



PUBLIC DISCLOSURE

January 06, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

INTRUST Bank, National Association
Charter Number **2782**

105 N. Main
Wichita, KS 67202

Office of the Comptroller of the Currency

2959 N. Rock Road, Suite 510
Wichita, KS 67226

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 INTRUST Bank, N.A. (INTRUST or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	(INTRUST Bank, N.A.) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory			
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:

- The Lending Test rating is based on good lending activity, good geographic distribution of loans, and the significantly positive impact of Community Development (CD) lending in Kansas and Oklahoma. Performance in the State of Kansas contributed significantly to the overall rating given that 95 percent of both deposits and lending are within the Kansas Assessment Areas (AA).
- The Investment Test rating is based on poor level of investment in Kansas and Oklahoma. Performance in the State of Kansas contributed significantly to the overall rating.
- The Service Test rating is based on good distribution of branches and accessibility of delivery systems in Kansas and Oklahoma. Performance in the State of Kansas contributed significantly to the overall rating.

Product Innovation and Flexibility

The institution makes limited use of flexible lending practices to serve AA credit needs. The bank participates in the U.S. Small Business Administration's SBA 504 program, which is a flexible lending program. The bank's geographic and borrower performance indicate the bank's existing products effectively address community credit needs.

Community Development Lending

This evaluation considered CD loans to organizations that serve two or more states and that directly or indirectly benefit one or more of the bank's AAs. INTRUST funded four CD loans totaling \$9.1 million for the benefit of a larger regional area that includes the bank's AAs. While some loans may not have direct benefit to any of the bank's AAs, participation in loan consortiums and multi-lender projects induce lenders to provide funding for projects outside their AAs to incentivize investment in projects in their AA(s). INTRUST made two CD loans, totaling \$6.3 million, for economic development that

created 10 jobs in the state of Missouri. The bank also participated in two CD loans, totaling \$2.8 million, with a woman-owned financial institution that serves communities outside the bank's AAs.

Investments

This evaluation considered regional investments serving two or more states that include one or more of the bank's AAs. INTRUST made six investments in a low-income housing tax syndicator that include the bank's AA's. Two of the investments, totaling \$1.5 million, were made during the evaluation period and outstanding prior period investments totaled \$1.7 million.

Alternative Delivery Systems

INTRUST offers free online and mobile banking to all customers. The bank also cashes government checks for all customers. The bank did not provide metrics to demonstrate the effectiveness of these services in helping to meet the needs of Low Moderate Income (LMI) communities, therefore, no significant weight was placed on the bank's alternative delivery systems.

Lending in Assessment Area

A substantial majority of the bank's loans are in its AA.

The bank originated and purchased 86.4 percent of its total loans inside its AAs during the evaluation period. The 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.

By product, 90.6 percent by number of home mortgages were inside the AA. Regarding small business loans, 82.9 percent by number were inside the AA. This performance was positively factored into the overall analysis of the geographic distribution of lending by income level of census tract.

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	2,927	90.6	303	9.4	3,230	346,798	89.0	42,810	11.0	389,609
Small Business	2,375	82.9	490	17.1	2,865	383,898	78.3	106,253	21.7	490,151
Small Farm	93	61.6	58	38.4	151	7,777	58.0	5,637	42.0	13,414
Total	5,395	86.4	851	13.6	6,246	738,473	82.7	154,700	17.3	893,174

The bank's mortgage and small business lending volumes are enough to conduct an analysis of geographic distribution of these loan products. The volume of small farm loans, in all but the Wichita AA, is too low to analyze. While the volume of small farm loans in the Wichita AA is enough to analyze, the volume is too low to have any impact on the bank's lending performance.

Description of Institution

INTRUST is a \$5.2 billion financial institution headquartered in Wichita, Kansas. INTRUST operates one subsidiary, Community Development Corporation (CDC), located in Wichita, Kansas. The bank is

wholly owned by INTRUST Financial Corporation (IFC), a one bank holding company located Wichita, Kansas.

INTRUST is a multistate institution with 44 branches and 106 automated teller machines (ATMs) serving 11 counties in Kansas, Oklahoma, and Arkansas. The majority of INTRUST's branches and ATMs (37 branches and 99 ATMs) are in Kansas, six branches and six ATMs are located in Oklahoma, and one branch and one ATM are located in Arkansas. INTRUST's deposit operations footprint covers four AAs in Kansas and one AA each in Arkansas and Oklahoma.

INTRUST offers a broad range of banking services, including trust, credit, and deposit services to commercial enterprises and consumers of all income levels and sizes. The primary business focus is small business and home mortgage loans. The bank is a Small Business Administration (SBA) Preferred Lender Partner, Express, Export Express, CapLines, Export Working Capital, and International Trade Program Lender. INTRUST also offers SBA 504 loans for larger, long-term purchases or renovations. Net loans and leases represent 65 percent of total assets as of December 31, 2018. By dollar volume, the loan portfolio is comprised of the following types of credit: 44 percent real estate loans (63 percent commercial, 19 percent residential, 2 percent farm, and 16 percent construction), 38 percent commercial and industrial loans, 4 percent agricultural loans, 8 percent consumer loans, and 6 percent other loans. Tier 1 capital totals \$429.5 million as of December 31, 2018.

There has been no merger or acquisition activity impacting the bank's CRA performance since the last evaluation. 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 October 31, 2016.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation covers home mortgage loans and small loans to businesses originated or purchased between January 1, 2016, and December 31, 2018. Small farm lending and consumer lending were not evaluated because they are not primary loan products. Primary loan products for purposes of this evaluation are products of which the bank originated at least 20 loans in an AA during the evaluation period. This evaluation also includes CD loans, qualified investments, and CD services for the period beginning October 25, 2016, through December 31, 2018.

Due to the changes in census demographic data during the evaluation period, lending performance will be analyzed in two separate data sets (2016 and 2017-2018). In 2017, Census demographic data was updated to reflect demographic information based on a five-year survey (2011-2015). This update impacted census tract income categories in many geographies. Lending activity for 2016 will be evaluated against 2010 census data and lending activity for 2017-2018 will be evaluated against the 2015 American Community Survey (ACS) census data.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were 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.

The AAs in Kansas include the Wichita AA, the Topeka AA, the Douglas County-Johnson County AA, and the Manhattan-Junction City AA. The Wichita AA and the Topeka AA received full-scope reviews and the remaining Kansas AAs received limited-scope reviews.

Each AA in Arkansas and Oklahoma received full-scope reviews. The Arkansas AA is Benton County and the Oklahoma AA is the Oklahoma City AA (Canadian, Cleveland, and Oklahoma Counties).

Ratings

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

The bank’s performance in Kansas carries substantial weight in the overall rating, and performance in the Wichita AA carries the most weight in the overall state rating. Kansas housed 84 percent of total branches, held 95 percent of total deposits, and generated 95 percent of the total number of loans analyzed in this evaluation. The Wichita AA housed 73 percent of total Kansas branches, held 86 percent of total Kansas deposits, and generated 85 percent of the total number of loans analyzed.

The Lending Test analysis places equal weight to home mortgage and small business lending based on the number of loans granted for each product in the Wichita and the Douglas County-Johnson County AAs. More weight is placed on small business lending in the Topeka and the Manhattan-Junction City

AAs in Kansas and the Benton County AA in Arkansas. More weight is placed on home mortgage lending in the Oklahoma City AA in Oklahoma. During the evaluation period, home mortgage lending represented approximately 54 percent of the number, and 47 percent of the dollar volume of total reportable lending in the AAs. CRA reportable small business lending represented 44 percent of the number, and 52 percent of the total dollar volume of reportable lending in the AAs.

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.

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 assessment area by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Kansas

CRA rating for the State of Kansas: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Good level of lending activity;
- Good geographic distribution of loans;
- Adequate borrower distribution of loans;
- Relatively high level of CD loans, which has a significant positive impact on the Lending Test;
- Poor level of CD investments;
- Retail delivery systems are readily accessible to geographies and individuals in the AA; and
- Relatively high level of CD services.

Description of Institution's Operations in Kansas

INTRUST delineated four AAs in Kansas. The AAs are the Wichita AA (Sedgwick and Butler Counties), which is part of the larger Wichita MSA (#48620); the Topeka AA (Shawnee County), which is part of the larger Topeka MSA (#45820); the Douglas County-Johnson County AA (Douglas and Johnson Counties), which is part of the larger Kansas City-Overland Park-Kansas City, MO-KS CSA; and the Manhattan-Junction City AA (Riley and Geary Counties), which is part of the larger Manhattan-Junction City CSA.

The bank has approximately \$3.8 billion in deposits in Kansas, representing 94.9 percent of INTRUST's total deposits. The bank operates 37 branches in Kansas, representing 84.1 percent of the bank's branches. In Kansas, the bank originated and purchased approximately \$776.9 million, or 95.2 percent of the total number of loans that INTRUST originated during the evaluation period. The primary product types in Kansas are HMDA and small business loans.

Wichita AA

INTRUST operates 27 branches and 86 ATMs (including 15 multi-service ATMs) in the Wichita AA. As of December 31, 2018, deposits totaled \$3.2 billion, or 81.7 percent of the total deposit base. During the evaluation period, INTRUST granted 4,390 home mortgage, small business, and CD loans totaling \$575.5 million, or 81.0 percent of total number of loans.

Demographics

The following table provides a summary of the demographic profile of the Wichita AA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a moderate level of LMI census tracts, which total 39.4 percent of the AA. The demographic data also reflects a relatively low percentage of home ownership in low-income geographies with 32.2 percent of 23,154 housing units in low-income census tracts owner-occupied. Rental housing units represent a

significant level of units in low- and moderate-income census tracts at 50.0 percent and 43.7 percent, respectively.

Table A – Demographic Information of the Assessment Area

Assessment Area: Wichita AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	137	11.7	27.7	32.8	27.7	0.0
Population by Geography	572,621	8.6	23.6	34.4	33.4	0.0
Housing Units by Geography	240,029	9.6	25.6	34.8	30.0	0.0
Owner-Occupied Units by Geography	141,382	5.3	18.5	35.8	40.4	0.0
Occupied Rental Units by Geography	75,852	15.3	35.4	34.9	14.4	0.0
Vacant Units by Geography	22,795	18.1	37.0	28.1	16.8	0.0
Businesses by Geography	29,100	6.5	27.2	32.8	33.4	0.0
Farms by Geography	1,097	2.6	12.5	36.9	48.0	0.0
Family Distribution by Income Level	141,972	20.8	17.6	21.1	40.5	0.0
Household Distribution by Income Level	217,234	23.7	16.6	18.3	41.4	0.0
Median Family Income MSA – 48620 Wichita, KS MSA	\$64,897	Median Housing Value				\$124,626
		Median Gross Rent				\$747
		Families Below Poverty Level				10.5%

Source: 2015 ACS Census 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.

Economic Data

Based on the March 2019 Moody's Analytics report, the Wichita MSA's manufacturing industry will outperform most of the Midwest for a few more quarters and will fare better when the economy contracts given a strong outlook for global demand for aerospace products. The economy is cooling, and job growth is expected to dip below the state and U.S. averages next year but recover after that. The low cost of doing business, relatively affordable housing, global manufacturing, and aerospace industry are strengths in the Wichita economy. Below-average earnings in every industry except manufacturing, low employment diversity, and above-average volatility are noted weaknesses.

The largest employers in the Wichita MSA are Spirit AeroSystems Inc., Textron Aviation, McConnell Air Force Base, and Via Christi Regional Medical Center. The unemployment rate has seen a significant decline from 4.6 percent in 2016 to 3.7 percent in 2018. Population growth is stagnant at an average growth of 0.1 percent during the evaluation period. According to Moody's Analytics, median household income has increased from \$53,200 to \$54,800, and personal income growth has averaged 2.73 percent per year.

Housing

Housing affordability in the Wichita AA is comparable to the State of Kansas. The Census' five-year (2014-2018) ACS statistics estimates an affordability ratio for Sedgwick and Butler Counties at 2.5 times and 2.3 times, respectively, compared to the State of Kansas at 2.5 times. The U.S average is 3.4 times. The affordability ratio measures homeownership opportunity by dividing the median value of

owner-occupied housing by the median household income of the area. Butler County's home ownership rate is 73.7 percent and exceeds Sedgwick County, the State of Kansas, and the U.S. at 63.6, 66.3, and 63.8 percent, respectively. Median gross rent levels are lower than those of the State of Kansas and the U.S.

Community Contacts

The OCC reviewed two recent community contacts to determine community credit needs and opportunities for financial institutions to help address these needs. The contacts included two economic development organizations. The contacts noted economic trends are strong or trending up and they felt that credit needs are generally addressed in the area. One contact stated the main credit need is to provide credit to those that struggle to qualify for credit.

Topeka AA

INTRUST operates one branch and an outdoor cash dispensing ATM in the City of Topeka. As of December 31, 2018, deposits totaled \$61.7 million, or 1.6 percent of the total deposit base. During the evaluation period, INTRUST granted 82 home mortgage and small business loans totaling \$14.8 million, or 1.5 percent of total loans.

Demographics

The following table provides a summary of the demographic profile of the Topeka AA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a moderate level of LMI census tracts, which total 34.9 percent of census tracts in the AA. The demographic data also reflects a relatively low percentage of home ownership in LMI geographies. Of the 7,169 housing units in the low-income tracts, only 2,099 or 29.3 percent are owner-occupied, 3,618 or 50.5 percent are renter occupied, and 1,450 or 20.2 percent are vacant. Of the 16,341 housing units in the moderate-income tracts, 7,039 or 43.1 percent are owner occupied, 6,793 or 41.6 percent are renter occupied, and 2,508 or 15.4 percent are vacant.

Table A – Demographic Information of the Assessment Area

Assessment Area: Topeka AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	43	11.6	23.3	39.5	25.6	0.0
Population by Geography	178,792	8.2	18.8	39.7	33.3	0.0
Housing Units by Geography	79,425	9.0	20.6	41.1	29.3	0.0
Owner-Occupied Units by Geography	45,873	4.6	15.3	39.1	41.0	0.0
Occupied Rental Units by Geography	25,495	14.2	26.6	45.9	13.3	0.0
Vacant Units by Geography	8,057	18.0	31.1	37.2	13.7	0.0
Businesses by Geography	9,279	17.0	18.9	39.4	24.8	0.0
Farms by Geography	309	3.6	8.7	26.2	61.5	0.0
Family Distribution by Income Level	44,654	20.8	17.2	21.8	40.3	0.0
Household Distribution by Income Level	71,368	24.0	17.2	18.1	40.7	0.0

Median Family Income MSA – 45820 Topeka, KS MSA	\$64,984	Median Housing Value	\$116,437
		Median Gross Rent	\$752
		Families Below Poverty Level	10.5%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Economic Data

Based on the October 2019 Moody's Analytics report, the Topeka MSA economy is slowly improving. Growth in healthcare and the public sector is the primary stabilizing force in the local economy. The population has been declining since 2011 and is aging. Healthcare will continue to grow with the older population as well as demand from nearby rural counties for health services.

The largest employers in the MSA are Stormont-Vail Regional Health Center, Saint Francis Hospital and Medical Center, Goodyear Tire and Rubber Company, Blue Cross Blue Shield, and Walmart Inc. The U.S. Bureau of Labor Statistics reflects improving employment rates with the average annual unemployment rate steadily declining from 4.2 percent in 2015, to 3.5 percent in 2018.

Housing

Housing affordability in the Topeka AA is comparable to the State of Kansas. The Census' five-year (2014-2018) ACS statistics estimates an affordability ratio for Shawnee County at 2.4 times compared to the State of Kansas at 2.5 times and the U.S. average at 3.4 times. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area. Shawnee County's home ownership rate is 64.8 percent and slightly lower than the State of Kansas of 66.3 percent but exceeds the U.S. rate of 63.8 percent. Median gross rent levels are lower at \$800 compared to the overall state of Kansas at \$831 and the U.S. at \$1,023.

Community Contacts

The OCC reviewed two recent community contacts to determine community credit needs and opportunities for financial institutions to help address these needs. Both contacts stated there is a need for small business loans. One contact reported a need for housing renovations in lower income areas. Both contacts believed area banks are meeting local business funding needs and contributing to the community.

Scope of Evaluation in Kansas

The Wichita AA and the Topeka AA received full-scope reviews and the remaining Kansas AAs received limited-scope reviews. The Wichita AA housed 73 percent of total Kansas branches, held 86 percent of total Kansas deposits, and generated 85 percent of the total number of loans analyzed. While the Topeka AA represents less than 3 percent of branches and less than 2 percent of Kansas deposits and loans, the Topeka AA was also selected for full-scope review to ensure both qualitative and quantitative analysis is performed periodically on all AAs over time. The Douglas County-Johnson County AA and the Manhattan-Junction City AA are each part of larger MSAs that, combined, are part of CSAs.

The Lending Test analysis places equal weight to home mortgage and small business lending based on the number, and dollar volume of loans granted for each product in the Wichita and the Douglas County-

Johnson County AAs. More weight is placed on small business lending in the Topeka and the Manhattan-Junction City AAs. During the evaluation period, home mortgage lending in Wichita represented approximately 55.6 percent of the number, and 45.9 percent of the dollar volume of total reportable lending in the Wichita AA. CRA reportable small business lending represented 42.4 percent of the number, and 52.6 percent of the total dollar volume of reportable lending in the Wichita AA. In the Topeka AA, the number and dollar of home mortgage loans represented 30.5 percent and 26.8 percent, respectively of total reportable lending in the Topeka AA and the number and dollar of small business loans represented 69.5 percent and 73.2 percent, respectively, of total Topeka AA lending.

Refer to Appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

The bank's performance under the Lending Test in Kansas is rated Outstanding.

Based on full- and limited-scope reviews, the bank's overall lending performance in the State of Kansas is excellent.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Wichita AA is excellent and performance in the Topeka AA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs taking into account the number and amount of home mortgages, small business, and community development loans relative to its capacity based on deposits, competition, and market presence. INTRUST has 37 locations in Kansas. A substantial majority of the bank's deposits, home mortgage loans, and small loans to businesses by both number and dollar are in the Wichita AA, while the Topeka AA had the least branches, deposits, and loans in Kansas. A limited-scope review was performed for the Douglas County-Johnson County AA and the Manhattan-Junction City AA. Small farm lending represented less than 2 percent of reportable lending in Kansas. Based on loan volumes, home mortgages are higher by number and small business loans are higher by dollar. As such, equal weighting was given to each loan product.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Wichita AA	2,431	1,853	91	15	4,390	85.1	86.2
Topeka AA	25	57	0	0	82	1.6	1.6
Douglas County-Johnson County AA	249	292	0	6	547	10.6	9.4
Manhattan-Junction City AA	53	84	2	2	141	2.7	2.8
Total	2,758	2,286	93	23	5,160	100.0	100.0

*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
Wichita AA	237,379	272,025	7,629	58,520	575,553	74.1	86.2
Topeka AA	3,981	10,858	0	0	14,839	1.9	1.6
Douglas County- Johnson County AA	74,284	69,281	0	11,441	155,006	19.9	9.4
Manhattan-Junction City AA	11,544	12,515	148	7,316	31,523	4.1	2.8
Total	327,188	364,679	7,777	77,277	776,921	100.0	100.0

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

Wichita AA

Lending activity in the Wichita AA is good. As of June 30, 2018, the Wichita AA had 41 financial service providers, which includes branches of national and regional banks, and local community banks. INTRUST ranked second in deposits with 22.3 percent market share and was in the 95th percentile. Bank of America, NA is the top deposit holder with 23.7 percent market share and Fidelity Bank ranked third with a market share of 10.0 percent.

In 2018, there were 314 home mortgage lenders in the AA. The bank ranked eighth with a market share of 3.9 percent by number of home loans and was in the 97th percentile. The top five home mortgage originators/purchasers (Credit Union of America, Fidelity Bank, Wells Fargo, Meritrust, and PennyMac Loan Services, LLC) have combined market share of 23.8 percent with individual percentages ranging from 4.0 percent to 6.6 percent.

The bank ranked seventh out of 92 lenders, or 92nd percentile and had a market share of 5.5 percent by number in 2018. The top five small business lenders are American Express National Bank; Chase Bank, USA, NA; Bank of America; Capital One; and Emprise Bank with a combined market share of 49.5 percent and individual market share ranging between 7.3 percent and 14.7 percent. INTRUST holds the highest percent of the market at 15.4 percent when calculating market share based on the total dollar amount of loans.

The bank's mortgage and small business market share and ranking is weaker than the bank's deposit market share and ranking. However, comparing the bank's percentile ranking within its respective markets is a more accurate assessment of the bank's performance relative to its competition. The bank's mortgage lending performance exceeds its deposit base relative to the level and nature of competition for home mortgage lending, with the bank in the 95th percentile for deposits compared to its position in the 97th percentile for home mortgage lending. The bank's small business lending performance is slightly below its deposit base relative to the level and nature of competition for small business lending, with the bank in the 95th percentile for deposits compared to its position in the 92nd percentile for small business lending.

Topeka AA

Lending activity in the Topeka AA is good. As of June 30, 2018, the Topeka AA had 22 financial service providers, which includes branches of national and regional banks, and local community Banks. The bank ranked 15th in deposits with 1.0 percent market share was in the 31.8 percentile of depository institutions. The bank with the largest market share is Capitol Federal Savings Bank with 33.7 percent

market share, CoreFirst Bank has 12.8 percent market share, and Bank of America has 7.4 percent market share.

The bank ranked 24th out of 61 small business lenders with a small business loan market share of 0.3 percent by number and was in the 60.7 percentile. The top five small business lenders are U.S. Bank, American Express National Bank, CitiGroup, Capital One FI, and CoreFirst Bank & Trust, with a combined market share of 67.4 percent.

The bank's small business market share and ranking is weaker than the bank's deposit market share and ranking. However, comparing the bank's percentile ranking within its respective markets is a more accurate assessment of the bank's performance relative to its competition. The bank's small business lending performance exceeds its deposit base relative to the level and nature of competition for small business lending, with the bank in the 32nd percentile for deposits compared to its position in the 61st percentile for small business lending.

As of 2018, INTRUST ranked 56th out of 211 residential mortgage lenders in the AA. The bank had a market share of 0.2 percent by number of home loans and was in the 73.5 percentile. The market is highly competitive and consists of lenders ranging from small community banks, credit unions, mortgage companies, and the largest banks. The top five home mortgage originators/purchasers (Envista Credit Union, Capitol Federal Savings Bank, Landmark National Bank, Fairway Independent Mortgage, and U.S. Bank, N.A.) have a combined market share of 38.1 percent with individual percentages ranging from 9.0 to 5.5 percent. INTRUST originated a minimal number of home mortgages in the Topeka AA (fewer than 20 during each data period). As a result, analysis regarding home mortgages in this AA is not meaningful.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

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.

Wichita AA

The geographic distribution of home mortgage loans reflects good distribution throughout the AA. In evaluating the geographic distribution of home loans in the Wichita AA, it is important to note that according to the Census data, low-income tracts contained 5.3 percent (7,458 units) of the total owner-occupied housing units in the AA. Of the total housing units in low-income geographies, rental and vacant units account for 50.0 percent (11,575 units) and 17.8 (4,121 units) percent respectively. Based on these statistics, INTRUST has limited opportunities for home mortgage lending in low-income census tracts. As such, greater emphasis was placed on the bank's performance in the moderate-income geographies when determining the overall geographic distribution conclusion for home mortgage loans.

In 2016, mortgage lending in low-income geographies was lower than the percentage of owner-occupied housing in those geographies but significantly exceeded the percentage of aggregate lending in low-income geographies. In moderate-income geographies, the lending was somewhat lower than the

percentage of owner-occupied housing in moderate-income tracts and was near to the percentage of aggregate lending in moderate-income geographies.

In 2017-2018, mortgage lending in low-income geographies was significantly lower than the percentage of owner-occupied housing and was near to the aggregate lending in moderate-income geographies. The mortgage lending was near to the percentage of owner-occupied housing and the aggregate lending in moderate-income geographies.

Topeka AA

INTRUST did not originate enough volume of home mortgage loans to conduct a meaningful analysis.

Small Loans to Businesses

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.

Wichita AA

The geographic distribution of small loans to businesses reflects an excellent distribution throughout the AA.

For 2016, the bank's small business lending in low-income geographies significantly exceeds both the percentage of businesses located in low-income geographies and the aggregate lending to small businesses. In moderate income geographies, lending significantly exceeded both the percentage of small businesses and the aggregate lending in moderate-income geographies.

For 2017-2018, small business lending in low-income geographies significantly exceeded both the percentage of businesses and the aggregate lending to small businesses. In moderate-income geographies, lending significantly exceeded both the percentage of small businesses and the aggregate lending in moderate-income geographies.

Topeka AA

The geographic distribution of small loans to businesses reflects a good distribution throughout the AA.

For 2016, small business lending in low-income geographies exceeded the percentage of businesses located in low-income geographies and significantly exceeded the aggregate lending to small businesses in low-income geographies. In moderate income geographies, lending significantly exceeded both the percentage of small businesses and the aggregate lending in moderate-income geographies.

For 2017-2018, small business lending in low-income geographies was lower than the percentage of businesses located in low-income geographies and was somewhat lower than aggregate lending to small businesses in low-income geographies. In moderate-income geographies, lending significantly exceeded both the percentage of small businesses and the aggregate lending in moderate-income geographies.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of INTRUST's home mortgage and small business loans during the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

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

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.

Wichita AA

INTRUST exhibits good distribution of loans among individuals of different income levels.

In 2016, lending to low-income borrowers was significantly lower than the percentage of families identified as low-income but significantly exceeded the aggregate percentage of lending to low-income borrowers. For moderate-income individuals, lending was near to both the percentage of families identified as moderate-income and the aggregate percentage of loans to moderate-income individuals.

In 2017-2018, lending to low-income borrowers is significantly lower than the percentage of families identified as low-income but near the aggregate percentage of loans to low-income borrowers. For moderate-income individuals, lending was near to both the percentage of families identified as moderate-income and the aggregate percentage of loans to moderate-income individuals.

Topeka AA

INTRUST did not originate enough volume of home mortgage loans to conduct a meaningful analysis.

Small Loans to Businesses

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.

Wichita AA

The distribution of small loans reflects an adequate distribution to businesses with revenues less than or equal to \$1 million in the AA.

In 2016, loans to businesses with revenues less than or equal to \$1 million was significantly lower than the percentage of businesses in the AA identified as having revenues less than or equal to \$1 million and was somewhat lower than the aggregate percentage of lending for these businesses.

For 2017-2018, the loans to businesses with revenues less than or equal to \$1 million was lower than the percentage of businesses identified as having revenues less than or equal to \$1 million and exceeded the aggregate percentage of lending for these businesses.

Topeka AA

The distribution of small loans reflects an adequate distribution to businesses with revenues less than or equal to \$1 million in the AA.

In 2016, loans to businesses with revenues less than or equal to \$1 million was significantly lower than both the percentage of businesses identified as having revenues less than or equal to \$1 million and the aggregate percentage of loans to these businesses.

For 2017-2018, loans to businesses with revenues less than or equal to \$1 million was lower than the percentage of businesses identified as having revenues less than or equal to \$1 million and was near to the aggregate percentage of loans to these businesses.

Community Development Lending

The institution has made a relatively high level of CD loans.

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.

INTRUST's CD lending supported revitalization and stabilization of LMI areas, economic development, and organizations that provide community services to LMI individuals and families. INTRUST's level of CD lending is excellent and had a significant positive impact on the overall Lending Test. During the evaluation period, the bank originated 23 CD loans totaling \$77.3 million in its Kansas AAs. The OCC also considered CD loans that benefited broader statewide and regional areas as INTRUST has met credit needs within the AA.

Wichita AA

During the evaluation period, INTRUST originated 15 CD loans totaling \$58.5 million in the Wichita AA. The bank made three CD loans totaling \$39.1 million (66.8 percent) that were particularly responsive to revitalization/stabilization needs. The bank also made seven CD loans totaling \$12.9 million (22.1 percent) for the primary purpose of community services to assist LMI individuals and three CD loans totaling \$6.4 million (10.9 percent) for economic development, which are responsive to needs for access to capital for small business and for small business assistance. The bank made two loans for \$145,000 for affordable housing.

Noteworthy examples of CD Lending include:

- A loan totaling \$9.5 million to revitalize a moderate-income census tract with a mixed-use retail and apartment complex.
- Two loans totaling \$5.3 million to an aerospace engineering firm for economic development. The loan created 46 new jobs, of which 29 were entry-level positions. The entry-level positions

provide industry training and help address the labor shortage of experienced/qualified machine operators in the Wichita market.

- Two loans totaling \$5.8 million to an organization that provides early learning programs to LMI children.
- Two loans totaling \$145,000 to an affordable housing developer for the construction of two new homes to be sold to LMI individuals.

Topeka AA

INTRUST did not make any CD loans during the evaluation period in the Topeka AA.

Kansas Statewide

Three CD loans totaling \$23.3 million were made in the state of Kansas but outside the banks AA's. Two loans were made to an organization that provides social services to LMI children and families and one loan to a small business that retained LMI jobs.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices to serve AA credit needs. INTRUST participates in the U.S. Small Business Administration's SBA 504 program, which is a flexible lending program. The bank developed a flexible loan product, but the product was not available to the public until 2019.

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

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Douglas County-Johnson County AA and the Manhattan-Junction City AA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance in the limited-scope areas had a neutral effect on the overall Lending Test conclusions.

Refer to Tables O through R 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.

During the evaluation period, the bank made \$3.8 million in investments and donations that supported affordable housing and \$640,000 for organizations that provide community services to LMI individuals and families in its Kansas AAs. The OCC also considered qualified investments that benefited broader statewide and regional areas that include the bank's AAs. The bank made 11 investments, including outstanding balances on prior period investments, and grants totaling \$1.5 million that benefited affordable housing and community service needs in the broader statewide or regional area that included the bank's AAs.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Wichita AA and the Topeka AA is poor. The institution has a poor level of qualified CD investments and grants. The Wichita AA is the largest in Kansas and is given the most weight. The institution exhibits poor responsiveness to credit and community economic development needs. The institution makes occasional use of innovative and/or complex investments to support CD initiatives.

The bank's investment performance was somewhat negatively impacted by a process change by the OCC that resulted in a shorter evaluation period (of 26 months) for CD activity in relation to retail lending activity (of 36 months). While not validated or considered in this evaluation, the bank made \$9.6 million in investment in its Kansas AAs in 2019. Even with these additional investments and the inclusion of statewide investments made during the evaluation period, while improved, the investment level is still low relative to allocated capital.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Wichita AA	0	0	78	3,581	78	52.70	3,581	37.21	1	1,485
Topeka AA	0	0	3	4	3	2.03	4	0.05	0	0
Limited-Scope:										
Douglas County-Johnson County AA	0	0	22	662	22	14.86	662	6.88	0	0
Manhattan-Junction City AA	0	0	5	161	5	3.38	161	1.67	0	0
Kansas Statewide	3	541	8	946	11	7.43	1,487	15.45	2	540

* 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.

Wichita AA

Performance in the assessment area is poor. During the evaluation period, investments totaled \$3.6 million and represent 1.0 percent of allocated tier one capital.

The bank purchased three investments totaling \$3.0 million in the Wichita AA during the evaluation period. All investments supported affordable housing for LMI individuals. The bank made 75 qualified grants totaling \$617,000 to 38 organizations in the Wichita AA during the evaluation period. The grants supported organizations who provide community services, such as programs for LMI individuals with disabilities, homeless shelters, life coaching programs, food networks, abuse centers, and youth programs.

Topeka AA

Performance in the assessment area is poor.

Bank management provided three donations totaling \$4,371 in the Topeka AA. Donations were made to organizations that provide social services to assist LMI individuals.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Douglas County-Johnson County AA and the Manhattan-Junction City AA is consistent with the bank’s overall performance under the Investment Test in the full-scope areas. The investments were to support affordable housing and combined for \$769 thousand. Donations combined for \$54,000 supporting various community service organizations in the area.

SERVICE TEST

The bank’s performance under the Service Test in Kansas is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Wichita AA is good and performance in the Topeka AA is excellent.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Wichita AA	86.2	27	73.0	3.7	25.9	33.3	37.0	8.6	23.6	34.4	33.4
Topeka AA	1.6	1	2.7	100.0	0	0	0	8.2	18.8	39.7	33.3
Limited Review:											
Douglas County-Johnson County AA	9.4	6	16.2	16.7	0	0	66.6	2.5	11.4	32.7	53.5
Manhattan-Junction City AA	2.8	3	8.1	0	33.3	66.7	0	0	28.4	51.8	17.5

Wichita AA

Access to services is good. As of December 31, 2018, INTRUST operates 27 branches in the Wichita AA. There are 86 ATMs, including 15 multi-function ATMs. In addition to cash dispensing, account transfers, and balance inquiry, there are 15 full-service ATMs that also accept cash and check deposits. In the Wichita AA, INTRUST has one branch or 3.7 percent of the bank’s branches in a low-income census tract. This is less than the volume of population living in low income tracts at 8.6 percent. However, the bank has six ATMs located in low-income tracts that help provide additional access. INTRUST has seven branches or 25.9 percent of branches in moderate-income census tracts. This exceeds the 23.6 percent of the population that lives in moderate income tracts. INTRUST also has 35 ATMs in moderate-income tracts. Of the multi-function ATMs, three are in moderate-income tracts and represent 20 percent of this type of ATMs. This percentage compares reasonably to the population

in the of 23.6 percent in the moderate-income tract. Nearly half (41 of the 86) ATMs in the AA are in LMI geographies, and the percentage of ATMs in LMI geographies exceeds the percentage of LMI populations of 32.2 percent in those areas.

Topeka AA

In the Topeka AA, INTRUST's one branch is in a low-income area, which exceeds the distribution of population living in low-income tracts of 8.2 percent. The bank has one ATM in the Topeka AA which is at the branch in the low-income geography. The location of the branch is also surrounded by four other low-income census tracts.

Distribution of Branch Openings/Closings (2016-2018)								
Kansas								
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)					
			Low	Mod	Mid	Upper	NA	
Full Review:								
Wichita AA	1	3	0	-2	0	0	0	0
Topeka AA	0	0	0	0	0	0	0	0
Limited Review:								
Douglas County-Johnson County AA	0	0	0	0	0	0	0	0
Manhattan-Junction City AA	1	1	0	+1	-1	0	0	0

Wichita AA

To the extent 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. INTRUST made the following changes in the Wichita AA.

- INTRUST opened one new branch in a moderate-income track during 2018.
- The bank closed a branch inside a Dillons store in a moderate-income geography in March 2017. The impact to customers was minimal as a bank ATM remains in-store and INTRUST consolidated the operations into a branch across the street.
- INTRUST closed both a branch inside a Dillons store and a traditional branch in July 2018. The branches were both in moderate-income tracts. The bank consolidated the branches into a new location that is across the street from the closed Dillons branch and about a mile from the other branch the bank closed. The new branch is also in a moderate-income census tract. A bank ATM remains at the Dillons location.

Services, including business hours, do not vary in a way that inconveniences its AA(s), particularly low- and moderate-income geographies and/or individuals. INTRUST provides a wide range of loan and deposit products including overdraft protection, safe deposit boxes, mortgage loans, and a variety of consumer, commercial, and small business loans. Products and services are tailored to meet the needs of individuals of all income levels and businesses of all sizes.

INTRUST's hours and services offered throughout the AA do not vary in a way that inconvenience portions of the AA, particularly LMI geographies or individuals. Bank hours of operations are generally

uniform: Monday through Friday from 9:00 a.m. to 6:00 p.m. and Saturday 9:00 a.m. to 12:00 p.m. Dillons branch hours are Monday through Friday from 10:00 a.m. to 8:00 p.m. and Saturdays from 10 a.m. to 6 p.m. Standard drive-up hours are on Saturday from 9:00 a.m. to 12:00 p.m. INTRUST also has branches in two Wichita retirement communities with reduced business hours to provide services to the residents. INTRUST reviews traffic patterns, technology trends, and customer needs when assessing or changing business hours. In most cases, changes in hours are by one hour.

INTRUST compliments its traditional service delivery methods with alternative delivery systems. INTRUST offers free online and mobile banking to all customers. The bank also cashes government checks for all customers. These services coupled with ATMs provide increased access to banking services throughout the AA. The bank did not provide metrics to demonstrate the effectiveness of its alternative delivery systems in helping to meet the needs of LMI individuals or communities so no significant weight on alternative delivery systems.

Topeka AA

INTRUST did not open or close branches in the Topeka AA during the evaluation period.

Services, including business hours, do not vary in a way that in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. INTRUST offers a wide range of loan and deposit products including overdraft protection, safe deposit boxes, mortgage loans, and a variety of consumer, commercial, and small business loans. Products and services are tailored to meet the needs of individuals of all income levels and businesses of all sizes.

INTRUST offers free online and mobile banking to all customers. The bank also cashes government checks for all customers. These services coupled with ATM provide increased access to banking services in the AA. The bank did not provide metrics to demonstrate the effectiveness of its alternative delivery systems in helping to meet the needs of LMI individuals or communities so no significant weight on alternative delivery systems.

Community Development Services

The institution provides a relatively high level of CD services.

Wichita AA

INTRUST provides a relatively high level of CD services within the Wichita AA. The bank had 38 different employees provide 3,294 hours of CD services to 36 different organizations. Two employees provided services to organizations with a purpose of assisting with affordable housing for LMI individuals totaling 656 hours of service within the review period. The remaining 2,638 service hours were to organizations with a purpose of community service. Examples of service hours include the following:

- Teaching a multi-session Financial Literacy class to LMI children.
- Fundraising for an organization that targets low-income children. Serving as treasurer for an organization that assists with basic needs of low-income individuals in the Wichita area.

Topeka AA

INTRUST did not provide any qualified services for the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Douglas County-Johnson County AA and the Manhattan-Junction City AA is consistent with the bank's overall performance under the Service Test in the full-scope area(s).

State Rating

State of Arkansas

CRA rating for the State of Arkansas: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Good level of lending activity relative to deposits in the AA;
- Poor geographic distribution of loans;
- Poor borrower distribution of loans;
- No CD lending, which has a negative impact on the Lending Test;
- Adequate level of CD investments;
- Retail delivery systems are reasonably accessible to geographies and individuals in the AA; and
- Relatively high level of CD services.

Description of Institution's Operations in Arkansas

INTRUST delineated one AA within Arkansas. The AA is Benton County, which is part of the larger Fayetteville-Springdale-Rogers, AR-MO MSA (#22220). INTRUST had approximately \$3.3 million of deposits in one branch in Arkansas, representing 0.1 percent of total deposits and 2.3 percent of the bank's total branches. The primary business focus for this branch is international letters of credit. Lending volume, like deposit volume is low in both number and dollar. The bank originated and purchased approximately \$7.6 million, or 0.6 percent of total number of reported loans and CD loans during the evaluation period. The bank's primary loan products in the Arkansas are home mortgage (40.0 percent) and small loans to businesses (60.0 percent); however, loan volume in both products was too low to derive meaningful conclusions regarding lending performance.

According to the June 30, 2018 FDIC Summary of Deposit report, INTRUST ranked 26th out of 26 FDIC insured institutions in Benton County with a deposit market share of 0.06 percent. The top three depository institutions are Arvest Bank; Bank of America, NA; and Bank of the Ozarks with a combined deposit market share of 66 percent. In 2018, INTRUST ranked 111th of 230 in HMDA mortgages with 0.06 percent market share. The top five lenders, holding 39.5 percent market share, are Arvest Bank; Wells Fargo Bank, NA; Iberia Bank; Quicken Loans, Inc.; and BOKF, NA. In 2018, INTRUST ranked 28th out 85 small business lenders with a 0.38 percent market share of small business loans. The top five small business lenders are Arvest Bank; American Express National Bank; Capital One; Synchrony Bank; and Chase Bank USA, NA with a combined market share of 56.7 percent.

Demographics

The following table provides a summary of the demographic profile of Benton County by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a low level of LMI census tracts, which represents 9.0 percent of census tracts in the AA and a low level of the population (7.9 percent) resided in LMI census tracts. The demographic data also reflects a low percentage of home ownership in low-income geographies. Of total housing units in low-income

geographies, 27.3 percent (449 housing units) are owner-occupied. Of the total housing units in the low-income geographies, rental and vacant units account for 64.4 percent (1,059 units) and 8.3 percent (137 units) respectively.

Table A – Demographic Information of the Assessment Area

Assessment Area: Benton County

Demographic Characteristics	#	Low % of #	Moderate	Middle % of #	Upper % of #	NA* % of
Geographies (Census Tracts)	22	4.5	4.5	63.6	27.3	0.0
Population by Geography	106,991	3.6	4.3	63.5	28.6	0.0
Housing Units by Geography	41,262	4.0	4.2	62.4	29.4	0.0
Owner-Occupied Units by Geography	21,791	2.1	5.1	60.3	32.5	0.0
Occupied Rental Units by Geography	16,100	6.6	2.9	65.1	25.5	0.0
Vacant Units by Geography	3,371	4.1	4.5	63.3	28.1	0.0
Businesses by Geography	7,079	3.9	3.7	59.8	32.6	0.0
Farms by Geography	161	6.8	3.1	57.8	32.3	0.0
Family Distribution by Income Level	27,323	18.4	17.2	20.2	44.3	0.0
Household Distribution by Income Level	37,891	18.8	14.9	18.7	47.6	0.0
Median Family Income MSAs – 22220 Fayetteville-Springdale-Rogers, AR-MO MSA		\$60,032	Median Housing Value			\$166,106
			Median Gross Rent			\$804
			Families Below Poverty Level			10.1%

Source: 2015 ACS Census 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.

Economic Data

Based on the Moody's Analytics report, the Fayetteville-Springdale-Rogers, AR-MO MSA is one of the strongest economies in the South. The economic outlook for the MSA is strong as reported by Moody's Analytics. The MSA has seen four-fifths of their private industries expanding with manufacturing, healthcare, and professional and business services showing the strongest expansions. The state and MSA have many poultry related businesses and demand for poultry continues to rise, positively impacting the economic outlook. The workforce is educated with approximately one-third of the population having at least a bachelor's degree compared to one-quarter a decade ago. A sizeable portion of the population holds degrees in science, technology, engineering, and mathematics (STEM) fields, which attracts professional and managerial firms to the area. Walmart is expected to build a new corporate campus in Bentonville as it expands its e-commerce and increasing hiring of software engineers, project managers, IT specialists, and data scientists. Walmart vendors are also opening locations in the area and hiring college graduates.

The top employers in the MSA and, specifically, in Benton County are Walmart Inc, Tyson Foods, and JB Hunt Transport Services. Several other large privately held companies are represented with offices in Benton County. Per capita income for the MSA is much higher than the rest of the state of Arkansas and higher than the rest of the U.S. The MSA also has a younger age mix than the rest of the U.S. According to the U.S. Bureau of Labor Statistics, the average unemployment rate in Benton County remained stable

during the evaluation period with the unemployment rate at 2.9 percent in 2016, 3.0 percent in 2017, and 2.9 percent in 2018.

Housing

The Census' five-year (2014-2018) ACS statistics estimated an affordability ratio for Benton County of 2.68, compared to the state of Arkansas at 2.70 and the U.S. at 3.40. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area based the U.S. Census Bureau's QuickFacts. Homeownership level in Benton County is 66.4 percent of housing inventory compared to 65.7 percent for the state of Arkansas.

Community Contacts

The OCC reviewed one community contact to determine community credit needs and opportunities for financial institutions to help address these needs. The contact stated there is a critical need for affordable housing including both rental and ownership housing units. There is a large population of LMI families but community organizations (local shelters and food pantries) are not able to fully meet their needs. The contact reported there is a need for financial education, free credit counseling, and education on the importance of obtaining high school diplomas or general equivalency diplomas. The contact indicated there is a need for, and an opportunity for banks to provide, prefunding for housing projects so that families could get into affordable housing more quickly. Currently, developers must obtain complete funding before they can start a new housing project.

Scope of Evaluation in Arkansas

INTRUST maintains deposit operations in only Benton County in the State of Arkansas. As such, Benton County received a full-scope review. Benton County is the bank's smallest AA based on branches, deposits, and loans. Benton County housed 2.3 percent of total branches, held 0.1 percent of total deposits, and generated 0.6 percent of the total number of loans analyzed. Given the very low volume of deposits, performance in the State of Arkansas has minimal impact on the overall CRA performance rating.

The Lending Test analysis only concluded on the bank's lending activity and CD lending. The bank did not grant enough loans of any type during the evaluation to derive statistically valid conclusions regarding the distribution of loans within geographies, or to borrowers/businesses of different income levels in the AA.

Refer to Appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

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

Conclusions for Area Receiving a Full-scope Review

Based on full-scope reviews, the bank's performance in Benton County is poor.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. The bank has one location in Arkansas. The loan volumes are minimal (fewer than 20 loans for each data period). While loan volume of any loan product is too low for meaningful analysis, the dollar volume of lending in the AA was 2.3 times the dollar volume of deposit held in the bank's single branch in the AA.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Benton County	12	18	0	0	30	100.0	100.0

*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*	% State Deposits
Benton County	3,548	4,095	0	0	7,643	100.0	100.0

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

The Benton County AA consists of 26 financial service providers, which includes branches of national, regional, and local community banks. As of June 30, 2018, the bank ranked 26th in deposits with 0.06 percent market share and a total of \$3.3 million. The three largest deposit competitors (Arvest Bank, Bank of America, NA, and Bank of the Ozarks) combined market share totaled 66 percent; Arvest Bank had 56.8 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits poor geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the states of Arkansas and Oklahoma 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.

INTRUST did not originate a sufficient volume of loans to conduct a meaningful analysis. Lending volumes are low and INTRUST did not make any home mortgage loans in low- or moderate-income tracts (all 12 loans were made to middle- and upper-income tracts).

Small Loans to Businesses

Refer to Table Q in the states of Arkansas and Oklahoma 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.

INTRUST did not originate a sufficient volume of loans to conduct a meaningful analysis. Lending volumes were low and INTRUST did not make any small business loans in low- or moderate-income tracts (all 18 loans were made to businesses in middle- and upper-income tracts).

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of INTRUST's home mortgage and small business loans during the evaluation period. The analysis did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the states of Arkansas and Oklahoma 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.

INTRUST did not originate a sufficient volume of loans to conduct a meaningful analysis. Lending volumes are low and INTRUST did not make any home mortgage loans to low-or moderate-income borrowers (all 12 loans were made to middle- and upper-income borrowers).

Small Loans to Businesses

Refer to Table R in the states of Arkansas and Oklahoma 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.

INTRUST did not originate a sufficient volume of loans to conduct a meaningful analysis.

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.

The institution did not make any CD loans during the evaluation period. The lack of CD loans has a negative impact on the lending test.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank participates in the U.S. Small Business Administration's SBA 504 program, which is a flexible lending program.

INVESTMENT TEST

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

Conclusions for Area Receiving Full-Scope Reviews

Based on a full-scope review, the bank’s performance in Benton County is adequate.

The institution has an adequate level of qualified CD investments and grants, particularly those that are not routinely provided by private investors, although rarely in a leadership position. The institution exhibits adequate responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Benton County	0	0	7	17	7	4.73	17	0.18	0	0
Arkansas Statewide	0	0	0	0	0	0.00	0	0.00	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.

During the evaluation period, the bank provided seven qualified donations, totaling \$17,000 in the AA. This amount represents 4.8 percent of the AA’s allocated tier 1 capital. The donations were granted to community service organizations, primarily supporting the homeless and LMI families. For example, the bank provided grants totaling \$7,500 to organizations serving the homeless; \$3,000 to a scholarship fund for LMI single parents; and \$1,500 to an organization focused on the health and safety of LMI families.

SERVICE TEST

The bank’s performance under the Service Test in Arkansas is rated Low Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank’s performance in Benton County is adequate.

Retail Banking Services

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 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
Benton County	100	1	100	0	0	0	100.0	3.6	4.3	63.5	28.6

In Benton County, the distribution of INTRUST’s branches in LMI census tracts is less than the distribution of population living in these geographies. However, Benton County only has one low-

income census tract and one moderate-income census tract and only 7.9 percent of the AA’s population reside in these geographies. The bank’s single AA branch and ATM is located in an upper-income tract.

Distribution of Branch Openings/Closings (2016-2018)							
Arkansas							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upper	NA
Full Review:							
Benton County	0	0	0	0	0	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 its AA, particularly low- and moderate-income geographies and/or individuals. INTRUST offers free online and mobile banking to all customers. The bank also cashes government checks for all customers. The bank did not provide metrics to demonstrate the effectiveness of its alternative delivery systems in helping to meet the needs of LMI individuals or communities so no significant weight on alternative delivery systems.

Community Development Services

The institution provides a relatively high level of CD services.

INTRUST provided an adequate level of community development services in Benton County. During the evaluation period, the bank provided 100 hours financial expertise and technical assistance to three community service organizations that support homeless families and LMI single parents as they work towards self-sufficiency. For example, one employee serves as the president, treasurer, and chair of the finance committee of an organization that assists families experiencing homelessness and one bank employee is a member of a finance committee of an organization that provides scholarships to LMI single parents.

State Rating

State of Oklahoma

CRA rating for the State of Oklahoma: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Adequate level of lending activity;
- Good geographic distribution of loans;
- Good borrower distribution of loans;
- Relatively high level of CD loans, which has a significant positive impact on the Lending Test;
- Poor level of CD investments;
- Retail delivery systems are readily accessible to geographies and individuals in the AA; and
- Adequate level of CD services.

Description of Institution's Operations in Oklahoma

INTRUST delineated one AA in Oklahoma. The AA is the Oklahoma City AA (Canadian, Cleveland, and Oklahoma Counties), which is part of the larger Oklahoma City MSA (#36420). INTRUST operates six branches and six outdoor cash dispensing ATMs within the state of Oklahoma. The primary focus is business lending with residential lending as another primary product. There are 220 Census Tracts (CT) in the AA. Demographics in 2016 reflected tract income levels at 31 percent upper, 33 percent middle, 27 percent moderate, 8 percent low and 1 percent all others. Tract income levels in 2018 reflected 28 percent upper, 35 percent middle, 26 percent moderate, 9 percent low, and 2 percent all others.

Deposits in this AA represent 5.0 percent of the bank's total deposits. Loan originations in this AA represent 4.2 percent by number and 4.3 percent by dollar of all INTRUST's loan originations. Due to the limited size and business generation of the Oklahoma operation, minimal weight will be given to the state of Oklahoma in the overall CRA rating.

Demographics

The following table provides a summary of the demographic profile of the Oklahoma City AA by categorizing the AA characteristics into their respective census tracts based on income level. The table reflects a low level of LMI census tracts, which represents 9.0 percent of census tracts in the AA and a low level of the population (7.9 percent) resided in LMI census tracts. The demographic data also reflects a low percentage (27.3 percent) of home ownership in low-income geographies.

Table A – Demographic Information of the Assessment Area

Assessment Area: Oklahoma City AA

Demographic Characteristics	#	Low % of #	Moderate	Middle % of #	Upper % of #	NA* %
Geographies (Census Tracts)	220	8.6	26.4	35.0	28.2	1.8
Population by Geography	778,147	7.4	23.5	34.3	34.7	0.1
Housing Units by Geography	325,533	6.9	25.7	34.8	32.6	0.1
Owner-Occupied Units by Geography	184,354	3.7	17.4	36.7	42.2	0.0
Occupied Rental Units by Geography	111,340	10.7	36.6	32.7	19.7	0.3
Vacant Units by Geography	29,839	12.3	36.2	30.5	20.7	0.3
Businesses by Geography	60,415	4.7	20.5	33.1	38.7	2.9
Farms by Geography	1,352	3.8	17.2	31.1	46.9	1.0
Family Distribution by Income Level	190,407	20.1	16.7	19.8	43.4	0.0
Household Distribution by Income Level	295,694	21.6	16.5	17.8	44.1	0.0
Median Family Income MSA – 36420 Oklahoma City, OK MSA		\$64,058	Median Housing Value			\$148,061
			Median Gross Rent			\$830
			Families Below Poverty Level			10.6%

Source: 2015 ACS Census 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.

Economic Data

According to Moody's Analytics, over half of major companies based in the Oklahoma City AA are in energy. The top three employers are Tinker Air Force Base (24,000), University of Oklahoma – Norman (12,700), and FAA Mike Monroney Aeronautical Center (7,000). Fortune 500 companies with headquarters in the Oklahoma City AA include Chesapeake Energy Corporation and Devon Energy Corporation; Fortune 1000 companies include Continental Resources, Inc., OGE Energy Corp, and SandRidge Energy, Inc. A few larger corporate companies represented include INTEGRIS Health, Hobby Lobby, and Sonic Corp. Several other large privately held companies are also represented. The area's industrial diversity is reasonable at 0.67 percent.

Moody's Analytics shows the economic outlook for the Oklahoma City AA has been satisfactory and expanding during the rating period but appears to be slowing. The area has a concentration in energy businesses which have been adversely impacted by lower oil prices and an ample supply. This is causing the economy to slow as the companies have decreased their number of workers and the effects are being felt by many other retailers and consumer driven businesses. Forecasts note a boost from military installations and defense contractors.

The U.S. Bureau of Labor Statistics reflect average unemployment rates for the evaluation period of 4.2 percent in 2016, 3.8 percent in 2017, and 3.1 percent in 2018.

Housing

The Census' five-year (2014-2018) ACS statistics estimated an affordability ratio for the Canadian, Cleveland, and Oklahoma Counties are 2.25, 2.54, and 2.8, respectively. The affordability ratio for the

state of Oklahoma is 2.54 and for the U.S. is 3.40. The affordability ratio measures homeownership opportunity by dividing the median value of owner-occupied housing by the median household income of the area based the U.S. Census Bureau's QuickFacts. Home ownership rates in Canadian, Cleveland, and Oklahoma Counties are 76 percent, 64 percent, and 59 percent, respectively compared to 66 percent for the state of Oklahoma. Median gross rent levels are higher at \$946, \$908, and \$851, respectively compared to the overall state of Oklahoma at \$793.

Community Contacts

The OCC reviewed two community contacts to determine community credit needs and opportunities for financial institutions to help address these needs. Both contacts stated there is a need for affordable housing developments. The contacts also indicated a need for financial education and credit rehabilitation. One contact stated that banks are developing loan programs to specifically meet the needs of small businesses. Both contacts noted the economy is expanding and there are numerous lending opportunities for both large- and small-scale projects.

Scope of Evaluation in Oklahoma

INTRUST maintains deposit operations in the Oklahoma City AA in the State of Oklahoma. As such, the Oklahoma City AA received a full-scope review. The AA housed 13.6 percent of total branches, held 5.1 percent of total deposits, and generated 4.2 percent of the total number of loans analyzed. Given the relatively low volume of deposits and loans, performance in the State of Oklahoma has minimal impact on the overall CRA performance rating.

The Lending Test analysis places slightly more weight on home mortgage lending than small business lending based on the number, and dollar volume of loans granted for each product in the AA. During the evaluation period, home mortgage lending represented approximately 69 percent of the number, and 51 percent of the dollar volume of total reportable lending in the AA. CRA reportable small business lending represented 31 percent of the number, and 49 percent of the total dollar volume of reportable lending in the AA.

Refer to Appendix A: Scope of Examination, for a list of full- and limited-scope AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. INTRUST has six locations in Oklahoma. Based on loan volumes, home mortgage loans are higher by number while dollar volumes

were relatively equal. As such, home mortgage loans were weighted heavier.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Oklahoma City	157	71	0	1	229	100.0	100.0

**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*	%State Deposits
Oklahoma City	16,063	15,124	0	4,074	35,261	100.0	100.0

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

The Oklahoma City AA consists of 65 financial service providers, which include branches of national, regional, and local community banks. As of June 30, 2018, the bank ranked 30th in deposits with a market share of 0.73 percent and was in the 54th percentile rank. The four largest deposit competitors (MidFirst Bank, JPMorgan Chase Bank, BOKF, NA, and Bank of America, NA) combined market share totaled 45 percent.

In 2018, there were 432 mortgage lenders in the AA. The bank ranked 93rd with a market share of 0.19 percent by number of home loans and was in the 79th percentile rank. This market is highly competitive and consists of lenders ranging from the largest banks, mortgage companies, and community banks. The top four home mortgage originators/purchasers (Cornerstone Home Lending, Inc., Wells Fargo, US Bank, NA, and BOKF, NA) combined market share of 21.7 percent with individual percentages ranging from 4.3 to 6.0 percent.

The bank's small business lending activity is adequate given the institution's ranking. The bank ranked 44th out of 122 lenders, or the 63.9 percentile and had a market share of 0.14 percent. The market is highly competitive. The top four lenders are American Express National Bank, Chase Bank USA, NA, Capital One, and US Bank with a combined market share of 46.7 percent and individual market shares ranging from 6.3 to 20.8 percent.

The bank's mortgage and small business market share and ranking is weaker than the bank's deposit market share and ranking. However, comparing the bank's percentile ranking within its respective markets is a more accurate assessment of the bank's performance relative to its competition. The bank's mortgage lending performance exceeds its deposit base relative to the level and nature of competition for home mortgage lending, with the bank in the 54th percentile for deposits compared to its position in the 79th percentile for home mortgage lending. The bank's small business lending performance also exceeds its deposit base relative to the level and nature of competition for small business lending, with the bank in the 64th percentile for small business lending.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA(s).

Home Mortgage Loans

Refer to Table O in the states of Arkansas and Oklahoma 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.

INTRUST's overall geographic distribution of home mortgage loans in the Oklahoma City AA for the evaluation period is good. In evaluating the geographic distribution of home loans in the AA, it is important to note that, according to the 2010 Census data, low-income census tracts contained 2.73 percent (4,954 units) of the total owner-occupied housing units in the AA. Rental and vacant units account for 46.92 percent and 17.45 percent respectively. Based on these statistics, the bank had limited opportunities for home mortgage lending in the low-income census tracts for 2016. Based on 2015 ACS U.S. Census information, for the 2017-2018 evaluation period, the low-income census tracts contained 3.7 percent (6,821 units) of the total owner-occupied housing units in the AA. Of the total housing units in low-income geographies, rental and vacant units account for 53.16 percent and 16.36 percent respectively. Based on these statistics, INTRUST had limited opportunities for home mortgage lending in low-income census tracts during the evaluation periods. As such, greater emphasis was placed on the bank's performance in moderate-income geographies when determining the overall geographic distribution conclusion for home mortgage loans.

The geographic distribution of home mortgage loans reflects a good distribution. In 2016, the bank did not make any home loans in the low-income tracts. During the 2017-2018 evaluation periods, the percentage of home mortgage loans to borrowers in low-income census tracts was significantly lower than the percentage of owner-occupied housing in low-income census tracts. When compared to aggregate lending data, the percentage of home mortgage loans in low-income census tracts was significantly lower than the percentage of loans by all lenders in low-income census tracts.

In 2016, the percentage of home mortgage loans to borrowers in moderate-income census tracts exceeds the percentage of owner-occupied housing and significantly exceeds the percentage of loans by all lenders in moderate-income census tracts. In 2017-2018, the percentage of home mortgage loans to borrowers in moderate-income census tracts was lower than the percentage of owner-occupied housing and near to the percentage of all loans by all lenders in moderate-income census tracts.

Small Loans to Businesses

Refer to Table Q in the states of Arkansas and Oklahoma 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.

INTRUST exhibits an excellent geographic distribution of loans to small businesses. Lending performance in low-income tracts was significantly lower than census demographics for the 2016 evaluation period and is considered poor. INTRUST did not originate or purchase any small loans to businesses in low-income census tracts. It is worth noting the percentage of businesses in low-income census tracts the Oklahoma City AA is low with 5.1 percent of businesses in low-income census tracts. The bank significantly exceeded performance in the low-income tracts in 2017- 2018. Performance during 2016 and 2017-2018 in the moderate-income tracts significantly exceeds the percentage of businesses located in those tracts and significantly exceeds the percentage of loans by all lenders in moderate-income census tracts.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of INTRUST's home mortgage and small business loans over the evaluation period. The analysis did not identify any unexplained conspicuous gaps. Census data illustrates opportunities are limited for mortgage lending in low-income tracts. For the 2016 evaluation period, rental and vacant units represent

64.4 percent of low-income housing, and this percentage increases to 70 percent for the 2017-2018 evaluation period.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the states of Arkansas and Oklahoma section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans among individuals of different income levels was good. In 2016 and 2017-2018, the percentage of home mortgage loans to low-income borrowers was significantly lower than the distribution of low-income families and significantly exceeded the percentage of loans by all lenders to low-income families. In 2016, the percentage of home mortgage loans to moderate-income borrowers was lower than the distribution of moderate-income families but was near to the percentage of loans by all lenders. During 2017-2018, the percentage of home mortgage loans to moderate-income borrowers exceeded both the distribution of families as well as the aggregate data. Given the median housing value of \$148,000, assuming a 20 percent down payment, and a market rate of interest on a 30-year loan, housing would be affordable for both low- and moderate-income borrowers provided they had the down payment of \$29,612.

Small Loans to Businesses

Refer to Table R in the states of Arkansas and Oklahoma 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.

INTRUST's lending to businesses of different sizes reflects adequate penetration during the evaluation period.

The bank's percentage of loans to businesses with revenues of \$1 million or less is significantly lower than the percentage of small businesses and lower than aggregate data as reflected in the census demographics for 2016. For the 2017-2018 evaluation period, INTRUST's percentage of loans to businesses with revenues of \$1 million or less was lower than the percentage of small businesses as reflected in the census demographics. When compared to the percentage of loans by all lenders, INTRUST was near to demographics.

Community Development Lending

The institution has made a relatively high level of CD loans.

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.

INTRUST's level of CD lending is excellent and had a significant positive impact on the overall

Lending Test. During the evaluation period, INTRUST originated one CD loan totaling \$4.1 million, which represents 20.99 percent for allocated tier 1 capital. The loan supported small business and economic development and created eight jobs.

Oklahoma Statewide

The OCC also considered CD loans that benefited broader statewide and regional areas as INTRUST has met credit needs within the AA. One CD loan totaling \$1.0 million was made to a low-income housing tax credit syndicator for the rehabilitation or preservation of affordable housing in the state of Oklahoma, including the bank’s AA.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices to serve AA credit needs. The bank participates in the U.S. Small Business Administration’s SBA 504 program, which is a flexible lending program.

INVESTMENT TEST

The bank’s performance under the Investment Test in Oklahoma is rated Needs to Improve.

During the evaluation period, the bank made \$523,000 in investments and grants that support affordable housing and the provision of community services to LMI individuals and families in the Oklahoma City AA. The OCC also considered qualified investments that benefited broader statewide and regional areas that include the bank’s AAs. The bank made four investments or grants totaling \$6,000 that benefited affordable housing and community service needs in the broader statewide or regional area that included the bank’s AA.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Oklahoma City AA is poor. The institution has a poor level of qualified CD investments and grants. The institution exhibits poor responsiveness to credit and community economic development needs. The institution makes occasional use of innovative and/or complex investments to support CD initiatives.

The bank’s investment performance was negatively impacted by a process change by the OCC that resulted in a shorter evaluation period (of 26 months) for CD activity in relation to retail lending activity (of 36 months). While not validated or considered in this evaluation, the bank made \$702,000 in investment in the Oklahoma City AA in 2019. These additional investments would have improved the bank’s investment level in the AA.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Oklahoma City AA	0	0	12	523	12	8.11	523	5.44	0	0
Oklahoma Statewide	1	1	3	6	4	2.70	7	0.07	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.

Investments and grants totaled \$523,000 million and represent 2.4 percent of allocated tier 1 capital. The bank made a \$500,000 investment that supported affordable housing and \$23,000 in grants to organizations that provide community services to LMI individuals and families in the Oklahoma City AA.

SERVICE TEST

The bank’s performance under the Service Test in Oklahoma is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank’s performance in the Oklahoma City AA is good.

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 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
Oklahoma City AA	100	6	100	16.7	33.3	50.0	0	7.4	23.5	34.3	34.7

INTRUST operates six branches in the Oklahoma City AA. There are six cash dispensing ATMs at the branch locations. INTRUST’s distribution of branches in both low-income and moderate-income census tracts exceeds the distribution of the population living in these areas

Distribution of Branch Openings/Closings (2016-2018)						
Oklahoma						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Full Review:						
Oklahoma City AA	0	0	0	0	0	0

The bank did not open or close branches during the evaluation period.

Services, including business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. INTRUST offers free online and mobile banking to all customers. The bank also cashes government checks for all customers. The bank did not provide metrics to demonstrate the effectiveness of its alternative delivery systems in helping to meet the needs of LMI individuals or communities so no significant weight on alternative delivery systems.

Community Development Services

The institution provides an adequate level of CD services.

During the evaluation period, two employees provided 144 hours to two CD organizations benefitting the Oklahoma City AA. All service hours focused on community services to LMI individuals. For example, one employee serves as the board president of a community organization that provides financial and business education to LMI individuals and one employee is a board member of a local community organization that provides services to LMI victims of domestic violence and sexual assault.

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:	01/01/16 to 12/31/18	
Bank Products Reviewed:	Home mortgage and small business loans (01/01/16-12/31/18) Community development loans, qualified investments, community development services (10/25/16-12/31/18)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
		None
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Kansas		
Wichita AA	Full-scope	Counties of Butler and Sedgwick
Topeka AA	Full-scope	Shawnee County
Douglas County-Johnson County AA	Limited-scope	Counties of Douglas and Johnson
Manhattan-Junction City AA	Limited-scope	Counties of Geary and Riley
Arkansas		
Benton County	Full-scope	Benton County
Oklahoma		
Oklahoma City AA	Full-scope	Counties of Canadian, Cleveland, and Oklahoma

Appendix B: Summary of MMSA and State Ratings

RATINGS INTRUST Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
INTRUST Bank, N.A.	Outstanding	Needs to Improve	High Satisfactory	Satisfactory
MMSA or State:				
Kansas	Outstanding	Needs to Improve	High Satisfactory	Satisfactory
Arkansas	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve
Oklahoma	High Satisfactory	Needs to Improve	High Satisfactory	Satisfactory

(*) 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 LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §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 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.

KANSAS

Charter Number: 2782

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2018		
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		
Full Scope:																					
Wichita AA	1,456	143,874	87.9	17,210	5.3	2.6	3.0	18.5	16.0	15.9	35.8	38.9	35.8	40.4	42.5	45.4	0.0	0.0	0.0		
Topeka AA	14	2,931	0.8	4,584	4.6	7.1	1.7	15.3	14.3	12.1	39.1	57.1	41.8	41.0	21.4	44.4	0.0	0.0	0.0		
Limited Scope:																					
Douglas County-Johnson County AA	158	49,836	9.5	26,823	0.4	0.0	0.5	7.2	10.8	6.6	32.0	19.6	31.0	60.4	69.6	61.9	0.0	0.0	0.0		
Manhattan-Junction City AA	28	3,746	1.7	2,217	0.0	0.0	0.0	10.3	17.9	14.1	63.9	46.4	54.2	25.4	32.1	30.9	0.4	3.6	0.8		
Total	1,656	200,387	100.0	50,834	2.7	2.4	1.4	12.5	15.5	10.5	35.7	37.3	34.6	49.1	44.7	53.4	0.0	0.1	0.0		
<i>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</i>																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2018		
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		
Full Scope:																					
Wichita AA	1,456	143,874	87.9	17,210	20.8	8.1	8.2	17.7	17.5	19.3	21.1	21.2	21.0	40.5	41.5	31.6	0.0	11.7	19.9		
Topeka AA	14	2,931	1.8	4,584	20.8	0.0	10.2	17.2	0.0	20.5	21.8	7.1	22.3	40.3	64.3	31.0	0.0	28.6	16.0		
Limited Scope																					
Douglas County-Johnson County AA	158	49,836	9.5	26,823	13.0	7.0	4.4	14.4	8.2	15.7	19.3	20.3	22.0	53.3	53.2	45.7	0.0	11.4	12.1		
Manhattan-Junction City AA	28	3,746	3.6	2,217	20.5	3.6	5.0	22.7	10.7	14.8	19.6	14.3	21.7	37.2	42.9	35.5	0.0	28.6	23.0		
Total	1,656	200,387	100.0	50,834	17.2	7.9	6.3	16.5	16.4	17.3	20.2	20.9	21.7	46.1	42.8	39.2	0.0	12.1	15.5		
<i>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</i>																					

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-2018		
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		
Full Scope:																					
Wichita AA	993	173,349	80.5	8,279	6.5	10.1	7.1	27.2	31.1	25.1	32.8	29.9	33.5	33.4	28.9	34.3	0.0	0.0	0.0		
Topeka AA	22	7,305	3.3	1,989	17.0	9.1	11.7	18.9	45.5	18.8	39.4	40.9	43.2	24.8	4.5	26.3	0.0	0.0	0.0		
Limited Scope:																					
Douglas County-Johnson County AA	171	48,591	13.9	16,499	1.9	2.9	1.2	9.9	15.2	10.7	27.9	15.8	26.0	57.5	50.9	58.7	2.9	15.2	3.3		
Manhattan-Junction City AA	48	8,728	3.9	918	0.0	0.0	0.0	30.7	50.0	26.8	52.0	33.3	51.5	16.6	16.7	21.2	0.7	0.0	0.4		
Total	1,234	237,973	100.0	27,685	4.6	8.7	3.7	16.9	29.9	16.1	31.6	28.3	30.4	45.2	31.0	47.8	1.6	2.1	2.0		
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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues													2017-2018	
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			
Full Scope:														
Wichita AA	993	173,349	80.5	8,279	78.5	44.2	41.9	8.0	54.5	13.5	1.3			
Topeka AA	22	7,305	1.8	1,989	75.1	36.4	40.9	8.0	63.6	16.9	0.0			
Limited Scope:														
Douglas County-Johnson County AA	171	48,591	13.9	16,499	82.0	45.0	44.0	6.8	53.8	11.2	1.2			
Manhattan-Junction City AA	48	8,728	3.9	918	76.8	72.9	46.8	5.6	27.1	17.6	0.0			
Total	1,234	237,973	100.0	27,685	80.0	45.3	43.2	7.2	53.5	12.7	1.2			
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														

ARKANSAS and OKLAHOMA

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-2018		
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			
Benton County, AR	10	3,295	100.0	4,847	2.1	0.0	1.5	5.1	10.0	3.2	60.3	20.0	47.2	32.5	70.0	48.2	0.0	0.0	0.0			
Oklahoma City, OK AA	99	10,072	100.0	27,015	3.7	1.0	2.0	17.4	13.1	13.3	36.7	56.6	34.6	42.2	29.3	50.1	0.0	0.0	0.0			

*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																				2017-2018		
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			
Benton County, AR	10	3,295	333.3	4,847	18.4	0.0	5.9	17.2	0.0	13.7	20.2	10.0	18.0	44.3	80.0	45.2	0.0	10.0	17.1			
Oklahoma City, OK AA	99	10,072	100.0	27,015	20.1	7.1	5.6	16.7	17.2	16.3	19.8	16.2	18.6	43.4	33.3	33.0	0.0	26.3	26.4			

*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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-2018		
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			
Benton County, AR	6	1,246	100.0	2,164	3.9	0.0	3.6	3.7	0.0	2.2	59.8	33.3	56.3	32.6	66.7	37.8	0.0	0.0	0.0			
Oklahoma City, OK AA	44	10,620	100.0	14,740	4.7	27.3	4.8	20.5	25.0	18.7	33.1	22.7	31.7	38.7	20.5	42.5	2.9	4.5	2.3			

*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												2017-2018	
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		
Benton County, AR	6	1,246	100.0	2,164	77.8	83.3	44.8	6.4	33.3	15.9	0.0		
Oklahoma City, OK AA	44	10,620	100.0	14,740	84.6	45.5	46.3	5.4	52.3	9.9	4.3		

*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*