



PUBLIC DISCLOSURE

August 3, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sunflower Bank, N.A.

Charter Number: 4742

1400 16th St.
Denver, CO 80202

Office of the Comptroller of the Currency

1225 17th Street, Suite 450
Denver, CO 80202

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.

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Overall CRA Rating

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

The following table indicates the performance level of Sunflower Bank, N.A. with respect to the Lending, Investment, and Service Tests:

Performance Levels	Sunflower Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X		
Needs to Improve		X	
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:

- Three out of six states are rated satisfactory and account for 57 percent of the total deposits
- The lending Test is rated satisfactory in three of the six states. While Texas and Missouri are rated as needs to improve, they represent a relatively small footprint and carried less weight.
- The Investment Test is rated outstanding in two of the six rating areas and satisfactory in one of the rating areas.
- The service test is rated satisfactory in all six states. We placed the primary weight on service delivery systems which are generally accessible to geographies and individuals of different income levels in all of the bank's AAs. Our secondary weight was placed on CD services which are adequate.

Lending in Assessment Area

A small percentage of the bank's loans are in its AAs.

The bank originated and purchased 41.1 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The in/out ratio was impacted by the acquisition of Guardian Mortgage, which originates home mortgage loans throughout the United States.

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	3,463	34.3	6,631	65.7	10,094	977,056	37.4	1,637,610	62.6	2,614,667
Small Business	1,393	74.3	482	25.7	1,875	378,286	73.5	136,433	26.5	514,719
Small Farm	150	72.1	58	27.9	208	17,819	73.5	6,411	26.5	24,230
Total	5,006	41.1	7,171	58.9	12,177	1,373,161	43.5	1,780,454	56.5	3,153,616

Overall, this had a neutral impact on the geographic distribution of loans in the bank's AAs.

Description of Institution

Sunflower Bank, National Association (SBNA) is a \$4.2 billion interstate financial institution headquartered in Denver, Colorado. SBNA is a subsidiary of FirstSun Capital Bancorp, also located in Denver, Colorado. The bank was founded in 1892 as The Farmers National Bank of Salina. Since then, the bank has been renamed a number of times. The most recent name change occurred in 1992 when the bank was renamed SBNA. The bank also operates under the additional trade names of First National 1870 and Guardian Mortgage. The bank is known as SBNA in Arizona, Colorado, Kansas, Missouri, and Central Texas. It is known as First National 1870 in New Mexico and as Guardian Mortgage across the United States. During the review period, the El Paso, Texas branch was also known as First National 1870; the name was changed to SBNA in February 2020. SBNA is the third largest bank headquartered in Colorado. However, SBNA's primary markets are in Kansas. The Kansas branches represent almost half (47 percent) of the bank's total branches.

As of December 31, 2019, SBNA was operating 58 branches and 66 ATMs in the six states where we assessed the bank's CRA performance. These states include Arizona, Colorado, Kansas, Missouri, New Mexico, and Texas. Within the six state rating areas, the bank has designated 17 AAs. Since 1988, the bank has been expanding its footprint through the acquisition of failed and healthy banks and the development of new branches. In June 2017, SBNA's bank holding company completed a merger with Strategic Growth Bancorp. Subsequent to the merger, the holding company (Sunflower Financial) was renamed FirstSun Capital Bancorp. The merged financial entities of the two holding companies included SBNA, First National Bank of Santa Fe, Capital Bank SSB, and Guardian Mortgage Company, Inc. The most recently opened branches include two Arizona branches, which were opened in November 2019 and an Austin, Texas branch which was opened in May 2020. This performance evaluation does not consider any branches or activities which occurred after December 31, 2019.

SBNA has always prided itself on being a community bank focusing on the financial needs of the communities it serves. Historically a retail bank, SBNA has expanded its capabilities through the years and currently offers a broad range of banking services, including credit and deposit services to commercial enterprises and consumers of all income levels and sizes. These services include treasury management and investment services across SBNA's footprint. The bank's primary business focus is home mortgage loans, commercial loans, and retail banking. As of December 31, 2019, net loans and leases represent nearly 76 percent of total assets. By dollar volume, the loan portfolio composition is as follows: 56.25 percent real estate loans, 25.04 percent commercial loans, 0.60 percent consumer loans,

0.15 percent agricultural loans, and 17.96 percent other loans and leases. Tier 1 capital totaled \$397 million as of December 31, 2019.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities. The bank received a Satisfactory rating in its previous CRA evaluation dated June 5, 2017.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation covers home mortgage loans, small loans to businesses, and small loans to farms originated or purchased between January 1, 2017, through December 31, 2019. Consumer lending was not evaluated because these loans are not a significant product for the bank. Furthermore, the bank did not gather data on this type of lending. Although the bank did report small farm loans, they represent only 3 percent of all reportable loans and were only a primary loan product in some AAs in the states of Colorado and Kansas. The analysis of a loan product is only considered if the product is considered a primary loan product for a given AA. Primary loan products are those where the bank originated or purchased at least 20 loans in a specific AA. This evaluation also includes CD loans, qualified investments and CD services for the period beginning June 5, 2017, through December 31, 2019.

During the evaluation period, there were changes in the designation of the census tracts (CTs) that impacted some of the bank's AAs in the state of Kansas. In order to reflect these changes, we evaluated this data using two evaluation periods, 2017-2018 and 2019.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (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 section 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 more weight on performance in the state of Kansas, followed by performance in the state of New Mexico and the state of Colorado. We considered that the state of Kansas accounts for 36.70 percent of total deposits; the state of New Mexico accounts for 28.50 percent of total deposits; and the state of Colorado accounts for 27.68 percent of total deposits. However, we did not discount the importance and significance of the bank's performance in the states of Arizona, Missouri and Texas. In addition, we also considered that almost half of the bank's branches are operated in the state of Kansas.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

In determining performance for the Lending Test and in consideration of performance context factors, we placed more weight on comparison to the aggregate than on comparison to the demographics. We did this because the aggregate factors in performance context factors such as the difficulty in making certain types of loans in an AA due to lack of affordable housing stock or high poverty levels.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §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 (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC does not have public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

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 Arizona

CRA rating for the State of Arizona¹: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels that reflect an excellent responsiveness to AA needs.
- A good distribution of loans in geographies of different income levels.
- An adequate distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.
- An adequate level of CD lending in the Phoenix-Mesa- Chandler AA, which had a neutral impact on the Lending Test rating in the state of Arizona.
- A high level of CD investments in the Phoenix-Mesa-Chandler AA.
- Service delivery systems that are reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- An adequate level of CD services.

Description of Institution's Operations in Arizona

The bank has designated one AA in the state of Arizona – the Phoenix-Mesa-Chandler AA. The AA includes the entire county of Maricopa. Maricopa County consists of several cities and towns, including, but not limited to Phoenix, Scottsdale, Mesa, Tempe, Glendale, Chandler, Avondale, Buckeye, and Goodyear. The AA consists of whole CTs and does not arbitrarily exclude any low- or moderate-income areas or reflect illegal discrimination. The bank operates three branches and no ATMs in this AA. The description of the full-scope AA is noted below:

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Phoenix-Mesa-Chandler MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	916	11.5	22.5	31.2	33.4	1.4
Population by Geography	4,018,143	11.1	22.9	31.3	34.4	0.3
Housing Units by Geography	1,668,555	9.8	23.4	33.3	33.4	0.1
Owner-Occupied Units by Geography	875,327	4.6	18.8	34.7	41.9	0.0
Occupied Rental Units by Geography	567,191	17.1	29.4	31.2	21.9	0.3
Vacant Units by Geography	226,037	11.8	25.6	33.2	29.3	0.2
Businesses by Geography	338,459	6.6	16.3	28.3	48.3	0.6
Farms by Geography	6,517	5.7	18.4	29.6	45.9	0.3
Family Distribution by Income Level	945,115	21.8	16.9	19.2	42.2	0.0
Household Distribution by Income Level	1,442,518	23.3	16.3	17.7	42.7	0.0
Median Family Income MSA - 2019 Phoenix-Mesa-Chandler, AZ AA		\$72,000	Median Housing Value			\$203,811
			Median Gross Rent			\$993
			Families Below Poverty Level			12.6%
Source: 2015 ACS and 2018 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.						

Employment

The main employment sectors in Maricopa County are healthcare, retail, hospitality, construction, administration, education, finance, insurance, manufacturing, and professional services. The major employers are Banner Health, American Express, Honeywell, Amazon, Fry's Foods, Dignity Health, Case, Bank of America, U Haul, and Phoenix Children's Hospital. As of December 31, 2019, the unemployment rate is 3.6 percent, which is lower than the state of Arizona's unemployment rate of 4.5 percent and only slightly higher than the U.S. unemployment rate of 3.5 percent.

Housing

The 2018 median sales price for a single-family residence was \$294,900. While there are some areas in Maricopa County where housing is not affordable to low-income individuals, there are other areas where housing is more affordable. The median gross rent in 2018 was \$1,119. The median family income for a low-income family was less than \$34,550, and the median family income for a moderate-income family was \$34,550 to \$55,280.

Community Contacts

We reviewed information from three community development organizations. Two organizations focused on affordable housing for low- and moderate-income individuals. The third organization focused on economic development and financial services to small businesses, in addition to affordable housing for low- and moderate-income individuals. Some of the most significant needs include affordable housing and affordable home mortgage loans for low- and moderate-income individuals. There is also a need for

start-up loans for small businesses, small dollar loans as alternatives to payday and title loans, and greater access to deposit accounts for low- and moderate-income individuals.

Scope of Evaluation in Arizona

Ratings in the state of Arizona are based entirely on the bank's performance in the Phoenix-Mesa-Chandler AA. This AA represents 100 percent of the bank's deposits and loans in the state as the bank does not have any other AAs in the state of Arizona.

SBNA gathered 0.67 percent of the bank's total deposits and originated 28.24 percent of the bank's home mortgage loans and 4.95 percent of small loans to businesses in the state of Arizona.

When evaluating the bank's performance, we placed greater weight on home mortgage loans. Home mortgage loans represent 93 percent and small loans to businesses represent 7 percent of the total loans in the state. We did not evaluate small farm loans since the bank did not originate any small farm loans in this AA. We also considered the volume of CD lending and other performance factors in concluding on the bank's lending performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARIZONA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix-Mesa-Chandler AA is adequate. Overall, geographic distribution of loans is good and borrower distribution is adequate. The bank originated one CD loan in the AA during the review period, which had a neutral impact on the overall Lending Test rating in the state of Arizona.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Phoenix-Mesa-Chandler AA	978	69	0	1	1,048	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Phoenix-Mesa-Chandler AA	\$311,163	\$24,401	\$0	\$87	\$335,651	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The proportion of the bank's loans in the AA is comparable to the proportion of its deposits since the Phoenix-Mesa-Chandler AA is the bank's only AA in the state of Arizona.

The bank's market share and rank in loans is comparable to its market share and rank in deposits. Due to the competition, both the deposit and loan market share are well below one percent. The bank has a 0.02 percent deposit market share and ranks 56th among 62 financial institutions. For home mortgage loans, the bank has a 0.29 percent market share and ranks 72nd among 732 home mortgage lenders. For small loans to businesses, the bank has a 0.01 percent market share and ranks 78th among 195 lenders. The bank's loan market share is impacted by the significant competition for home mortgage and small loans to businesses in this AA. The top five home mortgage lenders hold 25.51 percent of the market share and the top five small business lenders hold 70.35 percent of the market share.

The bank's home mortgage loan percentile is 92.00, which is similar to its deposit percentile of 90.30. Its small business loan percentile is 60.00, which is lower than its deposit percentile.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA, with a good distribution of home mortgage loans and an excellent distribution of small loans to businesses.

Phoenix-Mesa-Chandler AA

Home Mortgage Loans

The geographic distribution of home mortgage loans in the Phoenix-Mesa-Chandler AA is good. Refer to Table O in the state of Arizona 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.

Phoenix-Mesa-Chandler AA

The percentage of loans in low-income CTs is near to the aggregate and the percentage of owner-occupied units in low-income CTs. The percentage of loans in moderate-income CTs is near to the aggregate and exceeds the percentage of owner-occupied units in moderate-income CTs.

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent in the Phoenix-Mesa-Chandler AA. Refer to Table Q in the state of Arizona 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.

Phoenix-Mesa-Chandler AA

The percentage of small loans to businesses in low-income CTs exceeds the aggregate and the percentage of businesses in low-income CTs. The percentage of small loans to businesses in moderate-income CTs exceeds the aggregate and the percentage of businesses in moderate-income CTs.

Lending Gap Analysis

We identified some gaps in the distribution of lending in low- and moderate-income geographies. However, these were generally areas which were not close to a branch. This had a neutral impact on the bank's geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

The distribution of the bank's home mortgage loans to borrowers of different income levels is adequate. Refer to Table P in the state of Arizona 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.

Phoenix-Mesa-Chandler AA

The percentage of the bank's home mortgage loans to low-income borrowers is well below the aggregate and significantly below the percentage of low-income families. The bank's lower percentage of loans to low-income borrowers compared to the demographic is impacted to some extent by the high poverty level; 12.6 percent of the low-income families are below the poverty level. The percentage of home mortgage loans to moderate-income borrowers exceeds the aggregate and the percentage of moderate-income families.

Small Loans to Businesses

The distribution of the bank's small loans to businesses is poor. Refer to Table R in the state of Arizona section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Phoenix-Mesa-Chandler AA

The percentage of the bank's small loans to businesses is well below the aggregate and significantly below the percentage of businesses that are small.

Community Development Lending

SBNA made one CD loan in the Phoenix-Mesa-Chandler AA during the evaluation period which totaled \$87,060. This represents 3.25 percent of allocated tier 1 capital. Overall, CD lending had a neutral impact on the bank's Lending Test rating in the state of Arizona.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the Investment Test in Arizona is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix-Mesa-Chandler AA is excellent. SBNA has an excellent level of qualified CD investments and grants; however, the bank does not act as a leader, particularly for those investments that are not routinely provided by private investors. In addition, SBNA does not use innovative and/or complex investments to support CD initiatives. However, the bank exhibits good responsiveness to credit and community economic development needs.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Phoenix-Mesa-Chandler	0	\$0.00	5	\$1,182	5	100	\$1,182	100	0	\$0.00

* 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.

Phoenix-Mesa-Chandler AA

Qualified investments in the Phoenix-Mesa-Chandler AA total \$1.182 million. Total qualified investments and donations in the AA represent 44.22 percent of allocated tier 1 capital based on the AA's share of bank deposits. The investments consist of two current period investments totaling \$1.174 million. The remaining qualified investments consist of donations totaling \$7,346. Both of the large investments, which represent 99 percent of the investments/donations, consist of mortgage-backed securities, where the underlying mortgages are to low- and moderate-income individuals. The investments are responsive to a critical need in the AA. Some noteworthy donations are noted below:

- A \$1,846 donation provided funds to an organization which builds laundromats in low-income areas.
- A \$5,500 donation provided funds to two organizations which provide social services to low- and moderate-income individuals.

SERVICE TEST

The bank's performance under the Service Test in Arizona is rated Low Satisfactory. Accessibility to retail banking services to low- and moderate-income geographies and individuals is limited. The bank provided an adequate level of CD services to qualified organizations.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Phoenix-Mesa-Chandler AA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA, particularly low- and moderate-income geographies and/or low- and moderate-income individuals. The distribution of the SBNA's branches in the Phoenix-Mesa-Chandler AA is noted below:

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Phoenix-Mesa-Chandler AA	100	3	100	0.00	0.00	0.00	100	21.8	16.9	19.2	42.2

Phoenix-Mesa-Chandler AA

The bank is new to this market and operates only three branches in the Phoenix-Mesa-Chandler AA. In addition, the bank does not currently operate any ATMs in this AA. In order to further assess the accessibility of the bank's branches throughout its AA, we reviewed lending data. The lending data indicates the bank is reaching some low- and moderate-income areas with its home mortgage and small business loan products. Community contacts indicate there is a need for greater access to deposit products for low- and moderate-income individuals.

To complement its traditional service delivery methods, SBNA offers telephone banking access 24/7. Online and mobile banking services for consumers, which include online bill payment and mobile deposits, are offered for the convenience of all customers at no additional cost, though fees apply for certain actions as disclosed in the fee schedule. Bank data indicates increasing customer usage of online and mobile banking services during the evaluation period. These delivery methods are offered to increase access to banking services throughout the AA. Examiners did not place significant weight on any alternative delivery systems, as the bank does not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Phoenix-Mesa-Chandler AA	3	0				+3

To the extent changes have been made, the institution's opening of branches did not improve the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Community Development Services

SBNA provides an adequate level of CD services.

Phoenix-Mesa-Chandler AA

During the evaluation period, five employees provided 73 hours of qualified CD services to six organizations. The majority of the hours (85 percent) represent board membership in organizations that provide services to low- and moderate-income individuals.

State Rating

State of Colorado

CRA rating for the State of Colorado²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels that reflect a good responsiveness to AA needs.
- A good distribution of loans in geographies of different income levels.
- A good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution
- An overall adequate level of CD lending in the state of Colorado, which had a neutral impact on the Lending Test rating.
- An overall significant level of CD investments, particularly in the Denver-Aurora-Lakewood MSA, which represents a significant majority of the bank's deposits in the state of Colorado.
- Service delivery systems that are reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- An adequate level of CD services.

Description of Institution's Operations in Colorado

The bank designated four AAs in the state of Colorado – the Boulder MSA, the Colorado Non-MSA, the Denver-Aurora-Lakewood MSA, and the Pueblo MSA. SBNA operates 13 branches, four full service ATMs, and six limited-service ATMs in its Colorado AAs. The AAs consist of whole CTs and do not arbitrarily exclude any low- or moderate-income areas or reflect illegal discrimination. The descriptions of the full-scope AAs are noted below:

Colorado Non-MSA

The Colorado Non-MSA includes the non-contiguous counties of Fremont and Rio Grande. Both counties are located in the southern portion of the state. Fremont County includes the towns of Brookside, Canon City, Coal Creek, Cotopaxi, Florence, Lincoln Park, Portland, Wellsville, and Williamsburg. Rio Grande County includes the towns of Monte Vista, Center, Del Norte, and South Fork. The bank operates two branches and one full-service ATM in the Colorado Non-MSA.

Fremont County is home to 13 federal prisons, including ADX Florence, the only Supermax prison in the United States. As of March 2015, Fremont County surpassed all other counties in the United States with the largest proportion of its population (20 percent) incarcerated.

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Demographic data indicates there are no low-income CTs and seven moderate-income CTs representing 41.2 percent of the total CTs in the AA. In addition, 26.8 percent of the population is low-income; and 22.5 percent is moderate-income. Additional demographic data is noted below:

Table A – Demographic Information of the Assessment Area						
Assessment Area: Colorado Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	41.2	41.2	0.0	17.6
Population by Geography	58,554	0.0	46.7	38.2	0.0	15.2
Housing Units by Geography	25,858	0.0	51.8	48.2	0.0	0.0
Owner-Occupied Units by Geography	14,662	0.0	49.7	50.3	0.0	0.0
Occupied Rental Units by Geography	6,297	0.0	69.7	30.3	0.0	0.0
Vacant Units by Geography	4,899	0.0	35.1	64.9	0.0	0.0
Businesses by Geography	4,216	0.0	55.5	44.2	0.0	0.3
Farms by Geography	328	0.0	29.0	71.0	0.0	0.0
Family Distribution by Income Level	13,750	26.8	22.5	21.7	29.0	0.0
Household Distribution by Income Level	20,959	28.7	20.4	20.2	30.7	0.0
Median Family Income Non-MSAs – 2019		\$68,100	Median Housing Value			\$159,670
			Median Gross Rent			\$696
			Families Below Poverty Level			14.4%
Source: 2015 ACS and 2019 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.						

Employment

The main employment sectors in Fremont County are healthcare and social assistance; public administration; retail trade; utilities; agriculture; and mining, quarrying, and oil and gas extraction. The major employers are Fremont County, City of Canon City, City of Florence, St. Thomas Moore Hospital, Canon City Schools, Cotopaxi Consolidated Schools, Fremont RE-2 School District, and the Fremont County Sheriff. Due to the substantial number of prisons, data indicates that more than 50 percent of the population is employed in the corrections industry. As of December 31, 2019, the unemployment rate in Fremont County is 4 percent. This is higher than the state of Colorado's unemployment rate of 2.5 percent and the U.S. unemployment rate of 3.5 percent.

The main employment sectors in Rio Grande County are education; healthcare and social assistance; manufacturing; construction; information; retail trade; and transportation, warehousing, and utilities. There are no significant major employers located in Rio Grande County. Some larger universities located in large metropolitan areas in the state of Colorado such as the University of Colorado, Boulder; Metropolitan State University; and Colorado State University provide a limited number of jobs to county residents. As of December 31, 2019, the unemployment rate in Rio Grande County is 3.8 percent, which is higher than the state and U.S. unemployment rates. The 2018 median family income was less than \$33,600 for a low-income family and ranged from \$33,650 to \$53,840 for a moderate-income family.

Housing

A significant portion of the homes in the Colorado Non-MSA are owner-occupied, indicating that homes in this AA are somewhat affordable. The home ownership rate is 74 percent in Fremont County and 66.2 percent in Rio Grande County. Additional data also supports that during the review period, homes were affordable for moderate-income families with higher incomes. The 2018 data indicates that the median property value was \$160,000 in Fremont County and \$161,300 in Rio Grande County. The median rent in both counties is near \$800 monthly.

Community Contacts

There are a limited number of CD organizations in this AA. We obtained one community contact with a local real estate agent. The realtor noted that she is not aware of any particular lending or CD needs. She also noted that most individuals are looking to buy a house with some acreage rather than a house on a single lot. Other CD organizations that are located in this AA indicate on their websites that there is a need for affordable rental housing for low- and moderate-income individuals and families.

Pueblo MSA

The Pueblo MSA consists of Pueblo County which includes the towns of Pueblo, Boone, Rye, Salt Creek, and Colorado City. The bank operates three branches and three ATMs in the Pueblo MSA.

Demographic data indicates there are three low-income CTs representing 5.5 percent of the total CTs in the AA and sixteen middle-income CTs representing 29.1 percent of the total CTs in the AA. In addition, 22.6 percent of the population is low income; and 17.6 percent is moderate-income. Additional demographic data is noted below:

demographic data is noted below.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pueblo MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	55	5.5	29.1	32.7	27.3	5.5
Population by Geography	161,519	5.2	28.8	29.6	34.8	1.6
Housing Units by Geography	69,959	5.7	31.4	30.6	32.3	0.0
Owner-Occupied Units by Geography	40,369	3.5	23.6	30.7	42.2	0.0
Occupied Rental Units by Geography	22,519	9.3	44.0	31.2	15.5	0.0
Vacant Units by Geography	7,071	6.5	35.8	28.4	29.2	0.0
Businesses by Geography	11,584	3.0	26.6	29.5	40.3	0.4
Farms by Geography	459	3.1	12.6	37.0	47.1	0.2
Family Distribution by Income Level	40,660	22.6	17.6	18.7	41.1	0.0
Household Distribution by Income Level	62,888	24.1	16.3	16.9	42.7	0.0
Median Family Income MSA - 39380 Pueblo, CO MSA		\$51,986	Median Housing Value			\$131,090
			Median Gross Rent			\$768
			Families Below Poverty Level			15.1%
Source: 2015 ACS and 2019 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.						

Employment

The main employment sectors in Pueblo County are education and health services; government; retail trade; and leisure and hospitality services. Major employers include Parkview Medical Center, St. Mary-Corwin Medical Center, EVRAZ Inc., Loaf & Jug, Convergys Corporation and Walmart. As of December 31, 2019, the unemployment rate in Pueblo County is 4 percent which is higher than the State of Colorado's unemployment rate of 2.5 percent and the U.S unemployment rate of 3.5 percent.

Housing

The home ownership rate in Pueblo County is 57.7 percent. The 2018 data indicates the median property value is \$131,090 and the average monthly gross rent is \$768. The 2018 median family income is less than \$27,650 for a low-income family and ranges from \$27,650 to \$44,240 for a moderate-income family.

Community Contacts

We obtained one community contact with a local housing authority. The contact indicated there are opportunities for banks to provide construction or rehab loans, as the local housing stock is low and existing houses are generally older and in poor condition. There is a great need for capital investment in the area; the mayor currently has an initiative to renovate the downtown Pueblo area with a mix of residential and retail buildings. Small construction projects that are not prime credit candidates are having problems obtaining loans and this lack of financing could be better addressed by financial institutions in the area. Local financial institutions could do a better job of marketing themselves in order to attract potential borrowers and investors, which in turn would benefit the local economy.

Scope of Evaluation in Colorado

Ratings in the state of Colorado are based primarily, but not entirely, on the bank's performance in the full-scope AAs – the Colorado Non-MSA and the Pueblo MSA. Although the Colorado Non-MSA represents only 5 percent of home mortgage loans and 11 percent of loans to small businesses, the AA was selected because it represents nearly 23 percent of the bank's deposits in the state of Colorado. In addition, this AA was selected for a full-scope review in order to ensure that a qualitative and quantitative analysis of the AA is performed periodically. We also selected the Pueblo MSA for a full-scope review since historically, this AA has represented a significant portion of the deposits and loans. During this evaluation period, it is noted that the Pueblo MSA represents 10 percent of the deposits, 8 percent of home mortgage loans and 11 percent of small loans to businesses. In addition, we also considered the bank's performance in the limited-scope AAs. Specifically, performance in the Denver-Aurora-Lakewood AA substantially impacted the overall state of Colorado rating since this AA represents nearly 47 percent of the bank's deposits in the state, 83 percent of the bank's home mortgage loans, and 63 percent of the bank's small loans to businesses.

SBNA gathered 27.68 percent of the bank's deposits and originated or purchased 25.50 percent of its home mortgage loans, and 34.96 percent of its small loans to businesses in the state of Colorado. The bank operates 13 branches in the state of Colorado, which represents 22.41 percent of all the bank's branches in the six states where we assessed performance.

When evaluating the bank's performance under the lending test, we placed greater weight on home mortgage loans. Home mortgage loans represent 62.98 percent of total loans in the state and loans to

small business represent 34.73 percent. The remaining 2.28 percent represents small farm loans. We also considered the volume of CD lending and other performance factors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN COLORADO

LENDING TEST

The bank's performance under the Lending Test in the state of Colorado is rated High Satisfactory. Overall, performance in the limited-scope AAs was consistent with and further supported the overall Lending Test performance. The bank's performance in the Denver-Aurora-Lakewood MSA materially impacted the overall Lending Test rating due to the significant level of deposits and loan activity, including CD lending in that AA.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the full-scope AAs is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. The bank's adequate lending activity in the Colorado Non-MSA was partially offset by the bank's stronger lending activity in the Pueblo MSA. Performance in the Denver-Aurora-Lakewood MSA which received a limited-scope review also positively impacted the bank's lending activity performance.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Boulder MSA	35	73	1	3	112	7.94	20.65
Colorado Non-MSA	46	54	26	0	126	8.92	22.65
Denver-Aurora-Lakewood MSA	733	307	0	7	1,047	74.15	46.54
Pueblo MSA	69	53	5	0	127	8.99	10.15

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Dollar Amounts – 000's							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Boulder MSA	\$ 21,291	\$ 24,316	\$ 250	\$ 4,705	\$ 50,562	10.05	20.65
Colorado Non-MSA	\$ 9,072	\$ 9,191	\$ 5,668	\$ 0	\$ 23,931	4.76	22.65
Denver-Aurora-Lakewood MSA	\$287,215	\$105,180	\$ 0	\$18,062	\$410,457	81.60	46.54
Pueblo MSA	\$ 11,926	\$ 5,700	\$ 415	\$ 0	\$ 18,041	3.59	10.15

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Colorado Non-MSA

The proportion of the bank's loans is substantially weaker than the proportion of the bank's deposits in the AA. The proportion of the bank's deposits in the Colorado Non-MSA is 22.65. In comparison, the proportion of home mortgage loans in the AA is 2.75 percent and the proportion of small loans to businesses is 6.36 percent.

The bank's market share and rank in loans is substantially weaker than its market share and rank in deposits. The bank's performance is driven by the fact that the AA represents a secondary market with only two branches. The bank has a 21.20 percent deposit market share and ranks first in the Colorado Non-MSA. In comparison, for home mortgage loans, the bank has a 0.81 percent market share and ranks 33rd out of 229 lenders. For small loans to businesses, the bank has a 2.76 percent market share and ranks 9th out of 53 lenders. The bank's weaker market share is impacted by the significant competition for home mortgage and small loans to businesses in this AA. The top five home mortgage lenders hold 26.48 percent of the market share and the top five small business lenders hold 58.72 percent of the market share.

The bank's home mortgage loan percentile is 85.59 and its small business loan percentile is 83.02, which are both weaker than its deposit percentile of 92.98.

Pueblo MSA

The proportion of the bank's loans is stronger than the proportion of the bank deposits in the AA. The proportion of the bank's deposits in the Pueblo MSA is 2.83 percent. In comparison, the proportion of home mortgage loans in the AA is 3.61 percent and the proportion of small loans to businesses is 3.94 percent.

The bank's market share and rank in loans is substantially weaker than its market share and rank in deposits. The bank's performance is driven by the fact that the AA represents a more significant market with three branches. The bank has a 5.24 percent market share and ranks seventh among 14 banks. In comparison, for home mortgage loans, the bank has a 0.25 percent market share and ranks 63rd among 345 lenders in the AA. For small loans to businesses, the bank has a 0.88 percent market share and ranks 17th among 63 lenders in the AA. The bank's weaker market share is impacted by the significant competition for home mortgage and small loans to businesses in this AA. The top five home mortgage lenders hold 29.51 percent of the market share; and the top five small business lenders hold 58.13 percent of the market share.

The bank's home mortgage loan percentile is 81.74, and its small business loan percentile is 73.02. These percentiles are both stronger than its deposit percentile of 50.00.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs. The excellent geographic distribution in both the Colorado Non-MSA and the Pueblo MSA was impacted by the adequate distribution in the Denver-Aurora-Lakewood MSA. The geographic distribution of loans in the Boulder MSA did not materially impact the overall assessment of the geographic distribution of loans.

Home Mortgage Loans

The geographic distribution of home mortgage loans is excellent in the Colorado Non-MSA and the Pueblo MSA. Refer to Table O in the of state of Colorado 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.

Colorado Non-MSA

There are no low-income CTs in the Colorado Non-MSA. The distribution of home mortgage loans in moderate-income CTs exceeds both the aggregate and the percentage of owner-occupied units in moderate-income CTs.

Pueblo MSA

The percentage of loans in low-income CTs exceeds the aggregate. In addition, the percentage of loans in low-income CTs is below the percentage of owner-occupied units in low-income CTs. The percentage of loans in moderate-income CTs exceeds both the aggregate and the percentage of owner-occupied housing units.

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent in the Colorado Non-MSA and adequate in the Pueblo MSA. Refer to Table Q in the state of Colorado 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.

Colorado Non-MSA

There are no low-income CTs in the Colorado Non-MSA. The percentage of small loans to businesses in moderate-income CTs exceeds both the aggregate and the percentage of businesses in moderate-income CTs.

Pueblo MSA

The percentage of small loans to businesses in low-income CTs exceeds both the aggregate and the percentage of businesses in low-income CTs. The percentage of loans in moderate-income CTs is below the aggregate and well below the percentage of businesses in moderate-income CTs.

Small Loans to Farms

The geographic distribution of small loans to farms is very poor in the Colorado Non-MSA. The bank did not make sufficient small farm loans in the Pueblo MSA to perform a meaningful analysis.

Refer to Table S in the state of Colorado 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.

Colorado Non-MSA

The bank did not make any small farm loans in either low- or moderate-income CTs reflecting very poor performance.

Lending Gap Analysis

We identified a few gaps in the distribution of lending in low- and moderate-income geographies in the bank's AAs. However, we were able to identify some performance context factors that explained those gaps. This had a neutral impact on our conclusion regarding the bank's geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution. The overall good distribution of loans in the full-scope AAs is further supported by the good distribution of loans in the Denver-Aurora-Lakewood MSA, which is a limited-scope AA. Performance in the Boulder MSA did not materially impact the borrower distribution.

Home Mortgage Loans

The distribution of loans among individuals of different income levels is adequate in both the Colorado MSA and the Pueblo MSA. Refer to Table P in the state of Colorado 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.

Colorado Non-MSA

The percentage of loans to low-income borrowers exceeds the aggregate but is significantly below the percentage of low-income families. The poor distribution of loans compared to the demographic is partially impacted by the higher poverty level (14.4 percent) and the cost of housing which makes it difficult for a low-income family to qualify for home purchase loans. However, the current cost of housing does not impact the bank's ability to make home improvement or home refinance loans. The percentage of loans to moderate-income borrowers is below the aggregate and the percentage of moderate-income families.

Pueblo MSA

The percentage of loans to low-income borrowers is near to the aggregate. However, the percentage of loans is well below the percentage of low-income families. The poor distribution of loans compared to the demographic is partially impacted by the higher poverty level (15.1 percent) in this AA. The cost of housing coupled with the median family income for a low-income family also make it difficult for the bank to make home purchase loans. However, community contacts indicated that existing houses are generally older and in poor condition indicating there is a need and opportunity to originate home improvement or home refinance loans. The percentage of loans to moderate-income borrowers is below the aggregate but meets the percentage of moderate-income families.

Small Loans to Businesses

The borrower distribution of small loans to businesses is adequate in both the Colorado Non-MSA and the Pueblo MSA. Refer to Table R in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Colorado Non-MSA

The percentage of loans to businesses that are small exceeds the aggregate, but it is well below the percentage of businesses that are small.

Pueblo MSA

The percentage of loans to businesses that are small exceeds the aggregate, but it is well below the percentage of businesses that are small.

Small Loans to Farms

The borrower distribution of small loans to farms is excellent in both the Colorado Non-MSA and the Pueblo MSA. Refer to Table T in the state of Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Colorado Non-MSA

The percentage of loans to farms that are small exceeds the aggregate and is below the percentage of farms that are small.

Pueblo MSA

The percentage of loans to farms that are small exceeds the aggregate and is below the percentage of farms that are small.

Community Development Lending

SBNA did not make any CD loans in either of the full-scope AAs – the Colorado Non-MSA and the Pueblo MSA – where there is both a need and opportunity to make CD loans. The high level of CD lending the bank provided in its limited-scope AAs – the Boulder MSA and the Denver-Aurora-Lakewood MSA – offset an otherwise negative impact based on the lack of CD loans in both of the bank's full-scope AAs. CD loans in the Denver-Aurora-Lakewood MSA represent 35.98 percent of allocated tier 1 capital; CD loans in the Boulder MSA represent 20.75 percent of allocated tier 1 capital. Overall, CD lending had a neutral impact on the Lending Test.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs in its state of Colorado AAs.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Denver-Aurora-Lakewood MSA and the Boulder MSA is generally consistent with the bank's overall performance under the Lending Test in the full-scope AAs. As noted above, however, the level of CD lending in the limited-scope AAs, materially impacted the overall Lending Test rating.

Refer to Tables O through V in the state of Colorado section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Colorado is rated Outstanding. The bank's good performance in its full-scope AAs – the Colorado Non-MSA and the Pueblo MSA was favorably impacted by the bank's excellent performance in the Denver-Aurora-Lakewood MSA, a limited-scope AA. Performance in the Boulder MSA did not materially impact the overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance is good in both the Colorado Non-MSA and in the Pueblo MSA.

SBNA has a significant level of qualified CD investments and grants; however, the bank did not act in a leadership position. In addition, the bank does not have any investments that are not routinely provided by private investors. The bank exhibits good responsiveness to credit and community economic development needs. However, SBNA rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments – Colorado										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Boulder MSA	5	1,252	34	53	39	30.47	1,305	6.63	0	0
Colorado Non-MSA	3	887	32	236	35	27.34	1,123	5.70	0	0
Denver-Aurora-Lakewood MSA	7	4,597	27	12,108	34	26.56	16,705	84.83	0	0
Pueblo MSA	2	143	18	416	20	15.63	559	2.84	0	0
Total	17	6,879	111	12,813	128	100	19,692	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.

Colorado Non-MSA

Qualified investments in the Colorado Non-MSA total \$1.123 million. Total investments and donations in the Colorado Non-MSA represent 4.51 percent of allocated tier 1 capital based on the AA's share of bank deposits. The investments consist of three prior period investments and one current period investment which together total \$1.113 million. The remaining qualified investments consist of donations totaling \$10,000. All of the large investments, which represent 99 percent of the investments/donations consist of mortgage-backed securities where the majority of the underlying mortgages are to low- and moderate-income individuals. These investments are responsive to a critical need in the AA. Some noteworthy donations are noted below:

- A \$500 donation to a local emergency food pantry.
- A \$300 donation to an organization that provides food, clothing, and shelter to low- and moderate-income individuals.

Pueblo MSA

Qualified investments in the Pueblo MSA total \$559,000. Total investments in the Pueblo MSA represent 5.01 percent of allocated tier 1 capital based on the AA's share of bank deposits. The investments consist of two prior period investments and one current period investment, which together total \$536,000. The remaining qualified investments consist of 17 donations totaling \$23,000. All of the large investments, which represent 96 percent of the investments/donations, consist of mortgage-backed securities where a majority of the underlying mortgages are to low- and moderate-income individuals. The investments are responsive to a critical need in the AA. Some noteworthy donations are noted below:

- A furniture donation valued at \$15,000 to an organization that provides services to low- and moderate-income individuals.
- A \$750 donation, which helped provide financial literacy in schools where the majority of the students are low- and moderate-income.

In addition to investments noted above, the bank provided a \$1.5 million investment with potential to benefit the bank's AAs in the state of Colorado and the state of Kansas.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Boulder MSA is slightly stronger than the bank's performance in the full-scope AAs. Performance in the Denver-Aurora-Lakewood MSA is significantly stronger. The bank provided a very high level of investments in the Denver-Aurora-Lakewood MSA, which positively impacted the Investment Test rating. The majority of the investments consist of mortgage-backed securities.

SERVICE TEST

The bank's performance under the Service Test in Colorado is rated Low Satisfactory. The overall good performance in the bank's full-scope AAs was impacted by the weaker performance in the Denver-Aurora-Lakewood MSA due to the significant level of deposits and loan activity in that AA.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Colorado Non-MSA is good and performance in the Pueblo MSA is adequate. The Colorado Non-MSA carried more weight in the overall conclusion given that it has almost twice the level of deposits as the Pueblo MSA.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AAs. In the Colorado Non-MSA, service delivery systems are readily accessible; and in the Pueblo MSA, service delivery systems are reasonably accessible. The distribution of the bank's branches in all of the bank's Colorado AAs is noted in the table below:

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of SBNA Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Boulder MSA	20.7	2	15.4	0.0	50.0	50.0	0.0	6.7	22.3	43.1	27.9
Colorado Non-MSA*	22.6	2	15.4	0.0	100.0	0.0	0.0	0.0	46.7	38.2	0.0
Denver-Aurora-Lakewood MSA*	46.5	6	46.1	0.0	16.7	50.0	33.3	8.9	24.4	32.7	34.0
Pueblo MSA*	10.2	3	23.1	0.0	0.0	66.7	33.3	5.2	28.8	29.6	34.8

*This AA has at least one tract with unknown income, so the population percentages across geographies will not total 100%.

Colorado Non-MSA

In the Colorado Non-MSA, there are no low-income CTs; and the bank has two branches in moderate-income tracts. The percentage of branches in moderate-income CTs is significantly higher than the percentage of the population living in these tracts, which indicates ready accessibility in that AA.

To complement its traditional service delivery methods, SBNA offers access to a full-service ATM in one location in a moderate-income CT in the Colorado Non-MSA.

The bank also offers telephone banking access 24/7. Online and mobile banking services for consumers, which include online bill payment and mobile deposits, are offered for the convenience of all customers at no additional cost, though fees apply for certain actions as disclosed in the fee schedule. Bank data indicates increasing customer usage of online and mobile banking services during the evaluation period. These delivery methods are offered to increase access to banking services throughout the AA. Examiners did not place significant weight on these alternative delivery systems, as the bank does not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of low- and moderate-income individuals.

Services, including business hours, in the Colorado Non-MSA do not vary in a way that inconveniences the AA, particularly moderate-income geographies and/or low- and moderate-income individuals. All retail banking locations offer the same loan and deposit products, and SBNA offers a free checking

product that reduces barriers to banking access. Branches and drive-through facilities have similar business hours during the week. The Colorado Non-MSA branches offer limited service hours on Saturdays via drive-through facilities at all branch locations.

Pueblo MSA

In the Pueblo MSA, the bank has no branches in low- or moderate-income tracts. However, the bank's branches are accessible to low- and moderate-income tracts in the AA, given the geographic proximity of their branches relative to low- and moderate-income tracts and lending performance metrics. Examiners emphasize that lending data reflects reasonable penetration by geography and by income level of the borrower, which supports a conclusion of reasonable access to banking services in this AA.

The bank has no full-service ATMs in the Pueblo MSA. However, the bank offers all of the other online and mobile banking services as those noted in the Colorado Non-MSA.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AAs, particularly low- and moderate-income geographies and/or individuals. All retail banking locations offer the same loan and deposit products, and SBNA offers a free checking product that reduces barriers to banking access. Branches and drive-through facilities have similar business hours during the week. In the Pueblo MSA, all branch locations have drive-through facilities and offer limited Saturday service hours at branches and drive-through facilities.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Boulder MSA	0	2		-2		
Colorado Non-MSA	0	1		-1		
Denver-Aurora-Lakewood MSA	3	2		+1	+1	-1
Pueblo MSA	0	0				

To the extent that changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the Colorado Non-MSA, the bank closed a branch in a moderate-income CT located within a grocery store, which had limited transaction volume. SBNA did not open or close any branches in the Pueblo MSA.

Most of the changes in branches occurred in the limited-scope AAs. In the Boulder MSA, the bank closed two branches in moderate-income CTs after acquisition from First National Bank. The decision to close these branches was due to limited transaction volume at these locations, as well as other nearby branches in the AA (Boulder and Longmont); the remaining Boulder branch is in a moderate-income CT. In the Denver-Aurora-Lakewood MSA, the bank relocated one branch from an upper-income CT to

a middle-income CT to increase operational efficiency and added a commercial-focused branch in a moderate-income CT.

Community Development Services

The institution provides an adequate level of CD services.

Colorado Non-MSA

In the Colorado Non-MSA, a bank employee serving as an advisory board member provided a total of 111 qualifying community development service hours to an organization that provides services to abused and neglected low- and moderate-income children.

Pueblo MSA

In the Pueblo MSA, eight bank employees provided 84 qualifying community development service hours to five organizations. Just over 58 percent of the service hours involved serving as a board member or in another leadership position. Community services include financial education of low- and moderate-income students through Junior Achievement, as well as medical services targeted to address mental illness and drug abuse in low- and moderate-income populations.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Boulder MSA is consistent with the bank's overall performance in the full-scope areas. However, performance in the Denver-Aurora-Lakewood MSA is weaker than the bank's overall performance under the Service Test in the full-scope AAs. The Denver-Aurora-Lakewood MSA has no branches in low-income tracts, and just one business-focused branch with limited hours in a moderate-income tract. Lending data reflects a reasonable penetration by geography and by income level of the borrower, which supports a reasonable access to banking services. SBNA's performance in the Denver-Aurora-Lakewood MSA negatively impacted the overall Service Test conclusion.

State Rating

State of Kansas

CRA rating for the State of Kansas³: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect a good responsiveness to AA needs.
- A poor distribution of loans in geographies of different income levels.
- A good distribution of loans among individuals of different income levels and businesses of different sizes.
- An overall poor level of CD loans, which negatively impacted the Lending Test rating.
- A poor level of qualified CD investments and donations.
- Service delivery systems that are accessible to geographies and individuals of different income levels in the bank's AAs.
- An overall poor level of CD services in the bank's full-scope AAs.

Description of Institution's Operations in Kansas

The bank has designated six AAs in the state of Kansas. The AAs include Johnson County, KS; the Kansas Non-MSA; the Lawrence MSA; the Manhattan MSA; the Topeka AA; and the Wichita AA. As of December 2019, SBNA operated 27 branches, 20 limited service ATMs, and five full-service ATMs in its Kansas AAs. The AAs consist of whole CTs and do not arbitrarily exclude any low- or moderate-income areas or reflect illegal discrimination. The descriptions of the full-scope AAs are noted below:

Kansas Non-MSA

The Kansas Non-MSA includes the non-contiguous counties of Barton, Ellis, Ford, McPherson, Osborne, Russell, Saline, Seward, and Thomas, which are located in central and western Kansas. The counties consist of numerous cities and towns, including but not limited to Hays, Ellis, Dodge City, McPherson, Osborne, Salina, and Seward. SBNA operates 17 branches, 14 limited-service ATMs, and four full-service ATMs in its Kansas Non-MSA.

Demographic data indicates there are no low-income and eight moderate-income CTs, which represent 16.0 percent of the total CTs in the AA. In addition, 18.8 percent of the population is low income; and 17.4 percent is moderate-income. Additional demographic data is noted below:

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Kansas Non-MSA 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	0.0	16.0	58.0	26.0	0.0
Population by Geography	218,062	0.0	18.3	54.2	27.4	0.0
Housing Units by Geography	92,449	0.0	17.7	54.5	27.8	0.0
Owner-Occupied Units by Geography	56,698	0.0	12.8	55.3	32.0	0.0
Occupied Rental Units by Geography	27,498	0.0	27.0	51.9	21.1	0.0
Vacant Units by Geography	8,253	0.0	21.0	57.7	21.3	0.0
Businesses by Geography	13,574	0.0	20.7	52.0	27.3	0.0
Farms by Geography	1,390	0.0	4.1	64.7	31.2	0.0
Family Distribution by Income Level	54,831	18.8	17.4	20.3	43.4	0.0
Household Distribution by Income Level	84,196	21.2	16.3	18.1	44.4	0.0
Median Family Income - Kansas Non MSA – 2019		\$62,400	Median Housing Value			\$112,621
			Median Gross Rent			\$647
			Families Below Poverty Level			10.3%
Source: 2015 ACS and 2019 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.						

Employment

The main employment sectors in Barton County are healthcare and social assistance, retail trade, and manufacturing. The major employers are the University of Kansas Health System, Fuller Brush Co; Unified School District #428, Barton Community College, and Red Barn. As of December 31, 2019, the unemployment rate in Barton County is 3.1 percent. This is lower than the state of Kansas's unemployment rate of 3.2 percent and the U.S. unemployment rate of 3.5 percent.

The main employment sectors in Ellis County are agriculture, energy, manufacturing, healthcare, retail, and government. The major employers are Hess Services, Wheelchairs of Kansas, Hays Medical Center, Midwest Energy, and Eagle Communications. As of December 31, 2019, the unemployment rate in Ellis County is 2.3 percent.

The main employment sectors in Ford County are agriculture, healthcare, education, and government sectors. The major employers are National Beef, Cargill Meat Solutions, Unified School District #443, Western Plains Medical Complex, Ford County Government, and Dodge City Community College. As of December 31, 2019, the unemployment rate in Ford County is 2.5 percent.

The main employment sectors in McPherson County are pharmaceuticals, energy, and manufacturing. The major employers are Pfizer, CHS, Moundridge Manufacturing, Central Plastics, and Piping Technology Company. As of December 31, 2019, the unemployment rate in McPherson County is 2.2 percent.

The main employment sectors in Osborne County are health care and social assistance, manufacturing, and educational services. The major employers are Osborne Industries, Midway Co-Op, Osborne County, Unified School District #392, and the city of Osborne. As of December 31, 2019, the unemployment rate in Osborne County is 2 percent.

The main employment sectors in Russell County are manufacturing, health care and social assistance, and educational services. The major employers are Russell County Regional Hospital, USD # 407, Great Plains Manufacturing, Russell County, and PureField Ingredients. As of December 31, 2019, the unemployment rate in Russell County is 2.9 percent.

The main employment sectors in Saline County are manufacturing, health care and social assistance, and retail trade. The major employers are Schwan Food Company, Great Plains Manufacturing, and Philips Lighting. As of December 31, 2019, the unemployment rate in Saline County is 3 percent.

The main employment sectors in Seward County are manufacturing, retail trade, and health care and social assistance. The major employers are National Beef Packing, Unified School District #480, Southwest Medical Center, and Conestoga Energy. As of December 31, 2019, the unemployment rate in Seward County is 3.1 percent.

The main employment sectors in Thomas County are healthcare and social assistance, retail trade, and education. The major employers are Citizens Medical Center, Unified School District # 315, Walmart, and Colby Community College. As of December 31, 2019, the unemployment rate in Thomas County is 2.3 percent.

Housing

On average a significant portion of homes in the Kansas Non-MSA are owner-occupied demonstrating that homes in the AA are somewhat affordable. The home ownership rate ranges from a low of 61.9 percent in Ellis County to 76.4 percent in Russell County. The 2018 data indicates the median property value ranged from \$68,500 in Osborne County to \$146,600 in McPherson County. The median gross rent for the AA was \$647. The 2018 median family income was less than \$30,550 for a low-income family and ranged from \$30,550 to \$48,880 for a moderate-income family.

Community Contacts

We obtained one community contact with a local economic development corporation. The contact indicated the credit needs of the community include commercial, consumer and affordable home loans.

Manhattan MSA

The Manhattan MSA includes the contiguous counties of Geary, Pottawatomie, and Riley in northeastern Kansas. Geary County includes the cities of Junction City, Grandview Plaza, and Milford. Pottawatomie County includes the cities of Bellevue and Westmoreland. Riley County includes the cities of Manhattan, Riley, and Leonardville.

Manhattan, Kansas is home to Kansas State University, which has an annual undergraduate enrollment of over 17,500 students. The Fort Riley Army Base is also located in Riley County and is home to 20,000 soldiers. The bank operates two branches, one full-service ATM and one limited-service ATM in the Manhattan MSA.

Demographic data indicates there are no low-income CTs. There are 10 moderate-income CTs representing 30.8 percent of the total CTs in the AA. In addition, 19.5 percent of the population is low income and 21.6 percent is moderate-income. Additional demographic data is noted below:

Table A – Demographic Information of the Assessment Area						
Assessment Area: Manhattan MSA 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	26	0.0	30.8	38.5	23.1	7.7
Population by Geography	134,434	0.0	26.5	41.1	30.4	2.0
Housing Units by Geography	53,484	0.0	24.5	44.1	30.5	1.0
Owner-Occupied Units by Geography	22,887	0.0	14.8	45.4	39.5	0.3
Occupied Rental Units by Geography	24,495	0.0	31.3	43.9	23.1	1.6
Vacant Units by Geography	6,102	0.0	33.4	39.6	26.2	0.8
Businesses by Geography	6,671	0.0	25.5	40.6	33.2	0.6
Farms by Geography	420	0.0	12.6	43.3	44.0	0.0
Family Distribution by Income Level	28,857	19.5	21.6	20.9	38.0	0.0
Household Distribution by Income Level	47,382	21.8	17.7	20.0	40.5	0.0
Median Family Income – Manhattan MSA – 2019		\$67,200	Median Housing Value			\$150,534
			Median Gross Rent			\$912
			Families Below Poverty Level			7.9%
Source: 2015 ACS and 2019 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.						

Employment

The main employment sectors in Geary County are education, healthcare, government, military, manufacturing and distribution. The major employers are Advanced Call Center Technologies, Century Link, CertainTeed Gypsum, City of Junction City, Foot Locker Distribution Center, and Geary Community Hospital. As of December 31, 2019, the unemployment rate in Geary County is 4.4 percent. This is higher than the state of Kansas's unemployment rate of 3.2 percent and the U.S. unemployment rate of 3.5 percent.

The main employment sectors in Pottawatomie County are healthcare and social assistance, educational services, construction, manufacturing, and retail trade. The major employers are Pottawatomie School District, Caterpillar Work Tools, Inc., Brink's Home Security, and Onyx Collection Inc. As of December 31, 2019, the unemployment rate in Pottawatomie County is 2.8 percent.

The main employment sectors in Riley County are military, educational services, healthcare and social assistance, and manufacturing. The major employers are the Fort Riley Army Base, Kansas State University, Mercy Regional Health Center, and GTM Sportswear. As of December 31, 2019, the unemployment rate in Pottawatomie County is 2.8 percent.

Housing

The home ownership rate is 39 percent in Geary County, 78.4 percent in Pottawatomie County, and 42.3 percent in Riley County. The 2018 data indicates the median property value was \$142,200 in Geary County, \$181,200 in Pottawatomie County, and \$216,200 in Riley County. The median gross rent for the AA was \$912. The 2018 median family income was less than \$36,100 for a low-income family and ranged from \$36,100 to \$57,760 for a moderate-income family.

Community Contacts

We obtained one community contact with a local economic development corporation. The contact indicated there is a need for affordable housing loans for low- and moderate-income individuals.

Scope of Evaluation in Kansas

Ratings in the state of Kansas are based primarily, but not entirely, on the bank's performance in the full-scope AAs – the Kansas Non-MSA and the Manhattan MSA. The Kansas Non-MSA was selected because it represents 74.06 percent of the bank's deposits in the state, 43.62 percent of home mortgage loans, and 38.35 percent of small loans to businesses. Although the Manhattan MSA represents only 7.16 percent of the bank's deposits in the state, 4.66 percent of the bank's home mortgage loans, and 7.08 percent of the bank's small loans to businesses, this AA was selected in order to ensure that a qualitative and quantitative analysis of the AA is performed periodically. In addition, we also considered the bank's performance in the limited-scope AAs. Performance in Johnson County, KS and the Wichita MSA impacted the lending test rating for the state of Kansas more significantly than the other limited-scope AAs since 25.72 percent of the bank's home mortgage loans was originated or purchased in Johnson County, KS and 19.11 percent of home mortgage loans was originated in the Wichita MSA. Refer to Appendix A: Scope of Examination for a list of full- and limited-scope AAs.

SBNA gathered 36.70 percent of the bank's deposits and originated or purchased 30.98 percent of the bank's home mortgage loans and 24.34 percent of the bank's small business and small farm loans in the state. During the evaluation period, the bank operated 27 branches in the state of Kansas, which represents 47 percent of the bank's total branches.

When evaluating the bank's performance under the lending test, we placed greater weight on home mortgage loans than on small business and small farms. Home mortgage loans represent 70.64 percent of total loans in the state, small business loans represent 22.32 percent and small farm loans represent 7.04 percent. We also considered the volume of CD lending and other performance factors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Needs to Improve. In concluding on the bank's performance, we placed more weight on the bank's performance in the Kansas Non-MSA than on the Manhattan MSA since a substantial majority of the deposits and a significant number of loans were made in the Kansas Non-MSA. However, we did not discount performance in the Manhattan MSA. We also considered the bank's performance in the limited-scope AAs, which further supports the

overall rating. In concluding on performance in the full-scope AAs, we placed more weight on the bank's performance during the 2017-2018 evaluation period and less weight on the 2019 evaluation period since a majority of the loans were originated during the 2017-2018 evaluation period. Finally, the overall poor level of CD lending negatively impacted the Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Kansas Non-MSA and the Manhattan MSA is poor. The rating is driven by the bank's performance in the Kansas Non-MSA which represents almost half of the bank's deposits in the state of Kansas.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Johnson County, KS	276	60	1	0	337	21.17%	6.08%
Kansas Non-MSA	468	130	106	50	754	47.36%	74.06%
Lawrence MSA	31	44	0	1	76	4.77%	2.88%
Manhattan MSA	50	24	0	21	95	6.03%	7.16%
Topeka AA	15	10	0	0	25	1.57%	1.23%
Wichita AA	233	71	0	0	304	19.10%	8.59%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Dollar amounts – 000's							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Johnson County, KS	\$80,384	\$15,446	\$ 260	0	96,090	33.65%	6.08%
Kansas Non-MSA	\$53,778	\$16,802	\$10,901	1,568	83,049	29.07%	74.06%
Lawrence MSA	\$ 8,288	\$13,108	\$0	116	21,512	7.53%	2.88%
Manhattan MSA	\$ 8,553	\$ 4,586	\$0	5,143	18,282	6.40%	7.16%
Topeka AA	\$ 2,036	\$ 1,676	\$0	0	3,712	1.30%	1.23%
Wichita AA	\$47,905	\$15,090	\$0	0	62,995	22.05%	8.59%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Kansas Non-MSA

The proportion of the bank's loans is substantially weaker than the proportion of the bank's deposits in the AA. The proportion of the bank's deposits in the Kansas Non-MSA is 74.06. In comparison, the proportion of home mortgage loans in the AA is 26.76 percent and the proportion of the bank's small loans to businesses is 25.19 percent.

The bank's market share and rank in loans is slightly weaker than its market share and rank in deposits. The bank's performance in the AA is driven by the fact that the AA represents a primary market with 17 branches. The bank has a 14.71 percent deposit market share and ranks first among 49 banks in the AA. In comparison, the bank has a home mortgage loan market share of 4.93 percent and ranks fourth among 191 home mortgage lenders. SBNA has a small business loan market share of 2.02 percent and ranks 14th among 73 small business lenders in the AA. The bank's weaker market share is impacted by the significant competition for home mortgage and small loans to businesses in this AA. However, SBNA still holds a significant home mortgage market share in this AA. The top three home mortgage lenders hold 17.97 percent of the market share. On the other hand, the top five small business lenders hold 52.74 percent of the market share.

The bank's home mortgage loan percentile is 97.91, which meets its deposit percentile of 98.0. The bank's small business loan percentile is 80.82 which is slightly lower than its deposit percentile.

Manhattan MSA

The proportion of the bank's home mortgage loans is slightly weaker than the proportion of the bank's deposits for home mortgage loans. However, the proportion of small loans to businesses is comparable to the proportion of the bank's deposits. The proportion of the bank's deposits in the Manhattan MSA is 7.16 percent. In comparison, the proportion of the bank's home mortgage loans is 4.26 percent and the proportion of the bank's small loans to businesses is 6.87 percent.

The bank's market share and rank in loans is substantially weaker than its market share and rank in deposits. The bank's performance in the AA is driven by the fact the AA represents a secondary market with only two branches. The bank has a 2.71 percent deposit market share and ranks 11th among 21 financial institutions. In comparison, the bank has a home mortgage loan market share of 0.30 and ranks 51st among 172 home mortgage lenders. In addition, the bank has a small business loan market share of 1.11 percent and ranks 17th among 53 small business lenders. The bank's weaker market share is impacted by the significant competition for home mortgage and small loans to businesses in this AA. The top five home mortgage lenders hold 31.50 percent of the home mortgage loan market share. The top five small business lenders hold 57.22 percent of the small business loan market share.

The bank's home mortgage loan percentile is 73.35 and the bank's small business loan percentile is 67.92, which are both higher than its deposit percentile of 47.60.

Distribution of Loans by Income Level of the Geography

Overall, the bank exhibits a poor geographic distribution of loans in its full-scope AAs – the Kansas Non-MSA and the Manhattan MSA. Performance in Johnson County, KS; the Lawrence MSA; and the Wichita MSA is similar, with the exception of the geographic distribution of small business loans in Johnson County, KS, which is weaker. The bank did not make sufficient loans of any type in the Topeka AA to perform a meaningful analysis.

Home Mortgage Loans

The geographic distribution of home mortgage loans is poor in the Kansas Non-MSA and the very poor in the Manhattan MSA. Refer to Table O in the state of Kansas 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.

Kansas Non-MSA**2017-2018**

There are no low-income CTs in the Kansas Non-MSA. During the 2017-2018 evaluation period, the percentage of loans in moderate-income CTs is substantially below the aggregate and well below the percentage of owner-occupied housing units.

2019

During the 2019 evaluation period, the percentage of loans in moderate-income CTs is near to the aggregate and below the percentage of owner-occupied housing units.

Manhattan MSA**2017-2018**

There are no low-income CTs in the Manhattan MSA. During the 2017-2018 evaluation period, the bank did not make any loans in moderate-income CTs reflecting very poor performance.

2019

During the 2019 evaluation period, the percentage of loans in moderate-income CTs was significantly below the aggregate and the percentage of owner-occupied housing units, reflecting very poor performance.

Small Loans to Businesses

The geographic distribution of small loans to businesses is excellent in the Kansas Non-MSA. The bank did not originate/purchase sufficient small loans to businesses in the Manhattan MSA during either evaluation period to perform a meaningful analysis. Refer to Table Q in the state of Kansas 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.

Kansas Non-MSA**2017-2018**

During the 2017-2018 evaluation period, the percentage of loans in moderate-income CTs exceeds the aggregate and the percentage of businesses.

2019

The bank's performance during the 2019 evaluation period is similar to the bank's performance during the 2017-2018 evaluation period. The percentage of loans in moderate-income CTs exceeds the aggregate and the percentage of businesses.

Small Loans to Farms

The geographic distribution of small loans to farms is very poor in the Kansas Non-MSA. The bank did not originate/purchase sufficient small loans to farms in the Manhattan MSA to perform a meaningful analysis. Refer to Table S in the state of Kansas 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.

Kansas Non-MSA2017-2018

The bank did not make any small farm loans in either low- or moderate-income CTs during the 2017-2018 review period.

2019

The bank did not make any small farm loans in either low- or moderate-income CTs during the 2019 review period.

Lending Gap Analysis

Lending gaps identified in the Kansas Non-MSA and the Manhattan MSA are explainable. Overall, the lending gaps had a neutral impact on our conclusion regarding the bank's geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution, with an excellent distribution of loans in the Kansas Non-MSA and a poor distribution of loans in the Manhattan MSA. The borrower distribution in the limited-scope AAs further supports the overall rating. The borrower distribution of home mortgage loans is good in Johnson County, KS; but weaker in the Lawrence MSA and the Wichita MSA. The borrower distribution of loans to small businesses is also weaker in all three of these limited-scope AAs. In the Topeka AA, the bank did not make sufficient loans of any type to perform a meaningful analysis.

Home Mortgage Loans

The distribution of home mortgage loans among individuals of different income levels is excellent in the Kansas Non-MSA and poor in the Manhattan MSA. Refer to Table P in the state of Kansas 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.

Kansas Non-MSA2017-2018

During the 2017-2018 evaluation period, the percentage of loans to low-income borrowers is near to the aggregate but is below the percentage of low-income families. The bank's lower percentage of loans compared to the demographic is impacted by the high poverty level, which is 10.3 percent in this AA. The percentage of loans to moderate-income borrowers exceeds the aggregate and the percentage of moderate-income families.

2019

During the 2019 evaluation period, the percentage of loans to low-income borrowers exceeds the aggregate but is significantly below the percentage of low-income families. The percentage of loans to moderate-income families exceeds the aggregate and the percentage of moderate-income families.

Manhattan MSA2017-2018

The bank did not make any loans to low-income borrowers. The percentage of loans to moderate-income borrowers is significantly below the aggregate and well below the percentage of moderate-income families.

2019

The bank did not make any loans to low-income borrowers. However, the percentage of loans to moderate-income borrowers significantly exceeds the aggregate and the percentage of moderate-income families.

Small Loans to Businesses

The borrower distribution of loans to businesses that are small is good in the Kansas Non-MSA. The bank did not originate/purchase sufficient small loans to businesses in the Manhattan MSA during either evaluation period to perform a meaningful analysis. Refer to Table R in the state of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Kansas Non-MSA2017-2018

During the 2017-2018 evaluation period, the percentage of loans to businesses that are small exceeds the aggregate but is below the percentage of businesses that are small.

2019

During the 2019 evaluation period, the percentage of loans to businesses that are small exceeds the aggregate but is well below the percentage of businesses that are small.

Small Loans to Farms

The borrower distribution of loans to farms that are small is excellent in the Kansas Non-MSA. The bank did not originate/purchase sufficient small loans to farms in the Manhattan MSA during either evaluation period to perform a meaningful analysis. Refer to Table T in the state of Kansas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Kansas Non-MSA2017-2018

During the 2017-2018 evaluation period, the percentage of loans to farms that are small exceeds the aggregate and nearly meets the percentage of farms that are small.

2019

During the 2019 evaluation period, the percentage of loans to farms that are small exceeds the aggregate and is below the percentage of farms that are small.

Community Development Lending

Overall, the institution has made a low level of CD loans, which had a negative impact on the Lending Test rating. The high level of CD lending in the Manhattan MSA is impacted by the low level of CD lending in the Kansas Non-MSA and the Lawrence MSA, and the lack of any CD loans in Johnson County, KS; the Topeka AA; and the Wichita MSA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Kansas Non-MSA

The bank has made a low level of CD loans in the Kansas Non-MSA. During the review period, the bank made two CD loans totaling \$1.568 million which represents 1.45 percent of allocated tier 1 capital.

Manhattan MSA

SBNA has made a very high level of CD loans in the Manhattan MSA. During the review period, the bank made 22 CD loans totaling \$5.142 million in the Manhattan MSA. This represents 49.36 percent of allocated tier 1 capital.

Overall the bank's CD lending in the state of Kansas reflects a poor level of CD lending in the bank's AAs. The bank made a poor level of CD loans in the Kansas Non-MSA and the Lawrence MSA and no

CD loans in Johnson County, KS; the Topeka AA; and the Wichita MSA. The overall poor level of CD lending had a negative impact on the bank's Lending Test rating.

Product Innovation and Flexibility

The institution makes some use of innovative and flexible lending practices in order to serve AA credit needs. Twenty-two of the CD loans made in the Manhattan MSA represent small loans to a Catholic charity, which in turn provide affordable loans to low- and moderate-income individuals as an alternative to payday loans.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in Johnson County, KS, the Lawrence MSA, and the Wichita MSA is weaker than the bank's overall performance under the Lending Test in the full-scope areas. The geographic distribution of home mortgage loans is similar; however, the geographic distribution of small loans to businesses is weaker in Johnson County, KS. The borrower distribution of home mortgage loans is weaker in the Lawrence MSA and the Wichita MSA. The borrower distribution of small loans to businesses is also weaker in Johnson County, KS; the Lawrence MSA; and the Wichita MSA. The bank did not make sufficient loans of any type in the Topeka AA to allow for a meaningful analysis. Performance in the limited-scope AAs further supports the overall Lending Test rating of Needs to Improve (See conclusions on CD Lending above). Refer to Tables O through T in the state of Kansas section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Kansas is rated Needs to Improve. Overall, the bank's performance in its full-scope AAs is very poor. However, good performance in the limited scope AAs – Johnson County, KS; the Lawrence MSA; the Topeka AA; and the Wichita MSA, partially offset the bank's otherwise very poor performance.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance is very poor in the Kansas Non-MSA and poor in the Manhattan MSA. Substantial weight was placed on the Kansas Non-MSA which represents 74 percent of the bank's deposits.

SBNA has a very poor level of qualified CD investments and donations in its full-scope AAs. In addition, the bank did not act in a leadership position, particularly for those investments that are not routinely provided by private investors.

The bank exhibits a poor responsiveness to credit and community economic development needs and does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments – Kansas										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Johnson County, KS	1	366	0	0	1	.41	366	6.86	0	0
Kansas Non-MSA	0	0	145	1,006	145	59.43	1,006	18.86	0	0
Lawrence MSA	1	700	16	625	17	6.96	1,325	24.85	0	0
Manhattan MSA	0	0	40	119	40	16.39	119	2.23	0	0
Topeka AA	0	0	11	513	11	4.51	513	9.62	0	0
Wichita AA	2	201	28	1,803	30	12.30	2,004	37.58	0	0
Total	4	1,267	240	4,066	244	100.00	5,333	100.00	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.

Kansas Non-MSA

Qualified investments in the Kansas Non-MSA total \$1.006 million. Total investments in the Kansas Non-MSA represent 0.93 percent of allocated tier 1 capital based on the AA's share of bank deposits. The investments consist of three current period investments totaling \$926,000 and 142 donations totaling \$80,000. All of the large investments, which represent 92 percent of total investments and donations, consist of mortgage-backed securities. These investments are responsive to a critical need in the AA. Some noteworthy donations are noted below:

- A \$900 in-kind contribution which provided office space to an organization that provides affordable housing to low- and moderate-income individuals.
- A \$2,500 donation to an organization which provides medical care to low- and moderate-income.

Manhattan MSA

Qualified investments in the Manhattan MSA total \$119,000. Total investments in the Manhattan MSA represent 1.14 percent of allocated tier 1 capital. The investments consist of one prior period investment totaling \$110,000 and 39 donations totaling \$9,000. The investment, which represents 92 percent of total investments/donations, is a mortgage-backed security which is responsive to a critical need in the AA. Some noteworthy donations are noted below:

- A \$720 donation to an organization that provided Christmas gifts to low-income children.
- A \$500 donation to an organization that provides food to low- and moderate-income individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Johnson County, KS; the Lawrence MSA; the Topeka AA; and the Wichita AA is stronger than the bank's overall performance under the Investment Test in the full-scope areas. In all of the limited-scope AAs, performance was good. This positively impacted the bank's Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in Kansas is rated High Satisfactory. The bank has an excellent distribution of branches in both of its full-scope AAs. However, the poor level of CD services in the Kansas Non-MSA negatively impacted the overall Service Test rating. The overall rating was primarily driven by performance in the Kansas Non-MSA, which represents 74.06 percent of total deposits in the state of Kansas. In addition, the lack of any branches in low- and moderate-income CTs and the lack of any qualified CD services in Johnson County, KS; the Lawrence MSA; and the Topeka AA further supports the overall Service Test rating in the state of Kansas.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Kansas Non-MSA and the Manhattan MSA is good. The bank has an excellent distribution of branches in both of its full-scope AAs.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of SBNA Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Johnson County AA	6.1	2	7.4	0.0	0.0	0.0	100.0	1.0	7.7	32.8	58.5
Kansas Non-MSA	74.0	17	63.0	0.0	17.6	41.2	41.2	0.0	18.3	54.2	27.5
Lawrence MSA	2.9	2	7.4	0.0	0.0	50.0	50.0	10.3	29.2	31.9	28.6
Manhattan MSA*	7.2	2	7.4	0.0	50.0	50.0	0.0	0.0	26.5	41.1	30.4
Topeka AA	1.2	1	3.7	0.0	0.0	100.0	0.0	8.2	18.8	39.7	33.3
Wichita AA	8.6	3	11.1	0.0	100.0	0.0	0.0	9.3	24.9	28.5	37.3

*This AA has at least one tract with unknown income, so the population percentages across geographies will not total 100%.

Kansas Non-MSA

In the Kansas Non-MSA, there are no low-income CTs; the bank has three branches in moderate-income tracts with one of those branches located in an underserved middle-income CT. The percentage of branches in moderate-income CTs is similar to the percentage of the population living in these tracts.

To complement its traditional service delivery methods, SBNA offers access to four deposit-taking ATMs in the Kansas Non-MSA. The bank also offers telephone banking access 24/7. Online and mobile banking services for consumers, which include online bill payment and mobile deposits, are offered for the convenience of all customers at no additional cost, though fees apply for certain actions as disclosed in the fee schedule. Bank data indicates increasing customer usage of online and mobile banking

services during the evaluation period. These delivery methods are offered to increase access to banking services throughout the AAs. Examiners did not place significant weight on these alternative delivery systems, as the bank does not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of low- and moderate-income individuals.

Manhattan MSA

In the Manhattan MSA, there are no low-income CTs; the bank has one branch located in a moderate-income CT. The percentage of branches in moderate-income CTs is significantly higher than the percentage of the population living in these tracts.

To complement its traditional service delivery methods, SBNA offers access to one full-service ATM in the Manhattan MSA. The bank also offers telephone banking access 24/7. Online and mobile banking services for consumers, which include online bill payment and mobile deposits, are offered for the convenience of all customers at no additional cost, though fees apply for certain actions as disclosed in the fee schedule. Bank data indicates increasing customer usage of online and mobile banking services during the evaluation period. These delivery methods are offered to increase access to banking services throughout the AAs. Examiners did not place significant weight on these alternative delivery systems, as the bank does not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Johnson County AA	0	0				
Kansas Non-MSA	0	0				
Lawrence MSA	0	0				
Manhattan MSA	0	1				-1
Topeka AA	0	1			-1	
Wichita AA	0	0				

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the Manhattan MSA, the bank closed one branch in an upper-income CT due to limited transaction volume. In the Topeka AA, the bank closed one branch in a middle-income CT due to a lack of market share and competitive factors.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AAs, particularly low- and moderate-income geographies and/or individuals. Retail banking locations offer the same loan and deposit products, and SBNA offers a free checking product that reduces barriers to banking access. The bank has 17 branches in the Kansas Non-MSA. Operating hours vary slightly

depending on the branch, with drive-through facilities generally providing slightly expanded operating hours. Branches and drive-through facilities have similar business hours during the week except for two locations, one with limited hours on Tuesdays to meet the needs of a local senior center, and another with more limited hours compared to typical locations (which is located in an upper-income CT). Bank management closely monitors branch service hours and differences are based on transactional activity and competitive factors in certain markets. Most locations have drive-through facilities; one branch in a moderate-income CT provides drive-through services only, and another branch has no drive-through. Eight branch locations have Saturday hours and the others do not. The bank has two branches in the Manhattan MSA. One branch has a drive-through located in a moderate-income CT and offers Saturday hours and extended hours all week. In the Lawrence MSA, subject to limited-scope review, a branch in a middle-income CT caters to commercial clients and offers services by appointment only.

Community Development Services

The institution provides a poor level of CD services. Our conclusions were materially impacted by the bank's low level of CD services that SBNA provided in the Kansas Non-MSA, which represents a substantial majority of the bank's deposits; 74.06 percent of the bank's deposits in the state of Kansas are gathered in the Kansas Non-MSA. In addition, the bank did not provide any qualified services in Johnson County, KS; the Lawrence MSA; and the Topeka AA which represent another 10.19 percent of the bank's deposits in the state of Kansas.

Kansas Non-MSA

In the Kansas Non-MSA, 17 bank employees provided a total of 513 qualifying community service hours to approximately 22 organizations. The number of hours provided during this evaluation period is substantially less than that provided during the prior evaluation period and is poor.

About 15.4 percent of service hours represent leadership roles, such as board or committee membership. Some examples of community services include financial assistance and education provided to a local Girl Scouts chapter that serves a high percentage of low- and moderate-income children, the provision of financial education targeted to low- and moderate-income populations, and financial assistance to various organizations that provide services to low- and moderate-income individuals and families.

Manhattan MSA

In the Manhattan MSA, one bank employee provided 30 qualifying community development service hours to an organization that provides mental health services to low- and moderate-income individuals. The bank employee served on the board of the organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in Johnson County, KS; the Lawrence MSA; and the Topeka AA is weaker than the bank's overall performance under the Service Test in the full-scope areas. The bank did not provide any qualified CD services in these AA. The bank's performance in the Wichita AA is stronger than the bank's overall performance in the full-scope areas. Performance in the limited-scope AAs of Johnson County, KS; the Lawrence MSA; and the Topeka AA further supports the overall poor level of CD services.

State Rating

State of Missouri

CRA rating for the State of Missouri⁴: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Poor responsiveness to AA credit needs.
- The lack of any CD loans in Johnson County, MO.
- A very low level of qualified investments.
- Service delivery systems that are reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- A relatively high level of CD services.

Description of Institution's Operations in Missouri

The bank has designated one AA in the state of Missouri – Johnson County, MO. SBNA operates one branch and one full-service ATM in this AA. The AA consists of whole CTs and does not arbitrarily exclude any low- or moderate-income areas or reflect illegal discrimination. The description of the full-scope AA is noted below:

Johnson County, MO

The Johnson County, MO AA includes the single county of Johnson in west central Missouri. Johnson County includes the cities of Warrensburg, Kingsville, and Leeton and the towns of Centerview and Holden.

Demographic data indicates there are no low or moderate-income CTs in the AA. In addition, 13 percent of the population is low-income, and 13.7 percent is moderate-income. Additional demographic data is noted below:

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Johnson County MO AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	9	0.0	0.0	66.7	33.3	0.0
Population by Geography	54,155	0.0	0.0	53.0	47.0	0.0
Housing Units by Geography	21,710	0.0	0.0	51.2	48.8	0.0
Owner-Occupied Units by Geography	12,062	0.0	0.0	41.0	59.0	0.0
Occupied Rental Units by Geography	7,909	0.0	0.0	64.5	35.5	0.0
Vacant Units by Geography	1,739	0.0	0.0	61.9	38.1	0.0
Businesses by Geography	3,025	0.0	0.0	53.7	46.3	0.0
Farms by Geography	225	0.0	0.0	48.9	51.1	0.0
Family Distribution by Income Level	13,088	13.0	13.7	20.0	53.2	0.0
Household Distribution by Income Level	19,971	18.4	12.6	16.5	52.6	0.0
Median Family Income – Johnson County, MO – 2019		\$52,400	Median Housing Value			\$136,524
			Median Gross Rent			\$736
			Families Below Poverty Level			9.2%
Source: 2015 ACS and 2019 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.						

Employment

The main employment sectors in Johnson County are military, educational services, healthcare and social assistance, and retail trade. Major employers include Whiteman Air Force Base, University of Central Missouri, Enersys Energy Products, Inc., and Western Missouri Medical Center. As of December 31, 2019, the unemployment rate in Johnson County is 3.6 percent which is substantially similar to the state of Missouri's unemployment rate of 3.4 percent and the U.S. unemployment rate of 3.5 percent.

Housing

The 2018 data indicates the median property value was \$136,524 in Johnson County. The median gross rent for the AA was \$736. The 2018 median family income was less than \$26,550 for a low-income family and ranged from \$26,550 to \$42,480 for a moderate-income family.

Community Contacts

We obtained one community contact with a local municipal economic development officer. The contact indicated the housing stock in low- and moderate-income areas is inadequate, and the volume of affordable housing is insufficient.

Scope of Evaluation in Missouri

Ratings in the state of Missouri are based entirely on the bank's performance in Johnson County, MO. This AA represents 100 percent of the deposits and loans in the state as the bank does not have any other AAs in the state of Missouri.

SBNA gathered 0.28 percent of the bank's total deposits and originated 0.09 percent of the bank's home mortgage loans and 0.14 percent of the bank's small business loans in this AA.

We were unable to perform an analysis of the bank's lending by income level of geography or by borrower income as the bank did not originate or purchase a sufficient volume of any type of loan (home mortgage, small business, or small farm) to allow for a meaningful analysis.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

The bank's performance under the Lending Test in Missouri is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Johnson County, MO is poor. We based our conclusion on the bank's poor lending activity and the lack of sufficient loans of any type to perform a meaningful analysis. SBNA operates one branch which is located in Leeton, Missouri. However, the bank's AA includes a number of other small towns and rural areas within the county. Community contacts and market share data indicate there is a need for affordable housing loans and community development loans to rehabilitate or create affordable housing. Market share data indicates that 159 lenders provided home mortgage loans in this AA and 47 lenders provided small loans to businesses, further indicating there is need and opportunity.

Lending Activity

Lending levels reflect poor responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Johnson County, MO	3	2	9	0	14	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Johnson County, MO	\$149	\$ 45	\$187	\$ 0	\$381	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

The proportion of the bank's loans in the AA is comparable to the proportion of its deposits since Johnson County, MO is the only AA in the state of Missouri.

The bank's market share and rank in loans are substantially weaker than its market share and rank in deposits. The bank's performance in the AA is driven by the fact that the AA represents a secondary market with one branch. The bank has a 1.27 percent deposit market share and ranks eighth among eight financial institutions. 2019 peer mortgage data indicates the bank did not report any home mortgage loans in Johnson County, MO during 2019. The bank's small business market share is also substantially lower than its deposit market share. SBNA has a 0.20 percent market share and ranks 46 among 47 small business lenders. The bank's weak market share is impacted by the significant competition for home mortgage and small loans to businesses in this AA. The top five home mortgage lenders hold 37.33 percent of the market share and the top five small business lenders hold 59.55 percent of the small business loan market share.

The bank's home mortgage loan percentile is 0.00 which is comparable to its deposit percentile. SBNA's small business loan percentile is 2.13 percent, which is higher than its deposit percentile. However, this represents only one loan.

Distribution of Loans by Income Level of the Geography

The bank did not make sufficient loans of any type to allow for a meaningful analysis. In addition, there are no low- or moderate-income CTs in the AA.

Home Mortgage Loans

Refer to Table O in the state of Missouri 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.

Johnson County, MO

SBNA did not originate or purchase a sufficient volume of home mortgage loans to allow for a meaningful analysis. The bank only originated three home mortgage loans during the evaluation period.

Small Loans to Businesses

Refer to Table Q in the state of Missouri 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.

Johnson County, MO

SBNA did not originate or purchase a sufficient volume of small loans to businesses to perform a meaningful analysis. The bank only originated two small loans to businesses during the evaluation period.

Lending Gap Analysis

The bank did not make any loans in significant segments of the AAs. This is due to the overall very low level of lending in this AA. It is also important to note that there are no low- or moderate-income CTs in this AA.

Distribution of Loans by Income Level of the Borrower

The bank did not originate sufficient loans of any type to perform a meaningful analysis.

Home Mortgage Loans

Refer to Table P in the state of Missouri 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.

Johnson County, MO

SBNA did not originate or purchase a sufficient volume of home mortgage loans to perform a meaningful analysis. The bank only originated three home mortgage loans during the evaluation period.

Small Loans to Businesses

Refer to Table R in the state of Missouri section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Johnson County, MO

The bank did not originate or purchase a sufficient volume of small loans to businesses to perform a meaningful analysis. The bank only originated two small loans to businesses during the evaluation period.

Community Development Lending

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Johnson County, MO

The institution has not made any CD loans in Johnson County, MO. Although opportunities are more limited in this AA since it consists primarily of rural areas and small cities and towns, community contacts and information available on the internet indicate there are some opportunities and significant need. This further supports the poor Lending Test rating.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs in Johnson County, MO.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of Missouri is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Johnson County, MO is poor even when considering that opportunities for CD investments are somewhat limited since this AA is mostly rural.

The institution has a few qualified CD grants and no investments, particularly those that are not routinely provided by private investors.

SBNA exhibits a poor responsiveness to credit and community economic development needs. In addition, the bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments – Missouri										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Johnson County, MO	0	0	3	1	3	100	1	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.

Johnson County, MO

The qualified investments consist of three donations totaling \$1,000. Total investments/donations represent 0.09 percent of allocated tier 1 capital based on the AA's share of bank deposits.

SERVICE TEST

The bank's performance under the Service Test in Missouri is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in Johnson County, MO is good. The relatively high level of services impacted the overall Service Test rating since there are no low- or moderate-income CTs in this AA.

Retail Banking Services

Johnson County, MO

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of SBNA Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Johnson County, MO	100.0	1	100.0	0.0	0.0	100.0	0.0	0.0	0.0	53.0	47.0

There are no low- or moderate-income CTs, and no distressed or underserved middle-income CTs in the AA. The bank has one branch location in the southern part of the county that reasonably serves the AA.

To complement its traditional service delivery methods, SBNA offers telephone banking access 24/7. Online and mobile banking services for consumers, which include online bill payment and mobile deposits, are offered for the convenience of all customers at no additional cost, though fees apply for certain actions as disclosed in the fee schedule. Bank data indicates increasing customer usage of online and mobile banking services during the evaluation period. These delivery methods are offered to increase access to banking services throughout the AA. The bank also has one full-service ATM in Johnson County. Examiners did not place significant weight on these alternative delivery systems, as the bank does not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Johnson County AA	0	0				

The bank did not open or close any branches during the evaluation period. Services, including business hours, do not vary in a way that inconveniences the AA. The bank's single branch has a drive-through facility and offers limited banking hours on Saturdays.

Community Development Services

The institution provides a relatively high level of CD services.

Johnson County, MO

A bank employee provided 233 qualifying community development service hours to two organizations that reasonably serve low- and moderate-income residents, one of which provides support and services to the community through humanitarian services and grants, and another that focuses on fundraising events that benefit the community through outreach services and donations. A significant percentage of the hours represents board service or a CD service through a leadership role.

State Rating

State of New Mexico

CRA rating for the State of New Mexico⁵: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels that reflect excellent responsiveness to AA credit needs.
- An adequate distribution of loans in geographies of different income levels.
- An adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes.
- An overall good level of CD loans, which had a positive impact on the bank's Lending Test rating.
- An adequate level of qualified CD investments.
- Service delivery systems that are reasonably accessible to geographies and individuals of different income levels.
- An adequate level of CD services.

Description of Institution's Operations in New Mexico

The bank has designated four AAs in the state of New Mexico – the Albuquerque AA, the Las Cruces AA, the New Mexico Non-MSA, and the Santa Fe MSA. SBNA operates 11 branches and 14 ATMs in its New Mexico AAs. The AAs consist of whole CTs and do not arbitrarily exclude any low- or moderate-income areas or reflect illegal discrimination. The description of the bank's full-scope AA is noted below:

Albuquerque AA

The Albuquerque AA includes the single county of Bernalillo in north central New Mexico. Bernalillo County includes the city of Albuquerque, the towns of Tijeras, Los Rancho de Albuquerque, Sandia Park, and the Native American Pueblos of Isleta, Laguna, and Sandia. SBNA operates three branches, one limited-service ATM, and two full service ATMs in the Albuquerque AA.

Demographic data indicates there are 10 low-income CTs representing 6.5 percent of the total CTs in the AA and 46 moderate-income CTs representing 30.1 percent of the total CTs in the AA. In addition, 25.1 percent of the population is low-income and 15.3 percent is moderate-income. Additional demographic data is noted below:

⁵ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Albuquerque AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	153	6.5	30.1	28.8	33.3	1.3
Population by Geography	673,943	6.6	32.8	27.1	33.0	0.5
Housing Units by Geography	287,054	7.2	30.9	28.7	32.8	0.4
Owner-Occupied Units by Geography	163,821	2.8	28.4	28.6	40.1	0.2
Occupied Rental Units by Geography	99,449	14.0	34.6	28.3	22.4	0.6
Vacant Units by Geography	23,784	9.7	32.4	31.2	26.2	0.6
Businesses by Geography	57,947	10.3	24.8	29.1	34.8	0.9
Farms by Geography	1,068	6.3	27.3	28.7	37.5	0.2
Family Distribution by Income Level	161,704	25.1	15.3	17.8	41.8	0.0
Household Distribution by Income Level	263,270	26.3	15.6	16.3	41.8	0.0
Median Family Income - Albuquerque AA 2019		\$65,700	Median Housing Value			\$196,050
			Median Gross Rent			\$825
			Families Below Poverty Level			15.0%
Source: 2015 ACS and 2019 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.						

Employment

The main employment sectors in the Albuquerque AA are educational services, healthcare and social assistance, government, and retail trade. Major employers include The University of New Mexico, Sandia National Labs, Kirkland Airforce Base, Albuquerque Public Schools and Presbyterian Hospital. As of December 31, 2019, the unemployment rate in the Albuquerque AA is 4.0 percent, which is lower than the state of New Mexico's unemployment rate of 4.8 percent and higher than the U.S. unemployment rate of 3.5 percent.

Housing

The home ownership rate is 61.3 percent in the Albuquerque AA. The 2018 data indicates the median property value was \$196,050 in the Albuquerque AA. The median gross rent for the AA was \$825. The 2018 median family income was less than \$32,500 for a low-income family and ranged from \$32,500 to \$52,560 for a moderate-income family.

Community Contacts

We obtained one community contact with the director of a local small business development organization. The contact indicated that there is a need in the area for loans to entrepreneurs and small businesses that are not ready for the traditional financial system. There is an opportunity for banks to provide grants to CD organizations and financial literacy education to low- and moderate-income individuals as financial literacy does not always reach the neighborhoods where it is needed.

Scope of Evaluation in New Mexico

Ratings in the State of New Mexico are based primarily, but not entirely, on the bank's performance in the full-scope AA – the Albuquerque AA. The Albuquerque AA was selected because it is one of the bank's two AAs with the highest proportion of deposits and loans. The Albuquerque AA represents 7.63 percent of deposits, 17.36 percent of home mortgage loans and 51.83 percent of the small loans to business. We also considered the bank's performance in the limited-scope AAs. Specifically, performance in the Santa Fe MSA significantly impacted the state rating since 56.22 percent of the bank's deposits in the state of New Mexico were gathered from this AA. Refer to Appendix A: Scope of Examination for a list of the full- and limited-scope AAs.

SBNA gathered 28.50 percent of the bank's total deposits, 13.14 percent of the bank's home mortgage loans, and 19.53 percent of the bank's small loans to businesses in the state of New Mexico. The bank operates 11 branches in New Mexico, representing 20 percent of the bank's total branches.

When evaluating the bank's performance under the Lending Test, we placed greater weight on home mortgage loans than on small loans to business. Home mortgage loans represent 61.89 percent and small loans to businesses represent 37.83 percent of the total loans originated or purchased in the state of New Mexico. The percentage of small farm loans in New Mexico represents less than one percent. We did not analyze small farm loans as the bank only made two small farm loans in the entire state of New Mexico during the review period. We also considered the volume of CD lending and other performance factors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW MEXICO

LENDING TEST

The bank's performance under the Lending Test in New Mexico is rated High Satisfactory. Geographic and borrower distribution of home mortgage and small loans to businesses in the full-scope AA is adequate. Overall, the geographic and borrower distribution of loans in the limited-scope AAs supports an adequate rating. Specifically, performance in the Santa Fe MSA is similar. Performance in the New Mexico Non-MSA is weaker and performance in the Las Cruces MSA is stronger. However, the good level of CD lending in the Santa Fe MSA and the New Mexico Non-MSA, which together represent 65 percent of the bank's deposits in the state of New Mexico, positively impacted the Lending Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank's performance in the Albuquerque AA is adequate.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Albuquerque AA	79	141	0	5	225	30.70%	26.59%
Las Cruces AA	51	36	2	1	90	12.23%	8.64%
New Mexico Non-MSA	105	0	0	0	105	14.27%	8.55%
Santa Fe MSA	220	95	0	4	319	42.80%	56.22%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Albuquerque AA	\$20,119	\$41,116	\$ 0	\$10,142	\$71,377	32.62%	26.59%
Las Cruces AA	\$ 7,713	\$ 9,326	\$138	\$ 225	\$17,402	8.64%	8.64%
New Mexico Non-MSA	\$30,779	\$ 0	\$ 0	\$ 0	\$30,779	15.28%	8.55%
Santa Fe MSA	\$60,619	\$26,917	\$ 0	\$ 3,987	\$91,523	43.46%	56.22%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Albuquerque AA

The proportion of the bank's loans is stronger than the proportion of the bank's deposits. The percentage of the bank's deposits in the Albuquerque AA is 26.59 percent. In comparison, the proportion of the bank's home mortgage loans is 57.00 percent and the proportion of the bank's small loans to businesses is 43.14 percent.

The bank's lending market share is weaker than its deposit market share and rank. The bank's performance in the AA is driven by the fact that the AA represents a primary market with three branches. The bank has a 1.92 percent deposit market share and ranks ninth among 22 financial institutions operating in the AA. In comparison, the bank has a 0.27 percent market share and ranks 63rd among 348 home mortgage lenders. For small business lending, the bank has a 0.46 percent market share and ranks 21st among 109 lenders in the AA. The bank's weaker market share is impacted by the significant competition for home mortgage and small loans to businesses in this AA. The top five home mortgage lenders hold 29.46 percent of the home mortgage loan market share. The top five small business lenders hold 61.39 percent of the small business loan market share.

The bank's loan percentiles are stronger than its deposit percentile of 59.10. SBNA's home mortgage loan percentile is 81.90 and its small business loan percentile is 80.73.

Distribution of Loans by Income Level of the Geography

Overall, the bank exhibits an adequate geographic distribution of loans with poor geographic distribution of home mortgage loans and excellent geographic distribution of small loans to businesses in geographies of different levels in its AA. Performance in the limited-scope AAs did not materially impact the geographic distribution of loans. Specifically, geographic distribution of loans in the Santa Fe MSA, which represents 56.22 percent of deposits in the state, is similar. Performance in the Las Cruces

MSA is stronger but did not materially impact overall conclusions regarding the bank's geographic distribution of loans. Conspicuous lending gaps in the bank's lending in low- and moderate-income geographies, some which could not be reasonably explained, further supports our conclusion regarding the geographic distribution of loans.

Home Mortgage Loans

The geographic distribution of home mortgage loans in the Albuquerque AA is poor. Refer to Table O in the state of New Mexico 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.

Albuquerque AA

The percentage of home mortgage loans in low-income CTs is well below the aggregate and significantly below the percentage of owner-occupied housing units in low-income CTs. The percentage of loans in moderate-income CTs is also well below the aggregate and significantly below the percentage of owner-occupied housing units in moderate-income CTs.

Small Loans to Businesses

The distribution of small loans to businesses is excellent. Refer to Table Q in the state of New Mexico 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.

Albuquerque AA

The percentage of the bank's small loans to businesses in low-income CTs exceeds the aggregate and the percentage of businesses in low-income CTs. The percentage of loans in moderate-income CTs exceeds the aggregate and the percentage of businesses in moderate-income CTs.

Lending Gap Analysis

We identified a few conspicuous gaps in the distribution of lending in low- and moderate-income geographies. Despite a reasonable distribution of the bank's branches across the AAs, the bank made no home mortgage loans and limited small loans to businesses in significant segments of the Albuquerque MSA including low- and moderate-income areas with a branch or near to a branch. We were unable to identify significant performance context factors that explained those gaps. However, the number and dispersion of loans indicates the bank has the capacity to lend across the entire AA. This had a neutral impact, but further supports our conclusion regarding the bank's geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

Overall, the bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution. While the borrower distribution of home mortgage loans is good, the distribution of loans to businesses that are small is poor and impacted the conclusion. Performance in the Santa Fe MSA is similar. However, performance in the New Mexico Non-MSA is weaker, which further supports an overall rating of adequate. Performance in the Las Cruces MSA did not materially impact the conclusion.

Home Mortgage Loans

The distribution of the bank's home mortgage loans is good. Refer to Table P in the state of New Mexico 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.

Albuquerque AA

The percentage of the bank's home mortgage loans to low-income borrowers is near to the aggregate but is well below the percentage of low-income families. The bank's lower percentage of loans compared to the demographic is impacted by the high poverty level (15 percent) in this AA. The percentage of loans to moderate-income borrowers is near to the aggregate and exceeds the percentage of moderate-income families.

Small Loans to Businesses

The distribution of loans to businesses that are small is poor. Refer to Table R in the state of New Mexico section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

Albuquerque AA

The percentage of the bank's small loans to businesses is well below the aggregate and significantly below the percentage of businesses that are small.

Community Development Lending

Overall, the institution has made a good level of CD loans. SBNA has made a very high level of CD loans in the Albuquerque AA. However, the level of CD lending in the limited-scope AAs impacted the overall level of CD lending in the state of New Mexico. The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Albuquerque AA

The bank has made a high level of CD loans in the Albuquerque AA. During the review period, the bank made five CD loans totaling \$10.142 million representing 33.73 percent of allocated tier 1 capital.

Overall, the bank has provided a good level of CD lending in the state of New Mexico with an excellent level in the Albuquerque AA, an adequate level in the Las Cruces AA, a good level in the Santa Fe MSA, and a very poor level in the New Mexico Non-MSA. The bank did not make any CD loans in the New Mexico Non-MSA, where opportunities are not as abundant; nonetheless, there are still some opportunities and significant needs. In the Santa Fe MSA, the bank made four CD loans totaling \$3.987 million. This represents 6.27 percent of allocated tier 1 capital. The overall level of CD lending in the state of New Mexico had a positive impact on the bank's Lending Test rating in the state.

Product Innovation and Flexibility

The institution makes little use of innovative and/or flexible lending practices in order to serve AA credit needs.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the limited scope AAs is stronger in the Las Cruces AA. Specifically, both home mortgage geographic and borrower distribution are stronger in the Las Cruces AA. However, geographic distribution of small business loans in the Las Cruces MSA is similar. In the Santa Fe MSA, the geographic and borrower distribution of home mortgage loans is similar to that noted in the full-scope AA. For small business loans, the geographic distribution of loans is weaker, but borrower distribution is similar to that noted in the Albuquerque AA. In the New Mexico Non-MSA, performance is weaker due to the weaker home mortgage borrower distribution. There are no low- or moderate-income CTs in the New Mexico Non-MSA. The bank did not make any small loans to businesses in the New Mexico Non-MSA.

Refer to Tables O through S in the state of New Mexico section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in the state of New Mexico is rated Low Satisfactory. The bank's otherwise excellent performance in the Albuquerque AA was negatively impacted by the bank's weaker performance in the limited-scope AAs. In particular, the bank's poor level of qualified investments in the Santa Fe MSA, as well as the very poor level of qualified investments in the New Mexico Non-MSA significantly impacted performance in the state of New Mexico since these AAs represents 65 percent of the bank's deposits. The bank's performance in the Las Cruces MSA did not materially impact the overall Investment Test rating.

Conclusions for Area Receiving a Full-Scope Review

Albuquerque AA

Based on a full-scope review, the bank's performance in the Albuquerque AA is excellent.

SBNA has an excellent level of qualified CD investment and grants. However, the bank did not act in a leadership position, particularly regarding those investments that are not routinely provided by private investors.

The bank exhibits a good responsiveness to credit and community economic development needs. SBNA does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments – New Mexico										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Albuquerque AA	3	530	18	14,913	21	26.92	15,443	91.73	0	0
Las Cruces AA	1	104	8	185	9	11.54	289	1.72	0	0
New Mexico Non-MSA	0	0	2	2	2	2.56	2	0.01	0	0
Santa Fe MSA	1	57	45	1,045	46	58.97	1,102	6.55	0	0
Total	5	691	73	16,145	78	100	16,836	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.

Albuquerque AA

Qualified investments in the Albuquerque AA total \$15.443 million. Total investments in the Albuquerque AA represent 51.37 percent of allocated tier 1 capital based on the AA's share of bank deposits. The investments consist of three prior period investments and three current investments, which together total \$15.401 million. The remaining investments consist of 15 donations totaling \$42,000. All of the large investments, which represent 98 percent of total investments/donations, consist of mortgage-backed securities, which are responsive to a critical need in the AA. Some noteworthy donations are noted below:

- A \$5,000 donation to an organization that provides affordable housing to low- and moderate-income individuals.
- A \$5,000 donation to an organization that provides training, consulting and loans to small businesses.
- A \$2,000 donation that supports a program which provides financial literacy in schools where the majority of the students are low- and moderate-income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Las Cruces AA is weaker than performance in the full-scope area. In the New Mexico Non-MSA, and the Santa Fe MSA performance is substantially weaker than the bank's overall performance under the Investment Test in the full-scope AA. The bank's performance is adequate in the Las Cruces MSA, very poor in the New Mexico Non-MSA and poor in the Santa Fe MSA. Specifically, the bank did not make any large investments in the New Mexico Non-MSA and only \$2,000 in donations. In the Santa Fe MSA, investments and donations total \$1.102 million. This represents 1.73 percent of allocated tier 1 capital. All of the large investments in the Santa Fe MSA, which represent 85 percent of the total, are mortgage-backed securities. The bank's weaker performance in the limited-scope AAs significantly impacted the bank's overall Investment Test performance in the state of New Mexico.

SERVICE TEST

The bank's performance under the Service Test in New Mexico is rated Low Satisfactory. Performance in the Albuquerque AA is good. In arriving at the final conclusions, however, examiners also considered performance in areas subject to limited-scope review, particularly the Santa Fe MSA, given the significant level of deposits and loan activity in that AA. In the Santa Fe MSA, service delivery systems

are accessible to limited portions of that AA. The bank's performance in the Santa Fe MSA significantly impacted the overall Service Test rating.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of SBNA Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Albuquerque AA*	26.6	3	27.3	0.0	66.7	33.3	0.0	6.6	32.8	27.1	33.0
Las Cruces AA	8.6	3	27.3	0.0	33.3	0.0	66.7	7.7	36.0	26.4	29.8
New Mexico Non-MSA	8.6	1	9.1	0.0	0.0	0.0	100.0	0.0	0.0	0.0	100.0
Santa Fe MSA	56.2	4	36.3	0.0	0.0	50.0	50.0	3.9	23.0	44.6	28.5

*This AA has at least one tract with unknown income, so the population percentages across geographies will not total 100%.

Albuquerque AA

In the Albuquerque AA, the bank has two branches in moderate-income CTs. The percentage of branches in moderate-income CTs is significantly higher than the percentage of the population living in these tracts, which indicates ready accessibility in this AA. Examiners also considered that the bank had no branches in low- and moderate-income tracts in the Santa Fe MSA, which was subject to limited-scope review. Some branch locations are in tracts that border low- and moderate-income tracts, but lending data indicates more limited lending to low- and moderate-income individuals in this AA, and this impacted the conclusion regarding accessibility of retail banking services.

To complement its traditional service delivery methods, SBNA offers telephone banking access 24/7. Online and mobile banking services for consumers, which include online bill payment and mobile deposits, are offered for the convenience of all customers at no additional cost, though fees apply for certain actions as disclosed in the fee schedule. Bank data indicates increasing customer usage of online and mobile banking services during the evaluation period. These delivery methods are offered to increase access to banking services throughout the AA. The bank has one full-service ATM in the Albuquerque AA. Examiners did not place significant weight on these alternative delivery systems, as the bank does not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Albuquerque AA	1	1				
Las Cruces AA	0	0				
New Mexico Non-MSA	0	0				
Santa Fe MSA	0	3			-2	-1

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. In the Albuquerque AA, the bank relocated one branch in a moderate-income CT to a location within the same tract in order to increase operational efficiency. In the Santa Fe MSA, the bank closed two branches in middle-income CTs and one branch in an upper-income CT. After the bank acquired multiple locations in Santa Fe, management determined that the branch density per capita was high in comparison to other markets which did not warrant keeping all locations open.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AAs, particularly low- and moderate-income geographies and/or individuals. All retail banking locations offer the same loan and deposit products, and SBNA offers a free checking product that reduces barriers to banking access. Branches and drive-through facilities have similar business hours during the week. The bank has three branches in the Albuquerque AA that are open 9 am to 5 pm Monday through Friday, are closed on Saturdays and have no drive-through facilities.

Community Development Services

The institution provides an adequate level of CD services.

Albuquerque AA

In the Albuquerque AA, five bank employees provided 111 qualifying community development service hours to four organizations. About 18.9 percent of the service hours involved serving as a board member or in another leadership position. Community service hours include a significant number of hours to a local Rotary Club related to financial oversight and fundraising at the organization. The Rotary Club provides needed services to families, and a significant percentage are low- and moderate-income.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Las Cruces AA, New Mexico Non-MSA, and the Santa Fe MSA is weaker than the bank's overall performance under the Service Test in the full-scope AA. Performance in the Santa Fe MSA negatively impacted the overall Service Test rating.

State Rating

State of Texas

CRA rating for the State of Texas⁶: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Substantial Noncompliance

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect an adequate responsiveness to AA credit needs.
- An adequate distribution of loans in geographies of different income levels.
- An adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- A lack of CD loans which negatively impacted the overall Lending Test rating.
- A very poor level of qualified CD investments and donations.
- Service delivery systems that are readily accessible to geographies and individuals of different income levels in the bank's AA.
- An adequate level of CD services.

Description of Institution's Operations in Texas

The bank has designated one AA in the state of Texas – the El Paso AA. SBNA operates three branches and two full-service ATMs in its Texas AA. The AA consists of whole CTs and does not arbitrarily exclude any low- or moderate-income areas or reflect illegal discrimination. The description of the full-scope AA is noted below:

El Paso AA

The El Paso AA includes the single county of El Paso in southern Texas. El Paso County includes the cities of El Paso, Horizon City, San Elizario, and Socorro and the towns of Anthony and Clint. SBNA operates three branches, two full-service ATMs, and two limited-service ATMs in the El Paso AA.

Demographic data indicates there are 10 low-income CTs representing 6.2 percent of the total CTs in the AA and 54 moderate-income CTs representing 33.5 percent of the total CTs. In addition, 22.3 percent of the population is low-income; and 17.4 percent is moderate-income. Additional demographic data is noted below:

⁶ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: El Paso AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	161	6.2	33.5	33.5	26.1	0.6
Population by Geography	831,095	3.9	27.3	34.5	34.3	0.0
Housing Units by Geography	282,616	4.4	27.6	34.1	33.8	0.0
Owner-Occupied Units by Geography	159,647	1.8	24.7	33.2	40.2	0.0
Occupied Rental Units by Geography	99,965	8.0	31.5	35.8	24.7	0.0
Vacant Units by Geography	23,004	6.7	31.3	32.6	29.4	0.0
Businesses by Geography	45,585	6.9	26.6	30.3	35.5	0.7
Farms by Geography	585	2.9	29.1	28.0	39.8	0.2
Family Distribution by Income Level	194,964	22.3	17.4	19.1	41.2	0.0
Household Distribution by Income Level	259,612	24.6	15.6	18.1	41.7	0.0
Median Family Income - El Paso AA – 2019		\$50,200	Median Housing Value			\$119,494
			Median Gross Rent			\$763
			Families Below Poverty Level			19.6%
Source: 2015 ACS and 2019 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.						

Employment

The main employment sectors in the El Paso AA are educational services, healthcare and social assistance, and retail trade. Major employers include The University of Texas at El Paso, City of El Paso, El Paso ISD, Fort Bliss, and Ysleta ISD. As of December 31, 2019, the unemployment rate in the El Paso AA is 2.8 percent which is lower than the state of Texas's unemployment rate of 3.5 percent and the U.S. unemployment rate of 3.5 percent.

Housing

The 2018 data indicates the median property value was \$119,494 in the El Paso AA. The median gross rent for the AA was \$763. The 2018 median family income was less than \$28,850 for a low-income family and ranged from \$28,850 to \$41,360 for a moderate-income family.

Community Contacts

We obtained one community contact representing a local housing authority. The contact indicated the local market needs affordable mortgage loan products and programs to help the unbanked and under banked. The community is also in need of financial literacy programs.

Scope of Evaluation in Texas

Ratings in the state of Texas are based entirely on the bank's performance in the El Paso AA. This AA represents 100 percent of the deposits and loans as the bank does not have any other AAs in the state of Texas.

SBNA gathered 6.16 percent of the bank's total deposits and originated 2.05 percent of the bank's home mortgage loans and 16.08 percent of small loans to businesses in the state of Texas.

When evaluating the bank's performance under the lending test, we placed greater weight on small loans to businesses. Small loans to businesses represent 75 percent of total loans in the state. Home mortgage loans represent 25 percent. We did not evaluate small farm loans since the bank did not originate any small farm loans in this AA. We also considered the volume of CD lending and other performance factors in concluding on the bank's lending performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in the state of Texas is rated Needs to Improve. Both the geographic and the borrower distribution of loans are adequate. However, the lack of any CD lending in the AA negatively impacted the Lending Test rating in the state of Texas.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the El Paso AA is poor.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
El Paso AA	71	224	0	1	296	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
El Paso	16,067	65,386	0	10	81,463	100	100

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

El Paso AA

The proportion of the bank's loans in the AA is comparable to the proportion of its deposits since the El Paso AA is the only AA in the state of Texas.

The bank's market share and rank in loans is weaker than its market share and rank in deposits. The bank's performance in the AA is driven by the fact that the AA represents a secondary market with three branches. The bank has a 2.35 percent deposit market share and ranks seventh among 15 financial institutions. In comparison, the bank has a 0.24 percent market share for home mortgage loans and ranks 62nd among 329 home mortgage lenders. In addition, the bank has a 0.73 percent market share for small loans to businesses and ranks 20th among 85 small business lenders. The bank's weaker market share is impacted by the significant competition for home mortgage and small loans to businesses in this AA. The top five home mortgage lenders hold 31.64 percent of the market share and the top five small business lenders hold 56.49 percent of the market share.

The bank's home mortgage loan percentile is 81.11 and the small business loan percentile is 76.47 which are both higher than the its deposit percentile of 53.30.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA. We placed more weight on small loans to businesses. However, we also considered the poor geographic distribution of home mortgage loans.

Home Mortgage Loans

The geographic distribution of home mortgage loans in the El Paso AA is poor. Refer to Table O in the state of Texas 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.

El Paso AA

The percentage of home mortgage loans in low-income CTs exceeds the aggregate and is below the percentage of owner-occupied units. However, this represents only one loan. The percentage of loans in moderate-income CTs is well below the aggregate and significantly below the percentage of owner-occupied units.

Small Loans to Businesses

The geographic distribution of small loans to businesses is adequate. Refer to Table Q in the state of Texas 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.

El Paso AA

The percentage of small loans to businesses in low-income CTs exceeds the aggregate and the percentage of businesses. The percentage of loans in moderate-income CTs is significantly below the aggregate and the percentage of businesses in these CTs.

Lending Gap Analysis

We identified some gaps in the distribution of lending in low- and moderate-income geographies. Despite a reasonable distribution of the bank's branches across the AAs, the bank made no loans in significant segments of the AAs, including low- and moderate-income areas with a branch or near to a branch. We were unable to identify significant performance context factors that explained those gaps. However, the number or dispersion of loans indicates the bank has the capacity to lend across the entire AAs. This had a neutral impact but further supports our conclusion regarding the bank's geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

The distribution of the bank's home mortgage loans is adequate. Refer to Table P in the state of Texas 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.

El Paso AA

The percentage of the bank's home mortgage loans to low-income borrowers is well below the aggregate and significantly below the percentage of low-income families. The bank's lower percentage of loans compared to the demographic is impacted by the high poverty level in this AA; 19.6 percent of the families are below the poverty level. The percentage of loans to moderate-income borrowers is near to the aggregate but well below the percentage of moderate-income families.

Small Loans to Businesses

The distribution of the bank's small loans to businesses is adequate. Refer to Table R in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

El Paso AA

The percentage of the bank's small loans to businesses is near to the aggregate, but significantly below the percentage of businesses that are small.

Community Development Lending

El Paso AA

The bank made one CD loan in the El Paso AA totaling \$9,820. This represents 0.04 percent of allocated tier 1 capital. The very poor level of CD lending had a negative impact on the bank's Lending Test rating.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

INVESTMENT TEST

The bank's performance under the Investment Test in Texas is rated Substantial Non-Compliance.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the state of Texas is very poor.

The institution has a few qualified CD investments or grants. In addition, the bank did not make any investments that are not routinely provided by private investors.

The institution exhibits very poor responsiveness to credit and community economic development needs, based on the very low level of investments. In addition, the bank does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments – TX										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
El Paso AA	0	0	29	158	19	100	158	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.

El Paso AA

Qualified investments in the El Paso AA total \$158,000. Total investments in the AA represent 0.65 percent of allocated tier 1 capital based on the AA's share of bank deposits. The investments consist of one current investment which totals \$113,000 and 28 donations totaling \$45,000. The large investment, which represents 72 percent of total investments/donations, is a mortgage-backed security which is responsive to a critical need in the AA. Some notable donations are noted below:

- A \$3,000 donation to an organization which provides food to low- and moderate-income low- and moderate-income individuals.
- A \$2,500 donation to an organization that provides winter coats to low- and moderate-income children.
- A \$2,000 donation which provides food to low- and moderate-income individuals.

SERVICE TEST

The bank's performance under the Service Test in Texas is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the El Paso AA is good. This conclusion is based on the bank's excellent distribution of branches and adequate level of CD services.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of SBNA Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
El Paso AA	100.0	3	100.0	33.3	33.3	0.0	33.3	3.9	27.3	34.5	34.3

Note: Due to rounding, percentage totals may be less than 100%.

El Paso AA

In the El Paso AA, the bank has one branch in a low-income CT and one branch in a moderate-income CT. The percentage of branches in the low-income CTs significantly exceeds the percentage of the population living in these geographies, while the percentage of branches in moderate-income CT is similar to the percentage of the population living in these tracts.

To complement its traditional service delivery methods, SBNA offers telephone banking access 24/7. Online and mobile banking services for consumers, which include online bill payment and mobile deposits, are offered for the convenience of all customers at no additional cost, though fees apply for certain actions as disclosed in the fee schedule. Bank data indicates increasing customer usage of online and mobile banking services during the evaluation period. These delivery methods are offered to increase access to banking services throughout the AA. The bank does not have any full-service ATMs in the El Paso AA. Examiners did not place significant weight on any alternative delivery systems, as the bank does not maintain metrics to determine their effectiveness in helping to meet the service and credit needs of low- and moderate-income individuals.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
El Paso AA	0	0				

The bank did not open or close any branches in the El Paso AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and/or individuals. All retail banking locations offer the same loan and deposit products, and SBNA offers a free checking product that reduces barriers to banking access. Branches and drive-through facilities have similar business hours during the week. The bank has two drive-through facilities in the El Paso AA, and one is located in a moderate-income CT that offers limited service hours on Saturdays.

Community Development Services

The institution provides an adequate level of CD services.

El Paso AA

In the El Paso AA, three bank employees provided 145 qualifying community development service hours to five organizations. About 89.7 percent of service hours involved serving as a board member or in another leadership position. Community service hours include time spent assisting on the board and finance committee of a local private high school that serves a significant percentage of low- and moderate-income students through the provision of scholarship funds.

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:		
Bank Products Reviewed:	Home mortgage, small business, small farm, consumer loans): 01/01/2017 – 12/31/2019 Community development loans, qualified investments, community development services: 06/05/2017 – 12/31/2019	
Affiliate(s)	Affiliate Relationship	Products Reviewed
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
None		
State		
Arizona		
Phoenix-Mesa-Chandler AA	Full-Scope	County of Maricopa
Colorado		
Boulder MSA	Limited-Scope	County of Boulder
Colorado Non-MSA	Full-Scope	Counties of Fremont and Rio Grande
Denver-Aurora-Lakewood MSA	Limited-Scope	Counties of Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson
Pueblo MSA	Limited-Scope	County of Pueblo
Kansas		
Johnson County, KS	Limited-Scope	County of Johnson
Kansas Non-MSA	Full-Scope	Counties of Barton, Ford, Ellis, McPherson, Osborne, Russel, Saline, Seward, and Thomas
Lawrence MSA	Limited-Scope	County of Douglas
Manhattan MSA	Full-Scope	Counties of Geary Pottawatomie, and Riley
Topeka AA	Limited-Scope	Counties of Shawnee
Wichita AA	Limited-Scope	County of Sedgwick
Missouri		
Johnson County, MO	Full-Scope	County of Johnson
New Mexico		
Albuquerque AA	Full-Scope	County of Bernalillo
Las Cruces AA	Limited-Scope	County of Dona Ana
New Mexico Non-MSA	Limited-Scope	County of Los Alamos
Santa Fe MSA	Limited-Scope	County of Santa Fe
Texas		
El Paso AA	Full-Scope	County of El Paso

Appendix B: Summary of MMSA and State Ratings

RATINGS SUNFLOWER BANK, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
SBNA	Low Satisfactory	Needs to Improve	High Satisfactory	Satisfactory
MMSA or State:				
Arizona	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Colorado	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Kansas	Needs to Improve	Needs to Improve	High Satisfactory	Needs to Improve
Missouri	Needs to Improve	Needs to Improve	High Satisfactory	Needs to Improve
New Mexico	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Texas	Needs to Improve	Substantial Non-Compliance	High Satisfactory	Needs to Improve

(*) The Lending Test is weighted more heavily than the Investment and Service Tests 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 low- and moderate-income 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 loans are treated the same 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 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/assessment area. 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 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. 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 \$500,000) 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 U. Assessment Area Distribution of Consumer 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 households in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

STATE OF ARIZONA

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Phoenix-Mesa-Chandler MSA	978	311,163	100.0	254,466	4.6	3.2	3.6	18.8	13.9	14.7	34.7	31.5	34.9	41.9	50.8	46.3	0.0	0.6	0.6
Total	978	311,163	100.0	254,466	4.6	3.2	3.6	18.8	13.9	14.7	34.7	31.5	34.9	41.9	50.8	46.3	0.0	0.6	0.6
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2018-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Phoenix-Mesa-Chandler MSA	978	311,163	103.3	254,466	21.8	3.0	4.7	16.9	18.2	15.2	19.2	24.5	20.3	42.2	52.2	40.0	0.0	2.0	19.8
Total	978	311,163	103.3	254,466	21.8	3.0	4.7	16.9	18.2	15.2	19.2	24.5	20.3	42.2	52.2	40.0	0.0	2.0	19.8
Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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 **2018-19**

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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Phoenix-Mesa-Chandler MSA	69	24,401	100.0	104,551	6.2	10.1	6.8	15.9	26.1	16.3	28.4	24.6	26.5	48.9	36.2	48.7	0.5	2.9	1.7
Total	69	24,401	100.0	104,551	6.2	10.1	6.8	15.9	26.1	16.3	28.4	24.6	26.5	48.9	36.2	48.7	0.5	2.9	1.7

Source: 2019 D&B Data; 01/01/2018 - 12/31/2019 Bank Data; 2018 CRA Aggregate 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 **2018-19**

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
Phoenix-Mesa-Chandler MSA	69	24,401	100.0	104,551	87.7	36.2	46.1	4.3	60.9	7.9	2.9
Total	69	24,401	100.0	104,551	87.7	36.2	46.1	4.3	60.9	7.9	2.9

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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018-19
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
Phoenix-Mesa-Chandler MSA	0	0	0.0	357	5.7	0.0	1.6	18.4	0.0	13.5	29.6	0.0	32.3	45.9	0.0	46.6	0.3	0.0	6.1
Total	0	0	0.0	357	5.7	0.0	1.6	18.4	0.0	13.5	29.6	0.0	32.3	45.9	0.0	46.6	0.3	0.0	6.1
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											2018-19
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Phoenix-Mesa-Chandler MSA	--	--	--	357	94.0	--	39.7	3.8	--	2.2	--
Total	--	--	--	357	94.0	--	39.7	3.8	--	2.2	--
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%											

STATE OF COLORADO

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Boulder MSA	35	21,291	4.0	17,131	3.0	0.0	3.6	18.0	31.4	17.8	45.6	37.1	47.3	33.3	31.4	31.3	0.0	0.0	0.0
Colorado Non-MSA	46	9,072	5.2	2,341	0.0	0.0	0.0	49.7	60.9	51.8	50.3	39.1	48.1	0.0	0.0	0.0	0.0	0.0	0.0
Denver-Aurora-Lakewood AA	733	287,215	83.0	200,562	4.7	3.1	4.5	18.9	18.0	18.5	33.9	33.7	33.6	42.5	45.2	43.4	0.0	0.0	0.0
Pueblo MSA	69	11,926	7.8	7,943	3.5	2.9	2.2	23.6	31.9	20.8	30.7	30.4	25.2	42.2	34.8	51.7	0.0	0.0	0.1
Total	883	329,504	100.0	227,977	4.4	2.8	4.3	19.6	21.9	18.8	35.2	33.9	34.5	40.8	41.5	42.3	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Boulder MSA	35	21,291	6.1	17,131	22.3	0.0	7.9	17.0	25.7	17.6	19.9	17.1	22.4	40.8	54.3	41.0	0.0	2.9	11.2
Colorado Non-MSA	46	9,072	6.4	2,341	26.8	13.0	9.2	22.5	17.4	23.2	21.7	17.4	23.5	29.0	41.3	26.3	0.0	10.9	17.8
Denver-Aurora-Lakewood AA	733	287,215	99.1	200,562	21.4	7.4	5.5	17.5	20.2	18.1	20.4	23.1	22.9	40.7	46.5	37.3	0.0	2.9	16.1
Pueblo MSA	69	11,926	48.3	7,943	22.6	7.2	8.3	17.6	17.4	21.2	18.7	24.6	22.1	41.1	44.9	30.1	0.0	5.8	18.2
Total	883	329,504	100.0	227,977	21.7	7.4	5.8	17.5	20.0	18.3	20.3	22.7	22.8	40.6	46.4	37.2	0.0	3.5	15.9
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19	
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Boulder MSA	73	24,316	15.0	11,898	3.7	2.7	3.7	28.2	50.7	30.1	38.4	28.8	38.3	29.7	17.8	27.9	0.0	0.0	0.0	
Colorado Non-MSA	54	9,191	11.1	754	0.0	0.0	0.0	55.5	66.7	49.9	44.2	33.3	50.1	0.0	0.0	0.0	0.3	0.0	0.0	
Denver-Aurora-Lakewood AA	307	105,180	63.0	80,833	6.6	11.7	8.0	18.2	24.8	18.8	32.0	26.7	30.5	42.9	35.2	42.3	0.3	1.6	0.4	
Pueblo MSA	53	5,700	10.9	2,449	3.0	9.4	2.4	26.6	17.0	20.7	29.5	32.1	29.6	40.3	41.5	47.4	0.4	0.0	0.0	
Total	487	144,387	100.0	95,934	6.1	8.8	7.3	20.0	32.4	20.5	32.8	28.3	31.6	40.7	29.4	40.3	0.3	1.0	0.3	
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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-19
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
Boulder MSA	73	24,316	15.0	11,898	91.1	47.9	47.2	3.2	47.9	5.6	4.1
Colorado Non-MSA	54	9,191	11.1	754	86.3	53.7	48.7	3.8	44.4	9.8	1.9
Denver-Aurora-Lakewood AA	307	105,180	63.0	80,833	89.9	37.5	48.3	3.5	58.3	6.5	4.2
Pueblo MSA	53	5,700	10.9	2,449	86.7	56.6	44.8	3.4	43.4	9.9	0.0
Total	487	144,387	100.0	95,934	90.0	42.9	48.1	3.5	53.6	6.5	3.5
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 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
Boulder MSA	1	250	9.1	75	3.9	0.0	1.3	23.4	0.0	20.0	42.3	100.0	53.3	30.4	0.0	25.3	0.0	0.0	0.0
Colorado Non-MSA	26	5,668	81.3	47	0.0	0.0	0.0	29.0	0.0	19.1	71.0	100.0	80.9	0.0	0.0	0.0	0.0	0.0	0.0
Denver-Aurora-Lakewood AA	0	0	0.0	345	7.9	0.0	4.1	18.6	0.0	8.4	31.0	0.0	37.1	42.0	0.0	50.4	0.5	0.0	0.0
Pueblo MSA	5	415	20.0	41	3.1	0.0	0.0	12.6	0.0	0.0	37.0	60.0	61.0	47.1	40.0	36.6	0.2	0.0	2.4
Total	32	6,333	100.0	508	6.8	0.0	3.0	19.4	0.0	10.4	34.5	93.8	45.5	38.9	6.3	40.9	0.4	0.0	0.2
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	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Boulder MSA	1	250	3.1	75	97.0	0.0	65.3	1.4	100.0	1.5	0.0
Colorado Non-MSA	26	5,668	81.3	47	94.5	76.9	57.4	2.4	19.2	3.0	3.8
Denver-Aurora-Lakewood AA	--	--	--	345	95.6	--	62.0	2.5	--	1.9	--
Pueblo MSA	5	415	15.6	41	96.7	80.0	68.3	2.4	0.0	0.9	20.0
Total	32	6,333	100.0	508	95.8	75.0	62.6	2.3	18.8	1.9	6.3
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%											

STATE OF KANSAS

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Johnson County, KS AA	276	80,384	49.7	28,456	0.3	0.0	0.3	4.5	3.3	4.0	31.3	33.0	28.9	63.9	63.8	66.9	0.0	0.0	0.0
Lawrence MSA	31	8,288	5.6	3,454	1.3	0.0	1.9	25.4	12.9	23.6	36.9	32.3	34.2	36.3	54.8	40.3	0.0	0.0	0.0
Topeka AA	15	2,036	2.7	4,806	4.6	0.0	2.0	15.3	6.7	11.4	39.1	53.3	40.2	41.0	40.0	46.4	0.0	0.0	0.0
Wichita AA	233	47,905	42.0	16,918	5.8	0.9	3.2	19.6	11.2	15.6	29.0	27.9	27.8	45.6	60.1	53.3	0.0	0.0	0.0
Total	555	138,613	100.0	53,634	2.9	0.4	1.5	12.7	7.2	9.6	31.9	31.4	29.9	52.5	61.1	59.1	0.0	0.0	0.0
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Kansas Non-MSA 2017-2018	309	34,412	93.1	3,688	0.0	0.0	0.0	11.9	6.1	13.4	56.7	54.7	54.6	31.4	39.2	32.0	0.0	0.0	0.0
Manhattan MSA 2017-2018	23	3,547	6.9	2,355	0.0	0.0	0.0	3.7	0.0	5.9	79.8	82.6	73.2	16.1	17.4	20.2	0.4	0.0	0.8
Total	332	37,959	100.0	6,043	0.0	0.0	0.0	10.1	5.7	10.5	61.8	56.6	61.8	28.0	37.7	27.4	0.1	0.0	0.3
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Kansas Non-MSA 2019	159	19,366	85.5	3,222	0.0	0.0	0.0	12.8	10.7	11.6	55.3	46.5	56.8	32.0	42.8	31.6	0.0	0.0	0.0
Manhattan MSA 2019	27	5,006	14.5	3,461	0.0	0.0	0.0	14.8	3.7	13.0	45.4	40.7	37.0	39.5	55.6	49.6	0.3	0.0	0.4
Total	186	24,371	100.0	6,683	0.0	0.0	0.0	13.4	9.7	12.3	52.4	45.7	46.6	34.1	44.6	40.9	0.1	0.0	0.2
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Johnson County, KS AA	276	80,384	79.5	28,456	12.0	4.7	3.8	13.6	15.9	13.8	19.0	23.6	21.3	55.3	54.3	50.1	0.0	1.4	11.0
Lawrence MSA	31	8,288	27.4	3,454	19.1	3.2	7.8	19.6	12.9	19.0	20.6	25.8	22.4	40.7	58.1	38.2	0.0	0.0	12.6
Topeka AA	15	2,036	7.2	4,806	20.8	13.3	10.7	17.2	6.7	22.8	21.8	20.0	20.7	40.3	60.0	28.9	0.0	0.0	17.0
Wichita AA	233	47,905	206.2	16,918	21.7	6.0	7.2	17.7	24.5	18.3	20.9	21.5	21.3	39.8	47.6	33.6	0.0	0.4	19.7
Total	555	138,613	159.9	53,634	17.2	5.4	5.8	16.0	19.1	16.3	20.2	22.7	21.3	46.7	51.9	42.2	0.0	0.9	14.4
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-18
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kansas Non-MSA 2017-2018	309	34,412	93.1	3,688	18.6	6.5	7.3	19.2	22.7	19.6	20.3	29.1	24.1	41.9	39.2	30.0	0.0	2.6	19.0
Manhattan MSA 2017-2018	23	3,547	16.0	2,355	20.5	0.0	5.2	17.9	4.3	15.2	21.2	39.1	20.3	40.5	56.5	38.8	0.0	0.0	20.5
Total	332	37,959	100.0	6,043	19.1	6.0	6.5	18.9	21.4	17.9	20.5	29.8	22.6	41.6	40.4	33.5	0.0	2.4	19.6
Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2018 HMDA Aggregate 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																			2019
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Kansas Non-MSA 2019	159	19,366	85.5	3,222	18.8	8.2	7.3	17.4	23.9	18.3	20.3	29.6	22.8	43.4	38.4	33.1	0.0	0.0	18.5
Manhattan MSA 2019	27	5,006	14.5	3,461	19.5	0.0	3.8	21.6	40.7	13.5	20.9	14.8	20.0	38.0	44.4	38.8	0.0	0.0	24.0
Total	186	24,371	100.0	6,683	19.1	7.0	5.5	18.9	26.3	15.8	20.5	27.4	21.3	41.6	39.2	36.1	0.0	0.0	21.3
Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Johnson County, KS AA	60	15,446	32.4	14,676	1.2	0.0	0.9	7.1	3.3	8.0	26.9	15.0	25.2	61.6	81.7	62.1	3.2	0.0	3.7
Lawrence MSA	44	13,108	23.8	1,823	6.8	6.8	4.0	30.9	31.8	32.7	32.5	29.5	32.4	29.7	31.8	30.9	0.0	0.0	0.0
Topeka AA	10	1,676	5.4	1,989	16.2	0.0	11.7	18.7	0.0	18.8	40.4	80.0	43.2	24.7	20.0	26.3	0.0	0.0	0.0
Wichita AA	71	15,090	38.4	7,393	6.2	8.5	7.9	28.2	38.0	25.8	27.0	18.3	32.3	38.6	35.2	34.0	0.0	0.0	0.0
Total	185	45,320	100.0	25,881	4.7	4.9	3.9	16.4	23.2	15.6	28.8	23.2	29.1	48.5	48.6	49.2	1.7	0.0	2.1
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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18	
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Kansas Non-MSA 2017-2018	107	13,029	87.0	2,501	0.0	0.0	0.0	20.8	27.1	18.0	53.7	49.5	54.6	25.6	23.4	27.5	0.0	0.0	0.0	
Manhattan MSA 2017-2018	16	2,713	13.0	975	0.0	0.0	0.0	13.3	56.3	13.5	73.9	31.3	70.4	12.0	12.5	15.7	0.7	0.0	0.4	
Total	123	15,742	100.0	3,476	0.0	0.0	0.0	18.9	30.9	16.7	58.7	47.2	59.0	22.2	22.0	24.2	0.2	0.0	0.1	
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate 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
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Kansas Non-MSA 2019	23	3,773	74.2	2,251	0.0	0.0	0.0	20.7	26.1	14.9	52.0	47.8	56.5	27.3	26.1	28.7	0.0	0.0	0.0
Manhattan MSA 2019	8	1,873	25.8	1,225	0.0	0.0	0.0	25.5	25.0	20.1	40.6	12.5	63.7	33.2	37.5	15.9	0.6	25.0	0.3
Total	31	5,646	100.0	3,476	0.0	0.0	0.0	22.3	25.8	16.7	48.2	38.7	59.0	29.3	29.0	24.2	0.2	6.5	0.1
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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-19
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
Johnson County KS AA	60	15,446	32.4	14,676	83.1	48.3	43.3	6.4	43.3	10.5	8.3
Lawrence MSA	44	13,108	23.8	1,823	82.6	47.7	49.7	5.3	52.3	12.1	0.0
Topeka AA	10	1,676	5.4	1,989	77.6	70.0	40.9	7.0	20.0	15.4	10.0
Wichita AA	71	15,090	38.4	7,393	80.2	45.1	40.9	7.4	45.1	12.4	9.9
Total	185	45,320	100.0	25,881	81.6	48.1	42.9	6.7	44.9	11.7	7.0
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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
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
Kansas Non-MSA 2017-2018	107	13,029	87.0	2,501	74.0	62.6	42.7	7.0	31.8	19.0	5.6
Manhattan MSA 2017-2018	16	2,713	13.0	975	76.6	56.3	44.2	7.0	31.3	16.3	12.5
Total	123	15,742	100.0	3,476	74.6	61.8	43.2	7.0	31.7	18.3	6.5
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 CRA Aggregate 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
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
Kansas Non-MSA 2019	23	3,773	74.2	2,251	74.9	43.5	42.6	6.9	47.8	18.1	8.7
Manhattan MSA 2019	8	1,873	25.8	1,225	78.0	37.5	44.2	5.6	62.5	16.4	0.0
Total	31	5,646	100.0	3,476	75.9	41.9	43.2	6.5	51.6	17.6	6.5
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
Johnson County KS AA	1	260	100.0	99	1.0	0.0	0.0	6.4	0.0	2.0	31.4	100.0	34.3	60.6	0.0	63.6	0.6	0.0	0.0
Lawrence MSA	0	0	0.0	38	0.3	0.0	2.6	20.8	0.0	13.2	54.7	0.0	47.4	24.2	0.0	36.8	0.0	0.0	0.0
Topeka AA	0	0	0.0	17	4.3	0.0	0.0	9.5	0.0	0.0	26.2	0.0	11.8	60.1	0.0	88.2	0.0	0.0	0.0
Wichita AA	0	0	0.0	118	3.8	0.0	0.0	15.2	0.0	0.8	21.8	0.0	17.8	59.3	0.0	81.4	0.0	0.0	0.0
Total	1	260	100.0	272	2.3	0.0	0.4	11.3	0.0	2.9	30.0	100.0	27.6	56.2	0.0	69.1	0.3	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 S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2017-18
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
Kansas Non-MSA 2017-2018	74	7,815	100.0	752	0.0	0.0	0.0	3.8	0.0	0.3	65.5	74.3	73.7	30.8	25.7	26.1	0.0	0.0	0.0
Manhattan MSA 2017-2018	0	0	0.0	73	0.0	0.0	0.0	2.3	0.0	4.1	93.1	0.0	90.4	4.6	0.0	5.5	0.0	0.0	0.0
Total	74	7,815	100.0	825	0.0	0.0	0.0	3.5	0.0	0.6	70.8	74.3	75.2	25.8	25.7	24.2	0.0	0.0	0.0
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 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																			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
Kansas Non-MSA 2019	32	3,086	100.0	652	0.0	0.0	0.0	4.1	0.0	0.0	64.7	59.4	73.3	31.2	40.6	26.7	0.0	0.0	0.0
Manhattan MSA 2019	0	0	0.0	173	0.0	0.0	0.0	12.6	0.0	2.9	43.3	0.0	82.1	44.0	0.0	15.0	0.0	0.0	0.0
Total	32	3,086	100.0	825	0.0	0.0	0.0	6.1	0.0	0.6	59.7	59.4	75.2	34.2	40.6	24.2	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 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	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Johnson County KS AA	1	260	100.0	99	93.6	100.0	50.5	3.7	0.0	2.7	0.0
Lawrence MSA	--	--	--	38	96.2	--	39.5	2.8	--	1.0	--
Topeka AA	--	--	--	17	97.0	--	41.2	2.4	--	0.6	--
Wichita AA	--	--	--	118	96.9	--	50.8	1.9	--	1.2	--
Total	1	260	100.0	272	95.4	100.0	48.5	2.8	0.0	1.8	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											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas Non-MSA 2017-2018	74	7,815	100.0	752	96.7	90.5	39.8	2.3	6.8	1.1	2.7
Manhattan MSA 2017-2018	--	--	--	73	94.8	--	30.1	2.0	--	3.2	--
Total	74	7,815	100.0	825	96.3	90.5	38.9	2.2	6.8	1.5	2.7
Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 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	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Kansas Non-MSA 2019	32	3,086	100.0	652	96.5	81.3	39.0	2.5	15.6	0.9	3.1
Manhattan MSA 2019	--	--	--	173	95.0	--	38.7	1.9	--	3.1	--
Total	32	3,086	100.0	825	96.2	81.3	38.9	2.4	15.6	1.4	3.1
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%											

STATE OF MISSOURI

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Johnson County MO AA	3	149	100.0	1,822	0.0	0.0	0.0	0.0	0.0	0.0	41.0	100.0	38.9	59.0	0.0	61.1	0.0	0.0	0.0
Total	3	149	100.0	1,822	0.0	0.0	0.0	0.0	0.0	0.0	41.0	100.0	38.9	59.0	0.0	61.1	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Johnson County MO AA	3	146	300.0	1,822	13.0	0.0	2.4	13.7	66.7	7.0	20.0	0.0	20.5	53.2	33.3	44.8	0.0	0.0	25.3
Total	3	146	300.0	1,822	13.0	0.0	2.4	13.7	66.7	7.0	20.0	0.0	20.5	53.2	33.3	44.8	0.0	0.0	25.3

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Johnson County MO AA	2	45	100.0	494	0.0	0.0	0.0	0.0	0.0	0.0	53.7	100.0	51.0	46.3	0.0	49.0	0.0	0.0	0.0
Total	2	45	100.0	494	0.0	0.0	0.0	0.0	0.0	0.0	53.7	100.0	51.0	46.3	0.0	49.0	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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-19
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
Johnson County MO AA	2	45	100.0	494	84.0	100.0	50.4	3.7	0.0	12.3	0.0
Total	2	45	100.0	494	84.0	100.0	50.4	3.7	0.0	12.3	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 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
Johnson County MO AA	9	187	100.0	143	0.0	0.0	0.0	0.0	0.0	0.0	48.9	100.0	58.0	51.1	0.0	42.0	0.0	0.0	0.0
Total	9	187	100.0	143	0.0	0.0	0.0	0.0	0.0	0.0	48.9	100.0	58.0	51.1	0.0	42.0	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	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Johnson County MO AA	9	187	100.0	143	97.3	100.0	62.9	0.4	0.0	2.2	0.0
Total	9	187	100.0	143	97.3	100.0	62.9	0.4	0.0	2.2	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%											

STATE OF NEW MEXICO

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
Albuquerque AA	79	20,119	17.4	22,014	2.8	1.3	2.3	28.4	13.9	23.5	28.6	29.1	29.1	40.1	55.7	44.9	0.2	0.0	0.2
Las Cruces AA	51	7,713	11.2	5,450	3.6	2.0	2.1	34.5	17.6	13.9	24.8	29.4	31.5	37.1	51.0	52.5	0.0	0.0	0.0
New Mexico Non-MSA	105	30,779	23.1	812	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0
Santa Fe MSA	220	60,619	48.4	5,092	2.6	1.8	1.6	17.4	7.7	11.1	45.8	41.8	47.2	34.2	48.6	40.1	0.0	0.0	0.0
Total	455	119,231	100.0	33,368	2.8	1.3	2.1	27.2	8.1	19.5	30.0	28.6	31.5	39.9	62.0	46.8	0.1	0.0	0.1
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Albuquerque AA	79	20,119	38.5	22,014	25.1	5.1	5.4	15.3	16.5	17.2	17.8	15.2	21.4	41.8	59.5	40.9	0.0	3.8	15.0
Las Cruces AA	51	7,713	16.2	5,450	25.1	5.9	2.8	15.6	15.7	10.7	16.9	21.6	20.0	42.4	56.9	45.3	0.0	0.0	21.2
New Mexico Non-MSA	105	30,779	75.0	812	5.0	0.0	0.5	6.4	3.8	1.6	7.4	4.8	6.3	81.2	90.5	81.8	0.0	1.0	9.9
Santa Fe MSA	220	60,619	48.4	5,092	22.8	6.4	4.2	16.9	14.5	12.4	18.3	20.5	21.4	42.0	56.8	48.8	0.0	1.8	13.2
Total	455	119,231	100.0	33,368	24.4	4.6	4.7	15.4	12.5	15.1	17.5	16.0	20.8	42.7	65.1	43.8	0.0	1.8	15.6
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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 2017-19																			
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Albuquerque AA	141	41,116	51.8	12,140	10.3	16.3	11.5	24.8	45.4	26.7	29.1	9.9	26.3	34.8	27.0	35.0	0.9	1.4	0.5
Las Cruces AA	36	9,326	13.2	2,589	6.9	13.9	6.0	32.4	58.3	36.0	25.2	11.1	22.8	35.4	16.7	35.3	0.0	0.0	0.0
New Mexico Non-MSA	0	0	0.0	224	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0
Santa Fe MSA	95	26,917	34.9	3,804	4.2	4.2	5.6	14.4	13.7	14.4	39.3	50.5	36.6	42.1	31.6	43.5	0.0	0.0	0.0
Total	272	77,359	100.0	18,757	8.5	11.8	9.4	23.2	36.0	25.1	30.2	24.3	27.6	37.5	27.2	37.6	0.6	0.7	0.3
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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017-19											
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
Albuquerque AA	141	41,116	51.8	12,140	86.4	24.1	44.8	4.6	75.9	9.0	0.0
Las Cruces AA	36	9,326	13.2	2,589	83.7	25.0	42.5	4.3	75.0	12.0	0.0
New Mexico Non-MSA	--	--	--	224	87.0	--	40.6	2.6	--	10.4	--
Santa Fe MSA	95	26,917	34.9	3,804	88.4	33.7	45.1	3.5	58.9	8.1	7.4
Total	272	77,359	100.0	18,757	86.5	27.6	44.5	4.3	69.9	9.2	2.6
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 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
Albuquerque AA	0	0	0.0	48	6.3	0.0	18.8	27.3	0.0	14.6	28.7	0.0	27.1	37.5	0.0	39.6	0.2	0.0	0.0
Las Cruces AA	2	138	100.0	59	2.1	0.0	0.0	40.7	50.0	42.4	30.1	50.0	30.5	27.1	0.0	27.1	0.0	0.0	0.0
New Mexico Non-MSA	0	0	0.0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0
Santa Fe MSA	0	0	0.0	24	3.0	0.0	0.0	16.7	0.0	12.5	43.6	0.0	75.0	36.8	0.0	12.5	0.0	0.0	0.0
Total	2	138	100.0	131	4.5	0.0	6.9	27.4	50.0	26.7	31.9	50.0	37.4	36.0	0.0	29.0	0.1	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	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Albuquerque AA	--	--	--	48	95.6	--	58.3	2.6	--	1.8	--
Las Cruces AA	2	138	100.0	59	90.8	100.0	27.1	7.5	0.0	1.6	0.0
New Mexico Non-MSA	--	--	--	0	100.0	--	0.0	0.0	--	0.0	--
Santa Fe MSA	--	--	--	24	97.7	--	58.3	1.8	--	0.5	--
Total	2	138	100.0	131	95.1	100.0	44.3	3.5	0.0	1.4	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%											

STATE OF TEXAS

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% 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
El Paso AA	71	16,067	100.0	16,790	1.8	1.4	0.6	24.7	8.5	13.6	33.2	21.1	28.2	40.2	69.0	57.5	0.0	0.0	0.0
Total	71	16,067	100.0	16,790	1.8	1.4	0.6	24.7	8.5	13.6	33.2	21.1	28.2	40.2	69.0	57.5	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
El Paso AA	71	16,067	546.2	16,790	22.3	1.4	2.8	17.4	9.9	10.0	19.1	11.3	21.0	41.2	73.2	46.9	0.0	4.2	19.2
Total	71	16,067	546.2	16,790	22.3	1.4	2.8	17.4	9.9	10.0	19.1	11.3	21.0	41.2	73.2	46.9	0.0	4.2	19.2

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate 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																			2017-19
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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
	El Paso AA	224	65,386	100.0	12,565	6.9	8.5	5.8	26.6	10.7	29.3	30.3	27.2	29.0	35.5	53.6	35.6	0.7	0.0
Total	224	65,386	100.0	12,565	6.9	8.5	5.8	26.6	10.7	29.3	30.3	27.2	29.0	35.5	53.6	35.6	0.7	0.0	0.3
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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-19
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
El Paso AA	224	65,386	100.0	12,565	84.1	39.7	43.3	4.5	51.3	11.3	8.9
Total	224	65,386	100.0	12,565	84.1	39.7	43.3	4.5	51.3	11.3	8.9
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 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
El Paso AA	0	0	0.0	34	2.9	0.0	0.0	29.1	0.0	41.2	28.0	0.0	8.8	39.8	0.0	50.0	0.2	0.0	0.0
Total	0	0	0.0	34	2.9	0.0	0.0	29.1	0.0	41.2	28.0	0.0	8.8	39.8	0.0	50.0	0.2	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	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
El Paso AA	--	--	--	34	93.0	--	29.4	4.4	--	2.6	--
Total	--	--	--	34	93.0	--	29.4	4.4	--	2.6	--
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%											