PUBLIC DISCLOSURE

May 24, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The University National Bank of Lawrence
Charter Number 22241

1400 Kasold Drive
Lawrence, KS 66049

Office of the Comptroller of the Currency

7101 College Boulevard
Suite 1600
Overland Park, KS 66210

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, 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.

Table of Contents

Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:
- Both the bank's borrower and geographic distribution of loans are reasonable. The bank's borrower distribution was impacted by the lack of affordable housing stock within the Douglas County assessment area (AA). The bank's geographic distribution was impacted by physical barriers within the low-income census tracts. The University of Kansas (University) campus covers the majority of the low-income census tract geography.
- The loan-to-deposit (LTD) ratio is more than reasonable.
- The majority of lending by both number and dollar were originated inside the AA.
- The Lending Test rating is based on the bank's performance in its AA, the Lawrence, Kansas metropolitan statistical area (MSA), which consists only of Douglas County. We performed a full-scope review of the bank's home mortgage and small loans to businesses lending activity.

Loan-to-Deposit Ratio

Considering The University National Bank of Lawrence's (UNB or bank) size, financial condition, and the credit needs of the AA, the bank's LTD ratio is more than reasonable. UNB's quarterly average LTD ratio from December 31, 2016 to December 31, 2020 is 84.9 percent. UNB's LTD ratio ranged from a high of 90.33 percent to a low of 75.17 percent. The combined quarterly average LTD ratio for four competitor financial institutions was 79.2 percent. The combined quarterly average LTD ratios for the competitors ranged from a high of 112.7 percent to a low of 51.8 percent. The asset size of the competitor financial institutions ranged from $281 million to $66 million, with an average asset size of $168 million.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA. Based on the combined sample of loans reviewed, the bank originated and purchased 91 percent of its total loans by number inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. The Office of the Comptroller of the Currency (OCC) used the loans originated inside the bank's AA for the geographic distribution of lending and borrower income distribution analyses.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans $(000s)				Total $(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		$	%	$	%	
Home Mortgage	27	93.1	2	6.9	29	6,435	94.2	394	5.8	6,829
Small Business	34	89.5	4	10.5	38	7,596	93.2	556	6.8	8,152
Total	**61**	**91.0**	**6**	**9.0**	**67**	**14,031**	**93.7**	**950**	**6.3**	**14,981**

Description of Institution

UNB is a $85.6 million national bank chartered in 1988 with its headquarters in Lawrence, Kansas. The bank is owned by the Lawrence Financial Corporation. The bank has one AA, which comprises all of the Lawrence Kansas MSA (Douglas County AA). UNB operates one bank location and one automated teller machine (ATM) in the AA. UNB offers a full range of deposits, services, and loan products with a strategic focus on home mortgage lending.

As of December 31, 2020, the bank's total loans of $59.3 million represented 69.3 percent of total assets. The loan portfolio by dollar volume totaled 50.5 percent of 1-4 family residential real estate loans, 29.4 percent of nonfarm nonresidential loans, 17.6 percent of general commercial loans, 1.7 percent of agricultural-related loans, and 0.8 percent of consumer loans. Deposits totaled $77.7 million with tier 1 capital of $7.5 million.

UNB has no financial or legal factors impeding its ability to help meet the credit needs of its AA. The bank was rated satisfactory at its previous Community Reinvestment Act (CRA) examination dated November 28, 2016. Since the previous CRA examination, UNB has not opened or closed any branches.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The OCC used small bank examination procedures to evaluate UNB's record of meeting the credit needs of its community through its lending activities. The general evaluation review period is January 1, 2018 to December 31, 2020. The Lending Test will follow the general evaluation review period. Analysis of data related to calendar year 2018 is based on the 2015 American Community Survey (ACS). The LTD ratio review period for this evaluation is December 31, 2016 to December 31, 2020 due to the previous LTD ratio review ending September 30, 2016.

Primary loan products are products in which the bank originated at least 20 loans within the AA during the evaluation period. Loans secured by 1-4 family residential real estate properties within the home mortgage loan category represent 50.5 percent of the loan portfolio. Our sample consisted of 27 loans originated and/or purchased in the AA from January 1, 2018 to December 31, 2020. Loans secured by nonfarm nonresidential loans within the small loans to businesses category represent 29.4 percent of the loan portfolio. We added nonfarm nonresidential loans to the sample due to the 2019 increase in lending activity for this category. Our sample consisted of 34 loans originated and/or purchased in the AA from January 1, 2019 to December 31, 2020.

Selection of Areas for Full-Scope Review

In each state where a bank has an office, one or more AAs within that state was selected for a full-scope review. UNB only has one AA, which consists of all census tracts in Douglas County, Kansas. The city of Lawrence is the county seat. We performed a full-scope review of the Douglas County AA. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single AA. Refer to appendix A, Scope of Examination, for additional details.

Ratings

The bank's overall rating is based on its performance in the Douglas County AA. Refer to the "Scope" section for additional details.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

State of Kansas

CRA rating for the State of Kansas[1]: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:
- Both the bank's borrower and geographic distribution of loans are reasonable.
- The LTD ratio is more than reasonable.
- The majority of lending by both number and dollar were originated inside the AA.

Description of Institution's Operations in Kansas

The Douglas County AA within the Lawrence Kansas MSA consists of 22 census tracts: two low-income census tracts, seven moderate-income census tracts, eight middle-income census tracts, and five upper-income census tracts. UNB's primary product for the AA is home mortgage loans followed by nonfarm nonresidential properties. Competition is strong. UNB ranks 10th out of 22 financial institutions in the AA, with 2.5 percent of the home mortgage market share. Primary competitors include branches of large national and regional financial institutions. Key business activities within the AA focus on higher education, construction, clothing manufacturing, healthcare, and local government. Major employers in the AA are the University of Kansas, Lawrence Public Schools, Vangent, City of Lawrence, Lawrence Memorial Hospital, and Hallmark.

Affordable housing is limited. The City of Lawrence has a large student population of about 28,000 students attending the University of Kansas. Therefore, there is a large percentage of rental properties to accommodate the student population. Of the 47,812 housing units in the AA, 20,923 are rental units with 52.2 percent of the units in low-income and moderate-income census tracts. This significantly limits the availability of affordable housing for consumer purchase opportunities. In addition, the cost to purchase a home significantly increased during the past two years. A review by the Lawrence Board of Realtors shows the average sale price of a home in December 2019 was $237,884 and in December 2020, it was $269,410. This makes it difficult for individuals at the low- and/or moderate-income levels to afford a home purchase. Approximately 8.1 percent of families in the AA live below the poverty level. This percentage is higher for households, at approximately 17.8 percent.

We performed one community contact in conjunction with the CRA examination. The community contact was from a local, non-profit organization that collects and makes donations and grants to local affordable housing organizations. The contact identified needs in the AA as additional affordable housing and development of housing stocks for lower income individuals. Entrepreneurship and small business loans and grants were identified as needs to help improve and develop the economy. The contact stated the community does not have a Community Development Financial Institution (CDFI) and having one would be beneficial. Overall, the contact stated financial institutions are working to help meet the AA credit needs and had a favorable view of banks participation in the community.

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[1] This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

Douglas County Assessment Area

Table A – Demographic Information of the Assessment Area						
Assessment Area: Douglas County Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	22	9.1	31.8	36.4	22.7	0.0
Population by Geography	114,967	10.2	29.2	31.9	28.6	0.0
Housing Units by Geography	47,812	6.3	33.6	31.6	28.5	0.0
Owner-Occupied Units by Geography	22,806	1.3	25.4	36.9	36.3	0.0
Occupied Rental Units by Geography	20,923	11.2	41.0	25.8	22.0	0.0
Vacant Units by Geography	4,083	9.0	40.9	31.9	18.2	0.0
Businesses by Geography	6,745	6.6	31.4	32.3	29.7	0.0
Farms by Geography	281	0.4	21.0	56.2	22.4	0.0
Family Distribution by Income Level	23,794	19.1	19.6	20.6	40.7	0.0
Household Distribution by Income Level	43,729	26.4	15.1	17.5	41.0	0.0
2015 Census Median Family Income MSA - 29940 Lawrence, KS MSA		$72,755	Median Housing Value			$188,808
Updated 2020 MSA Median Family Income		$88,800	Median Gross Rent			$854
			Families Below Poverty Level			8.1%
Source: 2015 ACS and 2020 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance under the Lending Test for the Douglas County AA is rated satisfactory.

Based on a full-scope review, the bank's performance in the Douglas County AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the AA. More weight was given to the bank's home mortgage loan activity due to the overall higher volume of loan originations and purchases.

Home Mortgage Loans

Refer to Table O in the Douglas County AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is reasonable. Our sample consisted of home mortgage loans for personal use. The bank's distribution of loans is impacted by geographic barriers and low housing stock in the AA. The distribution of home mortgage loans in moderate-income geographies is reasonable. Approximately 41 percent of available housing stock in the moderate-income census tracts are rental properties, which limits the opportunities of available homes for personal use. The moderate-income tracts primarily provide rental housing for the University student population. An

analysis of the low-income census tracts is not meaningful. The AA only includes two low-income geographies, census tracts 3.00 and 4.00. The University campus encompasses the majority of census tract 4.00. Census tract 3.00 surrounds the University. Area demographics show the tracts only include 1.3 percent of the housing stock. Both tracts have a very low volume of owner-occupied housing units available for personal use, census tract 3.00 only has 298 units and census tract 4.00 only has eight units.

Small Loans to Businesses

Refer to Table Q in the Douglas County AA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. Our sample consisted of nonfarm nonresidential properties, which includes rental properties for housing. The bank's percentage of loans in moderate-income census tracts significantly exceeds the demographics indicator. Approximately 50.0 percent of the bank's loans for this category are in moderate-income census tracts. The demographic indicator demographics show 31.4 percent of the businesses are in moderate-income census tracts with the peer aggregate at 32.7 percent. In addition, only 6.6 percent of area businesses are in the low-income census tracts. The bank's percentage of 5.9 percent is slightly below the demographic indicator, but significantly exceeds the peer aggregate of 4.0 percent.

Lending Gap Analysis

We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the Douglas County AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans in the Douglas County AA is reasonable. This analysis included a review of area demographics and the borrowers' ability to obtain a loan based upon income level. Competition from other financial institutions, online finance companies and local payday lenders within the AA is strong. The bank's distribution of home mortgage loans of 18.5 percent to moderate-income borrowers is only slightly below area demographics of 19.6 percent and the peer aggregate of 19.0 percent. The distribution of home mortgage loans to low-income borrowers is below area demographics but is considered reasonable when considering loan qualification requirements.

In addition, the poverty level in the AA is high. Approximately 8.1 percent of the AA's families live below the poverty level. In general, it is difficult for low-income borrowers to qualify for loans when considering basic income requirements to meet underwriting debt-to-income standards. While the median housing value for the AA in 2015 was at $189,000, current realtor data for 2020, in addition

to the housing shortage, shows a significant increase with the average home selling for $269,410. The 2020 updated median family income for the AA is $88,800. Borrowers at the low-income level have income below $44,400 making it difficult to meet basic living needs and to afford a home loan payment.

Small Loans to Businesses

Refer to Table R in the Douglas County AA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The overall borrower distribution of small loans to businesses in the Douglas County AA is reasonable. Our sample consisted of nonfarm nonresidential properties, which includes rental properties for housing. Approximately 35.3 percent of the bank's borrowers in the sample for this category have revenues of less than $330,000. The distribution analysis of small loans to businesses with revenues less than $1 million is impacted by the high percentage (approximately 64.7 percent) of loans without available rental revenue information. Several of the bank's borrowers for this category of loans have multiple sources of revenue for the credit decision. The loans are to a mix of individuals and limited liability companies. None of the borrowers in the sample with income information had revenues greater than $1 million. In addition, of the 34 loans in the sample for this category, the average loan size was $223,000.

Responses to Complaints

UNB has not received any CRA performance-related complaints during this evaluation period.

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 MSAs and non-MSAs 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:	January 1, 2018 to December 31, 2020	
Bank Products Reviewed:	Home Mortgage and Small Business Loans	
Affiliate(s)	**Affiliate Relationship**	**Products Reviewed**
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	**Type of Exam**	**Other Information**
MMSA(s)		
Lawrence Kansas MSA	Full-Scope	All census tracts within Douglas County, Kansas

Appendix B: Summary of MMSA and State Ratings

RATINGS: The University National Bank of Lawrence	
Overall Bank:	**Lending Test Rating**
The University National Bank of Lawrence	Satisfactory
MMSA or State:	
Lawrence Kansas MSA	Satisfactory

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives 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 that conduct 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, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

Limited-Scope Review: Performance 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: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent

outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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**.**

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

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

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report 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.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

Table O. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - 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 aggregate peer data for the years the data is available.

Table P. **Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - 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 MMSA/AA. The table also presents aggregate peer data for the years the data is available.

Table Q. **Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to $1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.

Table R. **Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to $1 million) originated and purchased by the bank to businesses with revenues of $1 million or less to: 1) the percentage distribution of businesses with revenues of greater than $1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																		2018 - 2020		
	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area:	#	$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Douglas County AA	27	6,435	100.0	1.3	0.0	1.9	25.4	11.1	23.6	36.9	33.3	34.2	36.3	55.6	40.3	0.0	0.0	0.0
Total	27	6,435	100.0															

Source: 2015 U.S Census; 01/01/2018 - 12/31/2020 Loan Sample/Bank Data, "--" Data not available. Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																		2018 - 2020		
	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Douglas County AA	27	6,435	100.0	19.1	14.8	7.8	19.6	18.5	19.0	20.6	22.2	22.4	40.7	40.7	38.2	0.0	3.7	12.6
Total	27	6,435	100.0															

Source: 2015 U.S Census; 01/01/2018 - 12/31/2020 Loan Sample/Bank Data, "--" Data not available. Due to rounding, totals may not equal 100.0

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																		2019 - 2020		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	$	% of Total	% Businesses	% Bank Loan	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Douglas County AA	34	7,596	100.0	6.6	5.9	4.0	31.4	50.0	32.7	32.3	41.2	32.4	29.7	2.9	30.9	0.0	0.0	0.0
Total	34	7,596	100.0															

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Loan Sample/Bank Data; "--" Data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019 - 2020
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Douglas County AA	34	7,596	100.0	1,823	81.3	35.3	49.7	5.9	0.0	12.7	64.7
Total	34	7,596	100.0								

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Loan Sample/Bank Data; "--" Data not available. Due to rounding, totals may not equal 100.0