

LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Public Disclosure

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Community Reinvestment Act Performance Evaluation

First National Bank of Olathe

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NOTE: This evaluation is not, and should not 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **First National Bank of Olathe** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **January 18, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 25.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

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

Community Reinvestment Act (CRA) - The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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, branch distribution).

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

Institution's CRA Rating: This institution is rated "**Satisfactory.**"

The following table indicates the performance level of First National Bank of Olathe with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of Olathe Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			
Low Satisfactory		X	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 that support this rating include:

- First National Bank of Olathe (First National) demonstrated excellent responsiveness to the small business and home improvement credit needs of its assessment area.
- First National has an excellent record of meeting the credit needs of small businesses in its assessment area. The bank made 70 percent of its small business loans to businesses with revenues of \$1 million or less, which exceeded demographics.
- A substantial majority of the bank's loans are within its designated assessment area. The distribution of these loans by borrower profile reflects excellent penetration to individuals of different income levels and businesses of different revenue sizes. Geographic distribution was not considered, as the AA is comprised entirely of middle- and upper-income geographies.
- The level of qualified investments is adequate at \$65 thousand, given the limited investment opportunities within the AA.
- The bank's delivery systems are reasonably accessible to individuals of different income levels in its assessment area. Bank personnel provide an adequate level of community development services through their involvement in organizations

that further community development initiatives.

Description of Institution

First National Bank of Olathe (First National) is a \$338 million intrastate financial institution headquartered in Olathe, Kansas. First National is owned by First Olathe Bankshares, Inc., a one-bank holding company. In addition to the main banking facility, the bank has four branch locations and seven ATMs within its assessment area. First National faces strong competition. There are 50 banking institutions with 179 branch locations in First National's AA. Of the 50 institutions, 20 are headquartered in the bank's assessment area. There are also several stand-alone mortgage companies in the AA.

First National is a full-service banking institution. The bank offers a full range of loan and deposit products at its main bank and at three of the four branch banks. Because of its proximity to the main bank, loan and deposit products are not offered at the Kansas Avenue branch. The bank's primary lending focus is commercial lending. As of December 31, 1999, the bank's loan portfolio consisted of 89 percent commercial and commercial real estate loans, 5 percent residential real estate loans, including multi-family; 5 percent consumer loans; and 1 percent agricultural and other loans.

The bank's loan to deposit ratio was 56 percent as of December 31, 1999. Tier 1 capital totaled \$31 million as of the same date. The bank has the financial capacity to assist in meeting the credit needs of the community, and there are no legal or financial constraints that impede its CRA efforts.

The bank was last evaluated in June 1997, using the small bank procedures in effect at that time. The OCC assigned a rating of "Satisfactory" during the bank's prior CRA evaluation. This is the institution's first evaluation under the Large Bank CRA procedures.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated First National Bank of Olathe's CRA performance using the FFIEC Interagency Large Bank CRA Examination Procedures. We reviewed the small business loans the bank originated from January 1, 1998 through December 31, 1999. We reviewed the residential home improvement loans for the period January 1, 1998 through December 10, 1999, including the distribution of loans inside and outside of the bank's assessment area. For the Investment Test, we evaluated equity investments, grants and donations from July 1, 1997 through December 31, 1999. We evaluated retail banking services and community development services for this same period.

Data Integrity

Based on the results of our review, we concluded that the accuracy of the bank's data was satisfactory. Examiners verified the integrity of data used in this evaluation of the bank's performance by reviewing information contained in the loan files. We applied this review to 30 HMDA, 30 small business and 30 construction/development loans.

Selection of Area for Full-Scope Review

The bank has only one assessment area that includes all of Johnson County, Kansas. We assigned the bank's CRA rating based on its lending, investment, and service test performance within the AA. The AA is comprised of 29 middle- and 46 upper-income census tracts, and is a part of the Kansas City MSA. There are no low- or moderate-income census tracts in Johnson County.

Ratings

We weighted the bank's small business loans most heavily among the loan product types since they represent the bank's primary business focus and an identified credit need in the bank's assessment area. The only mortgage product given any weight was home improvement loans. The bank rarely makes home purchase loans for its own portfolio. As a result, the bank's home mortgage refinancing loans are also minimal. Small farm loans were also not a factor in this evaluation as less than one percent of the bank's loans were in this category.

Our lending analysis placed more weight on the bank's borrower distribution than its

geographic distribution, since all the census tracts in the bank's assessment are middle- and upper-income geographies.

Community Contacts

We performed two community contacts during the evaluation, and reviewed information from three other community contacts that bank regulators completed during 1999. One of the current contacts was with a city agency that assists low- and moderate-income people, and the other community contact concentrates on encouraging business development in the area. Two of the previous contacts concentrated their efforts on new business development, and one was a local businessman.

The contacts stated that there are many programs available to assist low- and moderate-income people in the area, and that local financial institutions do an excellent job of funding these programs. Investment opportunities are very limited in the assessment area. The community contacts state that banks fund various charitable organizations and participate in financial training programs to help meet CRA goals. The growing economy in the assessment area has resulted in the need for small business loans, and First National is a leader in small business lending, as stated by one of the community contacts. One of the persons contacted discussed the increase in new construction of single-family residences and the resultant requirement for home purchase mortgage loans. However, he also stated that this need is being met by area financial institutions.

Fair Lending Review

FNB is in substantial compliance with provisions of the anti-discrimination laws and regulations. Using gender as our prohibited basis group, we performed a comparative file review of individual applicants for loans to purchase automobiles from April 1999 to January 2000. We compared five denied female applicants to twenty approved male applicants to determine whether underwriting practices are applied consistently. Based on our review, there is no evidence of differential treatment of loan applicants based on their gender.

Conclusions with Respect to Performance Tests

The bank's performance under the Lending test is rated "Outstanding." The bank has an excellent record of lending to businesses of different revenue sizes and to

borrowers of different income levels for home improvement loans. Borrower distribution for these two loan types exceeded comparable demographic information in the AA. An analysis of geographic distribution of the bank's loans was not meaningful, as the AA contained only middle- and upper-income census tracts. The bank made the majority of its loans to borrowers within its assessment area.

First National Bank also provided an adequate level of investments that benefit the AA. According to the OCC's Community Reinvestment Development Specialists (CRD) and the community contacts, investment opportunities within the AA are limited.

We consider the bank's performance under the Service Test to be adequate. Bank personnel use their financial expertise in diverse ways to benefit their assessment area.

LENDING TEST

Lending Activity

Refer to Table 1 of Appendix C for the facts and data used to evaluate the bank's lending activities.

First National demonstrated excellent responsiveness to the small business and the home improvement credit needs of its AA given the fierce competition it faces. The bank ranked sixth in the number of originations among all lenders subject to reporting small business loan data. Although First National ranked 276th and 223rd in home purchase and refinance loans, respectively, it ranked 6th in home improvement loan originations, an identified credit need in the AA. The bank's market share of home improvement loans to low- and moderate-income people was 9 percent and 4 percent, respectively. The bank's market share of loans to small businesses with revenues of \$1 million or less was 38 percent. First National Bank ranked 7th in market share of deposits in its AA with 4.13 percent.

There were approximately 300 lenders that originated home purchase loans and home refinance loans in the bank's AA during the evaluation period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Table 8 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home improvement loan originations. The bank's home

purchase and refinancing loan originations were not a significant part of the bank's lending, as indicated by the bank's rank in these loan categories.

First National's distribution of home improvement loans among borrowers of different income levels is excellent. The bank originated 13 percent of its home improvement loans to low-income, and 20 percent to moderate-income people. The bank's lending to low-income and moderate-income borrowers significantly exceeded the demographics for both income levels of 8 percent and 13 percent, respectively. This performance is particularly notable, given that three percent of the families in the AA live below poverty, which represents a barrier to home ownership.

Small Loans to Businesses

Refer to Table 10 of Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

First National has an excellent record of lending to businesses of different revenue sizes. As seen in the Table, 70 percent of the number of First National's loans to business within the AA were to businesses with gross annual revenues of \$1 million or less. This compares well to demographic data, which showed 67 percent of all businesses in the AA had revenues of \$1 million, or less.

The bank also performed extremely well in its distribution of small loans to businesses by loan size within the AA. During the evaluation period, First National extended 80 percent of its total reported loans to small businesses in amounts less than \$100 thousand.

First National Bank of Olathe is the Top Small Business Administration (SBA) Lender for 1999, as named by the SBA. The bank originated 81 loans for \$11.8 million during 1998 and 1999. This loan program demonstrates First National's commitment to assisting small businesses in its assessment area. Small business lending has been identified as a major credit need in the AA, and a recent community contact identified First National as a leader in this area.

Small Loans to Farms

An analysis of First National's small farm loan originations for the bank's AA was not meaningful since this loan type represented less than one percent of all reported loan originations. Small farm loans were also not an identified credit need for this predominately metropolitan area.

Community Development Lending

First National made one community development loan in the amount of \$30 thousand

in its assessment area during the evaluation period. The loan was used to provide temporary or long-term housing for young people. Up to 15 people occupy the facilities at any one time.

Community development opportunities are limited in the Johnson County AA, primarily due to the affluence of its residents. The bank has been an active bidder on loans for a local housing coalition, having submitted bids on loans in excess of \$1.4 million; however, the bank was not the successful bidder on these projects. Based on contacts with community organizations, research on the Internet, and discussion with the OCC's Community Reinvestment Development Specialists (CRD), there were few other community development lending opportunities in Johnson County. The recent community contacts indicated that the credit needs in the AA are being met.

There are some opportunities for providing financial support to community development organizations that provide services for the LMI residents of Johnson County, but, these, too, are limited, and are being met by lending institutions. One agency representative stated that First National is a leader in assisting these organizations, with donations of both time and money. There are opportunities that the bank has participated in within the Kansas City MSA that are concentrated in benefiting LMI people, but are outside the Johnson County AA.

Product Innovation and Flexibility

The bank established a Special Purpose Loan Program designed to provide small loans for emergency home repair, automobile repair, purchase of appliances, or other needs for low- and moderate-income people. These loans are typically granted in amounts under \$5 thousand, at below market rates, and with repayment terms adjusted to meet the needs of the borrower. The bank has granted 44 such loans totaling almost \$40 thousand.

The bank also participated in the Olathe Home Improvement Partnership Program; however to date, only one loan has been granted through this city-regulated program.

Inside/Outside Ratio

First National originated or purchased a satisfactory percentage of reported loans within its AA. For all loans evaluated under CRA for 1998 and 1999, the bank originated or purchased 83 percent by number within its AA. By loan product, the bank originated or purchased 91 percent of its small farm loans, 83 percent of its small business loans, and 81 percent of its residential loans within its AA.

Distribution of Loans by Income Level of the Geography

First National's AA is comprised entirely of middle- and upper-income census tracts,

so an analysis of the geographic distribution of loans was not meaningful.

INVESTMENT TEST

The bank's performance under the Investment Test is rated "Low Satisfactory."

Refer to Table 12 of Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

First National provided an adequate level of qualified community development grants that benefited the AA. Our discussion with bank personnel, the OCC's CRD Specialists, and area business leaders indicates that opportunities for investments are limited. The bank has continuing prior investments of \$47 thousand in a fund that provides financing to small businesses. These investments, originated in the late 1980's, continue to provide funding for Kansas-based businesses. The fund is a licensed Small Business Investment Company (SBIC) that provides equity and mezzanine capital to small and middle market companies having potential for substantial growth and long-term equity appreciation. This SBIC has financed 28 businesses since its inception, and has created or preserved approximately 3600 jobs during that time. While the fund invests in businesses throughout the state of Kansas, nine of the businesses currently in the investment portfolio are located in the bank's assessment area.

The bank made almost \$18 thousand in qualified contributions to organizations that are directed toward low- and moderate-income people. These contributions allowed organizations in the assessment area to provide food, clothing, housing, childcare, job training, health care, and other necessities to disadvantaged people in the bank's AA.

One community contact stated that area financial institutions, including First National, meet the needs of LMI people in the area through donations to local charities.

COMMUNITY DEVELOPMENT SERVICES

The bank's performance under the Service Test is rated "Low Satisfactory."

First National participates in various activities in its AA that provides services to small businesses and low- or moderate-income people. The services provided needed training and advice to small business owners that allowed them to qualify for small business loans. Bank personnel also worked closely with small business people to prepare documentation to apply for guaranteed small business loans, allowing for the continued economic growth in the assessment area. The bank assisted low- and moderate-income people by participating in committees that determined allocation of contributions, assisting in obtaining housing alternatives, providing credit counseling, serving on foundations that provide health and wellness care to LMI people, and providing shelter to persons of domestic violence.

Retail Banking Services

Refer to Table 13 of Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

There are no low- or moderate-income geographies in the bank's AA. The bank's five branches and seven ATM's are distributed throughout the AA. With the exception of the Kansas Avenue branch, which offers 60 hours of banking services, each branch offers service in excess of 100 hours per week.

The bank offers an automated telephone inquiry/transfer system that allows bank customers to verify account information, including account balance, checks that have been posted to the account and deposits that have been credited. The customer can also transfer funds between accounts. This service is available 24 hours a day and is free of charge. We could not place any significant weight on the alternative delivery systems the bank offers because the affect of these services on low- and moderate-income people was not known.

The bank has not closed any branches or ATMs since the last evaluation; however, both an ATM and a branch bank have been opened since the last evaluation.

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 area that received comprehensive examination review (designated by the term **Full-Scope**).

Time Period Reviewed	Lending Test: January 1, 1998 to December 10, 1999 Investment Test: July 1, 1997 to December 31, 1999 Service Test: July 1, 1997 to December 31, 1999	
Financial Institution		Products Reviewed
First National Bank of Olathe Olathe, Kansas		Small Business, home improvement loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Johnson County, Kansas	Full-Scope	

Appendix B: Market Profile for Area Receiving Full-Scope Review

Johnson County, Kansas

Demographic Information for Full-Scope Area: Johnson County, Kansas					
Demographic Characteristics	Number	Low % of No.	Moderate % of No.	Middle % of No.	Upper % of No.
Geographies	75	NA	NA	39%	61%
Population by Geography	355,054	NA	NA	35.94%	64.06%
Owner-Occupied Housing by geography	94,487	NA	NA	32.66%	67.34%
Low-Income Family Distribution by geography	7,944	NA	NA	59.4%	40.6%
Moderate-Income Family Distribution by geography	12,413	NA	NA	54.64%	45.36%
Family Distribution by income	98,746	8%	13%	22%	57%
Small Business by geography	12,068	NA	NA	34.7%	65.3%

(*) The Lending Test is weighted more heavily than the Investment and Service Test in the overall rating.

First National Bank of Olathe defined its AA for its operations all of Johnson County, Kansas. Johnson County is located on the Kansas side of the Kansas City, MO-KS MSA and is one of the fastest growing counties in Kansas. The AA consists of 75 census tracts, 29 middle-income tracts and 46 upper-income tracts. There are no low- or moderate-income tracts in Johnson County. The County had a population of 355,054 per the 1990 U.S. Census. The HUD median family income for 1999 was \$54,200 for the AA.

There are 20 municipalities in Johnson County. The County has 20 financial institutions headquartered in the AA, and a total of 50 banks with 179 branches are located within the Johnson County boundaries. There are also several mortgage companies, auto finance companies and other stand-alone finance-based institutions that offer fierce competition for business in the assessment area.

Johnson County is one of the fastest growing counties in Kansas. Between 1985 and 1995, Johnson County accounted for 54 percent of the population growth in the Kansas City MSA and 71 percent of the growth in the state of Kansas. Johnson County's economy remains strong and unemployment is low at 2.1 percent as of June 30, 1999. This was below the Kansas City MSA unemployment rate of 3.1 percent and the Kansas state unemployment rate of 3.4 percent for the same time period. The diverse employment base of the Kansas City MSA provides many job opportunities for residents of Johnson County. The area's largest industries include agribusiness, telecommunications, banking, engineering, transportation, and manufacturing. Several major corporations are based in Kansas City, including Sprint Corporation, Hallmark Cards, and Farmland Industries.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CTA evaluation period. References to the "bank" include activities of any affiliated that the bank provided for consideration (refer to appendix A: Scope of the Evaluation). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.

- Table 7. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 12. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.

Table 1. Lending Volume

LENDING VOLUME													State: Kansas	Evaluation Period: January 1, 1998 TO December 10, 1999
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans(#) in MSA/AA		
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)			
Full-Scope:														
Johnson County	100%	110	\$1,183	642	\$55,286	10	\$745	1	\$30	763	57,244	100%		
Limited-Scope:														

* Deposit data as of June 30, 1999.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE State: Kansas Evaluation Period: January 1, 1998 TO December 31, 1999																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total*
Full-Scope:																
Johnson County	Analysis of Geographic Distribution Not Meaningful													1	100%	
Limited-Scope:																

(*) Based on 1998 and 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.
(**) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT State: Kansas Evaluation Period: January 1, 1998 TO December 10, 1999																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total **
Full-Scope:																
Johnson County	Analysis of Geographic Distribution is Not Meaningful														105	100%
Limited-Scope:																

(*) Based on 1998 and 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.
 (**) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE																	State: Kansas		Evaluation Period: January 1, 1998 TO December 10, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans					
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**				
Full-Scope:																				
Johnson	Analysis of Geographic Distribution is Not Meaningful														4	100%				
Limited-Scope:																				

(*) Based on 1998 and 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.
 (**) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES										State: Kansas		Evaluation Period: January 1, 1998 TO December 31, 1999				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total*
Full-Scope:																
Johnson County	Analysis of Geographic Distribution is Not Meaningful														642	100%
Limited-Scope:																

(*) Based on 1998 and 1999 Aggregate Small Business Data only. Market rank is for all income categories combined.
 (**) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS																
										State: Kansas		Evaluation Period: January 1, 1998 TO December 31, 1999				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total **
Full-Scope:																
Johnson County	Analysis of Geographic Distribution is Not Meaningful														10	100%
Limited-Scope:																

(*) Based on 1999 Aggregate Small Farm Data only. Market rank is for all income categories combined.
 (**) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE																State: Kansas		Evaluation Period: January 1, 1998 TO December 10, 1999	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans				
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**			
Full-Scope:																			
Johnson County	Analysis of Home purchase Loans is Not Meaningful														1	100%			
Limited-Scope:																			

(*) As a percentage of loans with borrower income information available. No information was available for XX% of loans originated and purchased by the bank.
 (**) Based on 1998 and 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.
 (***) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																
State: Kansas Evaluation Period: January 1, 1998 TO December 10, 1999																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Johnson County	8%	13%	13%	20%	22%	21%	57%	43%	6	4.5%	9.3%	4.2%	4.4%	3.8%	105	100%
Limited-Scope:																

(*) As a percentage of loans with borrower income information available. No information was available for 3% of loans originated and purchased by the bank.
 (**) Based on 1998 and 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.
 (***) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE																	State: Kansas		Evaluation Period: January 1, 1998 TO December 10, 1999				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***							
Full-Scope:																							
Analysis of Home Mortgage Refinance Loans is Not Meaningful																							
Johnson County															4	100%							
Limited-Scope:																							

(*) As a percentage of loans with borrower income information available. No information was available for NA of loans originated and purchased by the bank.
 (**) Based on 1998 and 1999 Aggregate HMDA Data only. Market rank is for all income categories combined.
 (***) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES State: Kansas Evaluation Period: January 1, 1998 TO December 31, 1999										
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		#	% of Total*****
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less		
Full-Scope:										
Johnson County	67%	70%	7.9%	80%	12%	8%	6.25%	38.1%	642	100%
Limited-Scope:										

(*) Businesses with revenues of \$1 million or less as a percentage of all businesses.
 (**) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for NA of small loans to businesses originated and purchased by the bank.
 (***) The market consists of all other Small Business reporters in the MSA/AA and is based on 1999 Aggregate Small Business Data only.
 (****) Based on 1999 Aggregate Small Business Data only.
 (*****) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS State: Kansas Evaluation Period: January 1, 1998 TO December 31, 1999										
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total*****
Full-Scope:	Analysis of Small Farm Loans is Not Meaningful									
Johnson County									10	100%
Limited-Scope:										

(*) Farms with revenues of \$1 million or less as a percentage of all farms.
 (**) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for NA of small loans to farms originated and purchased by the bank.
 (***) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1999 Aggregate Small Farm Data only.
 (****) Based on 1999 Aggregate Small Farm Data only.
 (*****) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS									
State: Kansas			Evaluation Period: July 1, 1997 TO December 31, 1999						
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$=s	#	\$ (000's)
Full-Scope:									
Johnson County	3	\$47	15	\$18	18	\$65	100%	N/A	\$78
Limited-Scope:									

(*) Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.
 (**) Unfunded Commitments means legally binding investment commitments reported on the Report of Condition Schedule-L Off Balance Sheet Items.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	State: Kansas		Evaluation Period: July 1, 1997 TO December 31, 1999			
MSA/Assessment Area:	Deposits	Branches						ATMs						Population								
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geography				% of the Population within Each Geography								
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp					
Full-Scope:																						
Johnson County	100%	5	100%	Analysis Not Meaningful				7	100%	Analysis Not Meaningful				NA	NA	36%	64%					
Limited-Scope:																						