAs. The Wichita AA is comprised of a portion of the Wichita Metropolitan Statistical Area (MSA) #48620, specifically portions of Butler and Sedgwick counties in Kansas. The Ellis/Trego AA is comprised of Ellis and Trego counties in Kansas. The Kansas City AA is comprised of a portion of the Kansas City KS/MO Multistate Metropolitan Area #28140, specifically Johnson County, KS, a small portion of Miami County, KS, and the town of Lee's Summit, MO. We performed a full-scope review for each of the bank's three AAs.

Ratings

The bank's overall rating is a blend of the Kansas City AA rating and the state of Kansas rating. The institution's CRA rating takes into account the ratings in different states/multistate metropolitan areas by considering:

- The significance of the bank's activities in each state/multistate metropolitan area compared with the bank's overall activities.
- The lending opportunities in each state/multistate metropolitan area.
- The importance of the bank in providing loans to each state/multistate metropolitan area, particularly in light of the number of other institutions and the extent of their activities in each state/multistate metropolitan area.
- Demographic and economic conditions in each state/multistate metropolitan area.

Conclusions with Respect to Performance Criteria

Loan-to-Deposit Ratio

Equity's lending level is outstanding. The bank's average quarterly loan-to-deposit ratio since the last CRA examination is 89%, compared to 80% for similarly situated banks. The average loan-to-deposit ratio for these banks ranges from 61% to 102%.

Lending in Assessment Area

Equity's level of lending within its AAs is satisfactory. A majority of the bank's primary loan products were granted in the assessment areas. Specifically, we found that 69% of the dollar amount and 87% of the number of loans were extended to borrowers within the bank's AAs.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Multistate Metropolitan Area Rating

Kansas City Assessment Area

CRA Rating for the Kansas City AA¹: Satisfactory

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

- Equity's lending activities demonstrated reasonable penetration to businesses of different sizes and borrowers of different incomes.
- Equity demonstrated excellent responsiveness to community development needs. The bank's volume of qualified community development loans represented 60% of allocated Tier One Capital.

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

The Kansas City AA is comprised of a portion of the Kansas City KS/MO Multistate Metropolitan Area #28140, specifically Johnson County, KS (104 CTs), a small portion of Miami County, KS (two CTs), and the town of Lee's Summit, MO (15 CTs). The AA consists of three moderate-income tracts (3%), 44 middle-income tracts (36%), and 74 upper-income (61%) tracts. There are no low-income CTs. One of the moderate-income tracts is within the town of Lee's Summit and two are within Johnson County. The delineation of the Kansas City AA does not reflect any illegal discrimination, or arbitrarily exclude any low- or moderate-income geography.

The 2010 U.S. Census population for the AA is 524,483. The Weighted Average of HUD Updated MSA Median Family Income is \$72,300. Persons over the age of 65 represent 10% of the AA population. Fourteen percent of the households are retired, 4% of the households have income below the poverty line, and 1% receives public assistance. The Weighted Average of Median Housing is \$154,189. One-to-four family units represent 83% of the total number of housing units, with rental units accounting for 29% of total housing. Four percent of the housing units are vacant.

The Kansas City AA has a wide variety of major employers. In Lee's Summit, the largest employers are AT&T, Caremark, Inc., Truman Medical Center, and the Lee's Summit R-7 School District. Johnson County's largest employers include Sprint, Honeywell, UPS, JC Penny, and Yellow Freight. In Miami County the largest employers are Unified School District (USD) 368, USD 367, Osawatomie State Hospital, Wal-Mart, and local governments. Unemployment rates also vary significantly. The September

¹This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

2011 unemployment rate for Johnson County is 6.4% and 7.6% for Miami County, KS. The average for Kansas is 6.7%. The unemployment rate in Jackson County, MO is more comparable to the national level, 11% compared to a national rate of 9.1%.

The Kansas City AA has a variety of community development opportunities. At the state level, there is an enterprise zone program offering sales tax exemptions and state income tax credits, a small business initiative which provides matching funds to businesses in distressed communities, and affordable housing programs. At the local level there are various neighborhood revitalization and development programs.

SCOPE OF EVALUATION IN KANSAS CITY

The Kansas City AA received a full-scope review for this evaluation. The Kansas City AA is given less weight than the Wichita AA; however, within the Kansas City AA, the Johnson County area was given the most consideration as the majority of the AA's deposit and lending activity occurs in that county. The AA has 22% of the bank's total deposits and 12% of the bank's total loans originated during the evaluation period. Commercial lending is the primary focus and comprises 86% of the AAs total loans. A sample of 20 business loans and all AA loans from HMDA were used for the evaluation. The bank has significant competition in the AA from many larger regional banks. Within the AA, there are 82 institutions with 314 locations. Equity's deposit market share is small at 0.51%.

Recent community contacts at regional economic development and affordable housing organizations state that small business loans and affordable housing are the primary credit needs of the community. Contacts state that banks satisfactorily meet the needs of the community.

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

LENDING TEST

The bank's performance under the lending test in KC AA is rated satisfactory.

Lending to Businesses of Different Sizes and to Borrowers of Different Incomes

Equity's lending in the AA is satisfactory and reflects reasonable penetration among businesses of different sizes and borrowers of different incomes.

The distribution of loans to business of different sizes is reasonable. The sample for the primary loan product, business loans, indicated the bank made 54.55% of its loans to businesses with revenues of one million dollars or less. This is somewhat lower than the AA demographic that reflects 65.55% of the businesses have revenues of one million dollars or less.

Borrower Distribution of Loans to Business in the Kansas City AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Business	65.55	3.18	31.27	100.00%
% of Bank Loans in AA by #	54.55	36.36	9.09	100.00%

Source: Business loan data sampled from 2009-2011 and U.S. Census Data

The bank's lending in the AA reflects reasonable penetration among borrowers of different incomes. Compared to business lending, HMDA lending does not represent a significant volume of lending in the AA. Home refinance loans were the primary HMDA product. The HMDA loan data reflect that the bank made 5.26% and 10.53% of its home refinance loans to low- and moderate-income borrowers. This level is lower than the AA demographic that reflects 13.81% and 15.50% of AA families are designated as low- and moderate-income (LMI), respectively. Excellent penetration to moderate-income borrowers for home purchase loans had a positive impact in determining reasonable penetration. The bank made 42.86% of its home purchase loans to moderate-income borrowers, while the AA demographic reflects only 15.50%.

Borrower Distribution of Residential Real Estate Loans in the Kansas City AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	13.81	0	15.50	42.86	20.04	0	50.65	42.86
Home Refinance	13.81	5.26	15.50	10.53	20.04	15.79	50.65	68.42

Source: HMDA data for 2009-2011 and U.S. Census Data

Geographic Distribution of Loans

The geographic distribution of business and HMDA loans reflects satisfactory geographic dispersion throughout the AA.

Dispersion of loans to businesses located in moderate-income tracts is excellent. The bank granted 4.55% of the number of business loans to borrowers located in moderate-income tracts. This level significantly exceeds the demographics, which reflect 2.6% of the AA's businesses are located in moderate-income tracts.

Geographic Distribution of Loans to Businesses in the Kansas City AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	0	0	2.60	4.55	27.03	22.73	70.37	72.72

Source: Business loan data sampled from 2009-2011 and U.S. Census Data

The bank did not grant any HMDA loans to borrowers located in the moderate-income tracts. The AA contains 3 moderate-income tracts, which represents only 3% of the total number of census tracts. Within those tracts, less than 2% of the housing is owner occupied. Given that the branches in Johnson County are not geographically close to the moderate-income tracts and that the bank has a small market share and significant competition, the absence of lending in the moderate-income tracts did not detract from the satisfactory rating for geographic distribution.

Geographic Distribution of Residential Real Estate Loans in the Kansas City AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.00	0	1.56	0	31.60	42.86	66.85	57.14
Refinancing	0.00	0	1.56	0	31.60	36.84	66.85	63.16

Source: HMDA data for 2009-2011 and U.S. Census Data

Responses to Complaints

The bank has not received any CRA related complaints since the previous CRA examination.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the community development test in the Kansas City AA is rated outstanding.

Number and Amount of Community Development Loans

Equity demonstrated excellent responsiveness to community development lending needs in the Kansas City AA considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area. The bank made a high level of CD loans in the AA. Equity granted six loans totaling \$7.9 million for community development purposes. This level of community development lending represents 60%

of the bank's allocated Tier One Capital. Five of the loans granted were part of the Small Business Association's (SBA) 504 community development program, providing economic development with stabilization in low- and moderate-income (LMI) tracts and employment for LMI persons. One loan was granted for 99 affordable-housing units for LMI persons.

Number and Amount of Qualified Investments

The bank demonstrated less than satisfactory responsiveness to community development investment needs in the Kansas City AA based on investment opportunities and the capacity to invest. The bank provided \$135 thousand in qualified investments and donations during the evaluation period. This amount represents one percent of the bank's allocated Tier One Capital. The investments are comprised of mortgage backed securities. The underlying mortgages are to LMI borrowers located in the bank's AA. Cash donations were to organizations providing social and employment services to LMI individuals.

Extent to Which the Bank Provides Community Development Services

The bank's level of community development services during the evaluation period demonstrates excellent responsiveness to community development service needs in the Kansas City AA. Five Equity employees supported seven qualifying organizations that have varying mission statements. The bank's involvement in various local community organizations has helped promote community development. The following are examples of how bank associates used their financial expertise to assist these organizations:

- An Equity employee serves on the board of an organization whose mission was to utilize corporate investment and available tax incentives to stimulate the development of affordable, LMI housing units.
- Another Equity employee serves on the board of the Johnson County Housing Authority and assists in the management of the federal Community Development Block Grant funds.
- A third employee serves on the Board of an organization that is a supporter of microenterprise through direct loans and education. The organization provides training for small business operations to low-income individuals.

Responsiveness to Community Development Needs

Equity demonstrated excellent responsiveness to community development needs in the Kansas City AA. By providing funds and technical financial services, the bank supported community needs, which included affordable housing, social services, and educational services.

State Rating

State of Kansas

CRA Rating for Kansas²: **Satisfactory**

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

- Equity's lending activities demonstrated reasonable penetration to farms of different sizes and to borrowers of different incomes. The bank demonstrated excellent penetration to businesses of different sizes.
- Equity demonstrated excellent responsiveness to community development needs. The bank's volume of qualified community development loans represented 17% of the Kansas allocated Tier One Capital.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KANSAS

Wichita AA

The Wichita AA consists of portions of Sedgwick County (115 CTs) and Butler County, Kansas (eight CTs). Five of the tracts are low-income (4%), 39 of the tracts are moderate-income (32%), 45 are middle-income (36%), and 34 of the tracts are upper-income tracts (28%). The majority of the low-income tracts are situated in the centrally located downtown district of Wichita. The moderate-income tracts are adjacent to the low-income tracts and extend primarily to the northwest and to the southeast of the city's center. The delineation of the Wichita AA does not reflect any illegal discrimination, or arbitrarily exclude any low- or moderate-income geography.

The 2010 U.S. Census population for the AA is 482,235. The Weighted Average of HUD Updated MSA Median Family Income is \$64,100. Persons over the age of 65 represent 11% of the AA population. Fifteen percent of the households are retired, 9% of the households have income below the poverty line, and 3% receives public assistance. The Weighted Average of Median Housing is \$80,171. One-to-four family units represent 80% of the total number of housing units, with rental units accounting for 35% of total housing. Eight percent of the housing units are vacant.

The local economy is stable, but dependent on the aircraft industry. Major employers in the Wichita area include Spirit Aerosystems, Raytheon Aircraft, Cessna Aircraft, McConnell Air Force Base, Via Christi Health Systems, the school districts, and city,

² For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

county, and state governments. Major employers in the Andover area include the school district, Butler County Community College, Vornado, and Sherwin-Williams. The unemployment rate for the Wichita MSA in September 2011 was 7.9%. The unemployment rate in Kansas is 6.7%.

The Wichita AA also has a variety of community development opportunities. In addition to the state level opportunities mentioned previously in this Evaluation, the Wichita AA has over a dozen neighborhood revitalization programs and five community development districts.

Ellis/Trego AA

The Ellis/Trego AA consists of the counties of Ellis (five CTs) and Trego (one CT). Five of the tracts are middle-income and one tract is upper-income. There are no low- or moderate-income tracts. The delineation of the Ellis/Trego AA does not reflect any illegal discrimination.

The 2010 U.S. Census population for the Ellis/Trego AA is 30,826. The Weighted Average of HUD Updated MSA Median Family Income is \$53,700. Persons over the age of 65 represent 15% of the AA population. Ten percent of the households are retired, 15% percent of the households have income below the poverty line, and 2% receive public assistance. The Weighted Average of Median Housing is \$80,518. One-to-four family units represent 84% of the total number of housing units, with rental units accounting for 35% of total housing. Nine percent of the housing units are vacant.

In the Ellis/Trego AA, major employers are primarily the county hospitals, school districts, and county or local governments, with some diversification provided by N.E.W. Customer Service Companies, Inc., WW Drilling LL, and Western Cooperative Electric. The unemployment rate for both counties is under 4%.

The Ellis/Trego AA has fewer community development opportunities than either the Wichita or Kansas City AAs. The county has a low number of LMI persons and there are no low- or moderate-income geographies. However, Trego County has been designated as a distressed and underserved non-metropolitan middle-income geography.

SCOPE OF EVALUATION IN KANSAS

Both the Wichita and Ellis/Trego AAs received a full-scope review. The Wichita AA receives the most weight in this evaluation.

The Wichita AA is where a majority of the bank's deposit and lending activities occur. Equity has four branches in the Wichita AA, which account for 62% of the bank's deposits and 52% of the loans for this evaluation period. Sixty percent of the loans originated in the Wichita AA during the evaluation period were business loans. A sample of 20 business loans and all AA loans from HMDA were used for the evaluation.

Competition is very strong in the Wichita AA. There are 42 institutions with 190 offices in the AA. The bank’s deposit market share is small at 2%.

The Ellis/Trego AA consists of two branches and represents 16% of the bank’s deposits and 5% of the loans made during this evaluation period. Commercial lending comprised 58% of the loans originated during the evaluation period, followed by agriculture loans representing 25% of originations. A sample of 20 business loans and 20 agriculture loans were used for the evaluation. There are 12 institutions with 21 branches in the AA. Equity is ranked sixth in deposit market share with 7% of deposits.

Community contacts in both the Wichita and Ellis/Trego AAs state that small business loans are one of the primary lending needs in the communities. Additional needs in the Wichita AA are for affordable housing, and in the Ellis/Trego AA, small farm loans. Contacts state that banks satisfactorily meet the needs of the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank’s performance under the lending test in Kansas is rated satisfactory. Based on full-scope reviews, the bank’s performance in the Wichita AA is satisfactory and the performance in the Ellis/Trego AA is outstanding.

Lending to Businesses of Different Sizes and to Borrowers of Different Incomes

Wichita AA

The bank’s record of lending in the Wichita AA reflects excellent penetration among businesses of different sizes. The business loan sample indicated the bank made 80% of its loans to business with revenues of one million dollars or less. The bank’s performance significantly exceeds the AA demographics of 66.61%.

Borrower Distribution of Loans to Business in Wichita AA				
Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Business	66.61	3.22	30.17	100.00%
% of Bank Loans in AA by #	80.00	20.00	0	100.00%

Source: Business loan data sampled from 2009-2011 and U.S. Census Data

The bank’s lending in the AA reflects reasonable penetration among borrowers of different incomes. Home purchase loans were the primary home loan product and comprised 70% of HMDA lending in the AA. The HMDA loan data reflect that the bank made 10.66% of its home purchase loans to low-income borrowers, reflecting penetration below the AA demographics. Lending to moderate-income borrowers reflects excellent penetration at 27.46% for home purchase loans, significantly above

the AA demographics. The bank's lending performance for home improvement loans is somewhat lower than the AA demographics.

Borrower Distribution of Residential Real Estate Loans in Wichita AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	17.74	10.66	18.73	27.46	24.09	25.41	39.44	33.61
Home Improvement	17.74	14.29	18.73	14.29	24.09	14.29	39.44	57.14

Source: HMDA data for 2009-2011 and U.S. Census Data

Ellis/Trego AA

The bank's record of lending in the Ellis/Trego AA reflects excellent penetration among businesses of different sizes. The business loan sample indicated the bank made 90% of its loans to business with revenues of one million dollars or less. The bank's performance significantly exceeds the AA demographics of 68.03%.

Borrower Distribution of Loans to Business in Ellis/Trego AA				
Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Business	68.03	2.77	29.20	100%
% of Bank Loans in AA by #	90.00	10.00	0	100%

Source: Business loan data sampled from 2009-2011 and U.S. Census Data

Lending in the Ellis/Trego AA reflects reasonable penetration among farms of different sizes. The farm loan sample indicated the bank made 90% of its loans to farms with revenues of one million dollars or less. The bank's performance is near to the AA demographics of 98.96%.

Borrower Distribution of Loans to Farms in Western Kansas AA				
Farm Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Farms	98.96	1.04	0	100%
% of Bank Loans in AA by #	95.00	0	5.00	100%

Source: Farm loan data sampled from 2009-2011 and U.S. Census Data

Geographic Distribution of Loans

Wichita AA

Dispersion of business and HMDA loans to LMI tracts in the Wichita AA is less than satisfactory. As noted previously, a majority of the LMI tracts are located center-city, and are a significant distance from the bank's branches. Attaining a reasonable geographic distribution given the bank's branch distribution and small market share could be a challenge; thus performance in this category did not negatively impact the overall lending conclusion for the Wichita AA.

Dispersion of business loans in low- and moderate-income tracts in the Wichita AA is less than satisfactory. The bank granted no loans in low-income tracts and 10% of the number of business loans to borrowers located in moderate-income tracts. These levels are significantly lower than AA demographics, which reflect 1.85% percent of the AA's businesses are located in low-income tracts and 23.04% are located in moderate-income tracts.

Geographic Distribution of Loans to Businesses in Wichita AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	1.85	0	23.04	10.00	40.64	15.00	34.47	75.00

Source: Business loan data sampled from 2009-2011 and U.S. Census Data

Dispersion of HMDA loans in low- and moderate-income tracts in the Wichita AA is less than satisfactory. The low-income tracts are a significant distance from the bank's branches and contain a low level of owner-occupied housing. The bank granted no loans in low-income tracts and only 9.02% of the number of home purchase loans was granted to borrowers located in moderate-income tracts. These lending levels are significantly lower than AA demographics, which reflect owner occupied housing demographics of 1.31% in low-income tracts and 22.12% in moderate-income tracts.

Geographic Distribution of Residential Real Estate Loans in Wichita AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	1.31	0	21.12	9.02	45.82	41.39	31.74	49.59
Home Improvement	1.31	0	21.12	14.29	45.82	42.86	31.74	42.86

Source: HMDA data for 2009-2011 and U.S. Census Data

Ellis/Trego AA

An analysis of the geographic distribution of loans in the Ellis/Trego is not meaningful as there are no low- or moderate-income tracts in the AA.

Responses to Complaints

The bank has not received any CRA related complaints since the previous CRA examination.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the community development test in Kansas is rated outstanding.

Number and Amount of Community Development Loans

The bank's level of community development lending during the evaluation period demonstrates excellent responsiveness to community development lending needs in the Wichita and Ellis/Trego AAs.

Wichita AA

The bank made a moderate level of CD loans in the AA during the evaluation period. Equity granted two loans totaling \$1.8 million for community development purposes. This level of community development lending represents 5% of the bank's allocated Tier One Capital. The loans were granted to provide affordable housing for LMI persons. The bank has affordable housing loans outstanding from the prior evaluation period that represent 10% of allocated Tier One Capital.

Ellis/Trego AA

The bank made a high level of CD loans in the AA. Equity granted two loans totaling \$6.5 million for community development purposes. This level of community development lending represents 63% of the bank's allocated Tier One Capital. The majority of the dollar volume was granted in conjunction with the SBA's 504 community development program, providing economic development with employment for LMI persons.

Number and Amount of Qualified Investments

The bank's level of community development investment and donations during the evaluation period demonstrates adequate responsiveness to community development lending needs in the Wichita and Ellis/Trego AAs.

Wichita AA

The bank demonstrated adequate responsiveness to community development investment needs in the Wichita AA. The bank provided \$379 thousand in qualified investments and donations during the evaluation period. This amount represents 01% of the bank's allocated Tier One Capital. Balances from the prior evaluation period total \$529 thousand. The investments are comprised of mortgage backed securities. The underlying mortgages are to LMI borrowers located in the bank's AA. Cash donations were to organizations providing health and social services to LMI individuals.

Ellis/Trego AA

The bank demonstrated less than satisfactory responsiveness to community development investment needs in the Ellis/Trego AA. The bank provided one thousand dollars in qualified donations during the evaluation period. This amount represents less

than 1% of the bank's allocated Tier One Capital. Cash donations were to organizations providing social services to LMI individuals.

Broader Regional Area Loans and Investments

Equity made qualified community development loans of \$15 million and investments totaling \$900 thousand during the evaluation period. These loans and investments have the potential to benefit the bank's AAs while benefitting community development purposes in areas near or adjacent to the AAs.

Extent to Which the Bank Provides Community Development Services

The bank's level of community development services during the evaluation period demonstrates excellent responsiveness to community development service needs in the Wichita and Ellis/Trego AAs.

Wichita AA

The bank's level of community development services during the evaluation period demonstrates excellent responsiveness to community development service needs in the Wichita AA. Ten employees supported five qualifying organizations that have varying mission statements. The bank's involvement in various local community organizations has helped promote community development. The following are examples of how bank associates used their financial expertise to assist these organizations:

- Two employees serve on boards for organizations that support affordable housing through the federal Community Service Block Grant program or local housing authorities. One of the organizations also provides social services to LMI persons.
- Several employees provide substantial financial training to high school students that attend schools located in LMI tracts.

Ellis/Trego AA

The bank's level of community development services during the evaluation period demonstrates excellent responsiveness to community development service needs in the Ellis/Trego AA. Five Equity employees supported six qualifying organizations that have varying mission statements. The bank's involvement in various local community organizations has helped promote community development. The following are examples of how bank associates used their financial expertise to assist these organizations:

- Two employees serve on boards, or are board chairman, for three organizations that provide affordable housing, housing for homeless persons, or foster care and social services for neglected or abandoned children.
- Three employees are board members or educators for two organizations that provide financial education or college tuition assistance for LMI persons.

Responsiveness to Community Development Needs

Equity demonstrated excellent responsiveness to community development needs in the Ellis/Trego AA. By providing funds and technical financial services, the bank supported community needs, which included affordable housing, social services, and educational services.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test: January 1, 2009 to June 30, 2011 Community Development Test: January 1, 2009 to October 1, 2011	
Financial Institution	Products Reviewed	
Equity Bank, National Association Andover, Kansas	Small business, small farm, residential real estate	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Kansas City, Kansas and Missouri MA# 28140	Full scope	
Kansas Wichita MSA# 48620 Ellis/Trego	Full scope Full scope	

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

Overall Bank:	Lending Test Rating	Community Development Test Rating	Overall Bank/State/Multistate Rating
Equity Bank	Satisfactory	Outstanding	Satisfactory
Kansas City AA	Satisfactory	Outstanding	Satisfactory
Kansas	Satisfactory	Outstanding	Satisfactory