



PUBLIC DISCLOSURE

July 20, 2020

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Midstates Bank, National Association
Charter Number 10354

1851 Madison Avenue, Suite 732
Council Bluffs, IA 51503-3602

Office of the Comptroller of the Currency
13710 FNB Parkway, Suite 110
Omaha, NE 68154-5298

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.....1
Description of Institution.....2
Scope of the Evaluation.....3
Discriminatory or Other Illegal Credit Practices Review.....4
State Rating.....5
 State of Iowa..... 5
Community Development Test9
Appendix A: Scope of Examination.....A-1
Appendix B: Summary of MMSA and State Ratings.....B-1
Appendix C: Definitions and Common Abbreviations.....C-1
Appendix D: Tables of Performance Data.....D-1

Overall CRA Rating

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

The lending test is rated: Satisfactory.

The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The loan-to-deposit ratio (LTD) is reasonable when considering the bank's size, financial condition, and the credit needs of the assessment areas (AAs).
- Management originates and purchases a majority of its loans to customers located in the bank's AAs.
- The distribution of loans to farms of different sizes reflects reasonable distribution.
- The distribution of loans to census tracts (CTs) of different income levels reflects reasonable distribution.
- There were no complaints regarding the bank's performance in meeting the credit needs of its AAs.
- Community Development (CD) activities represent satisfactory responsiveness to AA needs and opportunities.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, Midstates Bank, National Association's (Midstates Bank or bank) LTD ratio is reasonable. Midstates Bank's average quarterly LTD ratio was 77.3 percent for the 11 quarters from March 31, 2017 to December 31, 2019. The ratio ranged from a quarterly low of 71.8 percent and a quarterly high of 84.6 percent.

Midstates Bank's LTD ratio compares favorably to similarly situated banks operating in the AA. The average quarterly LTD ratio for competitor banks was 70.6 percent for the 11 quarters from March 31, 2017 to December 31, 2019. The ratio ranged from an average quarterly low of 33.4 percent to an average quarterly high of 100.3 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

We reviewed 20 agricultural loans originated between January 1, 2017 and December 31, 2019 to assess performance with this criterion. The bank originated and purchased 55 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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		
	#	%	#	%		\$	%	\$	%	
Agricultural Loans	11	55	9	45	20	1,271	26	3,670	74	4,941

Source: Bank Loan Sample

Description of Institution

Midstates Bank is a nationally chartered intrastate financial institution. Its headquarters is located in Council Bluffs, Iowa. As of December 31, 2019, Midstates Bank had total assets of \$608 million and tier one capital of \$48 million. Midstates Bank is wholly owned by Midstates Bancshares, Inc., a one-bank holding company located in Harlan, Iowa.

Midstates Bank maintains operations in western Iowa. The bank operates two full-service branches in Council Bluffs, Iowa, including its main branch. There is also one full-service branch in the following towns in Iowa: Avoca, Harlan, Kingsley, Le Mars, Minden, Missouri Valley, Mondamin, Neola, and Sergeant Bluff. Midstates Bank operates two automated teller machines (ATM) in both Kingsley and Le Mars and one ATM each in Avoca, Council Bluffs, Harlan, Missouri Valley, Neola, and Sergeant Bluff. The bank's footprint expanded during the evaluation period with the acquisition of two financial institutions in 2019.

Midstates Bank operates in two AAs, the Non-metropolitan statistical area (Non-MSA) AA and the metropolitan statistical area (MSA) AA. The May 2019 acquisitions caused additional CTs to be added to the existing Non-MSA AA, therefore the Non-MSA AA will be evaluated from January 1, 2017 to April 30, 2019 and from May 1, 2019 to December 31, 2019. These AAs will be denoted going forward as Non-MSA pre-acquisition and Non-MSA post-acquisition. The Non-MSA AA pre-acquisition includes all of Shelby County. The Non-MSA post-acquisition includes all of Plymouth and Shelby Counties, CT 803 in Cherokee County, and CTs 31, 32, 33, 35, 36, 19, 20, 21.01, 21.02 in Woodbury County. The MSA AA did not change due to the acquisitions and will be evaluated from January 1, 2017 to December 31, 2019. The MSA AA includes all of Pottawattamie County and CTs 2902, 2903, 2904, and 2905 in Harrison County.

Midstates Bank's primary business focus is consistent with the traditional community bank model. Midstates Bank offers a full range of loan and deposit services to its customers, including agricultural, commercial, consumer, and mortgage loans. The bank also offers and checking and savings accounts with low minimum balance requirements. As of December 31, 2019, total loans were \$354 million and represented 58 percent of total assets. The December 31, 2019, call report identifies \$203 million agricultural loans, \$86 million business loans, \$52 million residential real estate loans, and \$13 million consumer loans.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs of its AAs. Midstates Bank received a Satisfactory rating in its last Performance Evaluation dated April 11, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

Midstates Bank was evaluated under the Intermediate Small Bank examination procedures, which include a Lending Test and a CD Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through its lending activities. The CD Test evaluates the bank's record of responding to the CD needs of its AAs through CD lending and providing qualified investments, donations and services.

The Lending Test covers Midstates Bank's performance from January 1, 2017 to December 31, 2019. The Lending Test evaluated agricultural loans originated during the evaluation period, as this loan type was determined to be the primary loan product originated by Midstates Bank. The following table summarizes the percentage of loan originations by loan type over the evaluation period.

Loan Type	Number of Originations	% by Number	Dollar Amount of Originations	% by Dollar
Agricultural	1,995	40%	422,103,471	62%
Residential	617	12%	65,886,037	10%
Commercial	903	18%	174,982,950	26%
Consumer	1,428	29%	17,361,496	3%
Total:	4,943		680,333,954	

Source: Bank provided loan origination reports 2017 – 2019, percentages may not total 100 percent due to rounding.

To evaluate lending performance, we selected a random sample of agricultural loans originated and purchased during the evaluation period in each AA. Examiners sampled 20 agricultural loans in each AA and used that information in the lending analysis.

The CD Test covers Midstates Bank's performance from April 12, 2017 to December 31, 2019. We reviewed all CD loans, investments, donations, and services submitted by management to ensure they met the regulation definition of CD. We excluded from this evaluation some items submitted for consideration because they did not meet the definition or purpose of CD.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. 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 area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

We placed 50 percent weight on the MSA AA, 35 percent weight on the Non-MSA pre-acquisition AA, and 15 percent weight on the Non-MSA post-acquisition AA. The majority of bank branches, total deposits, and loan originations during the evaluation period are located in the MSA AA. The lowest volume of loan originations occurred in the Non-MSA post-acquisition AA causing that AA to be weighted the least.

The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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 institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution’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 Iowa

CRA rating for the State of Iowa¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The distribution of loans to farms of different sizes reflects reasonable distribution.
- The distribution of loans to CTs of different income levels reflects reasonable distribution.
- CD activities represent satisfactory responsiveness to AA needs and opportunities.

Description of Institution's Operations in Iowa

Midstates Bank operates all its branches and ATMs within the state of Iowa. The bank ranks second out of six financial institutions for deposits in the Non-MSA pre-acquisition AA at \$81 million, or 18 percent of total market share. In the Non-MSA post-acquisition AA, the bank ranks fifth out of 31 for deposits with \$253 million, or 6 percent of total market share. The bank ranks fourth out of 17 for deposits in the MSA AA with \$174 million, or 8 percent of total market share. All the bank's deposits are located within the AAs. The bank has several large competitors in the local market including American National Bank, US Bank, The Security National Bank of Sioux City, and Wells Fargo.

In conjunction with the examination, we conducted community contact interviews within the AAs.

Non-MSA AA

The contacts stated that the local economy is heavily impacted by agricultural conditions. Opportunities for participation by financial institutions include funding affordable housing and financing small businesses. One contact stated that local financial institutions are very involved in the community.

MSA AA

The contact stated that economic conditions are relatively strong. The largest problem facing the area is getting access to qualified workers. Opportunities for participation by financial institutions include funding affordable housing. The contact stated that while local financial institutions are meeting local credit needs, the contact would like to see banks doing more to address local problems.

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

Non-MSA pre-acquisition

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA pre-acquisition						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	4	0.0	0.0	100.0	0.0	0.0
Population by Geography	11,992	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	5,553	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	4,015	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	1,051	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	487	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,157	0.0	0.0	100.0	0.0	0.0
Farms by Geography	323	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	3,144	18.0	15.3	24.6	42.1	0.0
Household Distribution by Income Level	5,066	23.5	14.5	19.7	42.3	0.0
Median Family Income Non-MSAs - IA		\$61,681	Median Housing Value			\$108,553
			Median Gross Rent			\$569
			Families Below Poverty Level			6.4%
<i>Source: 2015 ACS and 2019 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Non-MSA post-acquisition

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA post-acquisition						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	20	5.0	5.0	50.0	40.0	0.0
Population by Geography	79,016	3.9	4.6	42.7	48.8	0.0
Housing Units by Geography	34,068	4.1	4.9	43.2	47.8	0.0
Owner-Occupied Units by Geography	24,213	0.4	4.4	43.1	52.1	0.0
Occupied Rental Units by Geography	7,272	16.1	7.0	42.8	34.1	0.0
Vacant Units by Geography	2,583	5.1	3.9	44.4	46.6	0.0
Businesses by Geography	7,511	19.0	6.9	33.1	41.0	0.0
Farms by Geography	1,253	1.1	1.8	61.6	35.4	0.0
Family Distribution by Income Level	21,512	15.3	15.5	23.3	46.0	0.0
Household Distribution by Income Level	31,485	20.8	15.4	18.2	45.6	0.0
Median Family Income MSA - 43580 Sioux City, IA-NE-SD MSA		\$59,402	Median Housing Value			\$122,396

Median Family Income Non-MSAs - IA	\$61,681	Median Gross Rent	\$603
		Families Below Poverty Level	6.7%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	34	5.9	29.4	55.9	8.8	0.0
Population by Geography	105,158	4.5	28.6	57.1	9.7	0.0
Housing Units by Geography	45,009	4.9	28.9	57.2	9.0	0.0
Owner-Occupied Units by Geography	29,083	1.7	26.4	60.5	11.3	0.0
Occupied Rental Units by Geography	12,510	11.6	33.1	51.0	4.4	0.0
Vacant Units by Geography	3,416	7.9	34.5	51.4	6.1	0.0
Businesses by Geography	6,991	8.4	23.7	57.8	10.1	0.0
Farms by Geography	772	1.2	4.3	76.8	17.7	0.0
Family Distribution by Income Level	27,722	23.1	20.3	24.0	32.6	0.0
Household Distribution by Income Level	41,593	25.4	19.2	19.2	36.2	0.0
Median Family Income MSA - 36540 Omaha-Council Bluffs, NE-IA MSA	\$73,632	Median Housing Value				\$128,986
		Median Gross Rent				\$740
		Families Below Poverty Level				8.7%
<i>Source: 2015 ACS and 2019 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Iowa

Midstates Bank operates in three AAs in the state of Iowa. A full-scope review was performed for the Non-MSA pre-acquisition, Non-MSA post-acquisition, and MSA AAs. For the CD test, the Non-MSA AA was not evaluated separately pre- and post-acquisition due to the short period of time that the bank operated in the post-acquisition communities. As such, the Non-MSA AA was evaluated as one AA for the whole evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN IOWA

LENDING TEST

The bank's performance under the Lending Test in Iowa is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the Non-MSA pre-acquisition, Non-MSA post-acquisition, and MSA AAs is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Small Loans to Farms

Refer to Table S in the state of Iowa 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 farms.

The bank exhibits reasonable geographic distribution of loans in the Non-MSA post-acquisition and MSA AAs. While the sample for both AAs included no loans made to either low- or moderate-income geographies, demographic data shows only 1.1 percent of farms in low-income tracts and 1.8 percent of farms in moderate-income geographies in the Non-MSA post-acquisition AA and 1.2 percent of farms in low-income tracts and 4.3 percent of farms in moderate-income tracts in the MSA AA. The Non-MSA pre-acquisition AA did not contain any low- or moderate-income CTs; therefore, an analysis of the geographic distribution within the AA would not have been meaningful.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a 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.

Small Loans to Farms

Refer to Table T in the state of Iowa 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 farms.

The bank exhibits a reasonable distribution of loans to farms of different sizes in the Non-MSA pre-acquisition AA. The loan sample showed that 95.0 percent of bank loans were made to farms with revenues less than or equal to \$1 million while demographic data shows that 98.8 percent of farms have revenues less than \$1 million.

The bank exhibits a reasonable distribution of loans to farms of different sizes in the Non-MSA post-acquisition AA. The loan sample showed that 70.0 percent of bank loans were made to farms with revenues less than or equal to \$1 million while demographic data shows that 98.2 percent of farms have revenues less than \$1 million. While the bank's lending levels to small farms is below the demographic level, the bank is above the aggregate level of loans to farms with revenues less than or equal to \$1 million of 66.0 percent. A review of the credit memos of sampled loans indicated that bank management will often make multiple small loans to cover different operating needs of larger borrowers while smaller borrowers would often have one loan to cover all borrowing needs. This practice inflates the number of loans to larger borrowers without limiting the amount of credit available to smaller borrowers. There is a high level of competition in the AA including Farm Credit which funds many

small borrowers. Additionally, bank management stated that many smaller borrowers are established farmers who require fewer loans to build farm assets.

The bank exhibits a reasonable distribution of loans to farms of different sizes in the MSA AA. The loan sample showed that 80.0 percent of bank loans were made to farms with revenues less than or equal to \$1 million while demographic data shows that 98.3 percent of farms have revenues less than \$1 million. While the bank's lending levels to small farms is below the demographic level, the bank is above the aggregate level of loans to farms with revenues less than or equal to \$1 million of 63.7 percent. There is a high level of competition in the AA including Farm Credit which funds many small borrowers. Additionally, bank management stated that many smaller borrowers are established farmers who require fewer loans to build farm assets.

Responses to Complaints

There were no complaints relating to the bank's CRA performance during the assessment period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Iowa is rated Satisfactory.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits reasonable responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Non-MSA	3	21	2,782	37
MSA	11	79	4,813	63

The bank's community development loans during the evaluation period totaled \$7.6 million.

Specific examples of CD loans originated in the Non-MSA AA include:

- Two loans totaling \$2.6 million were used to retain or create jobs for low- or moderate-income individuals. One of these loans totaling over \$2.5 million was used for employees to purchase a company to retain the business and keep employees' jobs.

- One loan totaling \$134,000 was used to provide affordable housing for low- to moderate-income individuals in an assisted living program.

Specific examples of CD loans originated in the MSA AA include:

- Seven loans were made to an organization that supports adults with developmental or intellectual disabilities, chronic mental illness, or brain injuries that are primarily low- to moderate-income individuals with 98.0 percent of patients funded by Medicaid.
- One loan to rehabilitate property for two new businesses that created six new jobs.
- One loan that provides affordable housing primarily for low- to moderate-income individuals.

Number and Amount of Qualified Investments

Assessment Area	Qualified Investments								Unfunded Commitments**	
	Prior Period*		Current Period		Total					
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Non-MSA	0	0	11	14	11	38	14	46	0	0
MSA	0	0	18	16	18	62	16	54	0	0
Total	0	0	29	30	29	100	30	100	0	0

* 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 that are tracked and recorded by the institution's financial reporting system.

The bank's qualified investments totaled \$29,000 and consisted solely of donations to qualified community groups.

Specific examples of qualified investments in the Non-MSA AA include:

- Donations to various foodbanks in the AA that primarily serve low- to moderate-income individuals.
- Donation to an organization that provides home repairs for individuals that are primarily low- to moderate-income.

Specific examples of qualified investments in the MSA AA include:

- Donations to various food banks in the AA that primarily serve low- to moderate-income individuals.
- Donation to one organization that provides emergency shelter and transitional housing for homeless individuals and families.

Extent to Which the Bank Provides Community Development Services

Thirteen employees provided 325 service hours to twelve organizations.

Specific examples of services in the Non-MSA AA include:

- One employee assisted in the IRS's VITA program by providing financial expertise to low- to moderate-income individuals needing their taxes completed.

- Two employees provided marketing services to an organization that primarily serves low- to moderate-income individuals.
- One employee serves on the board of directors providing financial management for an organization that provides affordable housing for low- to moderate-income individuals.

Specific examples of services in the MSA AA include:

- One employee serves on the board of an organization that provides services to individuals with disabilities that are primarily low- to moderate-income.
- One employee serves on the board of an organization that provides affordable housing to low- to moderate-income individuals.

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 MSA(s) and Non-MSA(s) 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:	01/01/2017 to 12/31/2029	
Bank Products Reviewed:	Small Farm Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Iowa		
Non-MSA pre-acquisition	Full-scope	Evaluated from 01/01/2017 to 04/31/2019
Non-MSA post-acquisition	Full-scope	Evaluated from 05/01/2019 to 12/31/2019
MSA Harrison and Pottawattamie	Full-scope	Evaluated from 01/01/2017 to 12/31/2019

Appendix B: Summary of MMSA and State Ratings

RATINGS		Midstates Bank	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Midstates Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Iowa	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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/assessment area. 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - 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 aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2019**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Non-MSA post-acquisition	20	2,551	100	809	1.1	0.0	0.1	1.8	0.0	2.0	61.6	95.0	72.1	35.4	5.0	25.8	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2017-19**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
MSA AA; Harrison & Pottawattamie Counties	20	4,784	100	339	1.2	0.0	0.0	4.3	0.0	1.5	76.8	95.0	82.3	17.7	5.0	16.2	0.0	0.0	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Farms			Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Non-MSA pre-acquisition	20	3,983	132	98.8	95.0	72.0	0.9	5.0	0.3	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2019**

Assessment Area:	Total Loans to Farms			Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Non-MSA post-acquisition	20	2,551	809	98.2	70.0	66.0	1.1	30.0	0.7	0.0

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2017-19**

Assessment Area:	Total Loans to Farms			Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
MSA AA; Harrison & Pottawattamie Counties	20	4,784	339	98.3	80.0	63.7	1.0	20.0	0.6	0.0

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data; "--" data not available.
Due to rounding, totals may not equal 100.0%