



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## Public Disclosure

January 06, 2003

### Community Reinvestment Act **Performance Evaluation**

**First National Bank  
Charter Number: 3777**

**401 N. Spruce Street  
Abilene, KS 67410**

#### Office of the Comptroller of the Currency

**Salina Field Office  
1516 East Iron  
Salina, Kansas 67401**

**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 “**Outstanding**”.

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

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- First National Bank's lending levels reflect good responsiveness to area credit needs and the bank originated a substantial majority of its loans within its assessment area.
- The distribution of lending among borrowers of different income levels and businesses and farms of different revenue levels is excellent.
- The bank's community development lending demonstrates a good response to meeting business development and affordable housing needs in its AA.
- FNB has been a leader in meeting community development needs by investing in its community.
- The bank has demonstrated leadership in services it provides in the community.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

**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, home equity 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 household and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full 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 or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 MA/assessment area.

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

**Metropolitan Area (MA):** Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 One 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

The First National Bank (FNB) is an intrastate bank located in Abilene, Kansas. As of September 30, 2002, FNB's total assets were \$95.1 million. Its main office and two branches are located in Abilene, and an additional branch is located in Talmage, KS. FNB is a subsidiary of Pinnacle Bancorp, Inc., a \$2 billion multi-bank holding company headquartered in Central City, Nebraska. The parent organization owns 10 banks, with 64 branch locations, in 9 states.

FNB's loan portfolio is \$51 million, or 54 percent of total assets. The bank offers a full range of credit products including real estate, commercial, agricultural and consumer lending. As of September 30, 2002, the bank's primary lending products were residential real estate loans (35.4 percent), commercial loans (30.8 percent), and agricultural loans (25.3 percent.) Consumer loans were 5.2 percent of the portfolio and other loans were 3.3 percent. We reviewed the bank's small business, small farm, and home mortgage loans as part of the CRA evaluation.

As of September 30, 2002, the bank's loan-to-deposit (LTD) ratio measured 58.7 percent. The bank has consistently ranked third in loan-to-deposit ratio in its assessment area. The bank's LTD ratio since the last evaluation (21 quarters) has averaged 64.7 percent. The bank's Tier 1 leverage capital is 8.1 percent. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA.

The OCC assigned a CRA rating of 'Satisfactory' during the last CRA evaluation, dated July 25, 1997.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the lending test includes small business, small farm, and home mortgage loans made from April 1, 1997, through December 31, 2001. Since FNB is not a HMDA reporter, we sampled home mortgage (purchase and refinance) loans originated or purchased during the evaluation period. FNB's origination of home improvement loans were not evaluated, as the volume was not significant enough to perform a meaningful analysis.

The evaluation period for the investment and service tests included all qualifying investments made and services performed from July 26, 1997, through December 31, 2002.

### Data Integrity

The OCC verified CRA loan data that was used in the evaluation of the bank's performance during a Data Integrity Review. Samples of small business, small farm, and home mortgage loans were selected in accordance with sampling methods described in the Large Bank CRA Examiner Guidance dated December 2000. The revenue data for the bank's loans to small businesses and small farms during 1998 was not accurate. The bank had corrected this information beginning with the 1999 data. Due to the age of the information and the four

years of data that was correct and could be used in the analysis, we did not request the bank to correct this information. We found the rest of the bank's data to be accurate.

### **Selection of Areas for Full-Scope Review**

We performed a full-scope review of the bank's one AA, Dickinson County, Kansas.

### **Ratings**

The bank's overall rating is based on the full-scope review of its Dickinson County AA.

## **Fair Lending Review**

An analysis of the most recent public comments and consumer complaint information was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in 1997.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

#### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the lending test is rated "Outstanding". Based on a full-scope review, the bank's performance in the Dickinson County AA is excellent.

#### **Lending Activity**

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

FNB generated a substantial majority of loans within its AA. The bank ranks first in market share (30.3 percent) of deposits among the nine banks in its AA. Based on 2001 aggregate data, FNB was the largest originator of small loans to businesses and small loans to farms with market shares of 22.5 percent and 43.3 percent, respectively.

First National Bank is not a HMDA reporter. However, the bank monitors the volume of real estate filings and consistently ranks first or second in these filings.

#### **Distribution of Loans by Income Level of the Geography**

An analysis of the bank's distribution of loans by geography was not performed. Such an analysis would not be meaningful, as the bank's AA does not have any low- or moderate-

income BNAs. As a result, we did not include any tables on the geographic distribution of FNB's loans in this performance evaluation.

## **Lending Gap Analysis**

We evaluated the lending distribution within the AA to determine if any unexplained conspicuous gaps existed. Based on our sample of home mortgage lending, and the lending reports we reviewed detailing the volume of small loans to businesses and small loans to farms, there were no conspicuous gaps in the geographic distribution of the bank's loans.

### ***Inside/Outside Ratio***

A substantial majority of the bank's loans were originated within its AA. All of the loans in our real estate mortgage sample were originated within the AA. The bank originated 97.9 percent of its small business loans and 95.0 percent of small farm loans inside its assessment area. These ratios demonstrate the bank's commitment to its AA and positively impacts the overall Lending Test rating.

## **Distribution of Loans by Income Level of the Borrower**

### ***Home Mortgage Loans***

Refer to Tables 8 and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

Overall, the bank's distribution of home purchase and refinance loans by borrower income is good. Since the bank is not a HMDA reporter, to assess its performance in distributing loans among borrowers by income level, we sampled home purchase and refinance loans originated in the AA during the evaluation period. The conclusions on the distribution of the bank's home mortgage loans are based on the results of our sample. We did not include an analysis of multifamily loans, as the minimal number of loans of this type would make such analysis meaningless.

The distribution of home purchase loans by borrower income is adequate. The bank's percentage of home purchase loans to low-income borrowers is lower than the percentage of families residing within the AA. However, the bank's penetration to low-income families was hindered by the fact that almost 12 percent of AA households live below the poverty level. Families in this income category have difficulty qualifying for home purchase loans. The bank's percentage of loans to moderate-income families, although slightly below demographics, demonstrates the bank's commitment to assist in affordable housing needs.

The distribution of refinance loans by borrower income level is excellent. Refinance loans to low- and moderate-income borrowers exceeds the area demographics.

### ***Small Loans to Businesses***

Refer to Table 11 in appendix C for the facts and data used to evaluate the distribution of the bank's origination of small loans to businesses by income level.

The distribution of small loans to businesses by income level is excellent. The bank's percentage of small loans to businesses with revenues of \$1 million or less exceeds the AA demographics. Also, the bank has a market share of 32.8 percent of small loans to businesses with revenues less than \$1 million. This exceeds the bank's market share of deposits (30.3 percent) and its market share for all small business loans (22.5 percent).

In addition, a substantial majority (87.7 percent) of the bank's loans to businesses by number were originated in amounts of \$100 thousand or less.

### ***Small Loans to Farms***

Refer to Table 12 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to farms.

The distribution of small loans to farms by income level is excellent. The percentage of small loans to farms with revenues of \$1 million or less exceeds the percentage of farms in the AA with revenues less than \$1 million. The bank's market share of small loans to farms with revenues less than \$1 million (43.7 percent) and to all farms in its AA (43.3 percent) exceeds its market share of deposits (30.3 percent.)

The bank's loans to small farms in amounts of \$100 thousand or less were 91.7 percent of all small farm loans originated.

### **Community Development Lending**

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

The bank has a good record of community development lending. FNB originated a \$500 thousand loan to construct a multi-family housing unit for low- and moderate-income individuals. The bank is a major small business lender in the area, but these loans were included in the small business loans.

### **Product Innovation and Flexibility**

To assist people who, for income level or other reasons, may not qualify for a home mortgage loan, First National Bank is one of the few remaining banks that escrow contracts for deed. These contracts allow for the purchase of homes directly from private parties with the seller accepting payments from the buyer. The bank is currently the escrow agent for 58 such contracts.

The bank also makes small loans with no minimum amount to assist primarily low- and moderate-income customers with short-term monetary needs.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the investment test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in its assessment area is good, particularly considering the limited opportunities to invest in this middle-income assessment area. Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The bank was the leader in organizing community leaders and businessmen to develop and invest in a project to provide affordable housing in its AA. The bank's original investment was \$10 thousand and all profits, estimated to be \$40 thousand, have been reinvested in the project. Since the beginning of this project, 27 moderate-income housing units have been constructed.

The bank also participated in a tax credit investment (\$432 thousand) to revitalize a moderate-income area of Wichita, Kansas, located approximately 90 miles south of Abilene. In addition to retail and office space, the investment also provided 27 housing units for low- and moderate-income individuals.

The bank also made \$30 thousand in donations to community organizations that primarily serve low- and moderate-income individuals.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Dickinson County AA is good.

### **Retail Banking Services**

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FNB's branches and services are reasonably accessible to its customers considering the bank's rural assessment area. The bank's main office in Abilene, KS provides all lending services and lending officers make themselves available to customers, even after normal banking hours. The two drive-in facilities offer extended hours and one has an Automated Teller Machine (ATM). Saturday hours are offered at the main bank and one drive-in facility. The bank also offers telephone and Internet banking services that allow customers access to select financial services on a 24-hour basis. There have been no branch closings during this evaluation period.

## Community Development Services

The bank provides a high level of community development services that primarily benefit low- and moderate-income individuals.

- A bank officer is a member of the Abilene Economic Development Council (EDC) and serves on its Housing Subcommittee. Through the EDC, interest-free financing is provided for financing of infrastructure improvements to attract affordable housing developers to Abilene.
- A bank officer continues to actively participate in an LLC he was responsible for forming with other community leaders to acquire property and construct affordable housing units in Abilene.
- A bank officer was instrumental in forming a community foundation to provide assistance, primarily to low- and moderate-income people in its AA. The bank also provides meeting space for the foundation.
- A bank officer serves as the treasurer of an organization that provides assistance to unemployed low- and moderate-income individuals. The officer also assists with fund-raising activities for this organization.
- A bank officer serves on the Board of an organization that promotes business opportunities in Abilene.
- FNB offers free checking accounts with a minimum opening deposit, and free government check cashing for customers and non-customers.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): April 1, 1997 to December 31, 2001 Investment and Service Tests and CD Loans: July 26, 1997 to December 31, 2002	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank Abilene, Kansas	Real Estate Mortgages, Small Business and Small Farm loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<i>[Instructions: Provide only if affiliate products are reviewed.]</i> N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Dickinson County, Kansas	Full Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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### Market Profiles for Areas Receiving Full-Scope Reviews

#### Dickinson County, Kansas

Demographic Information for Full-Scope Area: Dickinson County, Kansas						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	5	0	0	5	0	0
Population by Geography	16,205	0	0	100%	0	0
Owner-Occupied Housing by Geography	4,660	0	0	100%	0	0
Businesses by Geography	1,139	0	0	1,139	0	0
Farms by Geography	274	0	0	274	0	0
Family Distribution by Income Level	4,597	16.7%	18.6%	24.4%	40.3%	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	1,622	0	0	100%	0	0
Median Family Income HUD Adjusted Median Family Income for 2002	= 44,200	Median Housing Value		= 37,216		
Households Below the Poverty Level	=11.6%	Unemployment Rate		= 4.5%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

FNB's assessment area includes five of the six BNAs of Dickinson County, Kansas. All of the BNAs are designated middle-income. The BNA excluded (9946) is also middle-income and is the city of Herrington, Kansas. This BNA is furthest from the bank's branch locations and is served by two other financial institutions.

The HUD adjusted Median Family Income for 2002 is \$44,200. According to the 1990 United State Census Bureau data, 66 percent of AA housing is owner-occupied, 33 percent of households receive social security, and 12 percent of households live below the poverty level.

There are nine financial institutions and two mortgage companies located in FNB's AA. Abilene is a city of approximately 6,400 people. Abilene's economy is diversified, becoming less dependent on agriculture due to increasing tourism and manufacturing industries. Tourism attractions include the Dwight D. Eisenhower Center, Old Abilene Town, Greyhound Hall of Fame, museums, mansions, and the Great Plains Theatre. Major employers include

Russell Stover, Duckwall Alco, Inc., Great Plains Mfg., Memorial Hospital, and USD #435 Schools.

We contacted two community leaders in Abilene, Kansas, during this evaluation. One contact worked for economic development in Abilene and the other worked for an organization to improve the quality of life in Abilene. Both stated that Abilene is challenged by a lack of affordable housing, both single-family and multi-family, but that the problem is lack of developers willing to construct affordable housing, rather than available financing. However, FNB was cited as the institution responsible for organizing a group of area business leaders to invest for construction of such housing. Both contacts stated that FNB was a leader in providing leadership for the growth of Abilene. We also reviewed three previous community contacts performed by the OCC and other regulatory agencies. These contacts also discussed the need for housing and business opportunities.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: DICKINSON COUNTY						Evaluation Period: April 1, 1997 to December 31, 2001				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Dickinson County AA	100%	848	\$30,384	560	\$25,738	1023	\$44,417	1	\$500	2,432	101,039	100%

\* Loan Data as of 12-31-2001. Rated area refers to the state non-MSA rating area.

\*\* The evaluation period for Community Development Loans is July 26, 1997 to December 31, 2002.

\*\*\* Deposit Data as of [9-3-2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: DICKINSON COUNTY, KS				Evaluation Period: April 1, 1997 TO December 31, 2001					Market Share				
MA/Assessment Area:	Total Home Purchase Loans*		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers						
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Dickinson County AA	848	\$30,384	16.7%	5%	18.6%	15%	24.4%	25%	40.3%	55%	NA	NA	NA	NA	NA

\* Market share information is not available. Bank is not in MA and does not report HMDA data. This number represents all real estate mortgage loans originated during the evaluation period. The bank was unable to provide number and amount by type.  
 \*\* As a percentage of loans with borrower income information available.  
 \*\*\* Percentage of Families is based on the 1990 Census information.  
 \*\*\*\* Bank is not a HMDA reporter so this information was not available.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: DICKINSON COIUNTY, KS					Evaluation Period: April 1, 1997 to December 31, 2001				
MA/Assessment Area:	Total Home Mortgage Refinance Loans*		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share													
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Dickinson County AA	848*	\$30,384*	16.75%	19%	18.6%	19%	24.4%	47.7%	40.3%	14.3%	NA	NA	NA	NA	NA									

Bank is not a HMDA reporter. This number represents all real estate mortgage loans originated during the evaluation period. The bank was unable to provide number and amount by type.

\* As a percentage of loans with borrower income information available.

\*\* Percentage of Families is based on the 1990 Census information.

\*\*\* Bank is not a HMDA reporter so this information was not available.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: DICKINSON COUNTY, KS		Evaluation Period: April 1, 1997 to December 31, 2001*					
MA/Assessment Area:	Total Small Loans to Businesses***		Businesses With Revenues of \$1 million or less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Dickinson County AA	436	100%	70.6%	79.4%	87.7%	9.8%	2.5%	22.5%	32.8%

\* Based on 2001 Peer Small Business Data: US

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses. Bank revenue data was incorrect for 1998, so 1998 loans have been deleted for the analysis of businesses with revenues of \$1 million or less.

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS									
			Geography :DICKINSON COUNTY, KS			Evaluation Period: April 1, 1997 TO December 31, 2001*			
MA/Assessment Area:	Total Small Loans to Farms***		Farms With Revenues of \$1 million or less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Dickinson County AA	840	100%	93.5%	97.8%	91.7%	6.5%	1.8%	43.3%	43.7%

\* Based on 2001 Peer Small Business Data: US.

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms. Bank revenue data for 1998 was incorrect, so 1998 loans have been omitted from the analysis of loan to farms with revenues of \$1 million or less.

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
		Geography: DICKINSON COUNTY, KS				Evaluation Period: July 26, 1997 TO December 31, 2002			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Dickinson County AA	NA	NA	2	\$442	2	\$442	100%	NA	NA

\* '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.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: DICKINSON COUNTY, KS Evaluation Period: July 26, 1997 TO December 31, 2002																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Dickinson County AA	100%	4	100%			100%		NA	NA						100%		

